

**DOUNREAY PLANNING FRAMEWORK 2: SUPPLEMENTARY GUIDANCE  
Consultation Draft – November 2013  
RESPONSE FORM**

If you wish to comment on Draft DPF2, you should use this response form and submit it to the Council to arrive by the deadline which is **5pm on Thursday 16 January 2014**. If you have no comments to make in response to a particular question, please leave blank and move on to the next question. Question 6 provides opportunity to provide any other comments on the document. If you have additional information for us, please attach it as part of your submission.

**Please, if possible, type your responses into the form electronically, saving the file, then attach the completed form to an e-mail and send to: [devplans@highland.gov.uk](mailto:devplans@highland.gov.uk)** (If that is not possible then print the form, fill it in and then post to: Development Plans Team, Planning and Development, Council HQ, Glenurquhart Road, Inverness, IV3 5NX.) If you have any questions or require assistance, please contact the Development Plans Team on 01349 886608 or by e-mail to: [devplans@highland.gov.uk](mailto:devplans@highland.gov.uk)

Once we receive your form, we will acknowledge receipt of it.

Please firstly provide your contact details below, in order that we can acknowledge receipt of your submission and keep in touch with you about DPF2. Please note that comments cannot be treated as confidential and the Council cannot accept representations which do not have a name and address. Comments will be made available for public inspection, except any information which would be subject to the Data Protection Act 1998.

**YOUR DETAILS**

First Name	June
Last Name	Love
Main Contact Email	<a href="mailto:info@dounreaystakeholdergroup.org">info@dounreaystakeholdergroup.org</a>
House Name / Number	Dounreay.com
Street / Area	Traill House, 7 Odrig Street
Town / City	Thurso, Caithness
Postcode	KW14 7BJ
Customer Number (if you have one)	
Organisation (if applicable)	Dounreay Stakeholder Group
Agent Name	
Agent email address	
Agent address	

## CONSULTATION QUESTIONS

### 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?

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.

The Council's expectation's is that the "interim end state will be land decontaminated .... .. may include the removal of plinths .... .

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.

### 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?

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.

DSG members have considered the NDA's draft business plan and make the following comments:

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?

### 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?

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.

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.

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.

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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?**

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.

**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.**

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.

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.

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.

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.

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