

# Dounreay Planning Framework 2: Supplementary Guidance

## Frèama Dealbhaidh Dhùnraih 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](http://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](http://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](mailto: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.

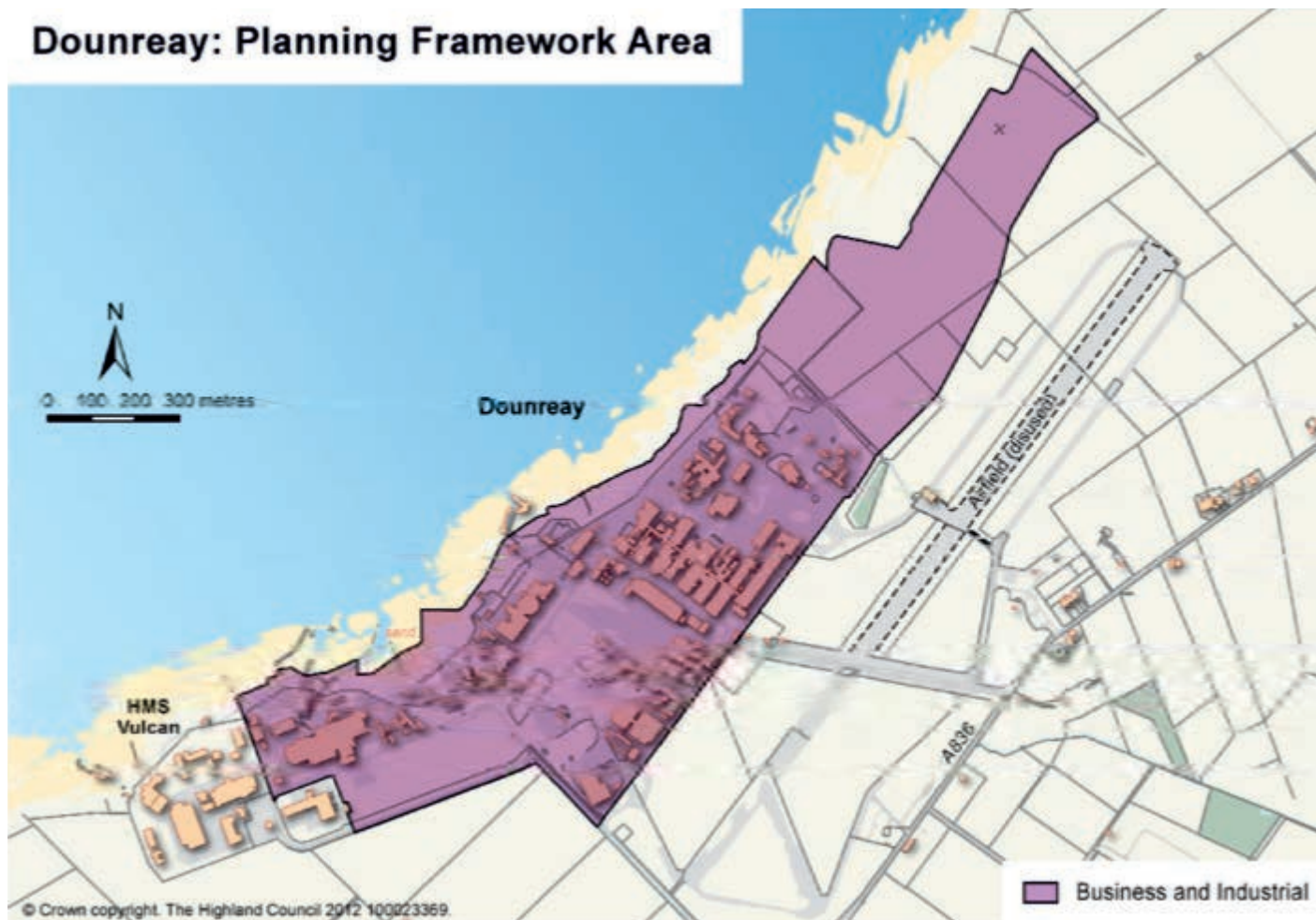
The DPF was a material consideration in the determination of Dounreay planning applications; the most notable being outline planning permission for the Phase 1 granted in 2007, and planning permission for Low Level Waste (LLW) Disposal facilities granted in January 2009.

