

Our Ref: [REDACTED]

12 June 2020

Planning Policy Team
Folkestone & Hythe District Council
Civic Centre
Castle Hill Avenue
Folkestone
Kent
CT20 2QY

[REDACTED]
avisonyoung.co.uk

Dear Sir / Madam,

**Folkestone & Hythe District Council
Core Strategy Review Submission Draft - Examination in Public**

We are writing to you on behalf of the Nuclear Decommissioning Authority (the NDA) and Magnox Limited (Magnox), in respect of the *Core Strategy Review Submission Draft – Examination in Public*.

Avison Young 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 Dungeness 'A' site, which is operated by Magnox Limited (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).

Previous Representations

As you will be aware, GVA (now Avison Young) have previously submitted representations on behalf of the NDA and Magnox to the *Core Strategy Draft Plan* consultation in March 2018, the subsequent *Core Strategy Review* in March 2019 and the *Core Strategy Review Submission Draft* consultation in January 2020. This current letter of representation should be read in association with all previously submitted representations, which you will find enclosed to this letter for reference.

The NDA and Magnox consider that the introduction of an appropriate site allocation and policy for the Dungeness 'A' site within the Council's planning policy framework will assist in achieving objectives for the Romney Marsh Area.

The NDA and Magnox highlighted that the Core Strategy should recognise and provide for the on-going decommissioning and remediation process, alongside future opportunities for development at Dungeness 'A'.

To summarise, the NDA and Magnox considered that the *Pre-Submission Draft Plan* was not positively prepared as required by Paragraph 81 of the NPPF which requires that policies positively and proactively encourage sustainable development.

Change(s) considered necessary to make the Local Plan legally compliant or sound

Overall, the NDA supports the Core Strategy's position on Dungeness 'A', including the acknowledgement that employment in the nuclear industry is declining and that alternative employment creation could be encouraged at Dungeness 'A'.

The NDA and Magnox suggest that a site specific policy and allocation should be included relating to Dungeness 'A' to support works and uses associated with nuclear decommissioning and remediation (in line with national waste strategies), together with other uses at the site within the employment (B1/ B2/ B8) and energy generation sectors. This would ensure that an appropriate land use planning context is provided within the Plan in relation to other uses on the site which lie outside the definition of waste development but which may be required as ancillary to decommissioning and remediation.

It should be noted that we accept that the detailed policy position for Dungeness 'A' is most appropriately addressed through the Places and Policies Local Plan.

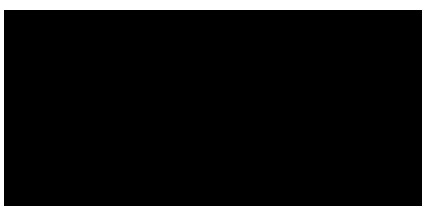
Details of Current Representation

It is noted that the forthcoming Examination in Public relates to the *Core Strategy Review* which considers revised housing figures and policies only; with none of the identified Matters, Issues or Questions likely to impact upon NDA and Magnox operations at the Dungeness 'A' site.

Whilst no additional comments are to be made at this stage in relation to the current *Core Strategy Review*, matters considered at the Examination in Public which may have an impact on the operations and objectives of the NDA and Magnox should refer back to previous representations submitted.

If you require any further information in respect of any of our previous representations, then please contact us using the information provided below. Whilst we do not intend to speak at the forthcoming Examination in Public, we would ask to be kept informed regarding future consultation opportunities in association with Dungeness 'A'.


Yours faithfully,




Senior Planner


For and on behalf of Avison Young

Enc.

Our Ref: 

8 March 2019

Planning Policy Team
Folkestone & Hythe District Council
Civic Centre
Castle Hill Avenue
Folkestone
Kent, CT20 2QY


avisonyoung.co.uk

By Email

Dear Sir / Madam,
Folkestone & Hythe District Council
Core Strategy Review 2019 Consultation

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 *Core Strategy Review 2019 Consultation*.

Avison Young 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 Dungeness Site, which is operated by Magnox Limited (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).

Outlined below are the points we wish to make in respect of Pre-Submission Draft. These are structured under the following headings:

- Previous Representations
- Context - Dungeness within the Draft Core Strategy
- Details of Representation (*as per the Representation Form*)
- Change(s) considered necessary to make the Core Strategy legally compliant or sound (*as per the Representation Form*)

As required a completed Representation Form has also been submitted.

Previous Representations

As you will be aware, GVA (now Avison Young) have previously submitted representations on behalf of the NDA and Magnox to the Core Strategy Draft Plan Consultation in March 2018.

Details of Representation

Dungeness 'A' generated electricity from 1966 to 2006 when it was shut down. The site is currently being decommissioned, with the first phase - defuelling - being completed in 2012. Decommissioning involves the systematic removal and management of plant, buildings and waste previously associated with electricity generation; it is a long process expected to occur throughout and beyond the plan period. The site is

currently in the Care & Maintenance (C&M) Preparation phase, following which it will move into C&M, during which time the site, and any remaining structures, will be kept in a passively safe and secure state for a great number of years until final site clearance is undertaken.

