

Part 1 – Respondent Details

1(a) Personal details									
Title									
First Name									
Last Name									
Job Title (where relevant)									
Organisation (where relevant)	United Kingdom Atomic Energy Authority								
1(b) Agent details <i>Only complete if an agent has been appointed</i>									
Title	Mr								
First Name	Steven								
Last Name	Sensecall								
Job Title (where relevant)	Partner								
Organisation (where relevant)	Kemp & Kemp LLP								
1(c) Contact address details <i>If an agent has been appointed please give their contact details</i>									
Address Line 1	1 – 3 Ock Street								
Line 2	Abingdon on Thames								
Line 3	Oxfordshire								
Line 4									
Postcode	OX14 5AL								
Telephone No.	01865 297705								
Email address	SSensecall@kempandkemp.co.uk								
Are you writing as	<table border="0"> <tr> <td><input type="checkbox"/> A resident</td> <td><input type="checkbox"/> A parish council</td> </tr> <tr> <td><input checked="" type="checkbox"/> A local business</td> <td><input type="checkbox"/> A district council</td> </tr> <tr> <td><input type="checkbox"/> Minerals industry</td> <td><input type="checkbox"/> A county council</td> </tr> <tr> <td><input type="checkbox"/> Waste industry</td> <td><input type="checkbox"/> Other (please specify)</td> </tr> </table>	<input type="checkbox"/> A resident	<input type="checkbox"/> A parish council	<input checked="" type="checkbox"/> A local business	<input type="checkbox"/> A district council	<input type="checkbox"/> Minerals industry	<input type="checkbox"/> A county council	<input type="checkbox"/> Waste industry	<input type="checkbox"/> Other (please specify)
<input type="checkbox"/> A resident	<input type="checkbox"/> A parish council								
<input checked="" type="checkbox"/> A local business	<input type="checkbox"/> A district council								
<input type="checkbox"/> Minerals industry	<input type="checkbox"/> A county council								
<input type="checkbox"/> Waste industry	<input type="checkbox"/> Other (please specify)								

Please tick the appropriate boxes if you wish to be notified of any of the following:	
That the Oxfordshire Minerals & Waste Core Strategy has been submitted for independent examination	√
Publication of the Inspector's report and recommendations	√
Adoption of the Oxfordshire Minerals and Waste Core Strategy	√

Please sign and date the form:			
Signature:	Steven Sensecall	Date:	28/09/2015

Part 2 – Representation

Please complete this part (Part 2) of the form separately for each separate representation you wish to make.

You can find an explanation of the terms used below in the accompanying guidance on making representations.

2(a) State which part of the Oxfordshire Minerals and Waste Local Plan Core Strategy you are making a representation about

Part or policy no. or paragraph

Policy M3: Principal locations for working aggregate minerals and Radioactive Waste Section.
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2(b) Do you consider the Oxfordshire Minerals and Waste Local Plan Core Strategy is: (tick as appropriate)

- (i) Legally compliant? Yes No
- (ii) Sound? Yes No

If you have answered **No** to question 2(b)(ii), please continue to question 2(c). In all other cases, please go to question 2(d).

2(c) Do you consider the Oxfordshire Minerals and Waste Core Strategy is unsound because it is not: (tick as appropriate)

- (i) Positively prepared
- (ii) Justified
- (iii) Effective
- (iv) Consistent with national policy

On the following pages, please set out why you think the Minerals and Waste Local Plan Core Strategy is legally non-compliant and/or unsound and any changes you are suggesting should be made to it that would make it legally compliant or sound.

Please note your representation should include as succinctly as possible all the information and evidence necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on your representation at this stage. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

2(d) Please give details of why you consider the Oxfordshire Minerals and Waste Local Plan Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

If you agree that the Oxfordshire Minerals and Waste Local Plan Core Strategy is legally compliant and/or sound and wish to support this, please also use this box to set out your comments.

Please see attached document.

Continue on a separate sheet or expand the box if necessary

2(e) Please set out the changes(s) you consider necessary to make the Oxfordshire Minerals and Waste Local Plan Core Strategy legally compliant or sound, having regard to the reason you have identified at 2(c) above where this relates to soundness. You should say why this change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see attached document.

Continue on a separate sheet or expand the box if necessary.

2(f) Written representations or oral hearing

If your representation is seeking a change to the Oxfordshire Minerals and Waste Local Plan Core Strategy, do you consider it necessary to participate at the oral hearing part of the examination? *(tick box below as appropriate)*

No, I wish to communicate through written representations	√
Yes, I wish to participate at the oral hearing part of the examination (go to 2(g))	

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated they wish to participate at the hearing part of the examination.

<p>2(g) If you wish to participate at the hearing part of the examination, please outline why you consider this to be necessary.</p>
Empty space for user input
<p>Continue on a separate sheet or expand the box if necessary</p>

Please complete Part 2 of the form separately for each separate representation you wish to make, and submit all the Parts 2s with one copy of Part 1 and Part 3.

