



Department  
of Energy &  
Climate Change

# Report from sector workshops held during the review of the siting process for a Geological Disposal Facility (GDF)

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# Report from sector workshops held during DECC's review of the siting process for a Geological Disposal Facility (GDF)

Prepared by Department of Energy & Climate Change

# Contents

Executive summary .....	7
Aims & Objectives.....	7
Overarching themes.....	8
Section 1: Introduction .....	7
Methodology and Approach .....	7
Section 2: Workshop Findings .....	11
Chapter 2: Decision making and roles .....	11
Chapter 3: Technical Delivery .....	18
Chapter 4: Communities .....	24

# Executive summary

The Department of Energy and Climate Change (DECC) held three sector-specific workshops in November 2013, as part of a wider programme of events to complement the Government's public consultation on the revised siting process for a geological disposal facility (GDF) for higher activity radioactive waste. The workshops took place in Warrington (industry) and London (local authorities and NGOs).

## Aims & Objectives

DECC commissioned a number of engagement events with the public and stakeholders during its consultation. It is important to note that the events complemented the consultation rather than acting as formal responses to the process, although contributions made during all events were a very helpful input to the policy development process, allowing Government to understand in more detail people's views on the issues.

The specific objectives of the workshops were:

- To help DECC explore and understand stakeholders' questions and concerns about the current GDF site selection process;
- To allow stakeholders to explore and understand the implications of the Government's proposals for them and other stakeholders;
- To obtain stakeholders' feedback on the proposals for improving the current GDF site selection process;
- To support stakeholders to compile any responses that they wished to make to the public consultation.

The workshops were guided by independent facilitators, with DECC staff giving presentations and providing support throughout the day. Representatives from other organisations such as the Nuclear Decommissioning Authority (NDA), the Office for Nuclear Regulation (ONR), the Committee on Radioactive Waste Management (CoRWM) and the Environment Agency (EA) were also on hand to aid the discussions around individual tables for each of the workshop sessions and, where appropriate, to explain what their respective roles might be in a siting process.

The structure for the day involved an optional introductory presentation on the history of the UK's involvement with civil nuclear power generation, followed by a discussion of each of the questions posed in the consultation from one to eight with extra space provided for any additional comments.

Invitations were issued to representatives of the nuclear industry, local authorities and NGOs, with attendance from a wide cross-section of those organisations. However, it should be noted that the feedback captured in the workshops was not fully representative of each sector and this

report summarises a range of viewpoints rather than seeking to represent every individual point made.

## Agenda

The workshops began with presentations from DECC outlining the history of the Managing Radioactive Waste Safely (MRWS) process in the UK, the key messages from their review of the siting process so far, and a summary of the proposed revisions to the siting process.

The workshops were structured around the proposals outlined in Chapters 2, 3 and 4 of the consultation document and the related consultation questions.

Discussions focused on questions of clarification to gain a better understanding of DECC's proposals, and listening to participants' thoughts on the consultation questions.

## Overarching themes

The main body of this report provides an overview of the themes coming out of each of the three events. In addition, a number of themes or discussion points were repeated across events and different stakeholder groups. These included:

- The need to define a community, as it affects many aspects of the process.
- Questions about community benefits and how these will be defined and administered.
- Challenges about the process for appointing a representative body or steering group to speak for a community.
- Questions about the propriety of the representative authority and how funds will be administered to a community.
- The need to explain the basic principles of a GDF in lay terms.
- The potential for more than one GDF to be constructed.

# Section 1: Introduction

The three sector-specific workshops held by DECC were designed as part of a wider programme of events to complement [Government's consultation](#) on the revised siting process for a geological disposal facility for higher activity radioactive waste. The consultation ran from 12 September to 5 December 2013.

The workshops took place in Warrington (the industry workshop) and London (workshops for local authorities and NGOs respectively). They ran alongside four national stakeholder workshops in Penrith, Llandudno, Exeter and London and four public dialogue research workshops held over two sessions to obtain views from representatives of the general public.

Information provided at the workshops aimed to help answer questions and inform participants' formal submissions to the public consultation. Whilst DECC representatives explained that they would use the events to explore and understand stakeholders' issues/questions/concerns about the current GDF site selection process, any views expressed in the sector events would not be considered as formal responses to the consultation. Instead, participants were encouraged and reminded to submit their responses after the event so that their views could be formally taken on board by DECC.

## Methodology and Approach

The workshops were preceded by an optional background briefing from DECC. This was aimed at participants who were new to the topic of geological disposal, or who wished to have a refresher on the history of radioactive waste management in the UK.

The main part of the workshop was introduced by the independent facilitator and a DECC representative who outlined the objectives and the agenda for the day.

The introductions were followed by presentations from DECC (see Appendix 3 for the presentation slides) outlining:

- The history of the MRWS process in the UK and the key messages from their review of the siting process to date, including the "Call for Evidence" that took place in May and June 2013.
- A summary of the key proposals in the consultation document.