Magnox is a significant local employer and employs a significant number of staff at Dungeness 'A', which includes various office based staff as well as 'site based' engineers and employees. Magnox and the NDA are engaged with the District Council and County Council to ensure the socio-economic benefits of decommissioning for both the local community and wider region are maximised. A key priority for the Romney Marsh Socio-Economic Plan is to continue to support the on-going employment provision throughout the decommissioning process, together with future opportunities for employment in current and future growth sectors. Accordingly, proposals which facilitate the diversification of the local economy as the power station is decommissioned will be supported. It is considered that the introduction of an appropriate site allocation and policy for the Dungeness 'A' site within the Council's planning policy framework can help achieve the objectives for the Romney Marsh Area.

In light of this, the NDA and Magnox consider that the Core Strategy should recognise and provide for the on-going decommissioning and remediation process, alongside future opportunities for development at Dungeness 'A'. Potential development opportunities may include areas within the NLS, which could become available for development of new uses as decommissioning is progressed, along with ancillary uses associated with the decommissioning and remediation.

The NDA supports the Core Strategy's position on Dungeness 'A', including the acknowledgement that employment in the nuclear industry is declining and that alternative employment creation could be encouraged at Dungeness. However, it is suggested that reference should also be made to the support to development proposals and uses associated with the decommissioning of Dungeness 'A'. It is therefore requested that a clearer reference is made to support both the decommissioning and remediation of the Dungeness 'A' site, together with employment (B1/ B2/ B8) uses and development associated with energy generation.

In conclusion, it is considered that the Pre-Submission Draft Plan has not been positively prepared as required by paragraph 81 of the NPPF which requires that Policies positively and proactively encourages sustainable development.

Change(s) considered necessary to make the Local Plan legally compliant or sound

Overall, the NDA supports the Core Strategy's position on Dungeness 'A', including the acknowledgement that employment in the nuclear industry is declining and that alternative employment creation could be encouraged at Dungeness.

The NDA and Magnox suggest that a site specific policy and allocation should be included relating to Dungeness 'A' to support works and uses associated with nuclear decommissioning and remediation (in line with national waste strategies), together with other uses at the site within the employment (B1/ B2/ B8) and energy generation sectors. This would ensure that an appropriate land use planning context is provided within the Plan in relation to other uses on the site which lie outside the definition of waste development and may be required as ancillary to decommissioning and remediation.

- Paragraph 5.117 – the importance of the nuclear industry at Dungeness to the Marsh's economy, and the possibility of future employment and alternative energy generation at Dungeness is acknowledged. In our view, this supports the allocation of the Dungeness 'A' site in line with our previous representations submitted.
- Paragraph 5.117 should also state that the Council will support development proposals and uses associated with the decommissioning of Dungeness 'A'.

It should be noted that we accept that the detailed policy position for Dungeness 'A' is most appropriately addressed through the Places and Policies Local Plan.

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

Yours faithfully

[Redacted signature]

[Redacted name]

Director

[Redacted contact information]

For and on behalf of Avison Young

cc.

[Redacted distribution list]

Our Ref: [REDACTED]

20 January 2020

Planning Policy Team
Folkestone & Hythe District Council
Civic Centre
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Folkestone
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The NDA supported the Core Strategy's position on Dungeness 'A', including the acknowledgement that employment in the nuclear industry is declining and that alternative employment creation could be

encouraged at Dungeness. However, it is suggested that reference should also be made to the support to development proposals and uses associated with the decommissioning of Dungeness 'A'. It is therefore requested that a clearer reference is made to support both the decommissioning and remediation of the Dungeness 'A' site, together with employment (B1/ B2/ B8) uses and development associated with energy generation.

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Change(s) considered necessary to make the Local Plan legally compliant or sound

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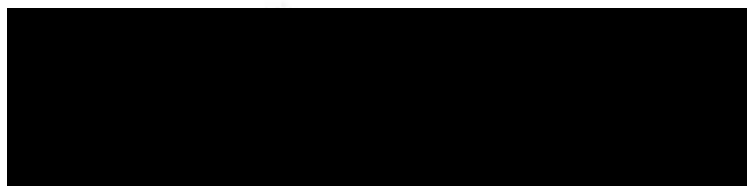
It should be noted that we accept that the detailed policy position for Dungeness 'A' is most appropriately addressed through the Places and Policies Local Plan.

Details of Current Representation

As the current consultation relates to revised housing figures only, we do not have anything further to add to our previous representations at this stage.

If you require any further information in respect of any of our previous representations, then please contact us using the information provided below. We also wish to be involved with any future opportunities for consultation in association with the Dungeness site.

Yours faithfully,



Director



For and on behalf of Avison Young