



**Local Plan 2031 Part 2**  
Publication Version  
Representation Form

Ref:

(For official  
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse  
Local Plan 2031 Part 2

**Please return by 5pm on Wednesday 22 November 2017 to:** Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk)

This form has two parts:

**Part A** – Personal Details

**Part B** – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

## Part A

### 1. Personal Details\*

\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

### 2. Agent's Details (if applicable)

Title	<input type="text"/>	Mr
First Name	<input type="text"/>	Owain
Last Name	<input type="text"/>	Griffiths
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation representing (where relevant)	The Nuclear Decommissioning Authority (the NDA) and Magnox Limited (Magnox)	GVA
Address Line 1	<input type="text"/>	GVA
Address Line 2	<input type="text"/>	One Kingsway
Address Line 3	<input type="text"/>	<input type="text"/>
Postal Town	<input type="text"/>	Cardiff
Post Code	<input type="text"/>	CF10 3AN
Telephone Number	<input type="text"/>	02920 248920
Email Address	<input type="text"/>	owain.griffiths@gva.co.uk

## Part B – Please use a separate sheet for each representation

Name or organisation: GVA (on behalf of the NDA and Magnox)

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

Core Policy  
15b

Policies Map

Harwell Campus

4. Do you consider the Local Plan is: (*Please tick as appropriate*)

4. (1) Legally compliant

Yes

No

4. (2) Sound

Yes

No

4. (3) Complies with the Duty to Cooperate

Yes

No

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Please see the covering letter which has been prepared by GVA and is submitted in support of this representation.

(Continue on page 4 /expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see the covering letter which has been prepared by GVA and is submitted in support of this representation.

(Continue on page 4 /expand box if necessary)

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.  
**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

**No**, I do not wish to participate at the oral examination

**Yes**, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

***Please note** the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.*

Signature:

Date:

**Sharing your personal details**

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Publicity Period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the council and the Inspector and respondents and the Inspector.

**Representations cannot be treated as confidential and will be published on our website alongside your name.** If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online, however the original representations are available for public viewing at our council office by prior appointment. All representations and related documents will be held by Vale of White Horse District Council for a period of 6 months after the Local Plan is adopted.

**Would you like to hear from us in the future?**

I would like to be kept informed about the progress of the Local Plan

I would like to be added to the database to receive general planning updates

Please do not contact me again

**Further comment:** Please use this space to provide further comment on the relevant questions in this form. **You must state which question your comment relates to.**

**Alternative formats of this form are available on request.** Please contact our customer service team on 01235 422600 (Text phone users add 18001 before you dial) or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk)

**Please return this form by 5pm on Wednesday 22 November 2017 to:** Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk)



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Our Ref: OG/17B604088/221117

22<sup>nd</sup> November 2017

Planning Policy Team  
Vale of White Horse District Council  
135 Eastern Avenue  
Milton Park  
Abingdon  
OX14 4SB

Dear Sir / Madam,

Vale of White Horse District Council  
The Local Plan 2031 Part 2: Detailed Policies and Additional Sites –  
Publication Version Consultation

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

We are writing to you on behalf of the Nuclear Decommissioning Authority (the NDA) and Magnox Limited (Magnox), in respect of the current consultation on *The Local Plan 2031 Part 2: Detailed Policies and Additional Sites (LPP2), Publication Version* consultation. GVA is the appointed property advisors for the NDA and Magnox, and provides planning advice across the NDA's UK-wide estate.

This representation is made in respect of the NDA/Magnox site ('the Harwell site'), which forms part of the Harwell Campus. The Harwell site is operated by Magnox (the Site Licence Company) on the NDA's behalf in order to carry out the decommissioning of the site (including waste management and, where appropriate, land remediation).

As you will be aware, GVA previously submitted a representation on behalf of the NDA and Magnox to the *LPP2, Call for Sites* consultation on 13<sup>th</sup> July 2016. Expanding on this earlier representation, GVA also submitted a representation on behalf of the NDA and Magnox to the *LPP2, Preferred Options* consultation on 4<sup>th</sup> May 2017. We have enclosed copies of these representations for your reference.

Through our representations to the *LPP2* thus far, GVA has consistently requested that the Harwell Campus Site allocation within the *LPP2* supports the decommissioning and remediation of the Harwell site. This includes the management of waste in line with national strategies and policies, together with new opportunities for development of B1/B2/B8 employment uses.

