

Consultation : Review of the Siting Process for a Geological Disposal Facility

Response by Applied Policy Sciences Unit (APSU), University of Central Lancashire (UCLAN)

The Applied Policy Sciences Unit (APSU) is an independent political science research unit aligned with the Lancashire Law School at the University of Central Lancashire (UCLan) and based at the Westlakes Science and Technology Park, near Whitehaven in West Cumbria.

APSU's mission is to make an original and independent contribution to policy and its implementation. This unit draws upon academic research, consultancy and dissemination in the field of applied policy and political science and applies them to current policy problems. In addition to UCLan staff involved in academic research and dissemination, the APSU also involves, as advisors, individuals who are professionally involved in politics, policy and government.

This submission draws upon work undertaken in applied policy sciences since the late 1980s in West Cumbria and further afield, relating to public opinion, perceived risk and the governance of the civil nuclear industry. This submission is, therefore, grounded in partnership working in the context of the earliest community partnership in Britain. This experience, which was centred on the nuclear sector at Sellafield, makes this work especially relevant to this consultation.

Specifically, the Units then partner organisation, Westlakes Scientific Consulting, was UK lead in a transnational research project on the Community Governance of Radioactive Waste Management (CoWAM) and its successor, "CoWAM in Practice", which produced "European Guidelines" (European – level Guidelines on the Community Governance of Radioactive Waste Management : European Commission, 2010).

Since DECC and NDA were also partners in this research, reference is made here to the relevant conclusions of that work, rather than reciting the full arguments made. In this response, we restrict ourselves to responding only to those questions which directly relate to the subject of the CoWAM research.

Question 1:

Do you agree that a test of public support should be taken before the representative authority loses the Right of Withdrawal? If so, what do you think would be the most appropriate means of testing public support, and when should it take place? If you do not agree with the need for such a test, please explain why.

Reference is made to "Developing Local Democracy" (European Guidelines, page 9)

Key to structuring any test of public support is clarity as to which public's support is being tested. There are definitions of "community" in the original MRWS White Paper but care must be taken to refine and clarify those definitions. The European Guidelines offer a methodology for so doing in "Affected Communities and Sustainable Territorial Development", page 17.

This suggested methodology draws on original research by Westlakes Scientific Consulting: “Defining an Affected Community”; (Wylie R, 2010)

Whilst it is not possible to define such a community at an early stage of the process, it would be essential to define now the methodology to be used in defining the community in due course.

Question 2:

Do you agree with the proposed amendments to decision making within the MRWS siting process? If not, how would you modify the proposed phased approach, or, alternatively, what different approach would you propose? Please explain your reasoning.

Our response to Q1 is equally applicable here.

Question 3:

Do you agree with this approach to revising roles in the siting process set out in the White Paper? If not, what alternative approach would you propose and why?

Our response to Q1 is equally applicable here.

Question 4:

Do you agree with this proposed approach to assessing geological suitability as part of the MRWS siting process? If not, what alternative approach would you propose and why?

Geology is not our field and we offer no response to this question.

Question 5:

Do you agree with this proposed approach to planning for a GDF? If not, what alternative approach would you propose and why?

Matters of specific planning law were not covered by the research so we offer no response to this question.

Question 6:

Do you agree with this clarification of the inventory for geological disposal – and how this will be communicated with the volunteer host community? If not, what alternative approach would you propose and why?

Reference is made to “Sustainable Long Term Governance of Radioactive Waste Management (European Guidelines; page 13)

Question 7:

Do you endorse the proposed approach on community benefits associated with a GDF? If not, what alternative approach would you propose and why?

Reference is made to “Benefit packages and sustainable development for affected communities” (European Guidelines; page 20). The point we make in response to Q1 about the need for a clear methodology, agreed at an early stage, for defining the affected community applies equally to the definition of the community to benefit. The Guidelines suggest that simply taking “a priori” definitions of spatial or administrative zones will not adequately reflect the complexity of the affected population and the diversity of communities in which that population is embedded.

Question 8:

Do you agree with the proposed approach to addressing potential socio-economic and environmental effects that might come from hosting a GDF? If not, what alternative approach would you propose and why?

Reference is made to “Development of the necessary skills and know-how” (European Guidelines; page11). It is not sufficient that “experts” undertake studies of social, environmental and economic effects of a GDF; the affected community must be equipped with the capacity and capability to understand and interpret those studies in the context of its Plan for sustainable territorial development.

Question 9:

Do you have any other comments?

No