

THE HIGHLAND COUNCIL

CAITHNESS AND SUTHERLAND AREA COMMITTEE

11 February 2014

DOUNREAY PLANNING FRAMEWORK

Report by Director of Planning and Development

Agenda Item	6.
Report No	CS/4/14

Summary

This report presents the results of public consultation on the Draft Dounreay Planning Framework 2 (DPF2). The Highland Council approved the existing Dounreay Planning Framework in January 2006, as a land use development brief against which to regulate and control future decommissioning and restoration works proposed at the former nuclear power research site at Dounreay. The Highland Council, in collaboration with Dounreay Site Restoration Limited (DSRL), has reviewed the existing framework, prepared DPF2 as a draft to replace the existing framework and invited comments on it from 15 November 2013 to 16 January 2014. The new draft framework presents an up-to-date overview of the policy context, regulatory regimes, site restoration programme and decommissioning works, providing explanation of the wider context for the component developments that are anticipated to be required. The intention is that DPF2 will be statutorily adopted as Supplementary Guidance to the Highland-wide Local Development Plan.

1. Background

- 1.1 The Highland Council approved the existing Dounreay Planning Framework in January 2006, as a land use development brief against which to regulate and control future decommissioning and restoration works proposed at the former nuclear power research site at Dounreay.
- 1.2 The Council, in collaboration with Dounreay Site Restoration Limited (DSRL), reviewed the existing framework and prepared Dounreay Planning Framework 2 (DPF2) as a draft to replace the existing framework. The new draft framework presents an up-to-date overview of the policy context, regulatory regimes, site restoration programme and decommissioning works, providing explanation of the wider context for the component developments that are anticipated to be required. The intention is that DPF2 will be statutorily adopted as Supplementary Guidance to the Highland-wide Local Development Plan.
- 1.3 The Draft DPF2 was considered by the Planning, Environment and Development Committee (PEDC) on 19 September 2012. PEDC agreed the content of the draft DPF2, noted that it would be considered by the Caithness

and Sutherland Area Committee (CSAC) following the consultation period, and brought to PEDC thereafter with the CSAC's recommendations prior to finalisation of the Framework. PEDC approved it for public consultation, subject to confirmation of Strategic Environmental Assessment (SEA) requirements and the meeting dates of the Dounreay Stakeholders' Group.

- 1.4 Subsequent to consideration by PEDC on 19 September 2012, Habitats Regulations Appraisal of DPF2 was undertaken and additional wording included in the document as a consequence. This resulted in DPF2 being 'screened out' for SEA purposes. A presentation was made to the Dounreay Stakeholder Group in December 2012 about the emerging DPF2 as a precursor to public consultation. There was subsequent delay in getting Draft DPF2 fully ready for consultation but the opportunity was taken by Council officers, working in collaboration with DSRL, to not only add materials to the document (e.g. illustrations) and make corrections but also to make some further updates to provide clarity and reflect latest information on intentions for the site.
- 1.5 The draft DPF2 was published for consultation on 15 November 2013 and the deadline for comments was on 16 January 2014. A copy of Consultation Draft DPF2 is in **Appendix 1**. The consultation was publicised in a public notice published in both the John O' Groats Journal and the Northern Times on 15 November 2013, via press releases, on the Council's website, via social media and through attendance of a Council officer at the December 2013 meeting of the Dounreay Stakeholder Group. Draft DPF2 was made available for people to view in public libraries and Council service points in the area, at the dounreay.com office in Thurso and on the Council's website. The Council informed the Dounreay Stakeholder Group and a wide range of other interest groups, organisations and individuals about the consultation, and paper copies were sent to Caithness West Community Council and the Buldoo Residents Group. We provided a response form on our website to facilitate submission of comments. DSRL helped to further publicise the consultation: via their website, their newspaper and site notices.

2. Response to Consultation and Officers' Recommended Council Response

- 2.1 Comments on DPF2 were received from:
 - Dounreay Stakeholder Group;
 - Scottish Environment Protection Agency (SEPA);
 - Scottish Natural Heritage (SNH);
 - Historic Scotland;
 - Caithness Renewables;
 - Mr J Webster, resident of Buldoo;
 - Councillor J McGillivray (Ward 5).

Additionally, a number of comments were submitted via DSRL's Planning Applications Manager.

2.2 We also received comments from SNH on the Habitats Regulations Appraisal (HRA) of DPF2. The comments do not effect DPF2 itself; they only concern the HRA record and officers will address the comments in finalising the record. Officers, in consultation in particular with SNH, will also need to revisit the HRA in the light of any revisions to Draft DPF2 which are agreed by PEDC; the content of the finalised DPF2 for statutory adoption will therefore be subject to the finalised HRA. This is reflected in the recommendations to CSAC and PEDC. However, officers currently do not anticipate any further changes to DPF2 being required as a consequence of HRA.

2.3 The comments on Draft DPF2 are presented in **Appendix 2**, arranged under the five consultation questions within the document. The comments of respondents who did not respond specifically to the set questions are to be found under Question 5 (any other observations). Appendix 2 also sets out how officers recommend the Council should respond on the issues raised including any revisions that we recommend be made to DPF2 before it is adopted. **It may be noted that officers will be discussing certain matters with DSRL and any update available at the time of the Committee meeting will be given by officers in presentation.** The following is a summary of the key issues raised and our recommended response to them.

2.4 Site Restoration Programme and Council's expectation with respect to Interim End State:

- Comments that DPF2 could be clearer by acknowledging and indicating the location of the off-site developments, indicating which Phase 2 developments already have planning permission and where Phase 3 developments are located.

Response: Revisions to text and mapping are recommended which will provide greater clarity, although additional detail for Phase 3 may not be available yet.

- Comments that the Council's expectation with respect to Interim End State may require more than the current contract for site decommissioning is set to deliver, and that clarity on timescales relating to our expectation would help.

Response: We do not have a firm timescale in mind for the release of land for re-use and we appreciate that there is a current contract being worked to. The key point is that there are decisions being made and works planned to be undertaken in delivering the interim end state, and that we feel these should be informed by the recommendations for the longer term site end state. This includes the Dounreay Stakeholder Group's stated preference for a restored site with early release of land and which was conditional, in essence, upon exploring and maintaining opportunities for re-use of the site and its infrastructure, including consideration of re-use as part of any regional development and regeneration initiatives. Our expectation is that, as stated in Draft DPF2, the interim end state delivered will make it possible to identify, and optimise the amount of, land suitable and available for reuse as an industrial/business site.

2.5 Environmental Protection:

- Comment that Draft DPF2 needs updating to reflect the most recent environmental regulations as applying to the Dounreay Site.

Response: Updates are recommended, whilst noting that it is not the role of DPF2 to detail all the regulatory regimes applying to the site.

- Comment that any future changes of land use need to be compatible with any ongoing regulatory requirements until the relevant permits are revoked.

Response: Inclusion of a statement to this effect is recommended, whilst clearly stating that development may not be precluded and that the extent of regulated area may reduce through revocation if the requirements for revocation can be met.

- Comment that the DPF2 needs to be strong in dealing with contamination and appropriate remediation through the planning process, particularly in order to meet the standards necessary to be suitable for future use of the site.

Response: Recommendations are made for strengthening of DPF2 in this regard, including inclusion of references to PAN33 Development of Contaminated Land and to engagement with SEPA.

2.6 Community Benefit

- Comment that with respect to community benefit there is a need to ‘think out the box more’ in terms of supporting growth sectors, and comment that community benefit should be spread more widely to reflect the wide impacts of Dounreay.

Response: DPF2, whilst referencing some of the wider work being done to address socio-economic benefits of decommissioning (section 8), is primarily concerned with planning for development on the site itself. It is not the role of DPF2 to set community benefit policy.

2.7 Developer Requirements:

- Comments that DPF2 could be clearer or stronger on: flood risk assessment requirements; protection of the water environment; contaminated land consideration; Natura sites consideration.

Response: Recommendations are made to clarify or strengthen the respective requirements in DPF2.

2.8 End Uses:

- Variety of comments: that there should be more information on potential end uses for the site in DPF2; that DPF2 should be flexible with respect to end uses; that DPF2 should be realistic about end uses; that certain uses for growth industries will be better located elsewhere in Caithness.

Response: DPF2 does go some way to recognising potential uses, and the Council is seeking to promote an approach which maintains options to respond to opportunities. The Dounreay Site could be suited to specific activities that are less suited to established harbours and business/industrial parks. Other ongoing workstreams with partners may inform us further with regard to potential future uses in due course.

3. Next Steps

- 3.1 DPF2 does not carry full weight as part of the development plan in decision-making on planning applications until it has been adopted in accordance with the legal requirements for Supplementary Guidance. Under the Council's Scheme of Delegation, statutory adoption of Supplementary Guidance is a matter for the PEDC.
- 3.2 CSAC is therefore being asked to recommend to PEDC a revised version of DPF2 for adoption. The intention is that CSAC's views, including any recommendations, will be reported by officers in presentation to PEDC at its meeting on 12 February 2014 (the day after the CSAC meeting).
- 3.3 For Members' information, PEDC will be asked, subject to their consideration of any views and recommendations of CSAC, to:
- consider the consultation responses;
 - agree the Council's response including any revisions to DPF2;
 - agree to the document, incorporating such agreed revisions, being submitted to the statutory process which will lead to it being adopted and issued by the Council as Supplementary Guidance (subject to there being no directions from Ministers indicating otherwise); and
 - agree that it be a material consideration for development management purposes with immediate effect.
- 3.4 The Development Plans Team monitor the outcomes and effectiveness of our Development Plan, including associated Supplementary Guidance. This monitoring provides the baseline for any future review as part of the cycle of plan preparation.

4. Fit with the Programme for the Highland Council 2012 – 2017

- 4.1 The revised Dounreay Planning Framework supports the Council Programme commitment for the economy and specifically recognises the world-class skills of the workforce of Dounreay. The Council will work with the Nuclear Decommissioning Authority, the Dounreay Babcock Partnership (now Cavendish Dounreay Partnership), the Scottish and UK Governments and Highlands and Islands Enterprise to ensure Caithness and North Sutherland reap maximum social and community benefits from the decommissioning process.

5. Resource implications

- 5.1 There is resource provision for publication and issuing of the adopted DPF2 as Supplementary Guidance.

6. Equality implications

6.1 The Council has screened DPF2 for equalities issues.

7. Climate Change and Carbon Clever implications

7.1 The Council is complying with SEA and HRA requirements in preparing DPF2 and no strategic effects have been identified with regard to climate change.

8. Legal and Risk implications

8.1 There are no legal implications arising from this paper other than the statutory duties placed on the Council as Planning Authority. There are no risks associated with this paper.

9. Gaelic Language

9.1 Headings and sub-headings in the version of DPF2 for adoption will be translated into Gaelic prior to publication.

10. Conclusions

10.1 Through preparation of the DPF2, the substantial progress with decommissioning of Dounreay has been recognised together with the greater clarity that now exists about the requirements for the remaining phases. Consultation has raised a number of issues; in response to some, revisions to DPF2 are now recommended to be made before it is finalised. With respect to future use of the site, whilst potential is uncertain it is important that opportunities are considered and a range of options maintained. CSAC's views are sought on the contents of this report and in particular the appendices, before PEDC makes decisions on DPF2. Once the finalised DPF2 has been statutorily adopted, it will be part of the Development Plan for the purposes of decision-making on planning applications.

11. Recommendation

11.1 Members are asked to:

- consider the Draft DPF2, the issues raised in consultation responses and the draft Council response recommended by officers including revisions to DPF2; and
- recommend the draft Council response and revised version of DPF2, which is subject to finalisation of the Habitats Regulations Appraisal by officers, to the Planning, Environment and Development Committee for adoption.

