
Hearing Statement

In Response to Matter 4 – Recycling, Recovery, Disposal and Other waste facilities

Nuclear Decommissioning Authority and Magnox Limited

1. Background

- 1.1 GVA submitted representations on behalf of the Nuclear Decommissioning Authority (NDA) and Magnox Limited (Magnox) to the Pre-submission Draft Waste Plan Consultation on 31st January 2018, which the Inspector should refer to.
- 1.2 Magnox operate the Winfrith site on behalf of the NDA in order to carry out the decommissioning process.
- 1.3 Magnox maintains a working relationship with Dorset County Council (DCC), as well as Purbeck District Council (PDC), through regular tri-party meetings where updates are provided in respect of forthcoming developments at the Winfrith site, key activities and DCC/PDC development plan progress.
- 1.4 For the Inspector's reference, Environmental Impact Assessments (EIAs) are being prepared to accompany planning applications for Winfrith's end-state and the decommissioning of the sea discharge pipeline. These are at a very early stage in preparation, but a brief overview of the project is provided at Appendix 1 of this Statement.

2. Response to Questions 59-62

- 2.1 A response to each question posed by the Inspector in respect of Policy 10 (Decommissioning and restoration of Winfrith Nuclear Licensed Site) is provided below.

59 Would highway improvements be needed to facilitate access via Dorset Innovation Park?

- 2.2 It is our understanding that Monterey Avenue was constructed to a standard capable of sufficiently serving the Dorset Innovation Park (DIP) and can therefore accommodate HGVs.

60 What are the advantages of using this route as opposed to Gatemore Road?

- 2.3 Access via DIP would require the consent of the landowner and the establishment of an appropriate route through the site. This is outside the control of the NDA and Magnox and therefore cannot be a policy requirement.
- 2.4 Furthermore, Dorset Police are located off Monterey Avenue and increasing the number of vehicle movements accessing the site this way has the potential to affect emergency vehicle response times.
- 2.5 The Magnox Winfrith site has always been lawfully accessed via Gatemore Road. Historically, when the site was fully operational, the level of traffic movements associated with accessing the site would have been significantly higher than now.
- 2.6 The EIA being prepared will assess the impact of the proposals on the highway network, in line with policies in the Purbeck Local Plan and other policies in the Waste Plan (eg. Policy 12). Again, it is not considered that the Council's aspiration for decommissioning movements to access the Winfrith site via DIP should be a policy requirement in Policy 10.

61 Which European habitat would potentially be affected by development and how close is this to the site?

- 2.7 The following designated sites affect parts of the Winfrith site and are directly adjacent to it:
- Ramsar Site (Dorset Heathlands)
 - Special Area of Conservation (Dorset Heaths)
 - Special Protection Area (Dorset Heathlands)
 - Site of Special Scientific Interest (Winfrith Heath)
- 2.8 The decommissioning and restoration of Winfrith will result in the majority of the site being restored to heathland habitat (with public access) and will therefore have a positive impact on biodiversity in the long term. The EIA being prepared will appropriately consider ecology and designated sites. Any mitigation measures required to ensure the development has an acceptable impact on these interests will be incorporated into the proposals.

62 Please explain the acronyms in the text (HAW, LLW, VLLW)

- 2.9 Each of the acronyms (plus ILW) is defined below (definitions taken from the NDA Strategy 2016, other than VLLW which is taken from the UK Radioactive Waste Inventory website).
- HAW (Higher Activity Waste) - Higher activity radioactive waste comprises a number of categories of radioactive waste – high level waste (HLW), intermediate level waste (ILW), and low level waste (LLW) that is not suitable for near-surface disposal in current facilities.

- ILW (Intermediate Level Waste) - Waste with radioactivity levels exceeding the upper boundaries for Low Level Waste (LLW), but which does not need heating to be taken into account in the design of storage or disposal facilities. ILW arises mainly from the reprocessing of spent fuel, and from general operations and maintenance of radioactive plant. The major components of ILW are metals and organic materials, with smaller quantities of cement, graphite, glass and ceramics.
- LLW (Low Level Waste) - Low Level Waste which includes metals, soil, building rubble and organic materials, arising principally as lightly contaminated miscellaneous scrap. Wastes other than those suitable for disposal with ordinary refuse, but not exceeding 4 GBq/te (gigabecquerels) of alpha or 12 GBq/te of beta/gamma activity. Metals are mostly in the form of redundant equipment. Organic materials are mainly in the form of paper towels, clothing and laboratory equipment that have been used in areas where radioactive materials are used – such as hospitals, research establishments and industry. The National Repository for LLW is near Drigg, Cumbria.
- VLLW (Very Low Level Waste) - is a sub-category of LLW with specific activity limits. Sites that produce VLLW can dispose of the waste with regular household or industrial waste at permitted landfill facilities. The major components of VLLW from nuclear sites are building rubble, soil and steel items. These arise from the dismantling and demolition of nuclear reactors and facilities.

3. Conclusion

- 3.1 This Statement has provided the position of the NDA and Magnox in respect of Questions 59-62, pertinent to Policy 10 of the emerging Plan under Matter 4 of the Inspector's Matters, Issues and Questions.
- 3.2 However, the NDA and Magnox have serious concerns with the Pre-Submission Draft version of Policy 10. GVA submitted representations on behalf of our clients to that consultation on 31st January 2018. It is considered fundamental that the Inspector has due regard to these previous representations.

Appendix 1 – Overview of End-state Project

The proposed future use of the main Winfrith Site is to be heathland with public access, providing a leisure resource and biodiversity enhancement. The project comprises of two main parts:

1. Restoration of the Winfrith Site land use and appearance to an approximation of its state before the establishment was built, and
2. Decommissioning of the sea discharge pipeline, which runs from the Winfrith site to a discharge point approximately 4km offshore.

No large-scale excavations or re-profiling is to be undertaken to restore the pre-1950s land profile at the main site. The activities likely to be involved include the removal of buildings/structures down to about 1m deep, the removal of some structures deeper than 1m below ground, and the filling and abandonment of other underground structures – notably the underground portions of the two remaining reactors on site, SGHWR and Dragon. The heathland will require management and enhancement, at least in the short term, to ensure the area maintains its character and that sites of former buildings/structures which are to be removed are enabled to recover.

The underground sea discharge pipeline is approximately 13km in length, 9km of which is terrestrial and 4km of which is marine. Ongoing characterisation work and landowner discussions will determine the final strategy for each section of the pipeline. Each section essentially has one of two options: in-situ disposal or removal.