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27th April 2017

Dear Ms Brett

Draft Cumbria Minerals and Waste Local Plan 2015-2030

Thank you for the opportunity to comment on the proposed modifications to the above plan and related sustainability appraisal. Given the pivotal role that Cumbria plays within the UK nuclear industry, the Cumbria Minerals and Waste Local Plan is of great interest to our members and we have commented on the various iterations of the Plan to date.

NuLeAF is the Local Government Association's (LGA) representative body on nuclear decommissioning and legacy radioactive wastes. Over 100 local authorities, including Cumbria County Council, are members; we also speak on these issues on behalf of the wider LGA. Our Radioactive Waste Planning Group (RWPG) meets regularly and acts as a forum for discussion of the important issues around radioactive waste management and to support the development of effective local plan policies.

We appreciate that comments at this stage are requested only on the proposed modifications and the updated sustainability appraisal. We are in general agreement with the proposed modifications, some of which respond to comments we have made on previous versions of the Plan. We do not therefore wish to propose any further alterations to the suggested text.

However, in terms of the figures used for expected arisings of radioactive waste (MM20) we note the publication on the 3rd April 2017 of the 2016 UK Radioactive Waste Inventory. The draft Plan refers to direct figures from Sellafield Ltd and LLWR

which would be expected to be accurate and up-to-date, but the 2016 Inventory may have led to some further revision of the anticipated timing of waste arisings.

MM21 refers to *'compliance with national strategies for... radioactive waste management, in the latter case including those produced by the Nuclear Decommissioning Authority.'* We agree with this text but, in terms of background context would note the current development by the NDA of a Radioactive Waste Strategy and ongoing UK Government (BEIS) work to review UK radioactive waste policy and infrastructure, which is considering all radioactive waste arisings in the UK, not just those from the NDA estate. This work may lead to changes which could affect the volumes of certain radioactive waste streams being assigned to different disposal or management routes.

I hope these comments are helpful. I am of course happy to provide further clarification if required.

Yours sincerely,

A solid black rectangular box used to redact the signature of Phil Matthews.

Phil Matthews
Executive Director