Designation: Director of Planning & Development
Date: 29 January 2014
Author: David Cowie, Principal Planner (01463 702827)

Background Papers:

DPF2 – Consultation Draft – November 2013 – (see Appendix 1)

Draft DPF2 – Consultation Responses – (see Appendix 2)

DPF2 – Consultation Draft, associated SEA Screening and Determination, associated HRA Draft Record and the existing Dounreay Planning Framework are all accessible on the Council's website at:

<http://www.highland.gov.uk/yourenvironment/planning/developmentplans/developmentbriefsandframeworkplans/dounreay-planning-framework.htm>

Dounreay Planning Framework 2: Supplementary Guidance

Frèama Dealbhaidh Dhùnraath 2: Stiùireadh Leasachail

PLANNING and DEVELOPMENT SERVICE



Consultation Draft - November 2013
Dreachd Cho-chomhairleachaidh – An Samhain 2013

1. ABOUT THIS VERSION OF THE GUIDANCE

The Dounreay Planning Framework is primarily for use by those preparing planning proposals for Dounreay and by the Council to assist in making decisions on the planning applications. This version, a draft Dounreay Planning Framework 2 (DPF2) is for public consultation. (Note: it includes some further updates, additions and corrections, made since a draft version was considered by Committee in September 2012.) It presents an up-to-date overview of the policy context, regulatory regimes, site restoration programme and decommissioning works, providing explanation of the wider context for the component developments that are anticipated to be required. Key aspects of the draft DPF2 that the Council is particularly seeking comment on are highlighted by consultation questions within the document, although you are welcome to submit observations on any part of it.



Draft DPF2 may be viewed free of charge during normal opening hours at: the Public Libraries in Thurso, Bettyhill, Wick and Helmsdale; on the Far North and Brora Mobile Libraries; in Highland Council Service Points in Thurso, Bettyhill, Durness, Wick, Helmsdale and Brora; at dounreay.com (7 Orlig Street, Thurso); at Council HQ (Planning Reception) in Inverness or may be viewed via 'Planning Consultations' at www.highland.gov.uk/developmentplans

If you wish to submit comments on Draft DPF2, please use our response form which includes the consultation questions set out in the document. The form is available on our website or by contacting us using the details below. Details of how to submit the form to us are given in the form. The deadline for comments to arrive with the Council is **5pm on Thursday 16 January 2014**.

All comments received by the deadline will be considered by the Council before DPF2, with any amendments, is finalised and adopted as Supplementary Guidance to Policy 24 of the Highland-wide Local Development Plan.

If you have a question, please look at the information on our website or otherwise contact The Highland Council Development Plans Team on (01349) 886608 or by e-mail to: devplans@highland.gov.uk

2. SCOPE OF THIS GUIDANCE

This consultation draft DPF2 has been prepared by the Council in partnership with Dounreay Site Restoration Limited (DSRL). Once DPF2 is finalised, it will be adopted as Supplementary Guidance to the Highland-wide Local Development Plan (2012) (HwLDP), giving it "development plan" status. It will be used by the Council to assist in making decisions on future planning applications. Policy 24 of the HwLDP states that the Council will support proposals which meet the requirements of the updated Dounreay Planning Framework. DPF2 covers the area shown in Figure 1 which includes the established Dounreay site and the consented Low Level Waste Facility now under construction.

The main principles of this Supplementary Guidance are:

- the timely, safe and environmentally acceptable decommissioning, restoration and after-use of the Dounreay site;
- phasing through to the interim end point, setting out the developments required for decommissioning and restoration towards achieving the site end state, including new build, adaptation, demolition and remediation;
- sufficient flexibility to respond to changing constraints whilst not placing undue restrictions on the site operator;
- indication of potential new interim uses and end uses for parts of the site in support of economic development of the area;
- and developer requirements as set out in Appendix 5 of the Revised Environmental Report for the HwLDP Policy 24.

3. BACKGROUND

In January 2006, the Highland Council approved the existing Dounreay Planning Framework (DPF) as a land use development brief against which to regulate and control future decommissioning and restoration works proposed at the former nuclear power research site at Dounreay, Thurso, Caithness (the Dounreay Site).

The DPF was adopted to support certain policies contained within the Highland Structure Plan and Caithness Local Plan (the then Development Plan). It comprised a policy framework designed to enable the early identification of development and environmental effects of the proposed decommissioning and restoration programme. This included a planning application strategy to achieve the timely and safe decommissioning of the Dounreay Site, aligned into three phases.

The DPF was a material consideration in the determination of Dounreay planning applications; the most notable being outline planning permission for the Phase 1 granted in 2007, and planning permission for Low Level Waste (LLW) Disposal facilities granted in January 2009.

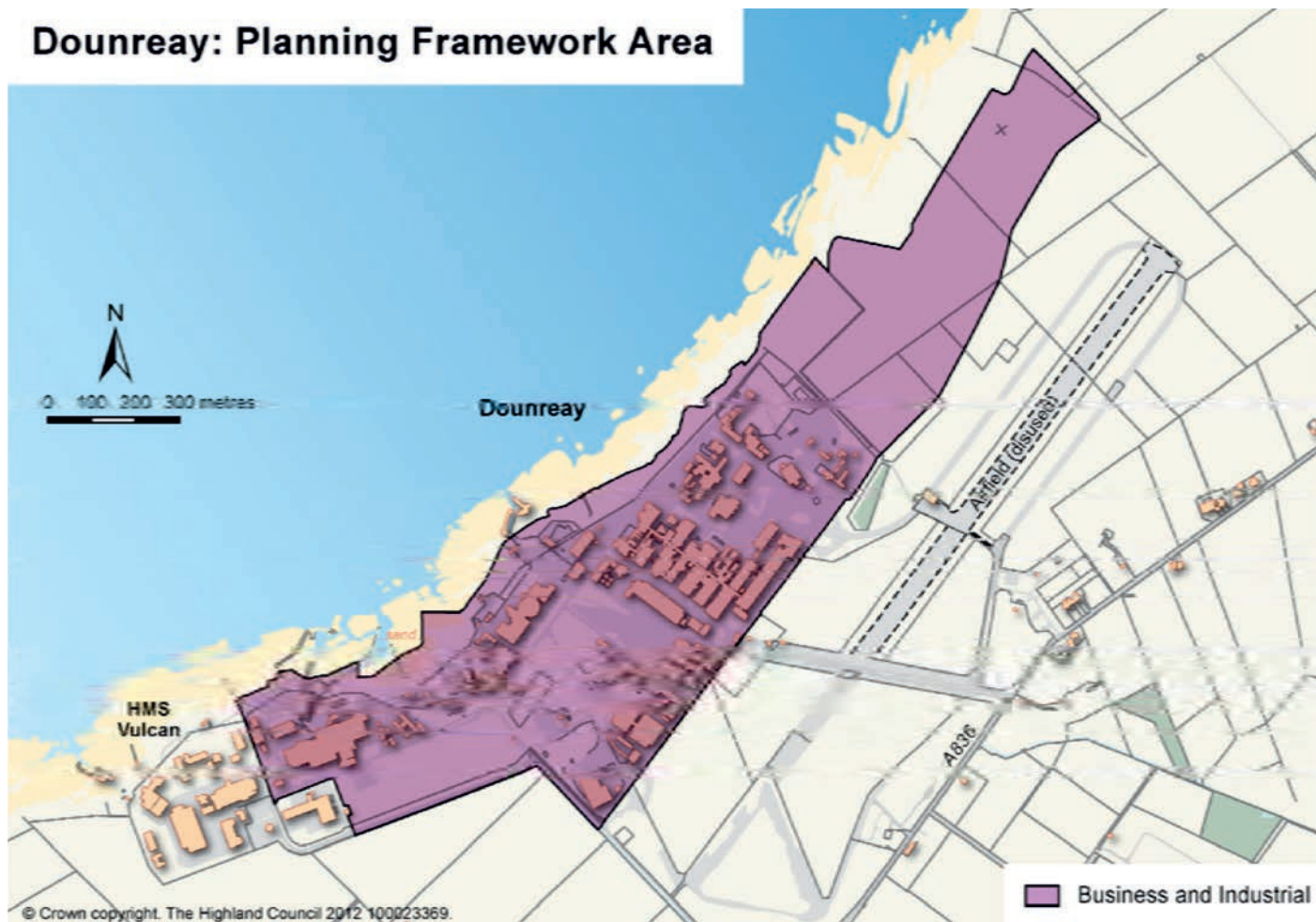
Discussions with the current Dounreay site operator, DSRL, has identified that the DPF needed to be updated to reflect the substantive decommissioning and restoration progress and achievements made since the original document was produced.

This revised Dounreay Planning Framework document (DPF2) shall be used by the Highland Council when considering future planning applications and to regulate and control future decommissioning and restoration proposals. DPF2 provides the Highland Council, and other stakeholders, the opportunity to work in partnership with the site operator to deliver a robust and flexible planning policy framework. This should ensure the timely, safe and environmentally acceptable decommissioning and restoration of Dounreay. This partnership will benefit the local community and socio-economic wellbeing of the Highlands generally, while also recognising wider national interests.

Technological advances, strategic decisions and Government policy may affect how the future waste streams are managed and best practical means for decommissioning the site will be under constant review. Future revisions to this document may be required.

FIGURE 1:

Dounreay: Planning Framework Area



4. POLICY FRAMEWORK AND PLANNING GUIDELINES

The emerging planning policy framework applicable to the Dounreay site is:

National

National Planning Framework 2 (NPF2)

A vision for Scotland to 2030. Main themes are economy, sustainability, connectivity and communities. Guides national and regional policy requirements. A new NPF3 is in preparation and is expected to be finalised mid 2014.

Scottish Planning Policy (SPP)

Scottish Government has rationalised national policy by providing a single Scottish Planning Policy. A revised SPP is in preparation and is expected to be finalised mid 2014.

Highland

Highland-wide Local Development Plan (Adopted April 2012)

The HwLDP replaces the Highland Structure Plan and certain parts of the Caithness Local Plan and guides future development of the Highland area for the next 20 years. The Council recognises the world class skills of the workforce at Dounreay and will work to safeguard and enhance the social and economic environments of Caithness and north Sutherland during the decommissioning of Dounreay.

Local Area

Caithness and Sutherland Local Development Plan (CaSPlan) (forthcoming)

Highland Council will produce and consult upon CaSPlan which, when adopted, will replace the currently remaining parts of the Caithness Local Plan. The review of this plan commenced in early 2013 with adoption likely in 2016.

Caithness Local Plan (2002) (as continued in force 2012)

The Council supports the view that Dounreay should continue for the near future as a location for large scale business and industry, particularly in view of the major site infrastructure which exists.

Supplementary Guidance

Dounreay Planning Framework 2 (DPF2)

Once adopted by the Highland Council, DPF2 will be Supplementary Guidance.

Highland-wide Local Development Plan

The following policies may be particularly relevant and refer, where appropriate, to relevant Supplementary Guidance in other documents:

- Policy 24 Dounreay.
- Policy 28 Sustainable Design outlines the Council's support for developments which promote and enhance the social, economic and environmental wellbeing of the people of Highland. Proposals will be assessed against a range of criteria. All proposals must demonstrate compatibility with the Council's Sustainable Design Guide – Supplementary Guidance.
- Policy 30 Physical Constraints requires developers to consider whether their proposals would be located in areas of constraints as set out in the Physical Constraints – Supplementary Guidance.
- Policy 42 Previously Used Land outlines the Council's support for development proposals that bring previously used land back into beneficial use subject to certain criteria.
- Policy 57 Natural, Built and Cultural Heritage requires all development proposals to be assessed taking into account the level of importance and type of heritage features.

