

Our Ref: Berkeley
Your Ref: Pre-Submission Draft



23 October 2024

The Planning Strategy Team
Stroud District Council
Ebley Mill
Stroud
GL5 4UB

Sent via email to: local.plan@stroud.gov.uk

Dear Sir/Madam,

STROUD DISTRICT LOCAL PLAN REVIEW: EXAMINATION PAUSE TECHNICAL EVIDENCE CONSULTATION 2024

REPRESENTATIONS ON BEHALF OF THE NUCLEAR DECOMMISSIONING AUTHORITY AND NUCLEAR RESTORATION SERVICES (NRS)

Introduction

We write to you on behalf of the Nuclear Decommissioning Authority ('the NDA') in respect of the *Stroud District Council Local Plan Review - Examination Pause Technical Evidence Consultation 2024*.

Avison Young are the appointed property advisors for the NDA and provide planning advice across the NDA's UK-wide estate. We have made representations to various planning policy consultations across the UK affecting multiple NDA assets; including representations to the Stroud District Council.

These representations are made in respect of the Former Berkeley Nuclear Power Station ('the site/NPS'). The power station element of the Berkeley Site is operated by Nuclear Restoration Services ('NRS'), the site license company, to carry out decommissioning and remediation at licensed site on the NDA's behalf, including waste management and land remediation where appropriate.

The de-licensed part of the Berkeley Site is leased by the NDA to South Gloucestershire and Stroud College ('SGSC'), who have developed a University Technical College ('UTC') and GREEN skills Centre at the site¹. Cavendish Nuclear also occupy office accommodation on this part of the Berkeley Site.

Previous Representations

In previous representations we have raised the following matters:

- Amendments were requested to draft Policy EI2a reflecting that the delicensed site should also be considered acceptable for alternative uses; including employment (B1-B8)/related training and education uses – and at the licensed site: operations and uses associated with

¹ For further information see the college website (<http://www.berkeleygreenutc.org.uk/>)

decommissioning, waste management and land remediation on the Nuclear Licensed Site to be permitted in line with national strategies, policies and regulatory requirements.

- Regarding the proposed new settlement at Sharpness, concerns were raised regarding a lack of evidence and assessment of potential impacts arising from the proposed development upon the NDA and NRS's operational requirements in decommissioning the Berkeley site – particularly remediation activities which may be regarded as a nuisance to sensitive new developments, such as the quantum of housing proposed.
- Local Planning Authorities should take into account the existing use of an area before a new development is introduced, and any adverse effects that existing developments may have on the new development. The 'agent of change' will then have to take action, sometimes in collaboration with the existing development, to reduce any potential adverse effects that the new development may suffer. These mitigation measures may form part of the conditions of granting planning permission for the new development.
- That the Local Plan Review would benefit from contextualising the on-going decommissioning process on the licensed site; in addition to employment uses and employment related training and education uses within the de-licensed site – and the distinction between the two. This would ensure that the Local Plan Review fully accounts for the current operational and future development of the Berkeley site over the Plan period. This approach suggested for the licensed site is consistent with development plans adopted elsewhere in the UK.

Current consultation

The current consultation relates to specific concerns raised by the Inspector during the Local Plan Examination in 2023, in respect of matters relating to the Council's proposed new settlements at Sharpness and Wisloe.

- *The capacity of the Strategic Road Network (SRN), specifically the capacity of M5 Junctions 12 and 14 to accommodate proposed housing growth;*
- *The proposed passenger train service and bespoke Mobility as a Service transport scheme (MaaS) at Strategic Site Allocation PS36 Sharpness New settlement on the grounds of viability and deliverability.*
- *The provision of the pedestrian and cycle bridge over the M5 motorway at Strategic Site Allocation PS37 Wisloe New settlement on the grounds of viability and deliverability.*

Having reviewed the technical documents it is not clear how, if at all, the operations of the NDA's Berkeley site have been taken into consideration. The NDA, therefore, remain concerned regarding the potential pressure on transport links in the area arising from the proposed housing allocation, both during construction and once complete, which may impact on the need to

maintain emergency access to the Berkeley site and may also reduce or restrict movement of large plant or materials from the NDA's Berkeley site. As such, it is requested that such information be provided.

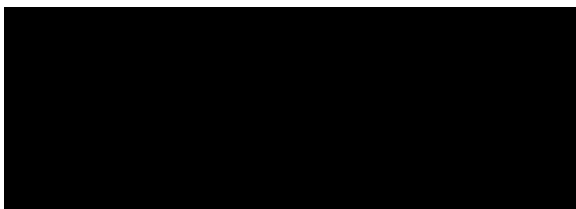
Conclusion

In light of the above, the NDA and NRS would like to reiterate the following points in relation to the proposed Sharpness new settlement:

- Clarification is required as to how the proposed housing allocation, both during construction and once complete, may impact on the need to maintain emergency access to the Berkeley site and the impact of the proposals on the operations of the NDA site;
- Further information is requested regarding the relationship between the Berkeley NPS and adjacent Sharpness new settlement is required;
- That the Council should confirm how the "Agent of Change" principle has been considered and assessed within the proposed housing allocation at Sharpness.

The NDA and NRS also wish to continue work with Stroud District Council on the Local Plan and look forward to continuing to engage with Officers.

Yours sincerely



Matt Verlander MRTPI
Director