Following these presentations, participants discussed the proposals and related consultation questions in Chapters 2, 3 and 4 of the consultation document. Each of the small group discussions was supported by a representative from DECC. Representatives from the supporting/observing organisations were also available to respond to technical questions and provide any necessary clarifications.

The discussions focused on questions of clarification to gain a better understanding of DECC's proposals, and listening to participants' thoughts on the consultation questions.

Main points and issues discussed were recorded on flipcharts and on table notes either during the small group discussions or in the plenary sessions that followed.

The key areas of discussion from all three workshops are summarised by sector in Section 2, which should be read alongside the [consultation document](#). Where participants are referred to by sector, for example 'local authorities', this does not mean that their comments represent the entire stakeholder group.

# Section 2: Workshop Findings

This section provides an indication of the key issues raised by stakeholder groups for each chapter of the consultation document, as well as other comments.

Proposals from the consultation and a summary of feedback are summarised up front. More detail follows about comments put forward by industry, local authority and NGO stakeholders.

## Chapter 2: Decision making and roles

**Decision making: Summary of proposals** (see also pages 21 to 31 of the consultation document)

- A period of national public awareness raising and engagement before seeking volunteers.
- A more continuous process of two phases – “Learning” and “Focusing”– with an on-going Right of Withdrawal.
- A possible requirement for a demonstration of community support before a community commits to hosting.
- Specify that it is the district council that will exercise the Right of Withdrawal during the siting process.

### Summary of Feedback

Key issues raised by industry, Local Authorities and NGOs include:

- The timetable and timeline of decision making points require clarity as well as flexibility.
- There is a need for an inclusive and challengeable approach to decision making; an eclectic representation could avoid the perception of an undemocratic process.
- More detailed information is needed on the definition of a community and about how the overall process will work.
- Communities need to be effectively engaged with appropriate information to support any decisions.
- It is important to maintain flexibility in obtaining public support in the face of long timescales and potential ‘opt-outs’.

## Industry

On the question of who should act as the representative authority, participants suggested that the district council should be the decision making body. However, discussion also focussed on whether engagement should go beyond the host community (such as neighbouring district councils and a broader range of communities). In particular, participants flagged that transport will be key to any site assessment and raised questions about the involvement of residents in communities through which waste would be transported.

Participants also asserted that there is potential for criticism if non-democratic, non-elected representatives are present within the decision making process, especially if from Government or the local authority. Some suggested that an advocate should be appointed in order to maintain momentum in the overall process.

Some raised questions over the capacity for the developer and Government to manage multiple communities in the future; pointing out that this process hasn't worked on a voluntary basis so far.

Assuming that there is public support within the defined community, participants expressed a desire to identify clear decision making points along the timeline of the process - for example, a further demonstration of community support to enable RWMD to proceed to development.

Participants felt that the up-front learning phase is a good principle to adopt in order to initiate the process of engaging with an audience, although more detail is needed including information on waste transport and the potential size of the area under investigation. Some also noted that there is a need to be more precise about the definition of 'local' and 'surrounding area'.

On the focussing phase: questions centred on the makeup of the steering group, its role and continuity of personnel over a long period. Participants suggested that Government and NDA should step back from the steering group and take on an advisory rather than a decision making role.

Some welcomed the proposed smoother process, whilst raising concerns that rushing to meet artificial deadlines may generate failure.

On national awareness-raising, participants raised questions about whether this would be done consistently across the nation - whether a potential GDF would be promoted more heavily in some areas than in others.

Some argued that there needs to be an incentive for communities to bid for the site (as opposed to campaigning against it). This brought to light questions around how to engage communities in a balanced way without creating an emotive issue.

Public support should be tested, but the local community should 'decide how this test should look. The approach to testing public support needs to be managed carefully and timescales should be carefully considered. With regards to mechanisms for testing public support, some contributors felt that a referendum was 'high risk', as it could be turned into an emotive debate locally, pitching pro-nuclear against anti-nuclear groups, rather than focusing on the question of a GDF. Other options discussed included continuous polling rather than a referendum.

Participants discussed what level of public support is required in the first place and considered 'targeted persuasion' of communities following discussions around which filter should come first: geology or public acceptance. Some noted that significant resources could be spent on engaging communities only for them to subsequently opt out.

## Local Authorities

Participants felt that Government should improve its approach to engaging local authorities overall.

On the specific question about district and county councils, participants suggested that there could be a partnership between the two tiers; however, some also suggested that it would be hard to obtain agreement between district council and county council on which should be the representative body. Some felt that the most affected authority should have a say; the views of those who were further away from the potential site shouldn't veto decisions taken by the local community. Participants also queried what would happen should all authorities become unitary authorities.

Participants also commented on the importance of trust in the whole process as well as the wide variation in the capabilities of district councils. Some stated that district councils might be too small and under-resourced to be the voice of a community for a GDF; using district councils as the voice of the community was therefore considered to be too simplistic. Some stressed that district councils should work with local enterprise partnerships (LEPs) or other local bodies from the outset. A few participants suggested that county councils are better resourced to deal with this than district councils and that if you leave out a tier of local government, such as county councils, the process will lose credibility.