**OXFORDSHIRE MINERALS AND WASTE LOCAL PLAN
CORE STRATEGY**

**PART 1 – CORE STRATEGY
PROPOSED SUBMISSION DOCUMENT**

**SUBMISSIONS ON BEHALF
OF
UK ATOMIC ENERGY AUTHORITY**

CULHAM SCIENCE CENTRE

SEPTEMBER 2015



INTRODUCTION

1. This consultation response is made on behalf of the UK Atomic Energy Authority (“UKAEA”) and sets out its comments on the Oxfordshire Minerals and Waste Local Plan, Part 1 – Core Strategy, Proposed Submission Document (August 2015) as it affects the Culham Science Centre (CSC).
2. CSC is an established part of the southern Oxfordshire cluster of education, science and technology, now known as Science Vale, and has established a broad high technology business base. It is also host to the Joint European Torus (JET) Project. The UKAEA is a partner in Science Vale and as such is committed to working together with the other partners, including South Oxfordshire District Council (SODC) and Oxfordshire County Council (OCC), to help to promote and develop the Science Vale area as an internationally recognised location for enterprise and innovation in science and technology.
3. South Oxfordshire Core Strategy Policy CSEM3 confirms the Council’s support for the redevelopment and intensification of the CSC and the creation of about 1,000 new jobs on the site. Pursuant to that allocation, the UKAEA and SODC in consultation with OCC (in its role as Highway Authority) have prepared a draft master plan framework for CSC, which has been the subject of public consultation. The purpose of the master plan framework is to guide the future development/redevelopment of the site.
4. The UKAEA wishes to put on record its concerns about the possibility of land south of the site, which is in the Thames & Lower Thame Valleys – Oxford to Cholsey Minerals “Area of Search”, becoming a major site for the extraction of sand and gravel. These concerns are explained below.
5. The UKAEA supports the Plan’s approach to radioactive waste as set out on pages 88 – 92, paragraphs 5.79 – 5.91 and PW9: Management and disposal of radioactive waste. There are however a limited number of matters arising from the text that require amendment. These are detailed below.

MINERALS AND WASTE PLANNING STRATEGY

Minerals Policy

6. The UKAEA notes from the Oxfordshire Minerals and Waste Development Scheme (Sixth Revision) December 2014 that the Minerals and Waste Local Plan will comprise two main parts:
 - Part 1 – Core Strategy; and
 - Part 2 – Minerals and Waste Allocations
7. This is an improvement on the fifth revision to the Scheme, which envisaged a single document; and which did not think it would be necessary to produce a separate minerals and/or waste site allocations document. We welcome this revised approach.
8. The UKAEA notes that a Proposals Map will be prepared to show any proposals that are “geographically defined, including specific minerals and waste site allocations...” The Scheme is not explicit but our assumption is that the Proposals Map will accompany Part 2, the Minerals and Waste Allocations.
9. Against this background, we note that Policy M3 identifies the principal locations for aggregate minerals extraction and confirms that “specific sites for working aggregate minerals” will be identified within the strategic resource areas in the Minerals & Waste Local Plan: Part 2 – Site Allocations Document. However, it is a matter of public record that notwithstanding the proposal for a two-part Plan, the Council has trailed extensively where sand and gravel extraction might be located by inviting landowners and operators to ‘nominate’ potential sites and by then publishing lists and plans of those sites. One such site is ‘Land at Culham (SG-17)’. This site is located due south of CSC.
10. CSC includes a number of science and technology facilities that require ‘clean’ air and that could be sensitive to dust and other air-borne debris arising from any sand and gravel workings that might be established down-wind of CSC on nomination site SG-17. There could also be traffic generation issues arising from such a use that might affect adversely operations at CSC.

11. UKAEA will continue to monitor the situation on nomination site SG-17 and would keen to engage in further, more detailed discussions with the County Council about the site and its future use.

Radioactive Waste

12. There are and will continue to be waste arisings from the activities at CSC. However, as a matter of policy the UKAEA is committed wherever possible to reducing the level of activity in waste prior to its disposal. This achieved by treating waste arisings prior to their disposal off site.
13. There are two references to the 'Joint European Taurus' (JET) at paragraphs 5.80 and 5.89. In both cases change 'Taurus' for *Torus*.
14. In the interests of accuracy, the UKAEA would ask that paragraph 5.89 is amended as follows:

“5.89 The ~~Culham Science Centre~~ UKAEA hosts and operates the Joint European ~~Taurus~~ *Torus* (JET) project at *Culham Science Centre* in ~~building J1~~. Support buildings include a small facility for the treatment and storage of radioactive waste; ‘*Best Available Techniques*’ assessments are used to identify the most suitable treatment and disposal routes for UKAEA wastes. Some buildings associated with JET will be retained when the project ceases, but others are subject to temporary permission and some radioactive waste will result when decommissioning takes place. The United Kingdom Atomic Energy Authority’s view is that, consistent with policies in the adopted South Oxfordshire Core Strategy, the JET site could continue to host further activity. This is not yet confirmed and so the possible need to manage radioactive wastes from decommissioning must be anticipated.”

15. As indicated above, the UKAEA will wherever possible look to reduce the level of radioactivity in waste arisings prior to disposal off-site. Consistent with that objective, the UKAEA would ask that the word ‘*treatment*’ is deleted from fifth line of paragraph 5.90.