The representation to the current *Publication Version* consultation is set out below. A completed representation comment form is also enclosed.

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London Manchester Newcastle

## Response to Publication Version Consultation

As stated in our representation to the *Preferred Options* consultation, it is important that the Local Plan's Vision and Strategy for Harwell Campus fully accounts for the current operational and future development at the Campus. Such development includes employment uses and the proposed housing development to the north of the Campus, together with operations taking place at the Harwell site, which includes activities and uses associated with decommissioning, waste management and site remediation.

It is acknowledged that the Harwell Campus is allocated as a Strategic Employment site within the *Local Plan 2031 Part 1: Strategic Sites and Policies (LPP1)* and this allocation is welcomed by the NDA and Magnox.

It is also noted that a housing allocation is proposed to the north of Harwell Campus (being put forward as part of the *LPP2*). As previously noted in our representation to the *Preferred Options* consultation, the proposed housing allocation comprises land currently subject to remediation works (known as the LETP and Sewage Farm site) and the NDA and Magnox would welcome further discussions with the Council to ensure that the delivery timescales for the allocation are in accord with those for the site's remediation, and that the site can be remediated to an appropriate level for residential development to be delivered.

However, it was considered that the emerging *Local Plan to 2031* (by virtue of the adopted *LPP1* and *Preferred Options* for the *LPP2*) did not provide enough context to the on-going decommissioning process at the Harwell site. In light of this, a representation was made to the *Preferred Options* consultation requesting that any allocation applied to Harwell Campus as part of the *LPP2* would benefit from supporting decommissioning and site remediation activities (including those associated with radioactive waste management) as well as traditional B1/B2/B8 employment development. This is particularly pertinent given that the majority of the Harwell site is not likely to be available for redevelopment for employment uses until the very end of the plan period, due to the on-going decommissioning process taking place in the interim.

We have viewed the Council's response to GVA's representation to the *Preferred Options* consultation, as set out within the '*Consultation Statement Appendix 3 – Summary of Consultation Responses*'. In response to GVA's representation, the Council has stated that it will continue to support the decommissioning of land at Harwell Campus to ensure that additional land will be made available for development in the short, medium and long term, including beyond the plan period of 2031.

Having reviewed the *Publication Version* of the *LPP2*, we note that paragraph 2.114 makes reference to the on-going decommissioning process. However, it is considered that the general focus on Harwell Campus is in respect to the 'post-decommissioning' phase for the Campus and its development for housing and employment uses. Core Policy 15b in particular focuses on new housing and employment uses at the Campus, but falls silent on activities and uses associated with the decommissioning process taking place at the Harwell site.

It is important that Core Policy 15b acknowledges all of the uses that would be supported at the Campus. Again, we must reiterate that the *LPP2* must support development required as part of decommissioning and site remediation processes. Much of this development is considered 'Sui Generis' use and will generate employment opportunities and business activity in the form of decommissioning, before redevelopment for other employment uses can come forward on the site.

Having regard to the operational requirements of the Harwell site, it is considered that Core Policy 15b should be modified to explicitly support activities and uses associated with decommissioning and site remediation (including the management of waste in line with national strategies and policies),

together with the employment uses and the proposed housing at the Campus. It is therefore requested that the following additional text is included within Core Policy 15b (new text underlined in red):

***“Core Policy 15b: Harwell Campus Comprehensive Development Framework***

*All new development at Harwell Campus will be guided by a comprehensive development framework.*

*The new housing allocated at Harwell Campus will be provided to an exemplar standard and in the form of an Innovation Village to unlock the unique potential for economic growth offered by the Campus. The new Innovation Village will be fully and successfully integrated with the Campus, incorporating on-site services and facilities and reflect a tailored mix of dwellings to help meet the needs of the organisations located at the Campus. This development will come forward in accordance with **Core Policies 15a and 15b** and the Site Development Template set out in **Appendix A**.*

*Sufficient land is also made available at Harwell Campus for research, innovation and economic development to accommodate at least 5,400 net additional jobs in the plan period up to 2031 within the designated Enterprise Zone.*

*Land within the Nuclear Licensed Site at Harwell Campus is subject to decommissioning of redundant facilities, management of waste in line with national policies and strategies for the management of waste (both directive and radioactive) and, where appropriate, the remediation of land. Land within the Nuclear Licensed Site may be released for redevelopment for alternative uses (including new employment uses). However, this is dependent on the progress made with site decommissioning and land remediation.*

*Proposals for development within the Campus must demonstrate how they contribute towards a comprehensive approach to development.*

...”