Some suggested that the two phased process is better than the previous six stage process, although there was some debate as to whether it would be better to have just one phase. A possible alternative suggested was for one national learning phase followed by a continuous community process. This could allow for quicker, simpler decision making.

Participants felt that it was important to understand why detailed geological information may only be available later in the process, and that DECC / RWMD needed to set out what the proposed geological and socio-economic reports would contain.

Some participants stated that they supported public engagement (from national awareness-raising through the learning phase) from early in the process and indeed that it was very important to the process, not only to ensure openness but in order to gain community support.

Discussions within the groups included debate on how to specify the test of public support now, whilst maintaining a degree of flexibility in the process. Participants felt that there was a line of tension here. Early local discussion of the siting process should be undertaken to establish understanding, along with a 'flexible test' to gauge local interest, including schemes such as a public education programme, referendum, opinion polls and citizen panels.

Some participants discussed referendum as a potential tool for local decision making; including the possibility that one could be held early in the process in order to produce a 'mandate'. Participants also discussed the need to get engagement from the community to participate in a referendum.

Some felt that the community should be able to decide on the right to withdraw, and the right of withdrawal shouldn't be held at the district level only: the community most affected must have the greatest say. Some raised concerns that the way that the proposal was structured in the consultation document could cause the right of withdrawal to be used very early in the siting process; participants discussed the need for flexibility in decision making timetables. There was a desire that 'community should be defined at the outset.

Participants tended to agree with the 'two-phased approach' (learning and focussing phases) of on-going right of withdrawal. Some noted that there was a distinction to be made between a 'right of withdrawal' and a 'right of veto' and questioned how rights of withdrawal would be managed across several interested communities..

## NGOs

Participants discussed local authority representation, suggesting that having district councils as the representative body was a flawed idea, as it wouldn't represent the entire area affected by a GDF.

Some felt that the proposal of using the local district council was not a strong enough representative body and suggested that this body had been chosen as the proposed representative of a community because they were more likely to say 'yes' to a GDF, referencing the previous process in Cumbria. Furthermore, in the absence of a definition of community, some felt that the county council should still play a prominent role, and that all three tiers of local councils (parish, district and council) should be involved with voting held at the same time, not separately.

Debate took place over two tier authorities and who would represent the public in those instances (also noting that in some cases there may be neighbouring authorities who would take an interest). Most considered that a local authority could not own this process, as it would require resources and support from an independent source.

With regard to the proposed 'learning' and 'focusing' phases, participants favoured a process involving clear decision points. It was felt that the decision making process should involve robust scrutiny comprising wide-ranging partnerships, with academics for example, and should include all of the community. This would need to be a continuous process. Participants suggested that NGOs should be given direct access to funds so that they can contribute to developing the peer review reports.

Participants felt that there was little in the consultation document about how the public will be informed or how a community could express an interest in hosting a GDF; as well as several aspects which needed further clarity, including:

- Governance
- Trust
- Scrutiny
- Resourcing

Participants noted that lack of information was a significant problem in the previous process, with people knowing very little about geological disposal. They stated that openness and transparency are essential to the process and participants discussed how lessons from the previous process should be taken into account and incorporated into the process. Participants stated that they want to see a process that succeeds.

Debate took place over where information would come from to advise people. Reports should be open to far more than consultants nominated by DECC. In order to involve the community, some felt that the process needs to be seen to include people who are not part of the enabling process. The lack of definition of a community was seen to be a problem in this regard.

Participants felt that a process of open challenge was required from the outset to build confidence in the siting process, for example a local community could commission its own geological report. Most felt that the need to build trust was a key component in the process, as was the need to work with critical friends in an open and honest dialogue. It was felt that unless there is acceptance of the validity of criticism, trust won't be built.

Participants noted that there is a need for independence. For example, the impartiality of the British Geological Survey (BGS) was queried on the basis that the BGS was employed by the government. RWMD reports would also need to be subject to expert challenge. Participants felt

that there has to be scrutiny in order to ensure that arguments are held in an open and transparent manner; a process of open challenge, such as a Citizens' Jury (with a number of local people and experts) or incorporating 'friendly critics' would help to build trust and inspire confidence in the process. Some also felt that more weight should be given to other sources of information in the public domain, including academic information.

Some stated that a test of public support has to be credible to the community. If an interest was expressed, there shouldn't be a single test; a long timescale means other factors should be considered as the process develops. In these cases, an assumption of acceptance could be misleading, whereas stages of multiple decisions require in-depth thinking. Some also suggested that any expression of interest should be made in the public domain.

However, participants also discussed whether public support should be the primary consideration, or whether other factors should come first, such as the local geology in an area that expresses an interest in hosting a GDF.

**Roles: Summary of proposals** (see also pages 32 to 35 of the consultation document)

- The Government and RWMD to carry out a national public awareness and engagement programme. RWMD, as the developer, to form part of a “Steering Group” with local councils.
- District council to be specified as the local decision making body. “Consultative Partnership” to provide a role for counties and parishes.
- The Government to explore using CoRWM, a pool of professional peer reviewers and/or a new independent advisory body.

