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**To:** [Strategy](#)  
**Cc:** [Verlander, Matt \(Avison Young - UK\)](#)  
**Subject:** Nuclear Decommissioning Authority - Somerset West and Taunton Issues and Options Consultation -  
**Date:** 16 March 2020 14:29:15  
**Attachments:** [image001.jpg](#)  
[image002.jpg](#)

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Dear Sir/Madam,

We write to you on behalf of our client, the Nuclear Decommissioning Authority (NDA), in respect of the current Issues & Options consultation.

Please find attached our relevant representations on behalf of their site at Hinkley Point A.

If you have any questions or further queries, please get in touch.

Regards,

Hannah

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16 March 2020

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Sent via email to: [strategy@somersetwestandtaunton.gov.uk](mailto:strategy@somersetwestandtaunton.gov.uk)

Dear Sir/Madam,

**SOMERSET WEST AND TAUNTON COUNCIL LOCAL PLAN ISSUES AND OPTIONS CONSULTATION: REPRESENTATIONS ON BEHALF OF THE NDA**

We write to you on behalf of the Nuclear Decommissioning Authority ('the NDA'), in respect of the current consultation on the *Somerset West and Taunton Council Local Plan Issues and Options Consultation*.

Avison Young are the appointed property advisors for the NDA, and provide planning advice across the NDA's UK-wide estate. This representation is made in respect of the Hinkley Point A site which is owned by the NDA and located within West Somerset.

**Context – Hinkley Point**

The NDA is the strategic authority responsible for managing the effective and efficient clean-up of the UK's nuclear legacy, which includes the Hinkley Point A site.

Hinkley Point A is the site of a closed power station that operated from 1965 and ceased generating electricity in 2000. As the Council will be aware, Hinkley Point A is currently being decommissioned and is located between Hinkley Point B to the east and the Hinkley Point C development site to the west. Hinkley Point B is the site of an existing nuclear power station, where Hinkley Point C received planning permission in March 2013 following submission of a Development Consent Order ('DCO') application for a new nuclear power station.

Hinkley Point A remains heavily developed, with twin reactors in the centre of the site and is surrounded by associated buildings with a grid yard to the south. Defuelling of Hinkley Point A took place between 2000 and 2004. The site is currently undergoing Care & Maintenance preparations up to 2025; where the Care & Maintenance phase itself will take place through to 2085.

**Context – Existing Local Plan**

The statutory development plan affecting proposals at Hinkley Point A currently comprises of the *West Somerset Local Plan (WSLP) (2016)* and *Somerset Waste Core Strategy (SWCS) (2013)*.

[West Somerset Local Plan \(2016\)](#)

Policy EN1 'Hinkley Point' states that proposals for the mitigation of impacts arising from the development of a new nuclear power station at Hinkley Point must demonstrate that they respect the positive economic and social characteristics of communities affected especially those

neighbouring them; adequate measures are taken to mitigate the adverse cultural, economic, environmental and social impacts of the development; and they respect the local natural environment in which they are located.

The Council has also prepared a Supplementary Planning Document for Hinkley Point C – the purpose of this document is to assist developers in formulating their plans for the new power station. In the adopted development plan, the Hinkley Point A site is unallocated land.

### Somerset Waste Core Strategy (2013)

Policy DM9 'Radioactive Waste Treatment and Storage' notes that planning permission for the treatment and/or interim storage of radioactive waste at Hinkley Point will be granted within the licensed area subject to the application demonstrating that the proposed development is consistent with national strategy for radioactive waste management; includes adequate measures to mitigate adverse impacts on the environment and local community or, as a last resort, proportionately compensate to offset such impacts; and is supported by robust economic and environmental assessments.

### **Response to Issues and Options Consultation**

Our general representations to the current *Issues and Options* consultation in respect of the Hinkley Point A site are set out below. We note that whilst some reference is made to the new Hinkley Point C nuclear power station within the consultation documentation, no reference is made to either Hinkley Point A or the decommissioning process being undertaken there.

Overall, a key priority for the NDA lies in securing a supportive policy context within the *new Somerset West and Taunton Local Plan* to help support and facilitate on-going operations at Hinkley Point A which are set to continue beyond the Plan period to 2085; particularly given that the site represents unallocated land within the *adopted Somerset Waste Plan*. This will include works and uses associated with nuclear decommissioning and site remediation, the management of waste in accordance with national strategies and policies, and opportunities for new development of B1-B8 employment uses. Such works may include the development of new buildings (both permanent and temporary), other required facilities and the management of waste (both radioactive and non-radioactive). The Hinkley Point A site will therefore continue to play a strategic role in terms of waste management throughout the Local Plan period and this should also be clearly reflected within the *new Local Plan*.