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:



## 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

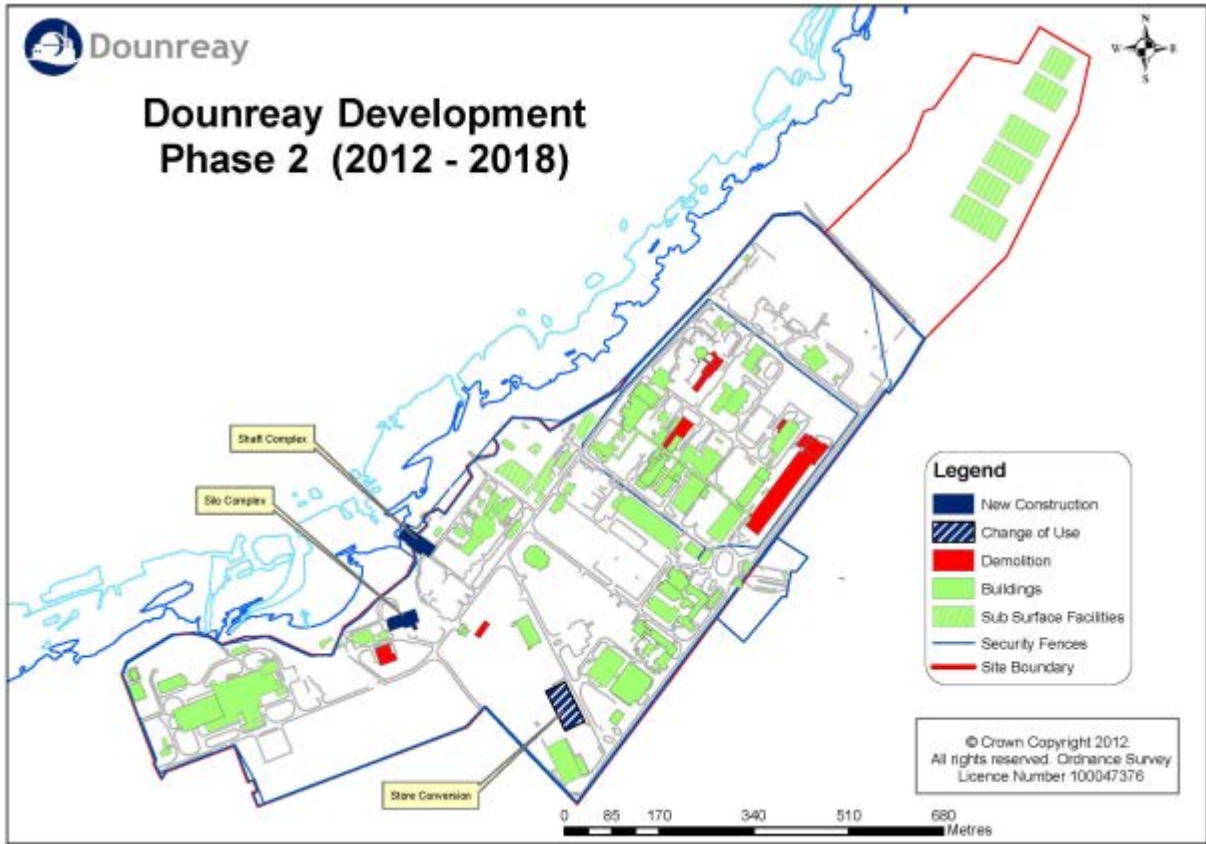


Figure 2