**Summary of Feedback**

Key issues raised by industry, Local Authorities and NGOs include:

- The view that regulators should take a more active role in order to increase public confidence
- A need to better define the steering group and the role of an advisory body
- Whether CoRWM is the most appropriate source of expert knowledge given that they may not be considered independent

**Industry**

Participants noted that RWMD would still play a leading role in helping the communities engage in the process as an implementing organisation, and participants agreed that their role could be increased to be a member of the steering group.

Some questioned who should make up the ‘local’ steering group and how continuity of personnel could be maintained over long timescales. A better definition of roles in general is needed, looking specifically at how the group will continue over a long timescale.

Clarity over the role of the regulator was requested. Participants were of the view that the regulators should be more visible in their role in the siting process in order to increase public confidence.

Industry felt that peer review was critical to the siting process. Some discussed the process for selecting the peer reviewers and whether the Committee on Radioactive Waste Management (CoRWM) was the most appropriate group for peer review. Participants felt that there was potential for more of an ‘up-front’ role for the CoRWM as independent experts to liaise with communities.

Some noted that there is a role for a proactive myth-buster who could be regarded as an ‘honest broker’.

## Local Authorities

Some support was shown by participants for a steering group made up of the district council, county councils and parish councils but participants were content for local community to take forward the final decision. Some noted that counties have expertise in areas such as planning as well as guidance on how a partnership would work, and as such shouldn't be excluded.

Participants felt that Government and RWMD should step back from involvement in the steering group and take an advisory role. RWMD should have observer status in the steering group as they did in Cumbria as part of the last process, which participants felt worked quite well; otherwise there could be a danger of RWMD being seen as controlling.

Participants stated that the perception of independence is critical and that although CoRWM is respected by many, it is probably not seen as independent. One idea was to bring in someone with expertise from abroad, with no 'baggage' of UK experience, as GDF experience is transferable. Some questioned who would fund such an advisory body if central government didn't provide finance for it.

## NGOs

Participants stressed that transparency is needed in Government on who appoints the consultative body and that there should be a partnership approach with dissenting voices having a clear role to provide legitimacy.

Some noted that constituents in a community (such as local authorities, NGOs or trade bodies) should appoint members of any committee for local community representation, and these representatives should be trusted by the community. An independent body or constituency advisory body should provide oversight. Participants mentioned that CoRWM would not be the right body as it was felt that this could reduce credibility.

Some also requested clarity of RWMD's position as a wholly owned subsidiary of the NDA.

## Chapter 3: Technical Delivery

**Geological settings: Summary of proposals** (see also pages 36 to 41 of the consultation document)

- The Government to publish information on regional geology in advance of any call for volunteers.
- The Government to move quickly to provide a detailed, independent geological report for areas engaged in the “Learning” phase.

### Summary of Feedback

Key issues raised by industry, Local Authorities and NGOs include:

- There is a need to consider more than geology, but geography and hydrology as well.
- Presentation of information should be clear, open and transparent.
- There may be a danger that not enough time will be spent gathering reliable data on geology.
- It is important that complex information is presented in an accessible but objective way by a neutral body.

### Industry

Participants agreed that it would be helpful to have a geological report but questioned whether there was a ‘preferred’ geology, as well as what kind of criteria would rule an area out.

Some agreed on the importance of having a more sophisticated discussion early on about containment and the engineering barriers. Overall, participants felt that better justification and detail was required about the extent of the criteria to be included in ‘the offer’ – whether areas would be ruled out, for example.

Some questioned whether timescales in the consultation were long enough to undertake geological screening; that there was a risk that more time may be spent consulting people and not obtaining information on geology. Discussion groups disagreed over the language which insinuated that suitable sites could not be identified at the outset. They also stated that there is a need to consider the opinion that there are significant limits in the UK of where a GDF could be sited.

Participants stressed the need to consider hydrogeology and expressed an interest in considering at least two sites simultaneously in order to avoid a ‘Hobson’s choice’ type scenario (a choice of one option only).

## Local Authorities

Participants stated a need for more geological information earlier in the process and that it should include clarity over any previous geological information provided as part of the process in Cumbria. Some stated that the information required for site suitability should be agreed up front. Participants welcomed the suggestion that geological information would come from the British Geological Survey (BGS). Some requested clarity on previous geological screening work, information and assumptions.

Participants felt that there was a problem of 'chicken and egg' whereby more information is needed to proceed, but this information cannot be gathered unless communities continue in the process.

Some discussed the way in which information should best be presented back to the community, including the point that all information should be peer reviewed. Information should be easy to understand, transparent, of good quality and not blind readers with science. , and all published information should be accompanied by good quality explanation. The benefit of hosting a GDF to the local community should be identified early on, along with a geological explanation. Linked to this, some requested clarity about the difference between mineral safeguarding and site identification, which could overlap. Any information that is provided should:

- Be of good quality (with health warnings)
- Be accessible to the layperson
- Transparent
- Include key messages that are clear (including information on how we make sure the site is safe in the future for future generation).
- Clarify why geology matters to the local community in order to add confidence.
- Communicate the "safety case", including information on how it looks at post closure phase/future operations.

