



# Submarine Dismantling Project (SDP)

Post-Consultation Report on the  
Site for Interim Storage of Waste

July 2015



Ministry  
of Defence



# Executive Summary

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In November 2014 the Ministry of Defence launched a public consultation on where the storage site for the reactor pressure vessels (RPVs) from 27 defuelled submarines should be.

The consultation ran for 14 weeks from 14 November 2014 to 20 February 2015 and gathered views on three main topic areas:

- The Strategic Environmental Assessment (Environmental Report)
- The process and criteria being used to compare the shortlisted storage sites
- The shortlisted sites and the differences between them

Exhibitions and facilitated workshops were held around each of the five shortlisted sites and there were two national events held in Birmingham and Glasgow.

Printed versions of the Consultation Document and supporting information were available to take away at the events and also to download from the internet. Newsletters were mailed to homes and businesses in the areas local to the shortlisted sites and advertisements placed in local newspapers promoting the events.

Around 170 written responses were received in total, comprising over 2300 individual points, which reflect a wide spectrum of views from a range of stakeholders including local residents, community-based organisations, non-governmental organisations and regulatory bodies.

This report documents the consultation process, and provides a summary of the points made which the MOD will now take into account as it assesses the shortlisted sites and makes its decision on the storage site.

The report is in two parts. Part A focuses on the consultation process and Part B summarises the points made, broken down by topic.

The SDP team has attempted to provide a fair and readable summary of the comments made but this required significant summarising. The team has tried to stay true to the respondents' views, even where they could mislead or appear to be based on assumptions that the team believe are factually incorrect.

This approach ensures that no points are lost and are all treated equally within the project team's analysis. However, the way in which responses are allocated to subject headings within the document are inevitably subjective and the balance of individual points may not be directly related to the balance of respondents' positions.

The comments recorded within this document reflect only those raised during events workshops, in written feedback forms and written submissions from other organisations, and do not include conversations held around the exhibitions..

For all these reasons the MOD has published the source material from which all of the points summarised here have been taken.

The MOD is committed to taking all the views received during this public consultation into account as it makes its decisions on the storage site for the submarine RPVs. Once a decision on the ILW storage site has been made, the MOD will publish a Response to Consultation report demonstrating how the consultation responses have been taken into account and explaining the way ahead for the project.

A Strategic Environmental Assessment (SEA) was carried out by the MOD and an Environmental Report with a Non-Technical Summary was published, in line with regulatory requirements. A Post-Adoption Statement will also be published as part of the statutory process, describing how environmental considerations and responses to the SEA specifically have been integrated into the final decision.

The final storage site decision will be announced during 2016.

The consultation bodies who responded seemed generally content with the Environmental Report and some provided a number of helpful comments. These included comments on the approach to the Post Adoption Statement and also the Environmental Impact Assessment which the selected site operator must undertake as part of a future planning application, with suggested mitigation to be taken forward to project level.

The Environment Agency (EA) concluded that 'an ILW store could be constructed and operated at any of the candidate sites in England without a significant adverse impact on people or the environment.' However EA identified that 'AWE Burghfield might present the greatest challenge in terms of flood risk management', while noting, 'AWE are developing a robust flood alleviation scheme and additional mitigation'.

The Scottish Environment Protection Agency (SEPA) confirmed that 'the relevant environmental issues have been considered and agree with the findings, in particular, that there are likely to be no significant environmental effects associated with the discharge or disposal of radioactive waste from the Reactor Pressure Vessel stores' (sic). SEPA also commented that 'Although we consider that the environmental issues related to the management of controlled and hazardous waste arising from the SDP project could be significant and should have been assessed as part of the SEA, we are content that this can be covered at the project stage through the EIA process and CEMP (Construction Environment Management Plan).'

Historic Scotland (HS) commented that 'the Non Technical Summary presents the assessment of this project in a clear, concise and accessible manner', and the assessment 'identified no significant effects on the historic environment from the Chapelcross site option, and I am content to agree with these findings.'

Scottish Natural Heritage (SNH) commented 'we are satisfied that the full range of relevant environmental issues/concerns and key trends have been identified'.

Natural Resources Wales (NRW) requested that 'were the Capenhurst site selected for the storage of the ILW, given its proximity to the River Dee and Bala Lake Special Area of Conservation (SAC) and The Dee Estuary SAC, Special Protection Area (SPA) and Ramsar Site, we would welcome the opportunity for an increased engagement programme with the Ministry of Defence and our regulatory partners going forward to understand and determine the potential impacts (if any) on the Welsh Environment from any proposed activities in England associated with the project.'