- Policy 64 Flood Risk states that development proposals within or bordering medium to high flood risk areas will need to demonstrate compliance with Scottish Planning Policy.
- Policy 72 Pollution does not support proposals that may result in significant pollution such as noise, air, water and light unless a detailed assessment is provided to show how the pollution can be appropriately avoided and if necessary mitigated. Major developments and developments subject of Environmental Impact Assessment will be expected to follow a robust project environmental management process, following the approach set out in the Council's Guidance Note "Construction Environmental Management Process for Large Scale Projects" or a similar approach.

Dounreay Site Planning Application Strategy

To facilitate the timely achievement of the necessary future grants of planning permission for decommissioning activities, the Dounreay Site has a planning application strategy that includes:

- the division of the future site restoration works into two remaining phases;
- the need for flexibility in the planning of decommissioning activities and in the timing of proposed future development; and
- the legislative changes introduced by the Planning etc. (Scotland) Act 2006 (including the pre application consultations for major developments prior to submission of planning applications) and policy revisions.

5. THE DOUNREAY SITE RESTORATION PROGRAMME

The clean-up of the Dounreay site is funded by the UK Government through the Nuclear Decommissioning Authority (NDA) and the existing programme is based on the proposal submitted following the conclusion of the NDA competition for the decommissioning and restoration of Dounreay.

The major restoration programme for the Dounreay site has been divided into three phases which enables the land use implications and environmental effects of the proposed activities and potential mitigation to be identified. The main focus of DPF2 is on Phase 2 onwards.

Phase 1 (2005 – 2012)

The Council granted outline planning permission for an application for Phase 1, which included the intermediate level waste (ILW) cementation plant and store, an extension to the existing ILW store within the fuel cycle area and a cask store, in January 2007. A reserved matters application for the cementation plant was approved in April 2009.

Phase 2 (2012 – 2018)

This next phase of the decommissioning programme requires the provision of further fuels and waste management facilities at the Dounreay Site, including:

- Headworks for the Shaft and Silo and associated waste treatment plant;
- Storage of demolition rubble for use in later landscaping and capping; and
- Extension of consent and change of use from interim LLW store to unshielded ILW store.

This phase will include further decommissioning of redundant plants and demolitions of available structures.

Phase 3 (2018 – 2025)

The main activities planned during this phase include provision of some facilities but primarily this phase consists of final demolitions, removal of debris and re-use of stored material for landscaping and capping. New facilities would include:

- Headworks for retrieval of LLW currently emplaced in the Dounreay Site LLW disposal pits; and
- Flask Handling Facility (Note: may be built around end of Phase 2 period, subject to consenting).

At the end of this Phase, all redundant buildings will be decommissioned and demolished leaving only:

- The Intermediate Level Waste stores, required to safely and securely store waste packages for 300 – 500 years in compliance with the Scottish Government's higher-activity waste policy. As a result there will be a requirement to construct replacement stores and decommission and demolish redundant waste storage facilities over this period; and
- The closed Low Level Waste disposal facilities which will be capped and landscaped.

The strategy for nuclear fuel is to package it in a way that does not foreclose options for its re-use, now or at a later date. It involves the temporary storage at Dounreay for fuel that is to be removed for re-use or management elsewhere. At the Interim End Point, the only remaining buildings will be stores along with the infrastructure to service their safe operation.

Note: A Dounreay Heritage Strategy was published in 2010 and it acknowledges that all facilities, including the Dounreay Fast Reactor (DFR) sphere, are planned to be demolished. A Heritage Officer will co-ordinate the preservation of Dounreay's heritage in a variety of ways such as: object collection, recording memories, archiving of records, photos, films and drawings, building recording, virtual models, history publications and a commemorative marker. An Advisory Panel of heritage experts has been constituted to advise DSRL on heritage matters.

Site End State

In 2006/07, the NDA requested each of its 20 nuclear sites to hold public consultations on their end states and end uses. At Dounreay, this was carried out by the Dounreay Stakeholder Group (DSG) in conjunction with a UKAEA Project Team. In March 2007, the DSG submitted their end state recommendations to the NDA. This submission was considered during the NDA's Site End States Reconciliation Process and it has provisionally recommended that the end state chosen by the DSG is incorporated into the site's Life Time Plan.

The DSG was formed in 2005 and is a forum for representatives of the local community to meet and consider issues arising from the site closure programme. Its role is to scrutinise the site and reflect the views of the community.

The NDA's aim is to reduce hazards safely and economically, progress decommissioning and restore the site. Radioactive waste is a devolved matter for the Scottish Government and any waste stores required at the site end state will remain on a nuclear licensed area.

The Council's expectation is that the interim end state will be land decontaminated to a point where it is possible to identify, and optimise the amount of, land suitable and available for re-use as an industrial/business site while not affecting the integrity of Caithness and Sutherland Peatlands SPA/Ramsar, Caithness Lochs SPA/Ramsar and the North Caithness Cliffs SPA. This may include the removal of plinths and some recontouring and landscaping is anticipated. There may also be opportunities for development/land use activities beyond the boundary of the licensed area on associated land.

QUESTION 1: Do you agree with the Council's expectation with respect to the interim end state for the site?