It was stated that it takes time for people to understand this information and that the period where information is provided needs to be flexible depending on the community involved and its level of understanding (including links to national awareness-raising). It was stated that people's opinion takes time to change.

## NGOs

Participants stressed that along with geology, geography and hydrology were also important to the whole process.

Participants suggested that previous geological studies outlined suitable and unsuitable areas to host a GDF; lessons should be learned from these studies, but more detailed geological studies are also needed.

Participants also noted particular lessons from the Canadian programme.

There was a strong feeling that pre-screening was needed and that, if it wasn't available, government should explain clearly why sites couldn't be pre-screened. Overall, participants felt that there is currently inadequate data to define localities based on geology in any meaningful way and that the site selection process should not go ahead without more detail. Some participants pointed to the importance of boreholes in providing detailed and specific geological

information. It was noted that hydrogeological data couldn't be used unless boreholes are drilled.

There was also discussion over the use of geological screening criteria and their suitability; queries were raised as to whether specific criteria would be able to determine locations.

Discussion moved on to longer term effects of climate change on flood risks, coastal erosion and sea level risk. Participants suggested that you shouldn't expect a community to host a facility in an area known for flooding.

With regard to how geological information could be presented, participants stressed the importance of presenting complex information in an accessible but objective way from a neutral body.

### **Planning: Summary of proposals** (see also pages 42 to 45 of the consultation document)

- The Government to commit to applying the Nationally Significant Infrastructure Project (NSIP) regime and bring forward necessary amendments to the Planning Act 2008.
- The Government to bring intrusive investigations within the definition of nationally significant infrastructure as well.
- The Government to publish a generic National Policy Statement (NPS), specifically for a GDF, early in the siting process, which would be subject to an Appraisal of Sustainability

### **Summary of Feedback**

Key issues raised by industry, Local Authorities and NGOs include:

- That there are potential benefits and dis-benefits of the Nationally Significant Infrastructure Projects (NSIP) approach.
- There is a need for clarity on the relationship between the voluntary siting process and the NSIP
- The suggestion that the role of the Planning Inspectorate in the drilling of boreholes should be fully considered

### **Industry**

There was general agreement that the Nationally Significant Infrastructure Projects (NSIP) planning regime was the right approach for the GDF as it is of Strategic National Importance. Participants felt that the NSIP process should only bring a decision to the Secretary of State if the community concerned had volunteered. Some felt that there is need for clarification of the role of the Planning Inspectorate in granting permissions in the drilling of boreholes..

Participants discussed whether waste transport would be included in the planning process.

Participants noted that a National Policy Statement (NPS) requires an appraisal of sustainability, which would include transport.

Some wanted more information on the role of the regulator. Furthermore, if RWMD are to implement the GDF, its make-up and accountability should be considered more closely.

## Local Authorities

Participants noted that handling of the GDF as a nationally significant infrastructure development is the most appropriate approach, and overall participants welcomed this proposed added clarity. Most welcomed the proposal for a National Policy Statement (NPS) but some questioned whether there would be more than one GDF facility. There were also mixed views on the planning process to be applied to the siting of exploratory boreholes. It was recognised that the drilling of boreholes would need both planning and regulatory permission to proceed.

Participants felt that there was too much power retained at the national level and discussion was held over who makes the decision or application. On balance, local authority representatives felt that decisions should be kept with the planning authority but participants also queried whether local authorities would have the capacity and resources to deal with GDF planning applications under the local planning system.

Participants queried who would bear the costs of handling any planning applications i.e. impact assessments, community engagement etc. In the current climate, most felt that the costs would be too high for local authorities to absorb.

## NGOs

NGOs expressed the view that relying on national elements of planning could affect the concept of voluntarism. It was felt that NPS invoked a process which has been designed to provide certainty to developers and remove community voice. Participants expressed mistrust of the planning process, asserting that the content of the NPS could affect the Planning Inspectorate's determinations.

Some discussed whether it would be possible to include vital conditions in the NPS such as voluntarism in order to ensure it is carefully constructed.

Some group discussions also noted that the NPS would enable a more straightforward process and help to consult communities at an earlier juncture. It could also be positive as it contains elements and stages that could complement voluntarism, but this would depend on how it is implemented.

Whatever process is adopted, participants felt that it would need to be undertaken in accordance with the Environment Agency's statutory processes for regulating a GDF.

All recognised that boreholes need both planning and regulatory permissions and that, prior to any borehole investigations, a number of earlier exercises could be undertaken (such as seismic surveys).

**Waste Inventory: Summary of proposals** (see also pages 45 to 50 of the consultation document)

- The inventory for disposal to be communicated to potential communities with a focus on waste and material types and the safety case (volume figures still available).
- To be clear on the inclusion of new nuclear waste, of a specified maximum size.

