

29 January 2024

# NDA Draft Business Plan 2024 - 2027

## 1. Introduction

In line with the Constitution in respect of Government consultations, this is a delegated Officer response to the NDA submitted following consultation with relevant South Gloucestershire Council Executive Members. We have also consulted with the Member Representative on the LGA Nuclear Legacy Advisory Forum.

As the Civil Nuclear Roadmap to 2050<sup>1</sup> (published 11 January 2024) has much to say about decommissioning and waste management and the role of the NDA as well as priorities for new nuclear it is considered that this is relevant to the South Gloucestershire Council response on the NDA Business Plan.

However due to the short timeframes involved since the publication of the Civil Nuclear Roadmap, our Councillors have had very limited time to comment. We therefore submit the response as set out below with the caveat that we may need to submit an amended version should comments be received from Executive Members.

## 2. Context

- 2.1 This Council hosts the Nuclear Reclamation Services (NRS) Oldbury Power Station that is currently being decommissioned with a view to final site clearance in the 2080's.
- 2.2 We have close ties with Berkeley via the Western Gateway led Severn Edge initiative and also joint meetings of the Oldbury and Berkeley Site Stakeholder Groups.
- 2.3 The Severn Edge initiative includes not only the two power stations now being decommissioned, but also the nationally designated new nuclear site adjacent to the existing power station at Oldbury, the South Gloucestershire and Stroud College and UTC at Berkeley as well as the adjacent Berkeley Green low carbon energy science and technology park.

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<sup>1</sup> [Civil Nuclear: Roadmap to 2050 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

- 2.4 The Severn Edge Vision<sup>2</sup> promotes the potential for the two sites as a low carbon energy hub (including nuclear) that will boost economic, education, training and skills and levelling up for our communities. Adopted local planning policy promotes the reuse of existing NRS assets and infrastructure and the grid connection, and these are also referenced in the Vision.
- 2.5 The NDA Business plan with its strategic and site-specific objectives and actions is therefore of particular interest to this Council.

### **3. Assessment of and response to the NDA Draft Business Plan 2024 – 2027**

#### **3.1 Civil Nuclear Roadmap and relevance to NDA Business Plan.**

- 3.1.1 Given the relevance of the very recently published Civil Nuclear Roadmap to the NDA's agenda, priorities and actions going forward, it is strongly recommended that the NDA Business Plan should be reviewed to ensure that the final version takes appropriate account of the Roadmap, not only in respect of decommissioning but also in relation to priorities relevant to new nuclear, and actions for Nuclear Reclamation Services (NRS) in relation to sites in close proximity to new build sites.
- 3.1.2 It is of course acknowledged that there is a difference in timing of publication and consultation between the two documents, however we trust that a review of the NDA Business Plan will be undertaken to ensure that it and the Civil Nuclear Roadmap align.
- 3.1.3 We welcome the inclusion of reference to nuclear new build in the NDA Business Plan and the page 35 commitment to actively providing 'support on nuclear new build' decommissioning plans. However we recommend that this is expanded and clarified to ensure full alignment of the Business Plan with the recently published Civil Nuclear Roadmap, and amplification where necessary of specific actions for both NDA and NRS to ensure delivery.
- 3.3.4 In terms of actions we also suggest that the Business Plan should:
- Include prioritisation of the production of a NDA prospectus stating which of its land holdings will soon become available for reuse (Roadmap page 32), particularly where this would support new nuclear. The prospectus should also highlight any land areas or facilities available for beneficial interim use (see 3.3.9 below).
  - Ensure that it includes reference to the Roadmap's stated priority that available NDA land should where feasible go FIRST to new nuclear projects 'as opposed to other commercial uses' (Roadmap page 32). This is likely to result in a change to the currently open commitment in the Business Plan (page 14 top right) to '...pursu(ing) all commercial opportunities using our existing (NDA) assets...' this should be clarified to align with the Roadmap's prioritisation of new nuclear over other commercial uses.
- 3.3.5 While acknowledging that priority must be given to decommissioning, as a Council that hosts the NRS Oldbury Power Station and adjacent EN-6 site, the

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<sup>2</sup> [Severn Edge | Western Gateway \(western-gateway.co.uk\)](https://www.western-gateway.co.uk)

reuse of NDA assets wherever possible for new nuclear is particularly important in terms of both sustainability and minimising the impacts of new nuclear build on host communities and the environment. Such reuse could also have benefits to NDA in reducing its liabilities.

### **3.2 Relevance to the Draft NDA Socio-Economic Strategy (also subject to consultation)**

This Council is providing comments also on the Draft NDA Socio-Economic Strategy and it is suggested that there are matters raised in the NDA Business Plan consultation that will also be relevant to that strategy and potentially vice versa. In particular, it is recommended that the Business Plan should include an action to ensure that the Socio-Economic Strategy takes due account of the particular and distinctive socio as well as the economic needs of each of NDA's host communities.

### **3.3 Other comments on the Draft NDA Business Plan**

#### NDA Corporate Centre

- 3.3.1 We welcome the NDA Business Plan commitment to support the maintenance of sustainable local communities. However, we suggest that objectives and actions should be broadened to ensure that they set the direction on and actions to promote STEM, education, training and skills opportunities for host communities. This will also help boost the pipeline of skills and workforce required by NDA to deliver on its mission.
- 3.3.2 This is of particular relevance to Oldbury, not only because the diminishing NRS workforce reduces the number of for example apprenticeship and employment opportunities for host communities, but also because this council area has a history of underperformance at secondary level, and therefore a need for initiatives and opportunities for local communities that will help raise aspiration and attainment. Local STEM outreach and opportunities such as apprenticeships could help address this.

