



Historic England

09 February, 2016

Dear Sir/Madam

Nuclear Decommissioning Agency Draft Strategy Published January 2016 for Consultation – Historic England Response

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

We recognise the national and international significance of Britain's nuclear industry and the pioneering role that British scientists and engineers played in the development of this technology. The sites that the Nuclear Decommissioning Authority is now tasked with decommissioning and demolishing may be seen as monuments to the pioneering phase of this technology, where British expertise was often at the forefront.

Most of the specific questions in this consultation lie outside of Historic England's expertise and responsibilities and we have restricted our response to comments on the two strategy areas where we suggest improvements could be made, Site Decommissioning and Remediation and Critical Enablers.

Site decommissioning and remediation

The threat presented to the historic infrastructure of the nuclear industry and its related research facilities by decommissioning and remediation is absolute and we recommend that this should be mitigated by a corporate heritage strategy and strategies for individual sites. Ideally, a heritage strategy will be developed prior to the closure of individual sites to ensure that an adequate and proportionate recording strategy is in place. For most of the sites that the NDA is responsible there are abundant records and the immediate need may be to ensure an adequate photographic record and supporting written analysis of all aspects of the station. Records created during decommissioning may also have historic interest as demolition will reveal further details of construction techniques.

Question 2. What are your views on the NDA's decision to review the deferred dismantling strategy for Magnox reactors?



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Historic England does not have view on the timetable for the dismantling of the Magnox reactors. It would, however, urge that the proposed heritage strategy is in place and implemented sooner rather later, especially if former employees are to be consulted.

Question 3. What do you think are the benefits and disadvantages of reusing wastes from remediation or demolition on site for backfilling void and landscaping?

Consideration might be given to ‘returning’ the landscape its pre-power station form. Careful thought was given to the design of many power station landscapes and the same care should be used in the design of their successor landforms.

Critical enablers

Question 11. Which areas should we focus on the strategic development of HSSSEQ?

A heritage strategy should be regarded as one of the Critical Enablers relating Objective 7.1 Health, Safety, Security, Safeguards, Environment and Quality (HSSSEQ). As the NDA strives to achieve leadership and best practice in all other areas of its operations it should also recognise the historic legacy of sites, their immediate landscapes, people, artefacts and documentation.

The heritage strategy adopted by the former research site at Dounreay, Caithness, in the spirit of the NDA’s ‘lead and learn’ culture, it is a model that could be applied across the whole estate.

<http://www.dounreay.com/site-closure/heritage/heritage-project>

Historic England is also working with the owners of England’s conventional power stations to develop generic guidance on the recording of redundant structures together with appropriate archiving of selective records and artefacts. The advice we are offering to this sector would be equally applicable to the documentation required for most nuclear facilities.

<http://www.historicengland.org.uk/advice/heritage-at-risk/industrial-heritage/protecting-industrial-sites/coal-and-oil-fired-power-stations/>

7.7 Information governance

Nuclear Archive

Historic England welcomes the creation of the Nuclear Archive in Caithness. In the past when major industries have been undergoing profound changes historical records have often either been destroyed or scattered between a multitude of private and public collections. This dispersal of archives can later be very frustrating for researchers. Historic England would urge that this archive has a broad based acquisition policy. In addition to administrative and technical papers the collecting policy should ensure that a representative sample of site plans and architectural drawings are kept, along with operating manuals and plant drawings. Still and moving photographic images of the industry are of particular significance.

To complement the technical records of the industry thought should also be given to documenting its social history. Material relating to the social life of the workforce is also of interest, for example, information relating to sports and social clubs.

In addition to the collection of documentary records consideration should also be given to the safeguarding of artefacts. These might include architectural and training plant models, inert training aids, sections of control room panels and specialist clothing worn by



the workforce. Material may be used to supplement the National Nuclear Archive, or be deposited with national or local museums.

The physical accessibility of the archive for researchers based in England is a concern, although should be eased by detailed cataloguing and digitisation of records. Initiatives at Dounreay have also shown how working with others can unlock the historical research potential of this rich historic resource.

Question 16. What factors should we consider when thinking about stakeholder engagement around Magnox reactor sites entering in to periods of quiescence?

Before the period of quiescence is entered a heritage strategy should be developed which will include gathering together and collating information on the sites and making it accessible through a variety of media. These sites, which will remain as landscape features for many decades will continue to provoke curiosity and local opportunities, may exist to promote further historical research. This may in turn enable the NDA to maintain links with local communities and the higher education sector over the lengthy quiescence period.

Historic England will be pleased to meet with the NDA to discuss the development of corporate and individual site heritage strategies. Given the UK scope of the industry, it would be helpful to include representatives from Historic Environment Scotland and Cadw in any such meeting and we can provide appropriate contact details, if necessary.

Yours faithfully,

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