### Summary of Feedback

Key issues raised by industry, Local Authorities and NGOs include:

- A desire for a more clearly defined inventory which is accessible and understandable to the public
- It was thought that new nuclear build provides some challenges, so there needs to be recognition that there is a level of uncertainty and a distinction between legacy waste and 'new build' waste

### Industry

Participants felt that the inventory should be more clearly explained, articulated and defined for 'Joe Public'. It should not be assumed that everybody knows about the nuclear industry. Participants suggested holding public awareness days. Some specific issues included:

- The upper estimate of waste needs to be robust
- Communities need to have awareness of volumes of waste
- The impact of new build needs to be more clearly defined
- An explanation of '16gigawatts' to the public is needed (for example, defined in terms of reactors)

Certainty over inventory should be helpful to raise confidence for communities. It would also give communities an idea of volumes, which would help understanding about transportation and how long the GDF could be open for. Some considered that the uncertainty around a future new fleet of nuclear reactors provides some challenges but there needs to be recognition of this uncertainty. Industry stakeholders noted that defining a ceiling was futile and some felt that a safety case would not be overly dependent upon a specific inventory of High Level Waste (HLW).

Industry stakeholders also stated that a case needs to be made around the movement of higher activity waste; safe transport will be essential to any site assessment.

## Local Authorities

Local Authorities considered that specification of the inventory is an absolute necessity. The general public needs to understand the types of waste, plus legacy and waste from new nuclear reactors. There was, however, a concern about the size of new build and spent fuel demands. Public attitudes may differ to new build and legacy waste.

Participants felt that a community needs to agree the inventory for the GDF and that there must be an agreed change mechanism for any additional waste to be emplaced.

Modelling different scenarios with different waste amounts could be useful, along with the proposal of a 'no more than' figure to help encourage 'buy-in' from communities.

Further practical questions from local authorities included:

- What is operating life of the facility, given that the planning permission is limited to 199 years for leases?
- What would be done with plutonium?

## NGOs

Participants felt that more certainty was needed on the inventory in general, including a clear definition of higher activity waste. Some raised a concern that there could be a proliferation of waste in years to come and that there is uncertainty over the amount of waste that would be generated by new build. Participants felt that GDF should only be used for legacy waste, and not to justify new build nuclear power.

There was also concern over non-UK waste, for example, whether the UK would take spent fuel from Japan. Some participants also queried whether foreign plutonium could be received in a UK GDF.

Some felt that nuclear waste should be discussed in terms of radioactivity, not just in terms of volumes. Participants also felt that it is dishonest to talk about waste only in terms of volumes, with most feeling that the radiological activity is more important. Participants also stressed that further information is needed on the long-term behaviour of Intermediate Level Waste (ILW) and any associated health impacts.

Some voiced concerns about the spent fuel which will be kept on-site until a GDF is built. NGOs raised the concern that there may not be any geology in the UK that is suitable for a GDF, underlining their view that a more measured method of safe storage is the solution. Participants also questioned whether retrievability would change the design of a GDF.

## Chapter 4: Communities

**Community benefits: Summary of proposals** (see also pages 51 to 52 of the consultation document)

- The Government to make clear – early in a revised siting process – the potential scale of community benefits.
- To start paying limited benefits to a potential host community during the „Focusing“ phase.
- The Government to create a Community Fund – only able to retrieve these funds if a GDF was not constructed in the community.

### Summary of Feedback

Key issues raised by industry, Local Authorities and NGOs include:

- The need for further definition of ‘community’ and ‘community benefits’
- Suggestions were made for improved and creative ways of engaging the public on information around community benefits and socio-economic and environmental assessments
- The need for further definition on how funding is to be sourced
- The need for further information on how funding would be distributed (geographically and inter-generationally)
- Suggestions were made around creative ways of providing reward

### Industry

Industry stakeholders felt that DECC needs to clarify what it envisages in terms of rewards for communities coming forward to engage and the conditions associated with these rewards/funding. Participants felt that further information should be provided on the details of community funding, including who will receive the benefits and when the funding would stop (if ever). Clarity was requested on the governance and administration of a community fund and how community benefits would work, up to the point where a community can no longer withdraw from the process. Other comments centred on whether funds paid would be subject to restrictions deriving from EU regulations and whether the Government could underwrite the value of people’s properties for hosting a GDF in their area. Discussion focused on the mechanism for a ‘community’ to decide on how to administer the benefits and whether this should be segregated from existing local authority money.

Participants felt that some funding needs to be paid in the learning phase and that the steering group should decide how money is paid and distributed. The community fund also had to be able to address calls for investment in the short term, as well as answer questions about availability of funds in the long-term. Further ideas linked to the payment of community benefits included the need for early identification of socio-economic benefits to an area for expressing an interest in hosting a GDF. Participants wanted further clarity about the fact that community benefits are in addition to statutory Section 106 payments.

