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Dear Sir / Madam

## LEISTON NEIGHBOURHOOD PLAN CONSULTATION

### Representation on behalf of Magnox Limited and the NDA

We are writing to you to provide a representation to the current consultation on the Leiston Neighbourhood Plan Submission Documents, on behalf of Magnox Limited and the Nuclear Decommissioning Authority (NDA). Bilfinger GVA is the appointed property advisors for Magnox Limited and the NDA and provides planning advice across the NDA's UK-wide estate. We have made representations to various local plan and other consultations across the UK, affecting various NDA sites.

These representations are made in respect of the Sizewell 'A' site, which is operated by Magnox Limited on the NDA's behalf in order to carry out the decommissioning process. Sizewell 'A' generated power until 31 December 2006 when it was shut down. Decommissioning involves the systematic removal of plant and buildings previously associated with electricity generation; it is a long process expected to last several decades.

### Representation Made

#### Employment

It is our view that the '*Leiston Neighbourhood Plan Submission Stage Consultation Version*' (LNP) does not properly acknowledge Sizewell A's importance as a local employer throughout the plan period (to 2029) and the importance of decommissioning, but focuses on the "*detrimental effects of decommissioning*" on the area's employment base, which is noted in the '*Vision for Leiston*' section at paragraph 3.3.

While the decommissioning of Sizewell A will ultimately lead to a reduction of employment in the area, the LNP covers the period 2015-2029. For the majority of this timeframe at least (current prediction for care and Maintenance is 2027), Sizewell A will continue to undergo decommissioning and continue to be a significant local employer. Magnox currently employs around 180 staff at Sizewell 'A', which includes various office based staff as well as 'site based' engineers and employees. Certain new development proposals will inevitably be required in connection with the decommissioning of the power station and these should be supported through the LNP.

The LNP is therefore not considered to be 'effective' in terms of the tests of soundness set out in paragraph 182 of the National Planning Policy Framework (NPPF). It is our view that the 5<sup>th</sup> bullet point at paragraph 3.3 should be amended to recognise the importance of the on-going development required as part of the decommissioning process, and to add clarity to the policy reference to the detrimental effects of that process. The proposed new additional text is set out (shown underlined) below:



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- To retain, strengthen and expand its employment base, and despite the detrimental economic effects of decommissioning Sizewell Station 'A', support development associated with its decommissioning throughout the plan period given the importance of the process.

Similarly, it is our view that paragraph 12.2 only refers to the eventual negative aspects of decommissioning Sizewell A, and does not acknowledge that decommissioning is a vital component of a nuclear power station's life and that Sizewell A will continue to be a significant local employer throughout the plan period (at least until 2027). It is therefore proposed that the following additional text is added to the end of paragraph 12.2:

*"However it is acknowledged that decommissioning is an inevitable and important process and that Sizewell A will continue to be a significant local employer, at least throughout the majority of the plan period."*

It is also suggested that the following paragraph be inserted after paragraph 12.2 to clarify the mechanism in place to mitigate against any socio-economic decline resulting from decommissioning:

*"It is also noted that, while the decommissioning of Sizewell A will eventually lead to a reduction of employment in the area, Magnox operate a socio-economic scheme (on behalf of the NDA) under the requirements of the Energy Act 2004. This scheme is intended to help mitigate the social and economic consequences of decommissioning (e.g. loss of jobs and economic activity)."*

#### Physical Limits Boundary

Further to the above, Sizewell A is located in the 'open countryside' in planning terms as it is outside the physical limits boundaries. While we are satisfied that Policy PL1 suitably allows for necessary development (associated with decommissioning) at Sizewell A, given that it permits "*necessary utilities infrastructure... where no reasonable alternative location is available*", we feel the Introduction to Chapter 4 would benefit from contextualising Sizewell A (and potentially B and C) site as a significant utility infrastructure site in the open countryside. This would assist in properly attributing the relevant clause in Policy PL1 to development proposals at Sizewell A which are associated with decommissioning. It would be particularly useful in addressing any doubt that may arise in relation to the pertinence of Policy PL1 to development proposals at Sizewell A, given that it has ceased electricity generation and is subject to decommissioning. The site remains vital utility infrastructure given the importance and inevitability of the decommissioning stage in the overall lifetime of a nuclear power station.

While it is outside of Magnox and the NDA's prerogative to suggest introductory wording in respect of Sizewell B or C, we suggest the following paragraph is inserted after the bullet points in paragraph 4.5 in respect of Sizewell A:

*"Of particular note to Leiston is the Sizewell nuclear power station complex. Sizewell A is subject to decommissioning, a long process which will extend beyond the plan period. Certain proposals for new development (associated with decommissioning) will be required at Sizewell A and these will be considered in the context of the nuclear power station as utility infrastructure."*

#### Conclusion

This representation has been made by Bilfinger GVA on behalf of Magnox Limited and the NDA in response to the current consultation on the Leiston Neighbourhood Plan (LNP). In summary, it is Magnox and the NDA's contention that Sizewell A should have more recognition as a local employer and that Magnox's socio-economic scheme to mitigate against the consequences of decommissioning should be acknowledged. Moreover, the LNP should acknowledge development proposals associated with decommissioning should be considered in the context of the nuclear power station as utility infrastructure.

If you require any clarity in respect of the above representation, then please contact me on

Yours faithfully

**Ben Lewis MRTPI**  
**Director in Planning, Development & Regeneration**  
**For and on behalf of GVA Grimley Limited**

cc. Kim Baines – NDA  
Stephen Wilmott – Magnox Limited