



Our Ref: MV/ 15B802553

18 January 2019

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

By Email

Dear Sir / Madam,

**Local Plan Review – Emerging Strategy Consultation – January 2019
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 Stroud District Local Plan Review (Local Plan Review), Emerging Strategy consultation. GVA is the appointed property advisor for the NDA and Magnox, and provides planning advice across the NDA's UK-wide estate.

This representation is made in respect of the 'Former Berkeley Power Station' (the Berkeley Site).

On the NDA's behalf, the power station part of the Berkeley Site is operated by Magnox Limited (the Site Licence Company) in order to carry out the decommissioning of the licensed site, including waste management and where appropriate land remediation.

The de-licensed part of the Berkeley Site is leased by NDA to South Gloucestershire and Stroud (SGS) College, who have developed a University Technical College (UTC) and GREEN skills Centre (Berkeley GREEN) at the site¹. Cavendish Nuclear also has offices on this non-power station part of the Berkeley Site.

Previous Representations

As you will be aware, GVA previously submitted representations on behalf of the NDA and Magnox to the Issues and Options stage consultation in December 2017.

In summary, the NDA and Magnox requested that the Berkeley Site should continue to be allocated within the *Local Plan Review* for B1-B8 employment uses and for employment related training and education within the de-licensed site; and for works and uses associated with nuclear decommissioning, waste management and land remediation in line with national decommissioning and waste management strategies and policies within the nuclear licensed site.

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

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Given the diverging nature of the de-licensed and licensed sites it was requested that the Council acknowledge this within the policy wording, or even splitting the allocation into two.

Comments

The Emerging Strategy consultation documents have been reviewed and we are of the view that they do not present any significant new additional issues of relevance to the NDA and Magnox Limited with limited references being made to the Berkeley site. Where reference is made to the Berkeley site we have responded to these below.

Local Plan Review Emerging Strategy Paper

The key issues within the Paper are considered to be as follows:

- The document includes a report back of the 5 key issues, challenges and concerns that were identified during the Issues and Options consultation in 2017. Of relevance to the Berkeley site is "Issue 3" - Maximising the potential of brownfield and underused sites.
- In terms of the "Economy and Jobs" theme, it is noted that the Council along with neighbouring Councils will undertake work next year to identify a future economic growth strategy for Gloucestershire and what this will mean in terms of employment policies and sites.
- The document sets out a Vision and Strategic Objectives which includes "Strategic Objective SO2" - Local economy and jobs, which will seek to provide for a strong, diverse, vibrant local economy that enables balanced economic growth, coupled with enhancing skills and job opportunities across the District.
- The Issues and Options document details four alternative patterns for future growth in the District. This includes Option 1 which would seek to continue to concentrate housing and employment development at a few large sites, located adjacent to the main towns in the District. The consultation showed that Option 1 was the most popular approach. A Sustainability Appraisal of the options concluded that Option 1 performs slightly better overall in terms of potential positive effects and slightly fewer negative effects.
- The document sets out an emerging growth strategy which will distribute at least 12,800 additional dwellings and sufficient new employment land to meet needs for the next 20 years. The strategy will concentrate housing growth at the main towns of Cam and Dursley, Stonehouse and Stroud, where there is best access to services, facilities, jobs and infrastructure.
- Preparation of the emerging growth strategy and a revised settlement hierarchy has involved studying the main towns and villages in the District, to identify their current roles and functions. The Berkeley site falls within the "Berkeley Cluster".
- Within the overview of the Berkeley Cluster reference is made to, "*The closure of Berkeley Nuclear Power Station had an impact on local employment opportunities, but the development of the Gloucestershire Science and Technology Park is providing new opportunities for growth.*"
- Reference is also made to site PS36 (South and east of Newtown and Sharpness) approximately 1km to the north east of the Berkeley site which is noted as having the potential for to 2,400 dwellings by 2040 in addition to 10 ha employment, retail, community uses and open space.
- The document notes that as the Council moves towards the preparation of a draft plan in 2019 and then on to submission in 2020, that they will work on a series of studies to update existing evidence. Of relevance to the Berkeley site is an "*Economic strategy and employment land review*".

In light of the above we can confirm that the key priority for the NDA and Magnox is securing a supportive policy context within the Local Plan Review to help support and facilitate the on-going decommissioning and, where appropriate, land remediation within

the licensed site. This includes the management of waste in line with national strategies and policies. The continuation of a supportive policy for decommissioning, waste management and site remediation on the licensed site is therefore required.

The NDA supports alternative development of the de-licensed site, currently led by SGS College at the UTC and GREEN Skills Centre, including B1-B8 employment uses and employment related training and education. Development of the de-licensed site for nuclear decommissioning or radioactive waste management purposes is unlikely to be appropriate since, with minor exceptions, there is a requirement for a Nuclear Site License for these activities.

