

Matter 3 Written Statement – Bilfinger GVA for the Nuclear Decommissioning Authority

We are writing to you in respect of the Examination of the Northamptonshire Minerals and Waste Local Plan Update, on behalf of the Nuclear Decommissioning Authority (NDA). As their appointed property advisors, GVA made representations to the *Northamptonshire Minerals and Waste Local Plan: Final Draft Plan (Proposed Submission Document)* Consultation on behalf of the NDA.

We have reviewed the Council's '*Final Draft Plan responses with NCC comments*' and '*Proposed modifications to Submission Plan*', which have been submitted as Examination documents to the Inspector. We are pleased to see that the Council has taken on board our comments and has proposed further modifications to the Plan in line with our suggestions.

However, we reiterate our previous comments in respect of paragraph 5.16 of the *Minerals and Waste Local Plan: Submission Plan*, which defines the different categories of radioactive waste. We note that paragraph 5.16 still refers to High Activity Low Level Waste (HALLW) and Low Activity Low Level Waste (LALLW). It should be noted that these are not legal definitions. The UK Strategy for the Management of Solid Low Level Waste from the Nuclear Industry (February 2016) provides the most up-to-date definitions of radioactive waste. It is recommended that the definition of LLW is updated in line with the definitions provided in the 2016 Strategy. If the Council insists on using non-standard waste definitions, we would suggest that these definitions are included in the glossary to the Plan along with a caveat to explain that they are non-standard definitions.

In light of the above, we would like to confirm that the NDA will not be attending the Examination Hearing Session on Wednesday 30th November, however, we would be grateful if you could pass on our comments to the Inspector for consideration.

Please do not hesitate to contact me should you have any further queries.

Kind regards,

Ben

Ben Lewis, Director, Planning, Development & Regeneration, Bilfinger GVA