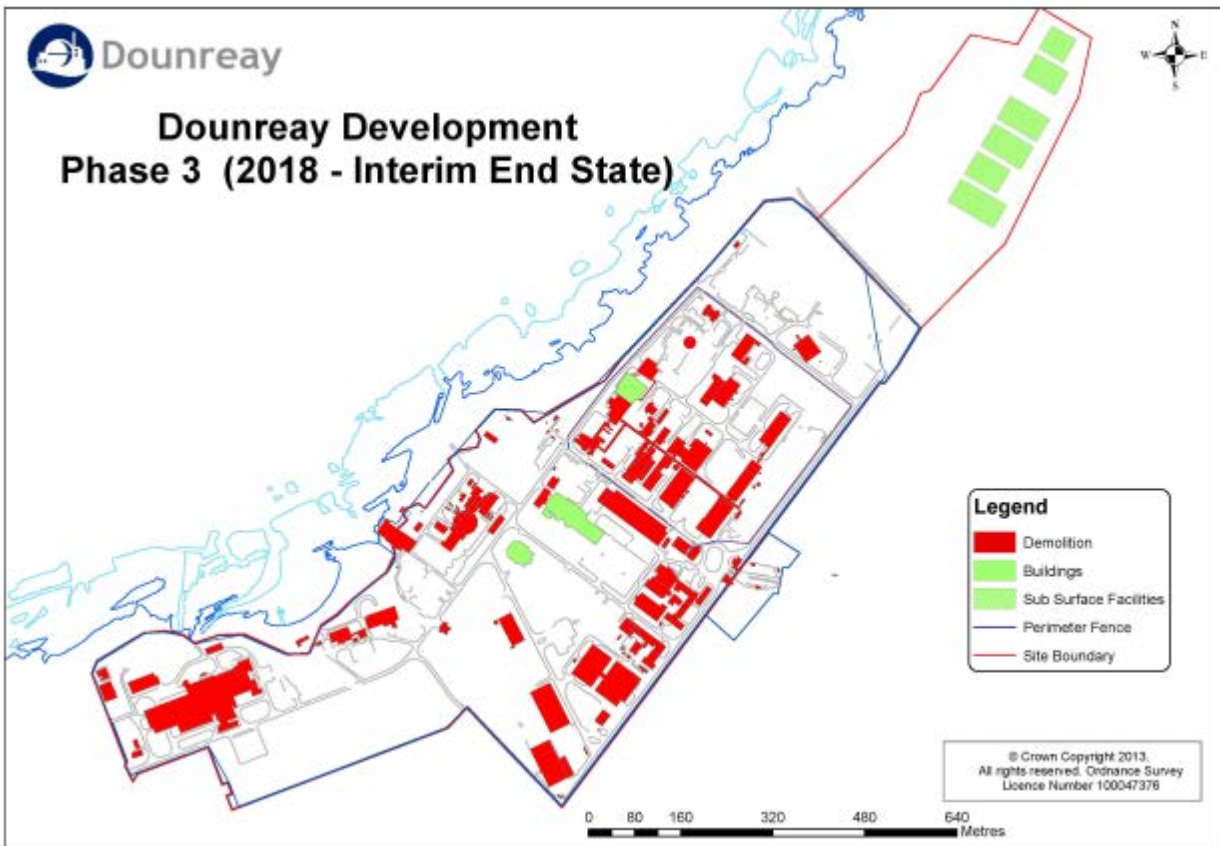


Figure 3





Figure 4

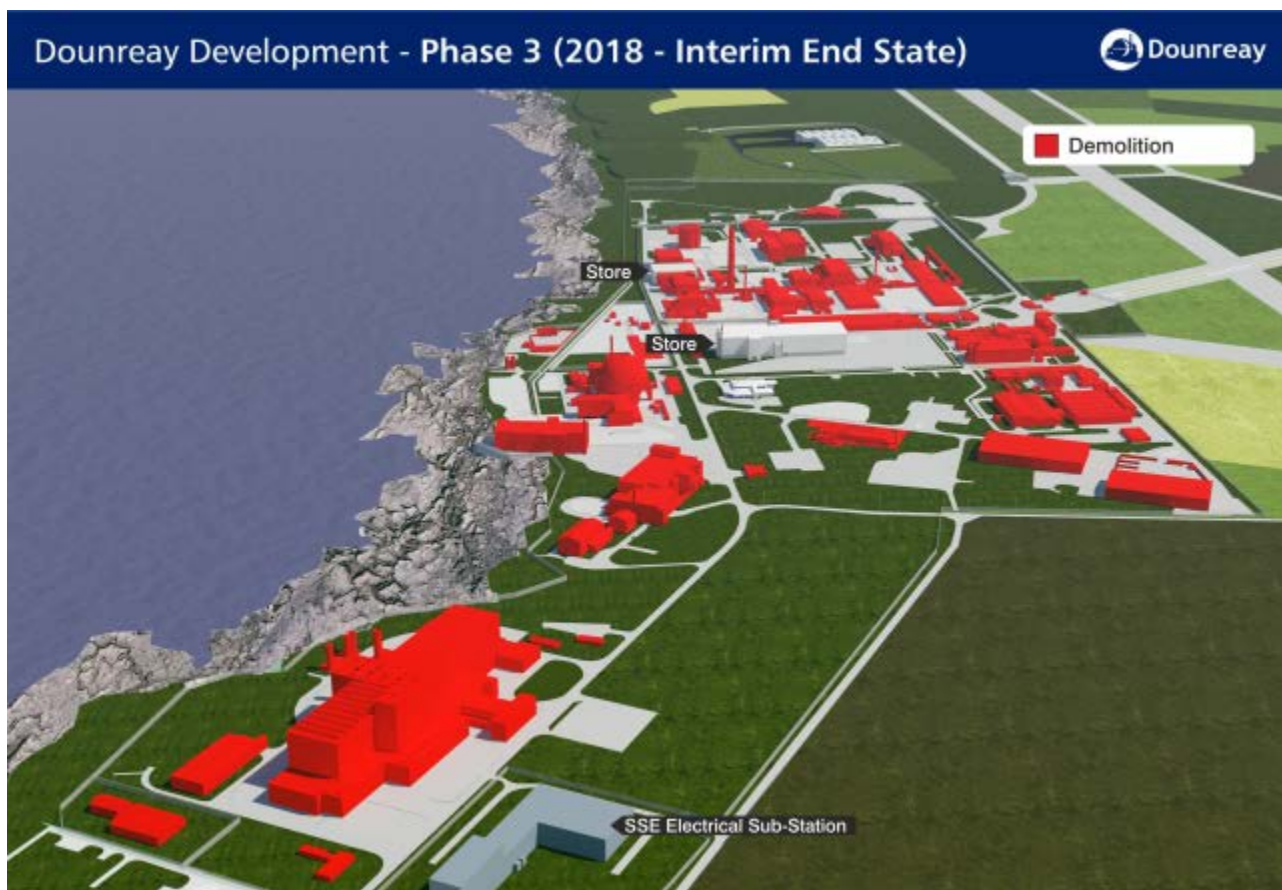


Figure 5

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.