Additionally, we reiterate the importance of Core Policy 15b recognising the significance of the national strategies which govern waste management and the decommissioning and site remediation process, and recognises that on-going development in line with these national strategies could be required as part of the decommissioning and clean-up process, which will take place throughout the plan period. Given that there is no recognition within the *LPP1* or *LPP2* of these national strategies or that on-going development in line with these national strategies could be required, it is considered that the policy framework provided by the *Local Plan to 2031* is inconsistent with national policy in the form of the aforementioned national strategies. For additional information in respect of this point, please see GVA's representation to the *Preferred Options* consultation, which is enclosed with this letter of representation.

However, we consider that the above can be suitably addressed by the inclusion of additional supporting text to Core Policy 15b to provide further clarity in relation to the policy support for decommissioning and clean-up. It is therefore suggested that the following supporting text to Core Policy 15b is added (new text underlined in red):

*“2.117 The requirements for the housing allocation at Harwell Campus will be brought forward in accordance with the Site Development Template set out in*

**Appendix A.** *The formerly saved Local Plan 2011 (Policy E7: Harwell Science and Innovation Campus) is also replaced by the Part 2 plan Core Policy 15b.*

*2.XXX The policy also supports the on-going decommissioning, radioactive waste management and land remediation process at Harwell Campus – a process governed by national strategies which are subject to regular review and consultation and recognised as a material consideration in planning decisions. The Council is aware that the Environmental Regulators have issued draft guidance<sup>1</sup> which requires Magnox (and other Nuclear Site Licence holders) to review the site-wide waste management approach to identify and deliver an optimised site end state. This includes considering a range of waste management options covering forms off on-site and off-site management and the approach to managing land contamination. Any works associated with decommissioning, radioactive waste management and land remediation at the site will be brought forward in line with Core Policies 15a and 15b. The Council will engage with the Site Licence holders during the plan period to keep updated on progress with decommissioning and clean-up.*

*2.118 The Council will work with Harwell Campus Partnership and other key stakeholders to prepare a comprehensive development framework for the campus, which will be adopted as a Supplementary Planning Document (SPD)..."*

The abovementioned approach will ensure that the *Local Plan to 2031* fully accounts for the current operational and future development at the Harwell Campus, thus ensuring a positive policy context for the site over the plan period.

Should Core Policy 15b and the supporting text not be modified as requested, the policy framework provided by the *Local Plan to 2031* is not considered to be 'effective' in terms of the test of soundness as set out in paragraph 182 of the *National Planning Policy Framework (NPPF)*. It would not represent what is deliverable at the site, given the continuing decommissioning and remediation activities which will extend throughout and beyond the plan period.

This is a similar situation encountered by the NDA and Magnox at Berkeley Power Station in the Stroud District of Gloucestershire, which is also subject to decommissioning and remediation. In light of the representations made to consultation documents and during the examination of the *Stroud District Local Plan*, a site-specific policy for the 'Former Berkeley Power Station' was included. This policy provides a site allocation which allows the site to be retained for B1-B8 employment uses and for employment related training and education purposes<sup>2</sup> and for operations and uses associated with nuclear decommissioning. This policy approach recognises and supports the on-going decommissioning process, together with the future re-use / redevelopment of the site.

In accordance with Core Policy 15b, it is noted that the Council intends on preparing a comprehensive development framework to guide future development at the Campus and this will be published as a SPD to the *Local Plan*. It appears that the focus of the SPD will be on the 'post-decommissioning' phase for the Campus, with guidance in respect of the proposed employment / housing allocations. It would be beneficial if this could be clarified and clearly stated in the text to Core Policy 15b. It is important to highlight at this time that the NDA and Magnox have not been invited to have any direct input into the SPD and, in the absence of their input, their preferred approach would be for the SPD to focus on the 'post-decommissioning' phase. Whilst

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<sup>1</sup> [Guidance on Requirements for Release of Nuclear Sites from Radioactive Substances Regulation \(February 2016\)](https://consultation.sepa.org.uk/operations-portfolio/grr/)  
(<https://consultation.sepa.org.uk/operations-portfolio/grr/>)

<sup>2</sup> Part of the site has been redeveloped as a University Technical College (UTC) and a GREEN Skills Centre by South Gloucestershire and Stroud College

decommissioning will ultimately result in the release of land for future re-use and redevelopment, some land areas within the licensed site will need to remain 'licensed' beyond the development plan period to 2031 and this should be acknowledged by the SPD.