Restoration Stages

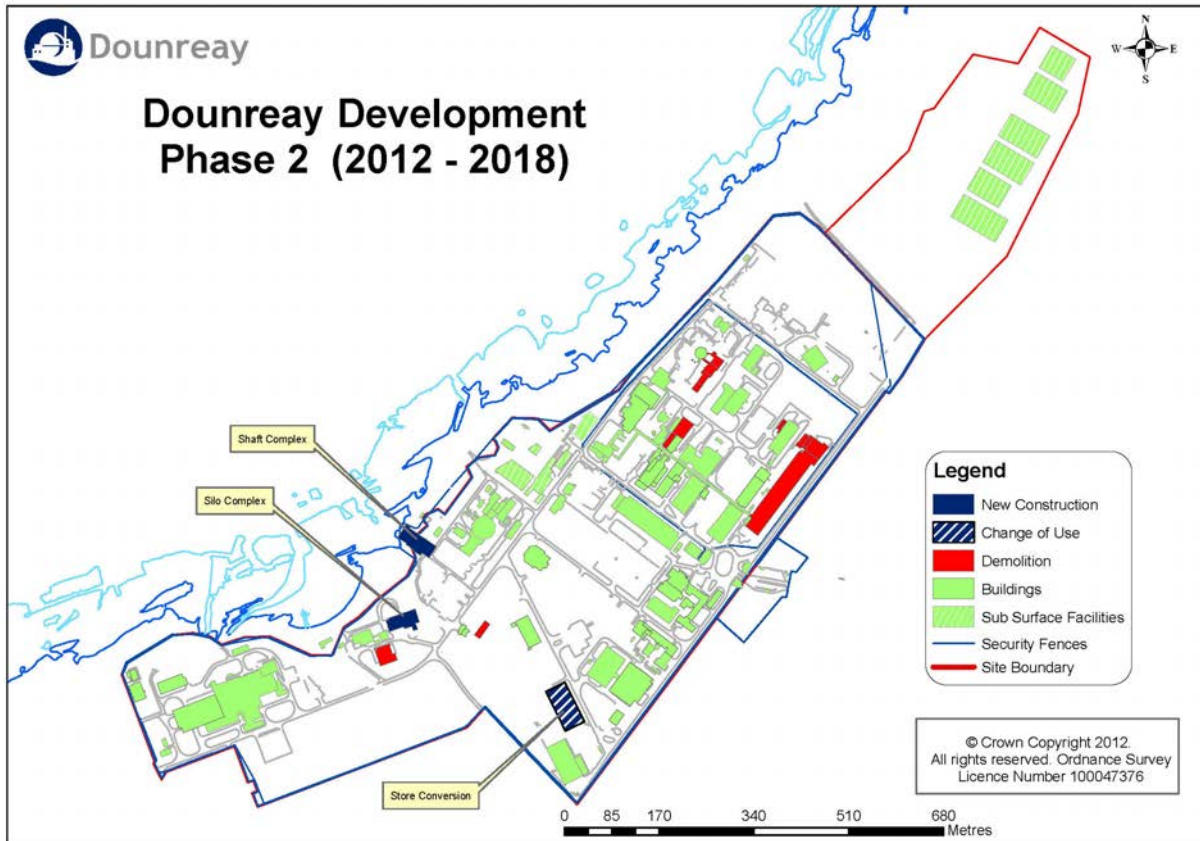


Figure 2

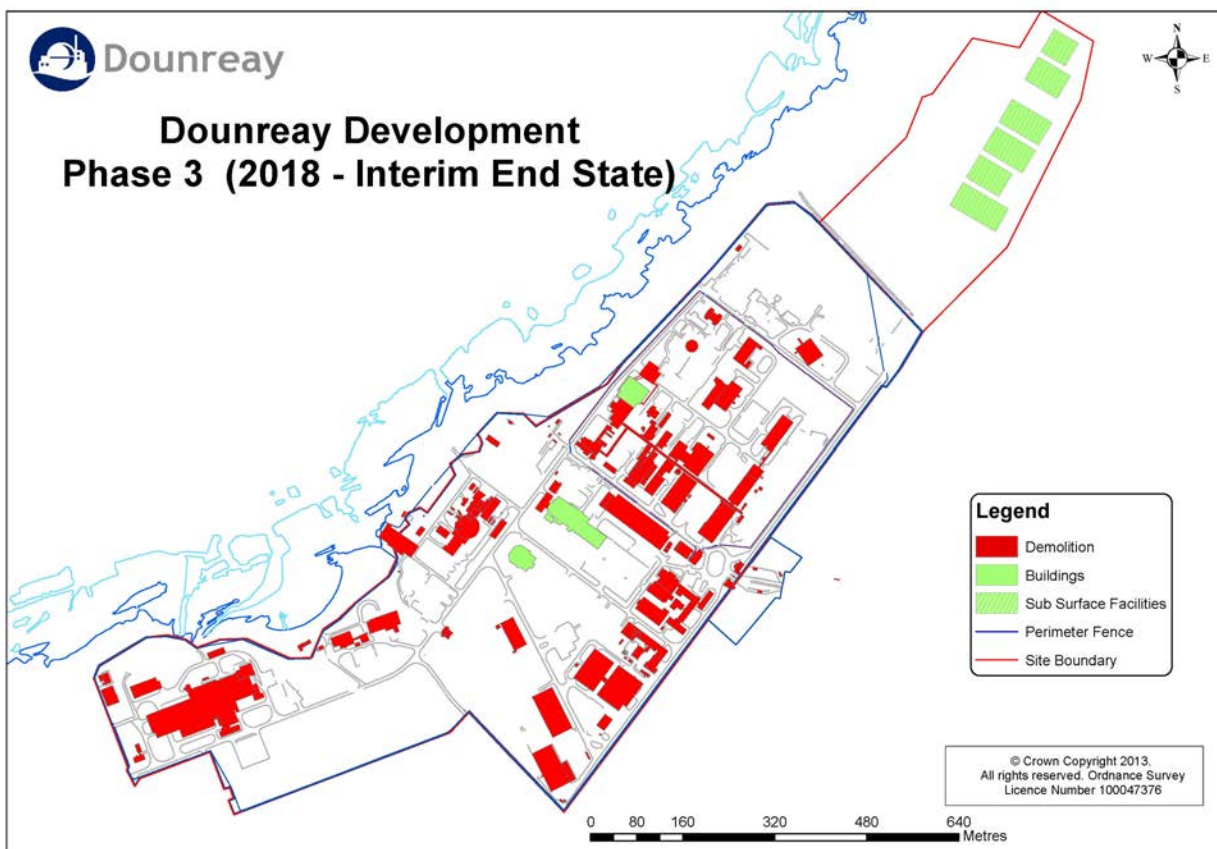


Figure 3



Figure 4

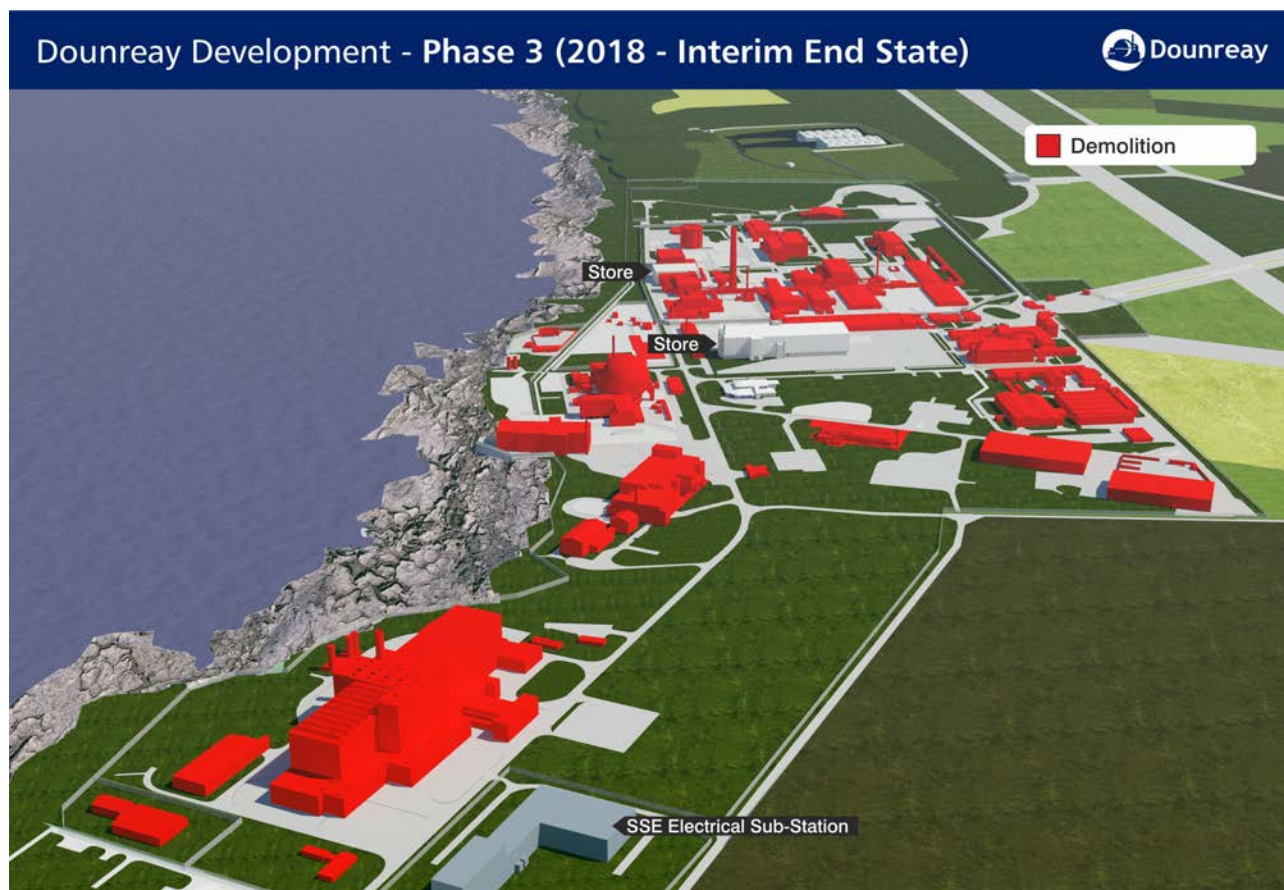


Figure 5

New Build and Demolition Projects Schedule

NEW BUILD	Site Decommissioning	Reactor Decommissioning	Low Level Waste	Historic Waste
Phase 2 (2012- 2018)	Unshielded ILW store		LLW Facilities phase 1	Build shaft waste retrieval and treatment plant
			LLW Facilities phase 2 sub surface vaults	Build silo waste retrieval and treatment plant
Phase 3 (2018 - 2025)		Flask Handling Facility (Note: may be built around end of Phase 2 period, subject to consenting)	LLW Facilities phase 3 sub surface vaults	LLW Pits Retrieval Plant
DEMOLITION	Site Decommissioning	Reactor Decommissioning	Fuel Cycle Area	Historic Waste
Phase 2 (2012- 2018)	Labs Demolition and Disposal	Dounreay Materials Test Reactor PFR Effluent Treatment Plant	Plutonium Evaporator Plant Reprocessing Plant – MTR waste	
	Boiler House Whatlings Hangar New Office Block Fire Station PFR Admin building Liquid Effluent Treatment Plant	DFR Waste Packaging Plant DFR Complex DFR Offices DFR Sphere Breeder Removal Facility PFR miscellaneous buildings & compounds	Analytical Lab/Argon Nitrogen Plant Billet Production Plant Examination (PIE) cells and labs High Active Liquor Store Fissile Material Store Change Rooms Decommissioning	Shaft waste retrieval and treatment plant Silo waste retrieval and treatment plant. LLW Pits Retrieval Plant
Phase 3 (2018 - 2025)	Store / Warehouse Descaling Plant Fire Station Building New Labs PFR BOC Tanks Offices Criticality Evacuation Centre 1 Workshops Chemical and solvent store	PFR Electrical Annexe PFR Surge Tanks & Tanks Farm PFR Control Block PFR Turbine Hall PFR Generator & Transformer Building PFR Ventilation Building (Back of Reactor Hall) PFR Secondary Containment Building	Reprocessing Plant – PFR Waste Marshall Labs Link Corridor Store Maintenance & Decontamination Building WRACS Cementation Plant Demolition FCA Police Lodge	

Table 1

6. THE DOUNREAY SITE DECOMMISSIONING WORKS

The ongoing decommissioning works include:

Dounreay Fast Reactor (DFR)

Initial stage decommissioning is planned to be complete by 2018. By then the remaining coolant and breeder elements in the reactor core will be removed.

The breeder fuel elements in the reactor will be removed by 2018 using bespoke retrieval equipment in the sphere, passing the elements to the Breeder Removal Facility (planning permission granted in February 2005). The elements will be treated and repackaged in this facility before shipment to Sellafield for future reuse. Phase 2 will see the reactor Primary Circuit Decommissioning with the removal of the residual coolant from the reactor vessel, size reduction and packaging of all reactor internals as radioactive waste. It is planned to strip out and remove the entire infrastructure of the sphere, including the Goliath crane, for reasons of safety, access and hazard elimination.

A study has assessed the future of the DFR Sphere and proposed demolition and this is reflected in the illustrations of future decommissioning in this document.

Prototype Fast Reactor (PFR)

The first stage of decommissioning is complete and the next stage is scheduled to be complete by 2020. Estimates of the quantities of the various waste types generated from the decommissioning and demolition of buildings have been prepared. Small quantities of special wastes (for example mercury and asbestos) will be dealt with, suitably packaged, and disposed by licensed carrier. The PFR reactor vessel will be cleaned of residual coolant, in situ, once the remaining heels have been drained. All reactor internals will be removed and size reduced in to suitable waste packages. The PFR is to be demolished before 2025.

Dounreay Materials Test Reactor

The dismantling of the active plant and tanks outside the reactor bioshield is taking place. The remaining decommissioning and demolition works are planned for before 2020.

Fuel Cycle Area (FCA) Plant

An increased amount of decommissioning and demolition work will be carried out during Phase 2. The interdependency of different facilities will influence the order and timing in which decommissioning can take place. Post operational cleaning will be followed by general decontamination, size reduction and packaging of remaining plant and equipment.

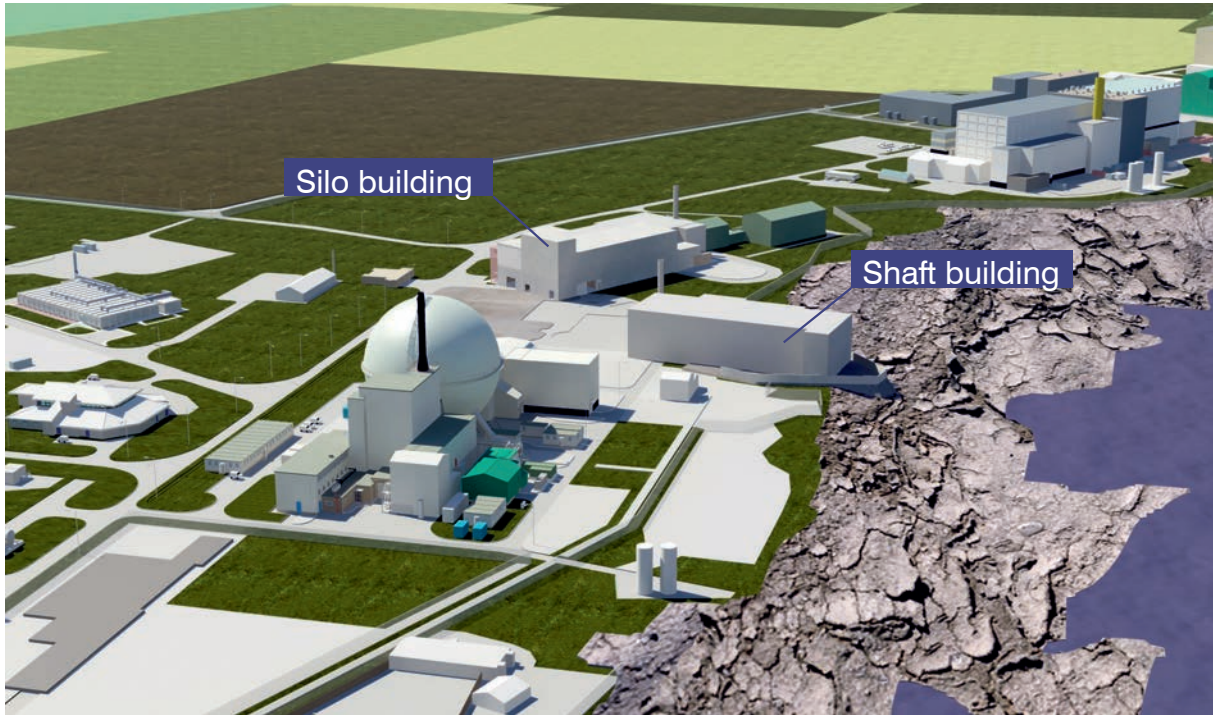
One of two new FCA ventilation stacks



FCA building demolition in progress



ILW Shaft and Silo



View of proposed Shaft and silo buildings

The objective is to recover waste from the Shaft and Silo and to treat, condition and store the waste on-site pending Government decisions on disposal of ILW. Hydrogeological isolation of the Shaft is complete, with construction and retrieval operations scheduled. Similarly, construction and waste retrieval operations for the Silo are planned for Phase 2.

Low Level Waste Disposal Facilities

In January 2009, the Highland Council granted planning permission subject to conditions for a new LLW disposal facility adjacent to the established Dounreay Site. The first Phase of this facility is currently under construction.