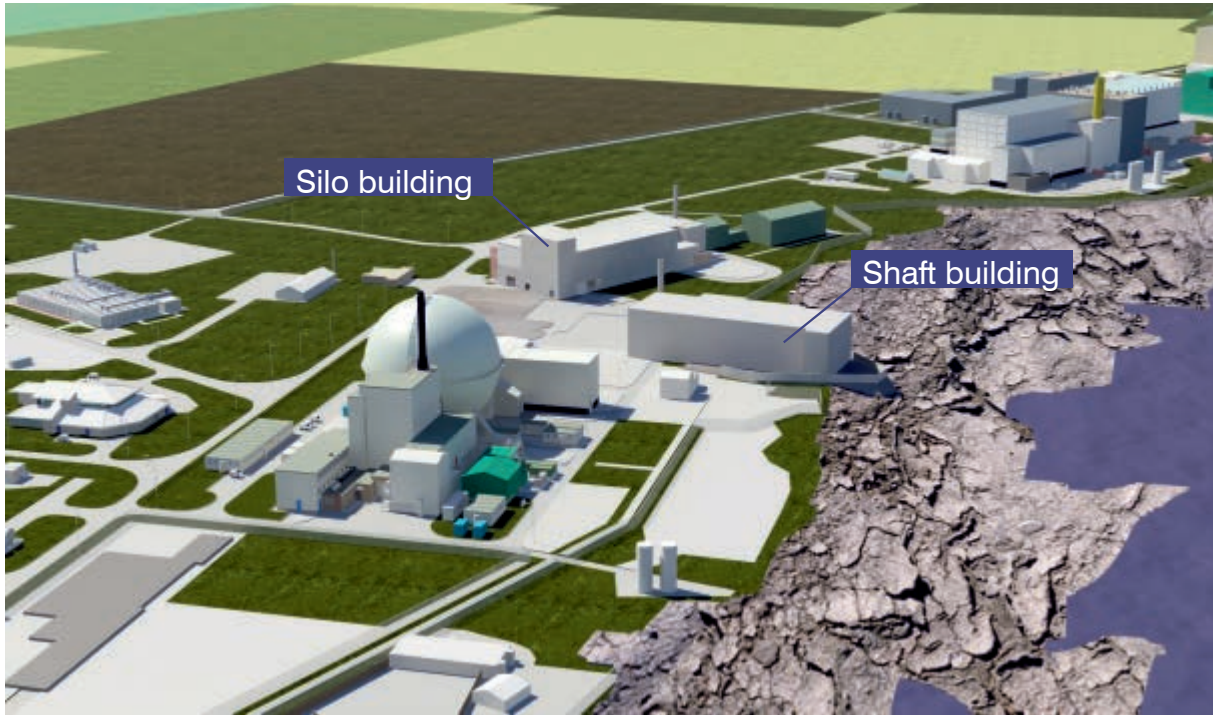
One of two new FCA ventilation stacks



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

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