

Written evidence submitted by Nuleaf (Nuclear Legacy Advisory Forum)

1. Introduction

Nuleaf (Nuclear Legacy Advisory Forum) is the Local Government Association (LGA) representative body on legacy wastes and decommissioning. We are directly supported by over 100 local authorities and national park authorities across England and Wales, including all those that host current NDA sites and those which host the English AGR stations.

We are funded by our member authorities and also by the NDA and RWM and hold regularly, well attended meetings where we engage with Government, the industry and regulators. We sit on the BEIS Radioactive Substances Policy Group (RSPG) and a range of NDA Group fora and are working closely with BEIS in the current review of Decommissioning and Radioactive Substances Policy. In parallel to this we work with RWM to support the GDF siting process within which local authority involvement is crucial.

Nuleaf, our member local authorities and the communities they represent all have a significant interest in proposals for the decommissioning of the AGR stations and the impacts it will have on their local economy, community and environment. Our comments are largely focussed on the third issue that the PAC is considering, namely *'progress with planning for defueling and decommissioning the stations, and risks to value for money'*.

True value for money requires that the maximum added value is derived from the large amount of expenditure that will be required to deliver this objective. Below we highlight a range of considerations that we believe the Government, NDA and EDF should address in developing their plans.

We would be happy to expand on the points made if that would be helpful.

2. Issues for Local Authorities and Communities

We believe that a range of issues for local authorities and communities should be considered and integrated into plans to ensure Value for Money.

i. Direct Employment

The current EDF stations support thousands of direct and indirect jobs across the UK. Each site is a major employer within their community with, for example, 500 staff and 250 contractors at Dungeness B.

The impact of plant closure, defueling and decommissioning on employment levels at EDF sites is, as yet, unclear. The move into defueling will ensure a continuity of jobs, though there will be a managed reduction over a 3 to 4 year period. Beyond that we believe that the NDA/Magnox should develop a co-ordinated approach to decommissioning across all existing and AGR sites, with the intention of maintaining employment as far as possible and ensure that an appropriate number of skilled workers remain in decommissioning and are not attracted to opportunities in related sectors.

ii. Wider socio-economic impacts

The decommissioning of the AGRs should provide wider economic benefits and supply chain opportunities. The Government has stated that *'The transfer of the stations to the NDA will provide enhanced opportunities for realising synergies, sharing know-how and creating a coordinated and consistent strategy as well as maximising and coordinating competition through the supply chain, which will also allow for more efficient delivery.'*

Working with local authorities and LEPs, there should be scope for skills enhancement and retraining that will allow local people to access the new roles required for decommissioning. The NDA/Magnox must also apply its commitments to social value to its work around the EDF sites.

iii. Planning

Local Planning Authorities (LPAs) have a role as a regulator of the EDF stations as they are decommissioned. LPAs will have to approve the Planning Applications needed for the decommissioning work such as building new facilities or repurposing existing ones. Land Use and Waste Plans will require clear policies that set out the council's view on the process by which the stations and wider sites are remediated. Issues that will need to be addressed include:

- The scope for interim uses and the Council's vision for the next planned use of the site (see below)
- Storage of waste
- Transportation
- Employment and skills
- Environmental protection and carbon management
- Mitigation measures through e.g. Section 106 agreements.

Where there is co-location with an existing Magnox station, then the inter-relationship between activities and plans for both sites will need to be considered.

Overall, Nuleaf believes that a Master-planning or Strategic Planning approach should be adopted for the decommissioning of all NDA sites, including the AGR fleet. We also believe that, where supported by the local authority, Magnox should enter into Planning Performance Agreements (PPAs) in relation to the decommissioning of the AGR sites. They already do this at some of their existing sites.

iv. Next planned use

The next planned use of a current nuclear site is a central driver for decommissioning with implications for the local economy and environment. Current NDA sites are intended to move to a variety of future uses, from open space and nature habitat to business parks or new nuclear development.

Magnox will have to engage effectively with local government and communities to determine the next planned use for the AGR sites and identify any opportunities for interim uses, including where this would require delicensing of part of a site.

Where an AGR is co-located with a Magnox site this may lead to a rethinking of the desired next use for the combined area covered by the two. The AGR sites will need to be incorporated into the NDA's vision as set out in their **Land Optimisation Programme**, currently under development.

v. National and local engagement

Nuleaf meets quarterly with EDF and NDA Communications Teams and will continue to host events that enable our members to engage at a national level on proposals for AGR decommissioning.

Looking forward, the management of EDF sites by Magnox will require thought to be given as to how local engagement processes are reformed to reflect the new reality on the ground.

In some host communities a Site Stakeholder Group (SSG) is already established, and EDF has begun the process of engaging with local authorities and SSGs around the three AGR sites that have already ceased generation.

In Heysham, Hartlepool and Torness this isn't the case, although EDF does have Local Community Liaison Committees (LCLCs) which perform a similar purpose to SSGs and involve local authority officers and elected members. Unlike NDA, EDF operates visitor centres around its nuclear stations, although it is unclear whether these will continue to function once a station moves to decommissioning.

vi. Community funds

An EDF company has agreed a large community benefits package as part of the development of the new Hinkley Point C plant. EDF also operates a community fund around its renewable energy developments.

Throughout their generating lives, the AGR stations have invested around £10,000 a year into local community projects with employees engaged in their local communities.

Magnox provides more significant community funds around its sites and we believe that their approach should be extended to the AGR stations once under Magnox control. The AGR sites should also be incorporated into the NDA's strategic work on socio-economics and sustainability. The overall scale of NDA funds should be extended to reflect the larger scale of its operations as it oversees the EDF station decommissioning.

vii. Environmental protection

Responsibility for protection of people and the environment, and for safety, will remain with the Environment Agency/SEPA and the Office for Nuclear Regulation (ONR) throughout the defueling and decommissioning phases, as it does with current NDA sites.

Through engagement with EDF/NDA and the regulators, councils have the potential to promote wider environmental benefits during the decommissioning phase, for example through enhancement of biodiversity on or around the site. As Magnox will be responsible for the clean-up of both A and B sites in some locations, there will be scope for collaborative working across the two sites, which may enable the freeing up of land for positive environmental outcomes.

The NDA has, in its recent **Strategy**¹, committed to move towards net-zero carbon across its operations and deliver against the UN Sustainable Development Goals. These commitments will need to be applied to its work on the AGR sites. Discussion should be undertaken with EDF to ensure that action on these areas is developed through the defueling phase.

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/973438/NDA_Strategy_2021_A.pdf