As noted in Core Policy 15b, the Council intends for development proposals at the Campus to be brought forward in view of a comprehensive site-wide approach to development. In light of this, the Nuclear Licensed Site and the rest of the Harwell Campus need to be treated as a single entity. As such, the policy approach set out by Core Policy 15b needs to recognise the varied operational requirements of the different organisations at the Campus. For example, the operational requirements for decommissioning and site remediation activities and uses at the Harwell site are very different to the operational requirements for traditional B1/B2/B8 employment uses on the rest of the Campus.

Criterion iii under Core Policy 15b relates to design of all buildings on the Campus, and it likely that this will be supplemented by additional guidance within the proposed SPD. However, it must be acknowledged that operational requirements for buildings have a huge influence on building design. In light of this, it is considered that any design guidance applied to the Harwell Campus must acknowledge that building design should be proportionate to the operation/use for which the building is required. The NDA and Magnox would not want overly prescriptive design criteria to foreclose potential development proposals coming forward at the Harwell site, many of which will be temporary and purely required to facilitate decommissioning.

It is considered that the inclusion of the Harwell site within the proposed LDO for the Campus could address the above design issue on the basis that an LDO could provide suitable planning control over the necessary operational development required at the NDA site. GVA has previously requested that the site be included within the LDO at the *Preferred Options* consultation stage. We note that the Council is considering the appropriateness of including the NDA/Magnox site within any future LDO for the Campus. The NDA and Magnox would support this and look forward to being kept informed of this process.

## **Conclusion**

This representation has been made by GVA on behalf of the NDA and Magnox in response to the current consultation on the *Publication Version of The Local Plan 2031 Part 2: Detailed Policies and Additional Sites*.

In summary, the NDA and Magnox are of the opinion that Core Policy 15b should explicitly support activities and uses associated with decommissioning and remediation, including the management of waste in line with national strategies and policies for the management of waste (both radioactive and directive), together with employment uses and the proposed housing at the Campus. It is also important that Core Policy 15b makes reference to the relevant national strategies which govern waste management and the decommissioning and site remediation process, thus ensuring compliance with such strategies.

If you require any clarity in respect of the enclosed representation, then please contact us.

Yours faithfully,

**Owain Griffiths** MRTPI MRICS  
**Director of Planning Development & Regeneration**  
02920 248920  
owain.griffiths@gva.co.uk

**For and on behalf of GVA Grimley Ltd**

cc. Kim Baines – NDA  
Laura Johnson - NDA  
Stewart Swift – NDA

Stephen Wilmott – Magnox Limited  
Roger Wrayford – Magnox Limited  
Stuart Clark – Magnox Limited

 <p><b>Vale of White Horse</b> District Council</p>	<p><b>Vale of White Horse Local Plan 2031 Part 2: Preferred Options</b></p> <p><b>Comment Form</b></p>	<p>Ref:</p>  <p>(For official use only)</p>
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Please return to the Planning Policy Team, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton OX14 4SB, or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk) no later than 5pm on Thursday 4 May 2017.

This form has two parts –

Part A – Your Personal Details

Part B – Your Comments

## Local Plan 2031 Part 2 Comment Form

The Vale of White Horse District Council are welcoming comments on the Local Plan 2031 Part 2: Detailed Policies and Additional Sites through our preferred options consultation. The aim of Part 2 is to set out:

- policies and locations for the Vale's proportion of Oxford's housing need up to 2031
- policies for the part of Didcot Garden Town that lies within the Vale of White Horse district
- detailed development management policies to complement Part 1 and replace the saved policies of the Local Plan 2011
- additional site allocations for housing.

This consultation is running for 8 weeks from **Thursday 9 March 2017 to 5pm on Thursday 4 May 2017**. All comments will be taken into consideration if submitted within the consultation time frame.