Phase 3 includes a proposal to construct a retrieval plant to empty LLW waste from the existing authorised disposal pits and to treat, package and emplace this waste in the new LLW Disposal facilities.

The new LLW Disposal facilities will operate until the interim end point and then be capped.

Construction work at the LLW facility



7. ENVIRONMENTAL PROTECTION DURING DECOMMISSIONING AND RESTORATION WORKS

The decommissioning and restoration operations proposed at Dounreay are subject to environmental regulation by Highland Council and SEPA and safety regulation by the Office for Nuclear Regulation which is an agency within the Health and Safety Executive (HSE).

Environmental Protection Act 1990 & Radioactive Substances Act 1993

Environmental discharges will continue to be regulated and authorised by SEPA.

The Environmental Protection Act (EPA) places a duty of care upon the site operator regarding the disposal, consignment and transport of non-radioactive waste. The provisions of the EPA are enacted through the Waste Management Licensing Regulations 1994, the Special Waste Regulations (Scotland) 1996 as amended, and the Landfill (Scotland) Regulations 2003.

SEPA is the lead regulator also for authorisations pursuant to The Radioactive Substances Act, which controls, amongst other things, the disposal of radioactive waste. Disposal of radioactive waste includes discharges of gaseous and liquid effluent and emplacement of solid waste.

There is currently an environmental monitoring programme that provides reassurance that the impact of Dounreay's approved discharges into the marine and terrestrial environment are insignificant. It is planned to continue this as long as is required, probably up to 2300. The results of the work will be presented to the DSG as well as the Regulator.

Waste Management Policy

The Scottish Government's policy on Scotland's Higher Activity Radioactive Waste (2011) says:

“The Scottish Government Policy is that the long-term management of higher activity radioactive waste, should be in near-surface facilities. Facilities should be located as near to the site where the waste is produced as possible. Developers will need to demonstrate how the facilities will be monitored and how waste packages, or waste, could be retrieved. All long-term waste management options will be subject to robust regulatory requirements.”

The National Planning Framework 2 (NPF2) refers to the proposed Low Level Waste disposal facility at Dounreay and states:

“The decommissioning of the former nuclear power research site at Dounreay in Caithness forms part of a programme of investment in specialised infrastructure designed to treat and manage radioactive waste safely. Highland Council has granted permission for a low level radioactive waste facility at Dounreay. A further facility will be needed in the South of Scotland for radioactive waste arising from processes elsewhere.

These facilities will be developed in line with the Policy for the Long Term Management of Solid Low Level Radioactive Waste in the United Kingdom published in March 2007.”

It is the Highland Council position to continue to support the above ground storage of ILW from Dounreay until a national waste strategy is agreed and implemented and to object to the use of Dounreay or any other site within the Highlands for a national nuclear waste repository. The Council has also clearly stated its position of support for the Scottish and UK Government proposed policy of radioactive waste substitution for the radioactive waste arising from historic fuel reprocessing contracts with overseas customers at Dounreay. Instead of sending customers the radioactive waste allocated to them under their reprocessing contracts from Dounreay, an equivalent amount of radioactive waste from another source within the NDA's estate would be sent, e.g. vitrified product from Sellafield. Substitution represents between 1% and 3% of the Dounreay ILW inventory and will be in the form of cemented drums.

Contamination - Land Remediation

The site operator has already undertaken remediation projects. The Council expects the site to be remediated to a level that is suitable for its future use, which may on some parts of the site require significant excavation and treatment.

Non-radiological contamination

The Highland Council will require the site operator to assess non-radiological contamination during decommissioning. Where significant contamination is identified, the Council will require a remediation strategy to be prepared and implemented to a standard where the land is fit for the intended future use.

Radiologically clean, exempt and excluded wastes have the potential to be recycled and reused on or off the site as construction and screening materials. The Council requires the site operator to operate the site in accordance with the waste hierarchy; that is reduce, re-use, recycle.

Radioactive contamination

Some parts of the site contain radioactive contamination; it is acknowledged that in certain areas the appropriate approach may be to allow this to decay naturally beyond the interim end point, capped where necessary, requiring access to these areas to be controlled for up to 300 years. However the Council will expect remediation of land as decommissioning progresses and for areas of radioactive contamination to be rationalised in the interests of optimising the amount of land that can be accessed and re-used, for industrial uses during the Interim End State and for unrestricted use post Final End Point.

QUESTION 2: Do you agree with the Council's expectations and requirements with respect to the remediation of contaminated land for the site?

8. SOCIO-ECONOMIC BENEFITS OF DECOMMISSIONING

The Highland-wide and Area Local Development Plans have a clear role to play in addressing the consequent land use planning implications of the decommissioning of the Dounreay Site. The HwLDP vision is for the Dounreay workforce to have found alternative sources of employment by the completion of decommissioning work.

Major expenditure is involved in decommissioning the site and current spend has peaked at £150 million a year. Approximately £63M of the annual spend is in purchases and services from companies based in Caithness and North Sutherland. It is estimated that approximately £90 million goes in to the Highland economy.

The estimated cost for decommissioning the site over a period of 10 – 13 years is £1.6billion. Staffing levels are expected to remain at current levels until 2020, including a high demand for technical and safety staff to meet the needs of accelerated projects.

The Energy Act 2004 empowers the NDA to make grants or loans that will result in social or economic benefits to the community.

The NDA requires all civil nuclear decommissioning sites within its estate to develop an annual socio-economic plan. The Dounreay site plan sets out how it intends to deliver its socio-economic obligations to the local community. In addition, Dounreay is supporting the Caithness Chamber of Commerce who is leading initiatives to help the workforce transition to new economic activity, such as alternative career planning and business start-up.

The NDA mission is to deliver a programme of safe, environmentally responsible and cost effective decommissioning with due regard to the socio-economic impacts on local communities.

To support the long-term sustainability of Caithness, the NDA, the Parent Body Organisation and site operator work with Caithness and North Sutherland Regeneration Partnership (CNSRP). The CNSRP (which includes, amongst others, partner organisations Highlands and Islands Enterprise (HIE) and The Highland Council (THC)), working with other agencies and the local communities, has a specific remit of developing, implementing and delivering the economic regeneration activities required to diversify the economy.

The CNSRP has identified a list of priority projects which sits on an over-arching programme of activities. In addition, the Scottish Government has made a commitment in the National Planning Framework 2 to address the economic and social impacts of the decommissioning of the Dounreay site.

The Highland Council will continue to contribute to the socio-economic development process through involvement in the CNSRP.

Highland Council recognises employment levels will reduce as decommissioning progresses and will seek to address this by giving due consideration to new business opportunities.

Beyond the existing contract requirements, The Highland Council will seek Community Benefit in line with its policy for projects that may have long term legacy implications for the community. However, any such "Community Benefit" arrangements which do not meet the tests set out in Circular 3/2012 Planning Obligations and Good Neighbour Agreements will not be taken into account in the development management process when dealing with planning applications.

9. DEVELOPER REQUIREMENTS

A Strategic Environmental Assessment Environmental Report was prepared for the HwLDP; Policy 24 Dounreay was assessed and a number of issues were raised that would need to be addressed by any proposed development on the site. These are included in the requirements set out below.

It is expected that planning applications for any developments will take account of the following developer requirements:

- A flood risk assessment should be completed and submitted to take account of coastal flooding and fluvial flooding (part of the site) to ensure compliance with Scottish Planning Policy
- To adopt and implement a sustainable waste management plan in accordance with the principles of the waste hierarchy to reduce, reuse, recycle and recover decommissioning waste.
- Produce and implement a sustainable drainage system plan. An assessment of the risk/impact of coastal erosion and, where necessary, to propose mitigation measures.
- Continue to monitor and protect the site of Dounreay Castle (a Scheduled Ancient Monument) or its setting, from significant impact associated with the decommissioning and remediation operations of the site. Proposed uses should take account of the existing bad neighbour developments with the site.
- Undertake a protected species survey for the site and local surrounding area and, where necessary, to undertake mitigation measures as part of a mitigation plan.
- To identify and assess likely significant impacts on locally important archaeological sites (as identified in the Historic Environment Record for the site and its local surrounding area) and, where appropriate, to undertake mitigation measures.
- Encourage active travel and increased use of sustainable means of transport to and from the site. (This may include proposals to continue and if necessary extend measures already operated by DSRL.)
- To ensure that decommissioning and remediation operations do not impact on the North Caithness Cliffs Special Protection Area.

QUESTION 3: Do you agree with the Developer Requirements set out in Section 9 of this document? What additional developer requirements, if any, should we consider adding and why?

10. THE WAY FORWARD

Highland-wide Local Development Plan - Supplementary Guidance

Adoption of DPF2 by Highland Council as Supplementary Guidance to the Local Development Plan will provide the confidence necessary for the Dounreay site operator to drive forward its decommissioning and restoration programme for Dounreay whilst continuing to generate employment and business opportunities in the Highlands, whilst also providing clarity of intent to the local community.

End Uses of Site

The Council's vision for the end use of the Dounreay Site is to see it as far as practicable re-developed for employment uses, with potential opportunities being the offshore renewables sector (wind, wave, tidal) and the expansion of oil and gas fields to the west of the Shetland Islands, while not affecting the integrity of Caithness and Sutherland Peatlands SPA/Ramsar, Caithness Lochs SPA/Ramsar and the North Caithness Cliffs SPA. The Council will continue to review potential options for the re-use of the Dounreay site with the site owner, regulators, the local public and stakeholder groups. As set out in Section 7 of this guidance, the Council expects the site to be remediated to a level that is suitable for its future use, as decommissioning progresses and for areas of radioactive contamination to be rationalised in the interests of optimising the amount of land that can be accessed and re-used. Such an approach may enable part(s) of the site to be made available for re-use in the short to medium term. Additionally there may be potential for land adjacent to the Dounreay Site to be made available for employment uses in the short term.

QUESTION 4: Do you agree with the Council's vision for the end use of the Dounreay Site? Do you agree with the Council's expectation for an approach which could see part(s) of the site being made available for re-use in the short to medium term and optimising of land for re-use? What alternatives, if any, should be considered and why?

11. LIST OF ACRONYMS

CaSPlan:	Caithness and Sutherland Local Development Plan
DFR:	Dounreay Fast Reactor
DPF2:	Dounreay Planning Framework 2
DSG:	Dounreay Stakeholder Group
DSRL:	Dounreay Site Restoration Limited
EPA:	Environmental Protection Act
FCA:	Fuel Cycle Area Plant
HIE:	Highlands and Islands Enterprise
HSE:	Health and Safety Executive
HwLDP:	Highland-wide Local Development Plan
ILW:	Intermediate Level Waste
LLW:	Low Level Waste
NDA:	Nuclear Decommissioning Authority
NPF2:	National Planning Framework 2
PFR:	Prototype Fast Reactor
SEPA:	Scottish Environmental Protection Agency
SG:	Supplementary Guidance
SPA:	Special Protection Area
SPP:	Scottish Planning Policy
THC:	The Highland Council

QUESTION 5: Do you have any other observations on the draft DPF2? In setting out your comments, please include reference to the relevant section(s) and heading(s) within the document.