## Local Authorities

Participants stressed again the importance of defining the concept of “community”. Political and geographical boundaries need to be managed. Some queried whether this should extend to the socio-economic area (communities of interest). Opinion was divided on whether communities are those that are the most impacted by the proposals or whether the ‘community’ should reflect local circumstances and interests, which will not necessarily be the same as those nationally. Discussion touched on the ‘proximity principle’ i.e. those who are impacted the most should benefit the most and issues of equality: whether benefits should go to areas of greatest need and not just the local authority. Some felt that the fund shouldn’t become part of the local authority budget, but also that authorities could be accountable for the fund.

Participants suggested that some indication of legitimate areas of ‘community’ would help a community visualise the benefits. Benefits should be spent on what the impacted community wants and that the community should define this.

Participants discussed the need to break down the term ‘community benefit’; more clarity was needed:

- On incentivising engagement nationally and locally, the communication of which was thought to be essential, it would be helpful if government engaged with the communities, and was not anonymous, as that vacuum would then be filled by protests.
- Early flow of benefits was considered to be good but there is also the need to revisit priorities for future generations.
- Whether the community benefits package will be a finite national total or increased per community.
- Possibility of linking payment of benefits to the inventory.
- Criteria should not be dictated for funding – it should not be tied to the nuclear industry.
- Explanation of what the fund would be spent on and to whom it would be distributed.
- DECC needs to assure communities that the ‘rest of government’ is aligned over community benefits.
- The link between this and EU funding.

Participants wanted clarity on the benefits package, including the ability to differentiate inherent benefits of a GDF, mitigation benefits, the community benefits package, and engagement funding. Interest was expressed in what opportunities there would be for local businesses coming online in the near future (such as information on contracts that might benefit a community). Local authorities suggested that more flexible and creative ways of providing reward should be provided, such as in the ‘Building Schools for the Future’ programme, rather than just paying direct payments. Community benefits should also cover ‘dis-benefits’, including damage to local ‘brand’ such as tourism. Participants felt that benefits needed to be phased – people aren’t going to want to wait until 2040 to see benefits.

The relationship between the local authorities having the right to withdraw and being the decision maker on community benefits needs to be defined, recognising that different communities will have different interests and needs.

## NGOs

Some NGOs felt, given the lifetime of the GDF, that future generations would also need to be compensated or benefited, highlighting an intergenerational equity issue. In addition, participants questioned where the funding will come from - from the taxpayer or from the waste producers? It was noted that taxpayers are not supposed to be funding new nuclear power stations, and it was felt that nuclear companies should be providing funding associated with the GDF.

Some suggested that it would be fairer if other impacted communities received benefits too and questioned whether a precedent was being set that communities are rewarded for accepting 'pollution'.

Further queries and suggestions included:

- The need to distinguish a community benefit from a social benefit.
- Any community fund should be broken down so that people can understand where it came from.
- Is the community fund compensation? If so, then it may logically need to be applied to other future sites who store waste. If not compensation, is it a bribe?
- There were a few ethical concerns (could local authorities use the funding as a way of filling a hole when strapped for cash?) highlighting the need to think about the mechanism for distribution.
- How will it be ensured that the money is spent properly?

**Socio-Economic and Environmental Assessments:** Summary of proposals (see also pages 53 to 56 of the consultation document)

- Offer to provide further information about potential environmental, socio-economic, health and transport effects at the launch of the revised site selection process.
- An Appraisal of Sustainability, satisfying the requirements of the Strategic Environmental Assessment (SEA) Directive and considering the implications of different approaches to site selection.
- A separate Habitats Regulation Assessment (HRA).
- All to be developed shortly after revised siting process launched.

### Summary of Feedback

Key issues raised by industry, Local Authorities and NGOs include:

- The importance of improved dialogue and communication throughout the socio-economic assessments.
- National Policy Statement approach to socio-economic impacts should be adopted

but should be refined, improved or tailored in some way.

- Climate change should be considered as part of the assessment work.

## Industry

Participants agreed with the approach to address potential socio-economic benefits and environmental impacts earlier in the process. Many supported early coverage of local issues but wanted more information on what that would look like. There could be a potential that socio-economic benefits and community benefits could be confused – clarity on this is key, including vocabulary and explanation.

Improvement of dialogue and communication is important, including an explanation of what would be covered in the socio-economic work, although participants wanted further clarity to understand fully how this would operate.

## Local Authorities

Participants reiterated many points made earlier in the day about the need for more clarity in the area of socio-economic assessments and also stressed the need to address the risks associated with a GDF.

There is no reason not to combine Sustainability Appraisal (SA) and the Strategic Environmental Assessment (SEA), and overall participants felt that the proposals for environmental assessments seemed sensible.

Information and communication would be vital to help people visualise impacts. Participants stated that resilience and continuity of knowledge from Government would be essential.

## NGOs

NGOs highlighted that the NPS process needs to consider climate change in the context of the impact that it could have on a GDF site in the future. It was noted that the NPS allows SEA to be applied to policy, where it would normally be applied to programme.

Participants felt that the proposed process is too generic, and does not take into account regional variation in community needs. The SEA needs to look wider than just development. Participants felt that 'generic assessment' is a nonsense term (everything is site specific; problems are generally site specific and a generic assessment allows for issues to slip through the cracks).