### Submitting Comments

Please fill in this form and return by:

- email to: [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk)

**OR**

- post to: Planning Policy  
Vale of White Horse District Council  
135 Eastern Avenue  
Milton Park  
Milton  
OX14 4SB

Comments must be received by **5pm on Thursday 4 May 2017 precisely**.

**Please complete a separate form (Parts A & B) for each Local Plan 2031 Part 2 Planning Policy, supporting text and/or Strategic Site you are commenting on.**

Please clearly identify which Planning Policy your comments refer to using the reference (i.e. DP1 and/or Page or Chapter number) in the Local Plan 2031 Part 2.

Please do not repeat your previous comments. The council will review any comments you have previously submitted.

# Part A: Your Details

## 1. Personal Details\*

*\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

## 2. Agent's Details (if applicable)

Title	<input type="text"/>	Mr
Last Name	<input type="text"/>	Lewis
Job Title (where relevant)	<input type="text"/>	Director
Organisation (where relevant)	The Nuclear Decommissioning Authority and Magnox Limited	GVA
Address Line 1	c/o agent	One Kingsway
Line 2	<input type="text"/>	Cardiff
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	CF10 3AN
Telephone Number	<input type="text"/>	029 2024 8911
E-mail Address (where relevant)	<input type="text"/>	ben.lewis@gva.co.uk

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If you do not wish to be informed of future updates to the Local Plan or other planning policy consultations in your area, please tick this box

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**PLEASE NOTE THAT YOU MUST PROVIDE YOUR NAME AND ADDRESS FOR YOUR COMMENTS TO BE CONSIDERED. BY COMPLETING THIS FORM YOU AGREE TO YOUR DETAILS BEING SHARED AND YOUR NAME AND COMMENTS WILL BE MADE AVAILABLE FOR PUBLIC VIEWING. THESE COMMENTS CANNOT BE TREATED AS CONFIDENTIAL.**

## Part B – Please use a separate sheet for each representation

Name or Organisation :

The Nuclear Decommissioning Authority and Magnox Limited

**The Vale of White Horse District Council are welcoming comments on the Local Plan 2031 Part 2: Detailed Policies and Additional Sites through our preferred options consultation. We would like to hear your opinions on:**

- the policies contained within this Plan
- the additional site allocations
- any recommendations you may have for alternative sites
- any improvements to the Local Plan Part 2 supporting text or policies that you believe will help to improve/strengthen the Local Plan.

**If you are commenting on more than one policy or site please complete one form (Parts A and B) for each policy or site you are commenting on.**

**3. Please state in the boxes below the Planning Policy or Site reference you are commenting on.**

Planning Policy reference – PP:  
Chapter Number:

Core Policy 15a, Core Policy 15b.

**4. Please make your comments on this Planning Policy or Site in the box below:**

Please see accompanying covering letter prepared by GVA and submitted in support of this representation.

(continue on a separate sheet/expand box if necessary)

**If you wish to comment on another policy or site please complete one form (Parts A and B) for each policy or site you are commenting on.**

**5. Please set out what change(s) you consider necessary.**

**It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Please see accompanying covering letter prepared by GVA and submitted in support of this representation.

(continue on a separate sheet/expand box if necessary)

**6. Do you have any comments on the Sustainability Appraisal or Habitats Regulations Assessment in respect of the Local Plan 2031 Part 2?**

No comment at this stage.

(continue on a separate sheet/expand box if necessary)

**PLEASE RETURN THIS FORM BY 5PM ON THURSDAY 4 MAY 2017**

***Please note your comment should cover succinctly all the information, evidence and supporting information necessary to support/justify the comment and the suggested change.***

**PLEASE NOTE THAT BY COMPLETING THIS FORM YOU AGREE TO YOUR DETAILS BEING SHARED AND YOUR NAME AND COMMENTS WILL BE MADE AVAILABLE FOR PUBLIC VIEWING. THESE COMMENTS CANNOT BE TREATED AS CONFIDENTIAL.**

4<sup>th</sup> May 2017

Vale of White Horse District Council  
Planning Policy Team  
135 Eastern Avenue  
Milton Park  
Milton  
OX14 4SB

Dear Sir / Madam,

Vale of White Horse District Council Local Plan 2031 Part 2:  
Detailed Policies and Additional Sites, Preferred Options  
Consultation

