



ENGLISH HERITAGE

LLW Strategy Consultation
Nuclear Decommissioning Authority
Herdus House
Westlakes Science and Technology Park
Moor Row
CA24 3HU

29 November 2009

Dear Sir / Madam

Response to the Nuclear Decommissioning Authority on a *UK Strategy for the Management of Solid Low Level Radioactive Waste from the Nuclear Industry: UK Nuclear Industry LLW Strategy*,

Consultation Document, June 2009

Thank you for the invitation to comment on this strategy document.

English Heritage is the UK Government's statutory adviser on all aspects of the cultural heritage with responsibilities that include: archaeology on land and under water; historic buildings, sites and areas; designed landscapes and the historic aspects of the wider landscape (within England). We also manage an estate of more than 400 historic properties open to visitors. English Heritage is an Executive Non-Departmental Public Body sponsored by the Department for Culture, Media and Sport and we report to Parliament through the Secretary of State for Culture, Media and Sport. Funding to us is provided in part by the Government, and in part from revenue earned from our historic properties and other services. In the delivery of our duties we work in partnership with central government departments, local authorities, voluntary bodies and the private sector to conserve and enhance the historic environment; broaden public access to the heritage, and to increase people's understanding and appreciation of the past.

General Comments

English Heritage does not have specific published guidance on the management and disposal of waste materials, and therefore our response is formulated with regard to the general desirability of policy and strategy frameworks which align with the broad principles of

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good conservation management practice for the historic environment. We do, however, have a published policy position statement on *Mineral Extraction and the Historic Environment* (copies may be downloaded at www.helm.org.uk), and, with regard to the historic environment, the same general principles tend to apply to both minerals and waste on the use of resources, recycling, transport, impact assessment and mitigation. As the disposal of waste may require mineral resources (e.g. for encasement), and as former mineral extraction sites may be used for waste (e.g. landfill), the relationship between minerals and waste operations is well-established, particularly within the context of strategic planning.

We are a statutory consultee to Local Planning Authorities on Minerals and Waste Local Development Frameworks, and on planning proposals for development that may affect certain types of historic assets and their settings.

Response to Consultation Questions

Question 1 – Do you agree with the proposed approach to avoidance and characterisation of waste? What are the most important areas for work and are there other actions that could be undertaken?

Q1 The management and disposal of waste can have adverse effects on the historic landscape and on historic assets situated on land and at sea. English Heritage therefore supports the government's broad aims of developing more sustainable approaches. These can be achieved by greater efficiency with waste management and, where appropriate, the increased re-use and recycling of waste materials. It also supports government policy to minimise and mitigate the impacts of waste disposal on the environment through fiscal measures such as the Landfill Tax.

Question 2 – Re-use and recycling of waste from the nuclear industry could yield significant benefits – do you agree with this approach and where do you see the significant opportunities for implementing the option?

Q2 English Heritage agrees, particularly in circumstances where these approaches will lead to reductions in the demand for encasement materials and land take for waste disposal, and therefore reductions in the potential impacts on the historic environment.

Question 3 – To what extent do you believe that compaction still has a key role to play in the optimisation of LLW management? What are the opportunities for improving the use of compaction?

Q3 We believe it has a role where it will lead to reductions in the demand for encasement materials and land take for waste disposal, and therefore the potential impacts on the historic environment.

Question 4 – Do you agree that the benefits of metal treatment outweigh the detriments? If not, why not? If metal treatment costs more than disposal to implement, is this acceptable?

Q4 No comment.

Question 5 – Do you agree with the proposals set out for thermal treatment? If not, why not? As incineration is often a controversial approach, what should be the key message if the LLW strategy were to actively promote the use of this technology?

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Q5 No comment.

Question 6 – We believe that the majority of waste management solutions that are required to implement this strategy are or will be available, either in the nuclear estate or through the supply chain and therefore should be used in preference to centralised investment in new infrastructure. To what extent do you agree with this statement?

Q6 No comment.

Question 7 – Do you agree with the approaches set out above for the development of an optimised approach to management of LLWR?

Q7 No comment.

Question 8 – What are the key considerations that should influence the development of new packaging solutions for LLW management?

Q8 No comment.

Question 9 – The impacts of the transport of LLW are limited when compared to transport of other materials, when considered at a national level. However, it is a very significant issue for local communities where the transport is taking place. How do you think this should be factored in to national strategy?

Q9 No comment.

Question 10 – To what extent does a movement of waste from road to rail for transport represent a significant improvement? Do you see any disadvantages to this approach?

Q10 Wherever possible, the transport of waste should be managed to minimise the impact of vehicle movements upon the historic environment. In some circumstances, transport by rail and water may have a lower environmental impact than transport by road. *Transport and the Historic Environment* (English Heritage 2004, copy at www.helm.org.uk) sets out the broad principles of English Heritage's vision for a long-term national transport policy.

Question 11 – Government's policy for the management of LLW indicates that landfill disposal of LLW and VLLW should be considered when determining end points for these wastes. What do you think should be the key considerations when comparing landfill disposal with other options such as LLWR, new vaulted disposal routes, etc?

Q11 English Heritage believes that environmental impact assessment over an appropriate, forward-looking timescale should be a key consideration.

Question 12 – To what extent do you agree with the key considerations set out above for on-site disposal proposals?

Q12 We support an approach based on Strategic Environmental Assessment and which takes into account the net overall environmental impacts - of the building materials, together with the impacts of construction and operation. The 'key considerations' as presented do not appear to take account of the significant impacts incurred by the extraction and processing of construction materials.

Question 13 – Do you agree with the approaches set out for encouraging the right behaviour? To what extent do you think that waste recycling targets could have benefit to the national strategy? What potential benefits and difficulties would you envisage from implementing such approaches?

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Q13 The approaches appear to be broadly in keeping with Government's over-arching policies on sustainable development - although sustainable development is not explicitly mentioned as an objective. Targets require incentives to encourage good performance. Mechanisms would need to be established for monitoring and measuring performance against targets. Lessons could be learnt from the minerals and construction industries where measuring the quantities of alternative and recycled materials has been undertaken for some years.

Question 14 – To what extent do you agree with the risks and mitigation set out here?

Q14 No comment.

Other Comments

We note that the consultation document is focused on matters related to waste management and disposal within terrestrial contexts. No mention is made of the marine environment. Disposal of waste in marine contexts, of course, may have significant adverse impacts on important archaeological remains which need to be taken fully and properly into account - as they are on land.

We hope you find these comments helpful.

Yours sincerely



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