Some tables discussed the status of National Parks as it was highlighted that these are not excluded under the NSIP process. Some felt that any consideration of burying the waste in National Parks should be ruled out, but urban areas should be considered.

## **Other Comments**

This section contains a summary of other issues discussed at the workshops that did not fit into the above categories, and includes responses to the final consultation question and key messages for DECC.

### **Summary of Feedback**

Key issues raised by industry, Local Authorities and NGOs include:

- The whole process could be presented more effectively in order to further engage communities and stimulate interest.
- Further creative approaches to raising awareness were suggested.
- NGOs highlighted the need to appropriately use the sources of expertise available.

### **Industry**

Industry representatives stressed that stakeholder engagement is important and that the implications of a GDF should be communicated in a scientific and credible way to stimulate the market and encourage early engagement. Some delegates felt that the consultation document does not communicate the premise clearly and will not generate new volunteers.

Representatives also emphasised that a capable and competent body should lead a positive communications initiative and dialogue with local authorities about the process in order to encourage volunteers.

### **Local Authorities**

Local authority representatives felt that there needed to be a better mechanism for the flow of engagement funding than in the past, including clarity as to whether the funding is paid upfront or in stages. Participants queried how Government would claim back unspent funds paid up front. Some wanted clarity on whether the Government, the delivery body (RWMD) and the community all have the right of withdrawal.

DECC needs to communicate better its 'offer' – provide models/photos etc. - to really make the GDF come alive. Suggest DECC speaks to the community and asks them what kind of information (and in what form) the residents would find useful and then provide it

Government/RWMD needs to have much more of an advocacy role and speak up in favour of the development and rebut arguments against it. It could be useful to have an advocate embedded in the community e.g. a RWMD presence locally and include local, independent people.

Some requested the need for more continuity in respect of Government staff as this translates into continuity of information and knowledge and makes it easier to do business.

## NGOs

Further comments highlighted by NGOs include:

- The need to harness the large source of expertise which goes back a long time with significant knowledge of the nuclear industry (including the attendees of the workshops). NGOs are uniquely placed to help with these discussions.
- A 'demonstration facility' could be used for education, research, and to help the public understand what is below their feet.
- The proposals in the consultation are too far removed from the totality of the 2008 White Paper as the consultation focuses too much on the siting process.
- Other issues included the feeling that the potential corrosion of copper canisters over time has not been addressed and that this is a very big issue.

## Appendix – Organisations represented at the three sector events

**Industry Event: Warrington – 13<sup>th</sup> November 2014**

<b><u>Organisation</u></b>
<b>Atkins</b>
<b>Westlakes Nuclear Ltd</b>
<b>Harwell</b>
<b>SKB International AB</b>
<b>Galson Sciences</b>
<b>AWE, Aldermaston</b>
<b>Quintessa Ltd</b>
<b>URS</b>
<b>McEwen Consulting</b>
<b>Capita Resourcing</b>
<b>MWH Global</b>
<b>AMEC</b>
<b>ARUP</b>
<b>Prospect</b>
<b>Royal Academy of Engineering</b>
<b>International Nuclear Services</b>

**Local Authorities Event: London – 14<sup>th</sup> November**

<b><u>Organisation</u></b>
<b>NuLeaf</b>
<b>Suffolk Coastal District Council</b>
<b>Kent County Council</b>
<b>Aldeburgh and Leiston (Suffolk)</b>
<b>Barrow Borough Council</b>
<b>Shepway District Council</b>
<b>Cumbria Association of Local Councils</b>
<b>Lancashire County Council</b>
<b>Gwynedd Council</b>
<b>Manchester City Council</b>
<b>Essex County Council</b>
<b>Hinkley Point</b>
<b>Tendering District Council</b>
<b>Copeland Borough Council</b>
<b>Staffordshire County Council</b>
<b>Bedford Borough Council</b>
<b>Dorset County Council</b>
<b>Norfolk County Council</b>
<b>Lancashire County Council</b>
<b>Northamptonshire County Council</b>
<b>DEFRA (Local Partnerships)</b>
<b>Cumbria Association of Local Councils (CALC)</b>

**NGO Event: London – 27<sup>th</sup> November**

<b><u>Organisation</u></b>
<b>Blackwater Against New Nuclear Group (BANNG)</b>
<b>North Cumbria Campaign for Nuclear Disarmament</b>
<b>West Cumbria &amp; North Lakes Friends of the Earth</b>
<b>The Rotary Club of Silloth on Solway</b>
<b>Wood farm, Leiston</b>
<b>Hockpitt Farm, Stop Hinkley group</b>
<b>Nuclear Waste Advisory Associates (NWAA)</b>
<b>HydroGEOtech Consultants,Ltd</b>

A number of individuals attended this event in a private capacity; not representing any particular organisation.

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Department of Energy & Climate Change

3 Whitehall Place

London SW1A 2AW

[www.gov.uk/decc](http://www.gov.uk/decc)

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