In light of the above, the NDA and Magnox consider that the Local Plan Review would benefit from contextualising the on-going decommissioning process on the licensed site, as well as employment uses and employment related training and education uses within the de-licensed site. This will ensure that the Local Plan Review fully accounts for the current operational and future development at the whole Berkeley Site over the Plan period. A site-specific policy and allocation should be included, similar to that within the existing Local Plan relating to the Berkeley Site, to support:

- B1-B8 employment uses;
- Employment related training and education uses within the de-licensed site; and
- Works and uses associated with nuclear decommissioning, waste management and land remediation in line with national strategies, policies and regulatory requirements within the licensed site / power station site.

The approach suggested for the licensed site is consistent with development plans adopted elsewhere in the UK. The existing site boundary for the Berkeley Site (as per its allocation under Delivery Policy EI2a within the adopted Stroud District Local Plan) is considered appropriate for any allocation applied to the site within the Local Plan Review provided that the divergent nature of the de-licensed site and the licensed site / power station site is recognised.

In summary, The NDA supports the continued redevelopment of the de-licensed site for alternative uses, including employment related training and education. As such it is suggested that the Local Plan Review includes a policy which seeks to retain the site for B1-B8 employment uses and for employment related training and education within the de-licensed area; and for operations and uses associated with decommissioning, waste management and land remediation on the Nuclear Licensed Site in line with national strategies and policies and regulatory requirements.

Strategic Assessment of Land Availability 2017

The Berkeley site is listed in the report as site BER013 (Former Berkeley Power Station). The assessment concludes that the site is considered suitable for employment and employment training and education purposes and for decommissioning of the nuclear power station.

In line with our previous representations, the Berkeley site should be recognised as an existing employment area (as per its existing Stroud District Local Plan allocation). The site is clearly established within the existing Stroud District Local Plan as an existing employment site. The Council's assessment of the site, as contained within their response to the SALA – Call for Sites consultation, is positive and recognises the site as being within key employment land. The assessment also considers the site to be 'deliverable and developable' for the proposed uses at the site. Given this the site should be considered as an allocated potential employment site within the replacement Local Plan.

It is also important to note that, the Berkeley GREEN University Technical College (UTC) opened in 2017, and there is also some additional commercial floor space. Furthermore, the

Power Station site will continue to be a significant local employer until the site enters C&M. It is therefore important that the employment role of the site continues to be recognised through the Local Plan Review as the site will continue to retain a strategic employment function throughout and beyond the Plan period.

Sustainability Appraisal findings for the Stroud Local Plan Review site options

We would like to support the conclusions as set out in the paper which summarises the findings of the Sustainability Appraisal work that has been undertaken in relation to the site options being considered for allocation in the Replacement Local Plan. The findings described in the note are structured by the type of site uses being considered: residential, employment, mixed use, community/retail and open space.

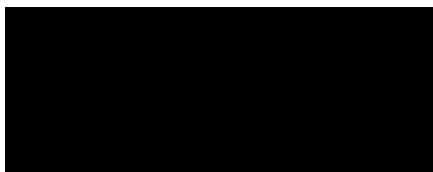
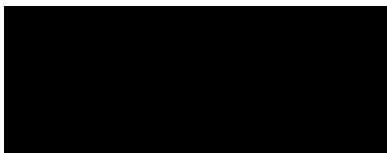
The Berkeley site is included within the appraisal as site BER013 which is one of 32 "reasonable alternative employment site options". The development of new employment areas within the District is generally likely to have positive effects on some of the social and economic objectives (vibrant communities, employment, economic growth). The Berkeley site is one of four of the 32 sites which would have significant positive effects as they are relatively large (i.e. they would provide more than 10ha of employment land). We would agree with this conclusion.

Sharpness Vision document

It is noted that the Sharpness Vision document has been prepared by the landowner and scheme promoter. The proposed new settlement has the potential to deliver up to 5,000 new homes, together with a comprehensive package of accompanying social and physical infrastructure. The site is within the "Berkeley Cluster" as described within the Emerging Strategy document. The document does not include any references to the Berkeley site or the NDA / Magnox – as a major employment site within the Berkeley Cluster we would expect that as consideration of the Sharpness proposal is progressed that due consideration and reference be made to the impact of the proposal on nearby major sites.

The NDA and Magnox would welcome the opportunity to work with Stroud District Council on the proposed policy wording for the Berkeley Site, and look forward to contributing to the *Local Plan Review* process. If you require any clarity in respect of this letter, then please contact us.

Yours faithfully



For and on behalf of GVA Grimley Limited