APPENDIX 2:

DRAFT DPF2 – COMMENTS RECEIVED AND RECOMMENDED COUNCIL RESPONSE

Person or Organisation	Comment	Recommended Council Response (including any changes recommended to DPF2)
QUESTION 1 (page 6 of Draft DPF2): Do you agree with the Council’s expectation with respect to the interim end state for the site?		
<p>Dounreay Stakeholder Group</p>	<p>Mention is made to the heritage strategy and further mentions the archiving of records, photos, films etc. It was disappointing to see no mention of the National Nuclear Archives which will be built in Caithness and which Highland Council is a partner.</p> <p>The Council’s expectation is that the “interim end state will be land decontaminated may include the removal of plinths”.</p> <p>We believe the Highland Council has to be clearer – our understanding is that the current contract allows the Parent Body Organisation to take the site to interim end state whereby the site will not be de-licensed and if waiting for the end state to come along then we are talking 100s of years. The Council’s expectations needs to be more fully qualified, do you expect the licensed site to ‘shrink’ to accommodate waste stores with everything else being made available for redevelopment or is this a longer term aspiration. If this is of a shorter term nature recognition has to be taken that costs will increase from an NDA point of view if additional work is required which is not included in the current contract. More clarity on this would be appreciated as to the timeline Highland Council would expect to see.</p>	<p>The National Nuclear Archive was not mentioned as it is a separate issue to the planning of the Dounreay Site itself (the focus of DPF2). Nevertheless it is recommended that at the end of the ‘Note’ on page 6, the following be added:</p> <p>“It may also be noted that a National Nuclear Archive is proposed to be developed at Wick.”</p> <p>The Council does not have a firm timescale in mind for the release of land for re-use and we appreciate that there is a current contract being worked to. The key point is that there are decisions being made and works planned to be undertaken in delivering the interim end state, and that in the Council’s opinion these should be informed by the recommendations for the longer term site end state. This includes the DSG’s stated preference for a restored site with early release of land and which was conditional, in essence, upon exploring and maintaining opportunities for re-use of the site and its infrastructure, including consideration of re-use as part of any regional development and regeneration initiatives. Our expectation is that, as stated on page 6, the interim end state delivered will make it possible to identify, and optimise the amount of, land suitable and available for reuse as an industrial/business site. See also response to SEPA comment, below.</p>

<p>SEPA</p>	<p>From a sustainable development aspect, SEPA would support beneficial re-use of the site. However, any future changes to land use must be compatible with any ongoing regulatory requirements until revocation of SEPA’s environmental permits, and the text needs to be amended to state this.</p>	<p>Agreed. It is recommended that the following paragraph be added after the final paragraph on page 6:</p> <p>“A number of site licences apply at Dounreay which regulate activities, for example as part of environmental protection. It should therefore be noted that any future changes to land use must be compatible with any ongoing regulatory requirements until such time as the relevant permit(s) are revoked. This may limit changes to land use prior to revocation of permits, but does not necessarily preclude some land use change. Generally, for a particular permit to be revoked the regulator must be satisfied that relevant regulation is no longer required. There may be scope in the future for the extent of land at Dounreay covered by these permits to be reduced, freeing some areas from the existing constraint whilst where necessary leaving other parts still regulated.”</p>
<p>Caithness Renewables</p>	<p>The council's expectation, whilst very thorough in terms of the demolition and reinstatement of the landscape, makes little reference to potential re-use of the site for economic gain of the local area. The 2006 Dounreay Planning framework suggests a business park or science park, but this is not mentioned in DPF2.</p> <p>If it were to be determined that office space would be required by inward investors or other companies involved in the future Caithness economy, some of the office space and associated facilities could be retained. An assessment should be undertaken to identify buildings with potential for re-use before demolition.</p> <p>The interim end state should remain flexible.</p>	<p>Figure 1 in DPF2 replicates Map 14 in the Highland-wide Local Development Plan, which identifies the site ‘Business and Industrial’ whilst Policy 24 of HwLDP, in referring to the main principles of DPF, mentions indication of potential new interim uses and end uses for parts of the site in support of economic regeneration of the area. In DPF2, on page 6, it is a stated part of the Council’s expectation that parts of the site should be suitable and available for re-use as an industrial/business site. On page 14 of DPF2 there is reference in broad terms to some potential opportunities. Whilst DPF2 is not very specific in this regard, requirements for opportunity sectors are only in the early stages of emerging. DPF2 therefore is encouraging some flexibility to be able to respond to opportunities. The Council agrees with the sentiment that opportunities should be considered for re-use of appropriate facilities, although it is also understood that matters</p>

		<p>are largely governed by the contract to deliver the interim end state. It is recommended that the following be added at the end of the final paragraph on page 6:</p> <p>“Notwithstanding that the current programme, governed by contract, includes the demolition of all redundant buildings, the Council is open-minded to considering proposals for retention and re-use of appropriate facilities for new uses in support of economic regeneration where that is compatible with the DSG’s recommendations for the site end state.”</p>
<p>QUESTION 2 (page 13 of Draft DPF2): Do you agree with the Council’s expectations and requirements with respect to the remediation of contaminated land for the site?</p>		
<p>Dounreay Stakeholder Group</p>	<p>The Dounreay Stakeholder Group is represented by over 20 organisations and therefore this response is one that is generally agreed by most organisations. However, there are some organisations, who may not agree entirely with this submission and therefore these organisations have been encouraged to provide their own response.</p> <p>DSG members have considered the NDA’s draft business plan and make the following comments:</p> <p>Yes in principle but the extent of the contractual obligations from the parent body organisation must be fully understood to ensure it is either consistent with HC’s aspirations. We note HC wants to have the site re-used and again we would question whether, if the site is still licensed, at interim end state is this possible?</p>	<p>See responses to Dounreay Stakeholder Group and SEPA in respect of Question 1, above.</p>
<p>SEPA</p>	<p>SEPA provides advice in relation to this question a) on matters within the context of existing regulatory control and b) on matters outwith existing regulatory control.</p>	<p>The Council does not propose to detail within DPF2 all the different licensing areas that apply at Dounreay; its role is in respect of Planning Regulation specifically. We do however</p>