One of the NDA's key strategic objectives in the adopted *NDA strategy*<sup>1</sup> is to optimise the re-use of sites within its portfolio. This encompasses land uses either when the NDA mission is complete or on an interim basis prior to achieving the site end state (interim use). As such, opportunities may arise during the decommissioning phase to make best and most effective use of parts of the site for alternative new land uses. The NDA are continually exploring the opportunities presented across its UK site portfolio but envisage that potential uses are likely to include employment uses falling within use classes B1, B2 and B8. The timing of the release of land will however be dependent on progress made with decommissioning and remediation activities, amongst other factors.

Therefore, it remains important to the NDA's objectives that a supportive policy context is in place to allow appropriate interim and future uses to come forward. The site is unallocated 'white land' within the existing *Local Plan* and therefore comparable, in planning policy terms, with the open countryside. It is subsequently considered by the NDA that an allocation and site-specific policy for Hinkley Point A should be considered by the Council as part of the *new Somerset West and Taunton Local Plan*.

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<sup>1</sup> For further information see NDA Strategy effective from April 2016 ([https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/512836/Nuclear\\_Decommissioning\\_Authority\\_Strategy\\_effective\\_from\\_April\\_2016.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/512836/Nuclear_Decommissioning_Authority_Strategy_effective_from_April_2016.pdf))

The NDA are aware of the *emerging Somerset Waste Plan*<sup>2</sup> which will guide the Council's approach to planning for sustainable waste management in Somerset. Whilst it is acknowledged that planning applications at Hinkley Point A are likely to be considered by the Council as 'waste developments' and given greater consideration within the specific *Waste Plan*, this does not eliminate the need for the site to be given context and policy provision within the *new Somerset West and Taunton Local Plan* given the significance and nature of the site.

For reference, a similar situation was encountered by the Berkeley Power Station in the Stroud District of Gloucestershire, which is also subject to decommissioning and site remediation. In light of representations made to the consultation documentation and during the examination of the *Stroud District Local Plan*, a site-specific policy for the 'Former Berkeley Power Station' was subsequently included. This policy provided a site allocation which allowed the site to be retained for B1-B8 employment uses and for employment related training and education purposes<sup>3</sup>, and for operations and uses associated with nuclear decommissioning. This policy approach recognises and supports both the decommissioning and site remediation process, and re-use of the site.

Importantly, a site-specific policy and allocation for Hinkley Point A would ensure that the *new Local Plan* reflects the significance of current national strategies (including NDA Strategies) to the decommissioning and remediation process, and that on-going development in line with these national strategies could be required throughout the Plan period.

National strategies concerning radioactive waste have been recognised as national policy in the wider planning arena – including within the currently adopted *Somerset Waste Core Strategy* where the above position was supported by the Inspector during the *Examination in Public* and is reflected in a number of adopted and emerging development plan documents; including the adopted Suffolk County Council *Waste Core Strategy* and adopted Kent County Council *Minerals and Waste Local Plan 2013 - 2030*.

## Conclusion

This representation has been made by Avison Young on behalf of the NDA in response to the current *Somerset West and Taunton Council Local Plan Issues and Options Consultation*.

Ultimately, the NDA request that the Hinkley Point A site should be subject to an allocation within the *new Somerset West and Taunton Local Plan* to support B1-B8 employment uses, together with works and uses associated with nuclear decommissioning and site remediation including the management of waste in line with national strategies and policies for the management of waste (both radioactive and directive).

The NDA will continue to welcome the opportunity to work with the Council on the proposed policy wording for the Hinkley Point A site, and look forward to contributing to the next stages of preparation for the *new Local Plan*: particularly the *Preferred Options Draft Consultation* which we understand is anticipated to take place in late 2020 to 2021.

The NDA also wishes to reserve the right to comment on any proposed site boundaries for the Hinkley Point A site at the next stage of consultation for the *new Somerset West and Taunton Local Plan*.

If you require any clarity in respect of the enclosed representation, then please get in touch.

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<sup>2</sup> It is understood from discussions with Officers that preparation of the plan is currently delayed due to resourcing issues

<sup>3</sup> Part of the site is being redeveloped as a University Technical College (UTC) and a GREEN Skills Centre by South Gloucestershire and Stroud College.

Nuclear Decommissioning Authority  
16 March 2020  
Page 4

Yours sincerely



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For and on behalf of GVA Grimley Limited t/a Avison Young