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

We are writing to you on behalf of the Nuclear Decommissioning Authority (the NDA) and Magnox Limited (Magnox), in respect of the current consultation on the Vale of White Horse District Council Local Plan 2031 Part 2: Detailed Policies and Additional Sites (herein referred to as 'LPP2'), Preferred Options Consultation. GVA is the appointed property advisors for the NDA and Magnox, 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 here are made in respect of land leased to the NDA from the UKAEA at the Harwell Campus site. The NDA site is operated by Magnox (the site Licence Company) on the NDA's behalf in order to carry out the decommissioning and remediation process. Decommissioning involves the systematic removal and management of plant, buildings and waste previously associated with research & development into a wide range of nuclear, radiation and non-nuclear activities. Decommissioning is a long process expected to occur throughout the plan period<sup>1</sup>.

Following discussion with the Vale of White Horse District Council Planning Policy Team, GVA made representations on behalf of the NDA and Magnox to the LPP2, Call for Sites Consultation by email to the Vale of White Horse District Council Planning Policy Team dated 13<sup>th</sup> July 2016.

The Council's Preferred Options 'Comment Form' is attached to this letter,. The detail of the representation is set out below. A plan showing the extent of the land in Magnox control at Harwell is available on request.

GVA is the trading name of GVA Grimley Limited registered in England and Wales number 6382509. Registered office, 3 Brindleyplace, Birmingham B1 2JB. Regulated by RICS.

Birmingham Bristol Cardiff Dublin  
Edinburgh Glasgow Leeds Liverpool  
London Manchester Newcastle

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<sup>1</sup> The expectation is to have to works completed by 2028.

## Context

The NDA is the strategic authority responsible for managing the effective and efficient clean-up of the UK's nuclear legacy, which includes the Harwell site. Land within the Nuclear Licensed Site (NLS) is subject to decommissioning of redundant facilities and, where necessary, the remediation of land.

The decommissioning and remediation process is expected to continue throughout the plan period (which extends to 2031). Certain new development proposals will be required in connection with the decommissioning and remediation process (including those associated with waste management) and the NDA continually seeks for these to be provided for, and supported by, the development plans relevant to its sites. Equally, the NDA seeks to ensure that the future re-use of its estate is optimised.

## Representation

It is important that the Local Plan's Vision and Strategy for Harwell Campus recognises the on-going decommissioning and remediation process at Harwell, together with the economic opportunity that it provides in employment terms, through the decommissioning process and future employment uses at the site.

One of the NDA's key strategic objectives in the current NDA strategy (NDA Strategy Effective from April 2016)<sup>2</sup> is to optimise the reuse of sites within its portfolio. This encompasses land use either when the NDA mission is complete or on an interim basis prior to achieving the site end state (an interim use). As such, it is critical to the NDA's mission that a supportive planning policy context is in place to allow appropriate interim uses to come forward. Accordingly, the Local Plan must recognise the site's strategic importance both currently, as an employment site being decommissioned, and in the future.

It is acknowledged that the Harwell Campus site is allocated as a Strategic Employment Site in the Vale of White Horse District Council Local Plan 2031 Part 1: Strategic Sites and Policies (LPP1). While the former Harwell nuclear site forms part of the wider Strategic Employment Site in the LPP1, many of the developments required as part of the nuclear decommissioning activities at Harwell will not fall within Use Classes B1, B2 or B8. Nuclear power stations and research facilities are considered Sui Generis use, and subsequently, various applications which may be required at Harwell would involve Sui Generis uses and development not typical of "employment uses".

While the NDA and Magnox are satisfied with the wider Strategic Employment allocation in the LPP1, it is considered that any allocation applied to Harwell as part of the LPP2 would benefit from supporting decommissioning and site remediation activities and uses (including those associated with radioactive waste management) as well as traditional B1/B2/B8 employment development.

It is noted that the Council proposes a new policy ('Core Policy 15b – Harwell Campus Comprehensive Development Framework') requiring Harwell Campus to have in place a comprehensive development framework to guide future development. It is also noted that the Council intends to prepare a comprehensive development framework for the Campus as a Supplementary Planning Document (SPD) to the Local Plan. If the SPD is to relate solely to the post-decommissioning reuse/redevelopment of the Campus only, then this should be clearly stated in the Local Plan. This would be the NDA's preferred approach for the SPD.