	<p><u>a) Advice in relation to existing regulatory controls</u></p> <p>The text of the draft Planning Framework should be amended to reflect the guidance below.</p> <p>The Council’s description of the site is incomplete (<i>and needs to properly reflect the environmental legislation relevant to Dounreay</i>). Distinction should to be made between the areas at Dounreay covered under the planning framework but fall within the bounds of the RSA93 Authorisation, the WML licence(s), the Dounreay Nuclear Site Licence (administered by Office for Nuclear Regulation) and land which is outwith all the above authorisations and unaffected by the licensed activities.</p> <p>Note that the environmental legislation referred to on page 12 is out of date (<i>and needs to properly reflect environmental regulation at the Dounreay site</i>). We suggest that the text requires updating to reflect 2011 and 2012 Waste legislation, PPC 2012 and The Water Environment (CAR) Regulations at a minimum. The comments below should assist in this process.</p> <p>A number of key points are highlighted below for the Council’s information and consideration which relate primarily to those areas within the planning framework covered by one or more of the above authorisations/ licences;</p> <ol style="list-style-type: none"> 1. Decommissioning nuclear sites are not “historic contaminated land sites” and land contaminated by radioactivity within a nuclear licensed site is excluded from Part IIA. 2. The Radioactive Contaminated Land regime does not apply to land within nuclear licensed sites. 	<p>acknowledge that there is a need to maintain a broad awareness of the other regulations, licences and corresponding areas and to understand any implications for planning. See also the response to SEPA in respect of Question 1, above.</p> <p>It is agreed that the references to environmental legislation on page 12 should be updated, whilst not purporting to detail the entire framework of regulation.</p> <p>In response to the points made by SEPA, a number of revisions are therefore put forward.</p> <p>It is recommended that in Section 4 on page 4, the title of the section be amended to: “Planning Policy Framework”.</p> <p>It is recommended that in Section 4 on page 4, the following be added in the sub-section ‘Supplementary Guidance’ after the reference to DPF2:</p> <p>“Supplementary Guidance – other A number of policy-thematic Supplementary Guidance documents, referred to by HwLDP policies, will be relevant.”</p> <p>It is recommended that in Section 4 on pages 4 and 5, in the list of HwLDP policies, at the end of the reference to Policy 42 Previously Used Land the following should be added: “including that site investigation and risk assessment are undertaken and demonstrate that the site is in, or is capable of being brought into, a condition suitable for the proposed development.”</p> <p>It is recommended that in Section 4 on pages 4 and 5, in the list of HwLDP policies, reference be added as follows: “Policy 63 Water Environment outlines the Council’s support for proposals</p>
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<p>3. Under the Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended) (“CAR”), SEPA regulates various “Controlled Activities” with the potential to have an adverse effect on the water environment. Controlled Activities include “the direct or indirect discharge, and any activity likely to cause a direct or indirect discharge, into groundwater of any hazardous substance or other pollutant.” An RSA authorisation is deemed to be a CAR authorisation, as is a Waste Management Licence. Both are in place at Dounreay.</p> <p>4. Article 6(1) of the Groundwater Directive 2006 requires that measures are introduced to prevent inputs into groundwater of hazardous substances, including radioactive substances. There are some exemptions from this requirement to prevent inputs of hazardous substances, which are determined by SEPA as competent authority for Article 6. CAR also requires SEPA to monitor compliance and enforce the provision of the Directive.</p> <p>5. SEPA will use its powers under CAR to require remediation of groundwater pollution and remediation of the source of the pollution across the Dounreay site, and beyond the RSA authorisation boundary where the source of the groundwater pollution has been identified as activities within the Dounreay site boundary.</p> <p>6. SEPA published in April 2013 “SEPA Guidance on Revoking Authorisations and Cancelling Registrations Granted under the Radioactive Substances Act 1993 Part 1: Principles and Expectations” which sets out at a high level SEPA’s expectations in this regard. This guidance applies to both nuclear and non-nuclear premises and is applicable to the Dounreay site and the site of the new Low Level Waste Disposal Facilities.</p>	<p>for development that do not compromise the objectives of the Water Framework Directive (2000/60/EC), aimed at the protection and improvement of Scotland’s water environment.”</p> <p>It is recommended that in Section 4 on page 5, the sub-section entitled ‘Dounreay Site Planning Application Strategy’ be made into a new main section numbered 5 (and subsequent main sections consequentially re-numbered).</p> <p>It is recommended that in Section 7 on page 12, the sub-title ‘Environmental Protection Act 1990 & Radioactive Substances Act 1993’ be re-written as follows: “Environmental Protection Act 1990, Radioactive Substances Act 1993 and Water Environment and Water Services (Scotland) Act 2003”.</p> <p>It is recommended that in Section 7 on page 12, the text under the sub-title ‘Environmental Protection Act 1990 & Radioactive Substances Act 1993’ be re-written as follows:</p> <p>“Environmental discharges will continue to be regulated and authorised by SEPA under the Pollution Prevention and Control (Scotland) Regulations 2012 (PPC).</p> <p>The Environmental Protection Act (EPA) places a duty of care upon the site operator regarding the disposal, consignment and transport of non-radioactive waste. The provisions of the EPA are enacted through the Waste Management Licensing (Scotland) Regulations 2011 (WML) and the Landfill (Scotland) Regulations 2003 [both as amended by the Waste (Scotland) Regulations 2012] and by the Special Waste Regulations (Scotland) 1996 as amended.</p> <p>SEPA is the lead regulator also for authorisations pursuant to</p>
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<p>The key message in the context of this supplementary guidance is that SEPA is of the view that the (statutory) contaminated land criteria developed under the provisions of Part IIA of the Environmental Protection Act 1990 are not appropriate to "drive" the return of the Dounreay site to a satisfactory state. Regulations in Scotland controlling radioactive contaminated land are intervention-based; this means that the dose threshold where regulatory "action" is taken (3mSv/annum) is much higher than what SEPA considers appropriate when revoking an authorisation. However, the risks associated with contaminated land are a material planning consideration and should be addressed by the planning authority in the preparation of development plans and in the determination of planning applications under the land use planning regime. When a change of land use is envisaged, SEPA will look to advise the planning authority on the risks and possible harm to human health caused by radioactive and non-radioactive substances.</p> <p>A copy of this document has been included for completeness. [Note: SEPA has provided a copy to the Council; available for inspection upon request.]</p> <p><u>b) Advice on residual matters outwith existing regulatory control, concerning conventional land contamination.</u></p> <p>In relation to residual matters outwith existing regulatory control, insofar as they relate to conventional land contamination, the intention for remediation projects to be undertaken at this site is welcomed and the following advice is provided.</p> <p>1. Standard of remediation</p>	<p>The Radioactive Substances Act (RSA), which controls, amongst other things, the disposal of radioactive waste. Disposal of radioactive waste includes discharges of gaseous and liquid effluent and emplacement of solid waste.</p> <p>Under The Water Environment and Water Services (Scotland) Act, the Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR) requires authorisation from SEPA for activities which may affect the water environment. Both the RSA authorisation and the WML licence in place at Dounreay are deemed to be CAR authorisations.</p> <p>There is currently an environmental monitoring programme that provides reassurance that the impact of Dounreay's approved discharges into the marine and terrestrial environment are insignificant. It is planned to continue this as long as is required, probably up to 2300. The results of the work will be presented to the DSG as well as the Regulator. As part of this ongoing monitoring programme the site operator is encouraged to consider from time to time the availability and appropriate use of background monitoring datasets, with the aim of ensuring that remedial targets set are protective of all aspects of the water environment."</p> <p>It is recommended that in Section 7 on pages 12 and 13, the text under the sub-title 'Contamination – Land Remediation' be re-written as follows:</p> <p>"The site operator has already undertaken remediation projects. The Council expects the site to be remediated to a level that is suitable for its future use, rather than only to a level that avoids action by the regulator. This may on some parts of the site require significant excavation and treatment.</p>
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<p>The Consultation Draft – November 2013 Dounreay Planning Framework refers to an expectation for remediation to a standard “where the land is fit for the intended future use” (section 7, page13, paragraph 1). The text should state that it will be important to ensure that the requirements of Planning Advice Note PAN 33 (http://www.scotland.gov.uk/Publications/2000/10/pan33) are adhered to when setting any such remedial objectives aligned to “suitability for use”. For your information, PAN 33 states in relation to the interaction between the planning and contaminated land regimes that “It is in the developer's interests to ensure that development of the site will not result in designation as contaminated land under Part IIA, and thus become prone to a remediation notice under the contaminated land regime.”</p> <p>Specifically, the Framework should refer to maintaining the necessary equivalence of PAN 33 with EPA 1990 Part IIA requirements, taking account of the specified Part IIA exclusions for nuclear sites and the existing regulatory controls provided by other legislation, such that the intended remediation works will address unacceptable risks to human health and the wider environment, including the water environment.</p> <p>It is noted that PAN 33 is not listed under Section 4 “Policy framework and planning guidelines”, nor under Section 7 “Environmental Protection...”. It should be added.</p> <p>There is a reference under Section 7 to the existing environmental monitoring programme at the site. The text should make reference to consideration of the use of available background monitoring datasets, where appropriate to do so, to ensure that the setting of remedial targets is protective of all aspects of the water environment.</p>	<p>In dealing with any planning proposals for development (including change of use), the Council will take into consideration the risks associated with contamination and will have regard to Scottish Government’s Planning Advice Note 33 Development of Contaminated Land (PAN33). The Council will seek the advice of SEPA on such matters as appropriate, including on individual remediation projects or groups of related projects, and early dialogue between the site operator/developer, SEPA and the Council on intentions for projects is encouraged.</p> <p>Non-radiological contamination</p> <p>The Highland Council will require the site operator to assess non-radiological contamination during decommissioning. Where significant contamination is identified, the Council will require a remediation strategy to be prepared and implemented to a standard where the land is fit for the intended future use. The remediation strategy should adhere to PAN33 and the remediation works should address unacceptable risks to human health and the wider environment, including the water environment.</p> <p>Radiologically clean, exempt and excluded wastes have the potential to be recycled and reused on or off the site as construction and screening materials. The Council requires the site operator to operate the site in accordance with the waste hierarchy; that is reduce, re-use, recycle.</p> <p>Radioactive contamination</p> <p>Some parts of the site contain radioactive contamination; it is acknowledged that in certain areas the appropriate approach may be to allow this to decay naturally beyond the interim end</p>
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<p>2. Consultation on risks to the water environment</p> <p>On establishing the standard of remediation for any individual remediation project on site, or related group of projects, in order to ensure that risks to the water environment have been adequately considered, the Framework should specify that SEPA will be consulted and its comments taken into account.</p> <p>When determining the licensing requirements of any individual or group remediation project insofar as it relates to areas outwith the existing authorisation/licence boundaries, relationship with existing regulatory controls in force at the site will need to be considered.</p> <p>It would therefore be advisable for the Framework to set out an intention for dialogue with other regulatory authorities on firstly the scope and extent of the individual and grouped remediation projects, and further, on the setting of remedial standards. SEPA would be pleased to continue providing advice on risks to the water environment arising from land contamination.</p> <p>3. General advice on investigative strategy insofar as it relates to areas outwith the existing authorisation/ licence boundaries.</p> <p>In designing an investigation, SEPA would always urge the site assessors to follow best practice (including British Standards, such as BS10175:2011 and BS 5930) and available guidance. To support this, and with respect to guidance on adequate assessment of the water environment in connection with potential land contamination, SEPA guidance may be found on our website here: http://www.sepa.org.uk/land/contaminated_land/contaminated_land_guidance.aspx</p>	<p>point, capped where necessary, requiring access to these areas to be controlled for up to 300 years. However the Council will expect remediation of land as decommissioning progresses and for areas of radioactive contamination to be rationalised in the interests of optimising the amount of land that can be accessed and re-used, for industrial uses during the Interim End State and for unrestricted use post Final End Point.”</p> <p>It is recommended that in Section 11 on page 15, the following be added:</p> <p>“CAR: Controlled Activities Regulations PAN33: Planning Advice Note 33 PPC: Pollution Prevention and Control RSA: Radioactive Substances Act WML: Waste Management Licence”.</p>
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QUESTION 3 (page 14 of Draft DPF2): Do you agree with the Developer Requirements set out in Section 9 of this document? What additional developer requirements, if any, should we consider adding and why?

<p>Dounreay Stakeholder Group</p>	<p>Under section 8 “Highland Council recognises employment levels will reduce as decommissioning progresses and will seek to address this by giving due consideration to new business opportunities”. DSG members are aware of the work of the CNSRP and the work undertaken by HIE to attract inward investment. However, we are doubtful whether the site would feature in attracting other businesses and even more so when the fact is that the intermediate level waste will be stored there indefinitely.</p> <p>Given the emphasis is now on renewable energy and oil & gas we would suspect that anyone interested in basing themselves in Caithness would rather be closer to the harbours. Socio economic and community benefit for this purpose should be considered however, as this is exceptional circumstances for this area, thinking outside the box on what will benefit the area more should be considered.</p> <p>On the list of developer requirements we agree with what your expectations are and suspect that some of these requirements are part and parcel of generic requirements for planning applications in a more general form. Therefore DSG would like to see more innovative thinking to ensure whatever happens to the site, during the decommissioning phases and the interim end state, that there is a lasting benefit to the community.</p>	<p>DPF2, whilst referencing some of the wider work being done to address socio-economic benefits of decommissioning (section 8), is primarily concerned with planning for development on the site itself. It is not the role of DPF2 to set community benefit policy. Whilst it is generally agreed that the continuing presence of waste stores and associated services in the coming years will limit the potential for land adjacent and nearby those facilities, there is nevertheless potential for some development. This should not be regarded as competing with other sites such as the existing harbours and business parks; however, there may be specific activities for which the Dounreay site, location and infrastructure ‘offer’ are suited and where the Dounreay site’s role can be complementary to that of other sites, to the benefit of the area as a whole.</p>
<p>SEPA</p>	<p>SEPA supports the expectation of a flood risk assessment as part of any future planning application. However, rather than the line stating “to take account of coastal flooding and fluvial flooding (part of the site) to ensure compliance with Scottish Planning Policy” it should state more correctly “to take account of all sources of flooding (part of the site) to</p>	<p>On flood risk assessment, agree but with some additional rewording to more clearly reflect the requirements of Policy 64 of the HwLDP. It is recommended that the first bullet point in section 9 on page 14 be revised to read:</p>

	<p>ensure compliance with Scottish Planning Policy”. See Section 196 of SPP for more detail.</p> <p>SEPA also supports the expectation of a sustainable waste management plan and sustainable drainage plan as part of any future planning application. However, the text should be amended to state that it will need to be demonstrated in any subsequent planning application that the design of any sustainable drainage system will not result in mobilisation of contamination and subsequent impacts on the water environment.</p>	<p>“For any development within or bordering the part of the site identified on SEPA flood risk mapping as being at medium to high flood risk, and for any other development where required by Policy 64 of the HwLDP, a flood risk assessment should be completed and submitted to take account of all sources of flooding to ensure compliance with Scottish Planning Policy.”</p> <p>On sustainable drainage systems, addressing the matters identified by SEPA would be considered good practice in the design of SUDS. However, we would be happy to provide additional wording in this instance to emphasise the matter. It is therefore recommended that the first sentence of the third bullet point in section 9 on page 14 be revised to read:</p> <p>“Produce and implement a sustainable drainage system plan; the developer will need to demonstrate in their planning application that the design of any sustainable drainage system will not result in mobilisation of contamination and subsequent impacts on the water environment.”</p> <p>It is also recommended that the following text, being the second sentence of the third bullet point in section 9 on page 14, be made a separate bullet point as originally intended:</p> <p>“An assessment of the risk/impact of coastal erosion and, where necessary, to propose mitigation measures.”</p>
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QUESTION 4 (page 14 of Draft DPF2): Do you agree with the Council’s vision for the end use of the Dounreay Site? Do you agree with the Council’s expectation for an approach which could see part(s) of the site being made available for re-use in the short to medium term and optimising of land for re-use? What alternatives, if any, should be considered and why?

<p>Dounreay Stakeholder Group</p>	<p>In principle, DSG agrees with the vision for the end use but not to the detriment of other areas. As an example, the Scrabster land has been designated an Enterprise Zone and we would expect is well placed to attract renewable energy and oil & gas companies. Therefore it would be important to ensure that the right type of business is attracted to the Dounreay site and not to the detriment of other areas within the county which might be best placed to provide the business attraction.</p>	<p>See response to Dounreay Stakeholder Group comments in response to Question 3, above.</p>
<p>SEPA</p>	<p>As stated in response to Question 1, from a sustainable development aspect, SEPA would support beneficial re-use of the site. However, any future changes to land use must be compatible with any ongoing regulatory requirements until revocation of SEPA’s environmental permits, and the text needs to be amended to state this.</p>	<p>Agreed. It is recommended that the following sentence be added to the end of the final paragraph on page 14:</p> <p>“As noted in Section 5, any future changes to land use must be compatible with any ongoing regulatory requirements until revocation of relevant permits, which includes SEPA’s environmental permits.”</p>
<p>Caithness Renewables</p>	<p>Potential opportunities are listed as renewables; wind, wave and tidal. However there is no detail as to how these will be targeted, what in particular related to the industries might be sited there, and that infrastructure will be available for future use. For example as a launch site for the nearby wave farm the road infrastructure would need to remain in situ with additional infrastructure such as a slipway.</p> <p>If the site were to be used for fabrication or assembly it is easy to foresee that there would be a use for the office buildings and other relevant infrastructure.</p>	<p>See responses to Dounreay Stakeholder Group comments in response to Questions 1 and 3 and to Caithness Renewables comments in response to Question 1, above.</p>

QUESTION 5 (page 15 of Draft DPF2): Do you have any other observations on the draft DPF2? In setting out your comments, please include reference to the relevant section(s) and heading(s) within the document.