There are particularly good NDA examples that would benefit from an NDA Business Plan commitment to wider roll out, such as Hinkley A's apprenticeship scheme and related STEM outreach into local schools. Given the timeframes for such initiatives it is likely that this action will have a duration across several iterations of the NDA Business Plan.

#### Nuclear Restoration Services

##### **Site Specific Strategies (SSS)**

- 3.3.3 The Business Plan commitment to move to decommissioning based on Site Specific Strategies (SSS) is welcomed as is the commitment to supporting economic growth through short terms plans with clear milestones, and the identification of long-term options for sites.
- 3.3.3 It would be helpful however if NDA could confirm whether the SSS's will replace the previously envisaged Lifetime Plans for individual sites. Such strategies will be important in informing host Councils and communities understanding of plans for

these major infrastructure sites, but also be helpful in informing the development of local authority strategies and plans for the future of the host areas.

- 3.3.4 Clear timeframes for development and delivery of the SSS's is also needed. It is also important that host Councils and communities are consulted on these and it is suggested that the Business Plan should include a specific action requiring this.
- 3.3.5 In view of the Civil Nuclear Roadmap and 2050 commitment, it is noted that rapid progress will be needed on these strategies will be needed if the potential for reuse of NDA assets for new nuclear is to be realised – particularly for any sites prioritised by GBN for delivery. They will need to include consideration of reuse of NDA NWS infrastructure, land or facilities.
- 3.3.6 We strongly support the development of strategic masterplans for each site, setting out the spatial requirements of decommissioning and environmental protection as well as highlighting areas, infrastructure and or land that may be released for beneficial interim uses or freed up for use by others in the longer term.
- 3.3.7 We are unable to find reference in the Business Plan to the potential for interim reuse of land? Given the long timeframes to final site clearance (for example Oldbury in the 2080's), it is strongly suggested that in support of exploring commercial opportunities, that where not needed for new nuclear build the NDA should commit NRS to explore the potential for beneficial interim uses. This might include for example solar power generation or other temporary uses that would be compatible with the decommissioning agenda. Areas available for interim uses should be identified on the SSS's for each site. We suggest that the exploration of potential for beneficial interim uses should be included in the Business Plan.

### **Supporting the maintenance of sustainable communities living near NDA sites (page 35)**

- 3.3.8 Related to our comments at 3.9 above, we strongly recommend that this is amended to recognise the socio as well as the economic needs of host communities, and that it should be amended to include reference to contributing to education, training and skills opportunities for local people, including STEM outreach. This would also help boost the skills pipeline that is required by NDA if it is to deliver on its mission. This relates also to our suggestion regarding rolling out the Hinkley A apprenticeship scheme across the fleet including at Oldbury.

### **Site specific plans**

- 3.3.9 We suggest that each site profile in the Business Plan should consider infrastructure that the site operator does not need/could be shared/or that may have the potential for interim or long-term reuse or redevelopment. This would have benefits to the NDA in enabling the beneficial reuse and a reduction in liabilities through redevelopment of existing infrastructure such as the sewerage plant, tidal lagoon, intake and outfall pipes or previously developed land etc and the grid connection at Oldbury.
- 3.3.10 It would also be helpful for each site profile page to identify the strategic area required for decommissioning purposes.

3.3.11 We strongly recommend, given the GBN indication that all currently available EN-6 sites will be required to deliver the Government commitment to 24GW electricity by 2050, and the NDA commitment to support on new nuclear, that the Business Plan be amended to include reference to the EN-6 designation on each relevant site-specific page. Further that the Business Plan should also include an action to engage with interested parties including host councils, and share site specific technical information. This should then be carried forward to Site Specific Strategies.

3.3.12 Lagoon 3 at Oldbury is an approximately 16ha. area of raised land to the south of the existing power station that is of declining biodiversity value as the lagoon dries up. It is the subject of an outstanding planning condition requiring approval of a restoration plan by the Local Planning Authority two years after the lagoon ceased operational use. This area is seen as having significant potential in the Green infrastructure Strategy for the wider area.

We understand from the most welcome consultation last year that NWS is progressing with a plan and actions to deliver restoration to wetland habitat, however as this is an outstanding planning matter, it is strongly recommended that the Site-Specific page for Oldbury includes an action to seek the approval of the planning authority for a restoration scheme that will discharge this outstanding planning condition.

#### 3.4 **Heritage Strategy** (page 31)

We are unclear as to whether this strategy covers the physical fabric of the power stations and their associated land, some of which are iconic and/or highly valued by local communities.

It is suggested that when considering its approach to aspects of decommissioning, and also to making assets available for reuse, the NDA should consider that they are custodians not only of iconic and/or landmark structures (such as the blue and white reactor structures at Oldbury), but also of robust landscaped areas (green infrastructure), that are of high value to local communities. Values including as screening/ buffering nuclear facilities, biodiversity values but also as assets that are of recreational value to people. At Oldbury examples include orchards, hay meadows and paths to which the public have permissive access.

It would be helpful therefore if the NDA Business Plan could clarify what aspects of heritage the relevant strategy should cover.

If there are any questions or comments on the above, please contact the author.

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