If, however, the SPD is to relate to the decommissioning period as well, then the NDA and Magnox request that the proposed Core Policy 15b and the proposed Harwell Campus development framework SPD acknowledge and support decommissioning and site remediation activities and uses

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<sup>2</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))

(including those associated with radioactive waste management), together with traditional B1/B2/B8 employment uses at the Harwell Campus.

Furthermore, it is noted that the Council will prepare a Local Development Order (LDO) to facilitate the delivery of proposals coming forward on the Campus. The NDA and Magnox request that the NDA site is included in the boundary for the proposed LDO for the Campus, thus supporting the development required for the on-going decommissioning and remediation process at the NDA site. A plan showing the extent of the land in Magnox control at Harwell is available on request.

The NDA and Magnox would also like to highlight that the decommissioning of Harwell is subject to various pieces of legislation outside of planning's remit. The decommissioning and remediation process is governed by national strategies which are subject to regular review and consultation. Magnox translates these strategies into its own Integrated Decommissioning and Waste Management Strategy, the latest version of which was published in May 2016<sup>3</sup>. National strategies on radioactive waste have been recognised as national policy in the planning arena. This position was supported by the Inspector during the Somerset County Council Waste Core Strategy Examination, and is reflected in a number of adopted and emerging development plan documents including the Suffolk County Council Waste Core Strategy and Kent County Council Minerals and Waste Local Plan.

The NDA and Magnox would like to ensure that the LPP2 recognises the significance of national strategies which govern waste management and the decommissioning and remediation process. The LPP2 needs to support the development and activities required as part of decommissioning, where proposals are consistent with the relevant national strategies. As such, it is requested that the proposed Core Policy 15b recognises that on-going development in line with these national strategies (including that associated with radioactive waste management) could be required as part of the decommissioning process.

The NDA and Magnox have made a number of representations to development plans throughout the UK to ensure that the policy provisions relating to their sites make reference to the need to comply with the aforementioned national strategies for decommissioning and radioactive waste management (including NDA Strategies). Examples policies can be found in the adopted Kent Minerals and Waste Local Plan, the adopted Somerset Waste Core Strategy, the adopted Cumbria Minerals and Waste Development Framework Core Strategy and Generic Development Control Policies Development Plan Documents, and in the emerging plans for Cumbria, Essex and Southend-on-Sea, Oxfordshire, Anglesey & Gwynedd, and Bournemouth, Dorset and Poole Councils. The approach suggested is therefore consistent with development plans elsewhere in the UK.

The NDA and Magnox note that the LPP2 proposes a new housing allocation to the north of the Harwell Campus for 1,000 dwellings. It is understood that the proposed new housing allocation is intended to facilitate the creation of a 'work-live-play community' at Harwell Campus, by complementing the existing employment uses on the site. This allocation comprises land currently subject to remediation works (known as the LETP and Sewage Farm site) and the NDA and Magnox would welcome further discussions with the Council to ensure that the delivery timescales for the allocation are in accord with those for the site's remediation, and that the site can be remediated to an appropriate level for residential development to be delivered.

## Conclusion

This representation has been made by GVA on behalf of the NDA and Magnox Limited in response to the current consultation on the Vale of White Horse District Council Local Plan 2031 Part 2: Detailed Policies and Additional Sites, Preferred Options documents.

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<sup>3</sup> Magnox Limited – Integrated Decommissioning and Waste Management Strategy (May 2016)  
(<https://magnoxsites.com/wp-content/uploads/2016/06/Magnox-IWS-May-2016.pdf>)

In summary, the NDA and Magnox support the proposed site specific policy relating to the Harwell Campus and request that the LPP2 supports the on-going decommissioning and remediation process at Harwell, together with traditional B1/B2/B8 employment uses at the site. This should also be acknowledged and supported by the proposed Harwell Campus development framework SPD and LDO for the Campus.

The NDA and Magnox would welcome the opportunity to work with the Council on the wording for the proposed policies relating to Harwell Campus and be involved in the preparation of the SPD and LDO. The inclusion of a site specific policy within the emerging Plan would also provide a suitable opportunity to make reference to the relevant national strategies which govern the decommissioning and remediation process, thus ensuring compliance with such strategies.

If you require any clarity in respect of the enclosed representation, then please contact us.

Yours faithfully

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**For and on behalf of GVA Grimley Limited**

cc. Kim Baines / Stewart Swift – NDA  
Roger Wrayford / Stuart Clark – Magnox Limited