<p>Dounreay Stakeholder Group</p>	<p>The Dounreay Stakeholder Group is represented by over 20 organisations and therefore this response is one that is generally agreed by most organisations. However, there are some organisations, who may not agree entirely with this submission and therefore these organisations have been encouraged to provide their own response.</p> <p>DSG members welcome the opportunity to provide comment. As a general comment, there was about a years' delay from the pre-consultation carried out until the consultation draft was published. It would be useful to understand if in the intervening period any planning that is included in the second phase of decommissioning has already been approved.</p> <p>It is also very difficult to get to grips with 'interim end states' and 'final end states' and the requirements for the current Parent Body Organisation who is tasked with taking the site to the 'interim end state'. It would be useful to clarify to what extent Highland Council's aspirations for the site line up with the current contract. We suspect there may be differences in these two things going forward.</p> <p>As reported at the December DSG meeting there is a re-profiling of the site decommissioning programme and therefore it would be useful to understand whether this causes any issues with this document as it stands.</p>	<p>Agreed. It is recommended that Section 5 be updated to indicate which works under Phase 2 already have consent (including in particular relevant works under application 12/04017/PIP, approved in May 2013).</p> <p>With respect to interim end state, final end state, Council aspirations and the current contract for the site, see responses to Dounreay Stakeholder Group and Caithness Renewables comments in response to Questions 1, above.</p> <p>With respect to re-profiling of the site decommissioning programme, officers will discuss with DSRL whether this is likely to cause any issues with DPF2 as it stands and officers will advise members in presentation to Committee. It may be noted however that DPF2 does indicate, in section 3 on page 2, that future revisions to DPF2 may be required.</p>
<p>SNH</p>	<p>We welcome the recognition of the nearby Special Protection Areas (SPAs) in the Site End State (Page 6) and the End Uses of Site (page 14). We agree that these protected sites will be an important consideration for any future use of the site.</p>	<p>In the first instance the developer requirements set out in Draft DPF2 relate to development proposals required for decommissioning. However, they are also relevant to the generality of potential future business and industrial proposals</p>

	<p>We have assumed that the developer requirements (section 9, page 14) refer to decommissioning works and not the future use of the site. We welcome the inclusion of the North Caithness Cliffs SPA. If this section also refers to wider work or future uses for the site, where impacts could affect a wider area, then we would recommend the inclusion of the Caithness and Sutherland Peatlands SPA/Ramsar and the Caithness lochs SPA/Ramsar in this section.</p> <p>We note that the figures on pages 7 and 8 for Phase 3 do not show the locations of the proposed new construction. The table 1 on page 9 states that the new build includes;</p> <ul style="list-style-type: none"> – Flask handling facility – LLW facilities phase 3 sub-surface vaults – LLW pits retrieval plant <p>If the locations are known then it would be helpful if they are shown on these figures. If they are not yet known, then perhaps this could be made clearer in the document.</p> <p>[NOTE: SNH has also provided comments on the Habitats Regulations Appraisal Draft Record; available for inspection upon request.]</p>	<p>as part of re-use of the site. To that end, it is recommended that the final bullet point in section 9 on page 14 be revised to read:</p> <p>“To ensure that decommissioning and remediation operations do not impact on the North Caithness Cliffs Special Protection Area (SPA), the Caithness Lochs SPA/Ramsar and the Caithness and Sutherland Peatlands SPA/Ramsar.”</p> <p>This is without prejudice to the fact that the Council may in the future provide further development guidelines, in response to specific proposals or opportunities for re-use of the site.</p> <p>With respect to the Phase 3 developments, Figure 3 (and also Figure 2 for Phase 2) both depict the existing consent for low level waste facilities, which is for up to six shallow sub surface vaults. This includes the phase 3 vaults. At the time of writing this report, full pre-application discussions between Council officers and DSRL about Phase 3 have yet to be held; information currently available on Phase 3 for inclusion in DPF2 is limited. Officers will nevertheless discuss with DSRL how DPF2 might be made clearer on this and officers will advise members in presentation to Committee.</p>
<p>Historic Scotland</p>	<p>The following comments are based on our statutory historic environment interests. That is scheduled monuments and their setting, category A listed buildings and their setting and gardens and designed landscapes and battlefields in their respective Inventories. We would advise you also seek comments from your Council’s Conservation and Archaeology Services who will also be able to advise on the potential for significant impacts on the historic environment and of potential impacts and mitigation for any sites of regional and local importance.</p>	<p>Noted. The fourth bullet point in section 9 on page 14 covers sites of national importance, whilst sites of regional and local importance are already addressed in the sixth bullet point. Additionally, the Council’s Historic Environment Team will be consulted as appropriate as part of pre-application and application processes. The Highland-wide Local Development Plan, associated Supplementary Guidance and related Standards address these issues.</p>

	<p>We welcome the production of this updated planning framework and will continue to work with stakeholders in relation to heritage matters associated with the site. We also welcome the continued use of the developer requirements for the site as set out in Section 9.</p>	<p>It is recommended that the second sentence of the fourth bullet point in section 9 on page 14 should be reworded as follows and should be made a separate bullet point as originally intended:</p> <p>“Proposed uses should take account of the existing bad neighbour developments within the Dounreay site.”</p>
<p>Caithness Renewables</p>	<p>Since the 2009 stakeholder consultation significant changes have occurred in Caithness, such as offshore wind developments around our coastlines, Pentland Firth and Orkney Waters and work around oil and gas decommissioning.</p> <p>Carrying out further stakeholder / community consultation given the changes in the area since this time might be valuable.</p>	<p>The points made are noted. Such further stakeholder / community consultation referred to is outwith the scope of work on DPF2 itself. However, other workstreams of the Nuclear Decommissioning Authority, Highlands and Islands Enterprise and the Council, including but not limited to work together through the Caithness and Sutherland Regeneration Partnership and work of the Council in preparing the Caithness and Sutherland Local Development Plan (CaSPlan), can provide opportunity for further consultation on relevant issues.</p>
<p>John Webster</p>	<p>Thanks to Planning Department for providing copies of the consultation draft to those at Buldoo, the nearest neighbours to DSRL.</p> <p>The following comments on the Draft are personal and do not reflect any group view. The views expressed are clearly parochial in scope, hence the suggested format is not being followed.</p> <p>Over the past few years Dounreay has introduced construction activities off the LNS, these are LLW vaults and spoil heaps, plus the new firing range, all to the disadvantage of local residents. The firing range is not shown on any of the illustrative material, a strange omission.</p> <p>Further possible developments resulting in change are hinted at in the</p>	<p>The concerns expressed are noted. DPF2 is being prepared to update the original Dounreay Planning Framework which inevitably lacked certain detail of the requirements for decommissioning; more is now known and has been reflected in Draft DPF2. DPF2 presents the programme in Phases, to which time periods are attached (Phase 2 being to 2018 and Phase 3 from 2018 to 2025). DPF2 therefore helps to inform the public of the current programme.</p> <p>Additionally, see responses to comments logged against Question 5 from Dounreay Stakeholder Group and SNH (above) and to comments logged against Question 5 that were submitted via DSRL’s Planning Applications Manager (below).</p>

last paragraph of page 2. This has increased local concern. It may be recollected that the Mark 1 document gave an unreliable and vague location of the proposed waste vaults, two of which are now nearing completion. Will lightening strike twice?

The Dounreay site has now been split into a series of Planning areas, the LNS, the Planning Framework Site and the rest. Information on the rest, that is other land owned by NDA, is mostly expressed in platitudes. There is unease about the fate of some the those areas, especially in regard to concern that the vast spoil heaps and rock store to the east of the Framework Site are perhaps abandoned in the future. Perhaps the Framework should express a commitment to encouraging that the "rest" is allowed to remain undisturbed by decommissioning activities and revert to their pre World War 2, and pre UKAEA status, an aspiration of many local residents.

The opening paragraph on page 6, "headworks for retrieval of LLW pits" is interesting. This no doubt indicates an intention to empty Pits 1-6. For years it has been stated that options other than emptying are being considered in relation to these Pits. If they are not emptied then the ten thousand year erosion line for the LLW vaults is open to question. If they are emptied then the waste inventory will increase with a likelihood of more vaults being needed. Already a third is being planned and the term "a fourth vault" is used in conversation. The consequence of this is viewed with alarm at Buldoo, another lengthy period of regrettable nuisance for the area.

The writer is well aware that Planning Permission was given for up to six vaults.

It is a matter of regret that the nuclear industry have not been able to produce reliable estimates of the amounts of waste to be created.

<p>Councillor Jim McGillivray</p>	<p>I perceive the current boundaries of the Dounreay Travel to Work area to be a historical anomaly from the 1960's. I know directly of one individual who commuted regularly from Edderton to Thurso for a number of years, and the CEO of NDSL travelled regularly from his home in Dornoch to work at Dounreay until recently.</p> <p>We also have a "Caithness & Sutherland Area Committee" and a "Caithness & Sutherland Local Development Plan". Material going to and from Dounreay has used the A9 arterial road through East Sutherland, and also the main Inverness/Thurso rail service.</p> <p>Also, the "realm" of the North Highland College extends from the main campus in Thurso to the thriving satellite campuses in Dornoch. In fact, these campuses are a feature of the Dornoch Masterplan, as sponsored by HIE and supported by the North Highland Initiative.</p> <p>I would therefore argue that any Community Benefit from the Dounreay De-commissioning be extended to include the whole of Sutherland and that part of Easter Ross as determined by the boundaries of Ward 1 and Ward 5.</p>	<p>The points made are noted. Caithness and North Sutherland provides a particular focus to activities to address the socio-economic effects of the decommissioning of Dounreay; within that there is the immediate Dounreay/Thurso 'local' area. It is understood though that the previous operation and current decommissioning of Dounreay is in some respects related to a wider area. However, whilst Draft DPF2 includes reference to community benefit (in section 8) including signposting the Council's Community Benefit Policy, setting of policy for Community Benefit from the Dounreay De-commissioning is outwith the scope of DPF2.</p>
<p>Comments via DSRL's Planning Applications Manager (summary)</p>	<p>Potential revisions to the maps in DPF2 should be considered, in order to:</p> <ul style="list-style-type: none"> • Reflect more precisely the location of the consented LLW underground vaults which are being developed, subject of phased implementation; • Include the small grout plant which is being built for the LLW project, located in the corner of the site adjacent to the LLW vaults; • Reflect the more extensive planning application area for the LLW vaults development, which includes an area off-site for laying down excavated material (the geosphere); • Include the firing range, which is off-site. 	<p>In 2011 the LLW underground vault proposals had some minor changes agreed as non material variations. The mapping in Draft DPF2 does not reflect these. It is therefore recommended that the mapping be amended to show the agreed variation in terms of size and alignment of the vaults.</p> <p>It is recommended that the Phase 2 map be revised to show the small grout plant.</p> <p>It is recommended that the mapping be revised to refer to the presence of the area for laying down excavated material, which is off-site.</p>

		It is recommended that the mapping be revised to refer to the presence of the firing range, which is off-site.
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