



Department for Environment and Community Services

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Date: 24 June 2013

Your reference:

Our reference:

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Dear Sir or Madam

**FED treatment options at Magnox sites
ILW storage options for England and Wales**

We write in response to your current consultations on the above. This response has been the subject of consultation with Lead Councillors of the Planning, Transportation and Strategic Environment Committee and with local Councillors.

South Gloucestershire hosts the Oldbury power station, and is also located very close to the Berkeley power station site. Key transport routes to the South West, including motorways and main railway lines run through South Gloucestershire.

It is acknowledged that Magnox has a strong track record of community engagement through the Site Stakeholder Groups at Oldbury and Berkeley and that the power station has and continues to provide employment opportunities in the locality.

It is also acknowledged that whilst the storage of radioactive materials and their transport off site has always taken place at Oldbury this has to date only related to materials arising from the site itself.

With respect to the current consultation, the benefits of reviewing options for both FED treatment and ILW storage in the interests of reducing environmental impact, reducing timescales for decommissioning and also relating to cost savings are acknowledged.

However, the current NDA consultation includes a number of options that represent a fundamental shift in policy from treatment and storage on each individual site, to transportation of radio active materials across varying distances across country, and the import and consolidation of radioactive materials onto a reduced number of sites.

This is also set within the context of current uncertainty as to the timing and location of a deep geological storage facility, and therefore sites are being asked to host the storage of radioactive waste for an indeterminate period.

Whilst it is acknowledged that representatives of the Site Stakeholder Groups and representative Officers from the Councils were invited to input to the optioneering process for the ILW and FED studies, and that further workshops are proposed for July, it is not considered that this can substitute for direct and formal consultations with the communities and Councils that may be affected by these proposals. Indeed Officers of the Councils were very clear at the workshop that while they would give their best advice based on their experience of related issues, that they could not make recommendations or take decisions on behalf of their Council. There are also concerns that consultations with the Council have come only via NuLeAF (the Local Government Association special interest group) and not direct with the Councils concerned. There is also a concern that the length of the current consultation period (even with the extension) does not take account of Parish and District/ County decision making procedures.

The implications for South Gloucestershire's communities of the options shortlisted in the current consultations include:

- The current proposal that Oldbury would store its own ILW on site and treat its own FED on site,
- Proposals to transport FED and/or ILW to other sites including Berkeley or Hinkley Point.
- One FED option involves transporting Sizewell's FED across the country to Oldbury.
- Hinkley Point also features as recipient site in a number of options for transfer of ILW and FED, presumably via transport routes through South Gloucestershire.

It is considered likely that there may be in principle community concerns about the possibility of the import of radioactive material from other sites into Oldbury; there may similarly be concerns about concentrations of materials at nearby Berkeley and/or the transport of materials across country. The recent Points West article showed that there is media interest in this issue.

It is considered very important therefore that NDA should pro-actively seek to engage directly with communities and Councils that may be affected by the options, to explain the implications of the credible options to communities and seek their views on these, and that the feedback from this should be taken into account before identifying the preferred options.

In order for responses to be informed, information needs to be provided as to the nature and quantity of materials proposed for movement and storage, and what this means in terms of transport movements, volumes of materials and whether this has any implications for the number/ size of new buildings that would be needed, the duration of the FED facility and what happens to any waste or discharges arising from the FED treatment programme. In addition it would be helpful to understand the implications of the proposals for jobs and the supply chain in the locality. This should be supported by information on the benefits and justification for as well as the consequences or impacts of each of the proposals.

Given the environmental sensitivity of the Oldbury site and its proximity to the estuary, it is considered important that the consultation information should set out how the species and habitats associated with the international designations on the adjacent Severn Estuary will be protected, and reassurance given to the Council and communities that any proposed works will not have any adverse impact on or risk from flooding in the locality.

It is suggested that with sufficient advance notice to local communities including Parish Councils, NDA could undertake consultations with the community via the Site Stakeholder

Group (SSG) network and/or meetings? Perhaps the NDA could hold a drop in exhibition before an SSG meeting, with a NDA presentation and staff available for questions and answers during the course of the meeting. Direct consultation should also take place with the Council, both Councillors and officers, giving them the opportunity to understand and ask questions about the options and the consequences of these.

Your attention is also drawn to this Council's emerging Core Strategy, which is at an advanced stage, having been through Examination. The full document may be found at <http://www.southglos.gov.uk/Pages/Topic%20Pages/Planning%20Transport%20-%20Strategic%20Environment/Planning%20Environment/Core-strategy.aspx> .

Policy CS37 points 13 and 14 are however of particular relevance:

13. *The burden and disturbance borne by the community in hosting a major national or regional nuclear related infrastructure project should be recognised; and appropriate packages of community benefits provided by the developer will be sought to offset and compensate the community for the burden and disturbance imposed by hosting the project.*

14. *Any proposal (outside a DCO) to treat, store or dispose of Very Low level, Low Level or Intermediate Level Waste or to treat or to store spent fuel arising from the existing nuclear power station or any future nuclear development or from elsewhere within or outside the Council area, in an existing or proposed facility on or off the nuclear site would need to:*

- *Be strongly justified;*
- *Demonstrate that the planning impacts are acceptable; and*
- *Demonstrate that the environmental, social and economic benefits outweigh any negative impacts.*

Attention is also drawn to the Council's Adopted Statement of Community Involvement, that sets out the Council's approach to engagement with the community, including 'hard to reach' groups. It is recommended that the NDA consider how to engage with such groups when consulting on their proposals. This document may be found at <http://www.southglos.gov.uk/Documents/PTE080288.pdf>

We trust that the NDA will rethink its current consultation programme and ensure that direct engagement with communities and Councils is built into the work programme for review of the ILW storage and FED treatment proposals.

Yours faithfully



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Environment & Community Services