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# Part A – Consultation Process

## 1. Background

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### 1.1. Submarine Dismantling Project

The Submarine Dismantling Project (SDP) is the MOD's programme to deliver a safe, secure and environmentally responsible solution for dismantling 27 defuelled submarines. This involves recycling the bulk of the submarine and safely disposing of the remainder. The submarine's Reactor Pressure Vessel (RPV) contains Intermediate Level radioactive Waste (ILW). After the RPV has been removed in its entirety, it must be stored for an interim period until it can be processed and sent to a proposed Geological Disposal Facility (GDF) sometime after 2040.

### 1.2. Public Consultation Context

In February 2014 the Ministry of Defence launched a programme of engagement to help it decide where the interim RPV storage site should be. It started with a six-week period of 'pre-engagement' with people from potentially involved communities, and other stakeholders, to allow them to comment on the shortlist and plans for the next steps in comparing potential storage sites and public consultation<sup>1</sup>. In parallel, the draft Scoping Report for an update of the Strategic Environmental Assessment (SEA) was issued to statutory and non-statutory consultees and made available for comment by other stakeholders and the wider public, in accordance with the legal requirement.

Pre-engagement included briefings for site stakeholder groups / local liaison committees and local authorities and included two stakeholder workshops, at Bristol and Penrith.

The public consultation on the site for interim storage of the ILW followed, running for 14 weeks between 14 November 2014 and 20 February 2015 and gathered views on three main topic areas:

- The Strategic Environmental Assessment (Environmental Report)
- The process and criteria being used to compare the shortlisted storage sites
- The shortlisted sites and the differences between them

This report documents the Public Consultation process and provides a summary of the responses received, which the MOD will now take into account as it revisits its analysis of the options in order to take a decision on the site for the RPV store.

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<sup>1</sup> Summarised in the SDP ISS Criteria and Screening Report (downloadable from <https://www.gov.uk/government/publications/submarine-dismantling-project-interim-storage-of-intermediate-level-radioactive-waste> )

# This Document

This report is in two parts:

- **Part A** focuses on the consultation process. It explains how the programme was designed, as well as describing the consultation documents, the public exhibition and workshop programmes. It includes statistics on the attendance and a selection of media coverage. It also provides a short description of the process that has been used to collate and organise the responses.
- **Part B** comprises the SDP team's summary of assimilated, collated comments, for analysis purposes, of more than 2500 individual points made and questions asked by individuals and organisations participating in the consultation process. They are taken from questionnaire responses, public consultation workshop meeting notes and longer submissions from local authorities, local liaison committees and regulatory bodies. Where appropriate the comments are displayed verbatim, using quotation marks. Part B organises comments in the same structure as the original Public Consultation Document.

## 2. Designing the Consultation on the Site for Interim Storage of Intermediate Level Radioactive Waste

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This section describes the scope and purpose of this Consultation, the design process, and how stakeholders were involved in its planning.

It is important to note that this consultation is only one element in the wider ongoing public and stakeholder engagement process described in the SDP's Approach to Public and Stakeholder Engagement report<sup>2</sup>. This started with the 'Front End Consultation' in 2001. In October 2011 the Ministry of Defence launched a further public consultation on the strategic options for dismantling redundant nuclear submarines. Engagement will continue at varying levels of scope and intensity until project completion.

### 2.1. Scope of the Consultation

The aim of the consultation was to help the MOD decide where the interim storage site for the ILW (ie the RPVs) arising from submarine dismantling should be stored. There was also a statutory requirement to consult on the Strategic Environmental Assessment (SEA) Environmental Report as it applies to the shortlist of sites.

To achieve this, the SDP committed to:

- Provide information to local communities and other stakeholders about submarine dismantling and RPV storage. In particular, the differences between options, the impacts they may have and the logic behind the MOD's analysis and proposals
- Ensure that both local and national stakeholders had the opportunity to engage with the project and provide responses
- Gather and assess views on the three main topic areas: the SEA; the process and criteria being used to compare the shortlisted storage sites; and the shortlisted sites and the differences between them

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<sup>2</sup> Downloadable from <https://www.gov.uk/government/publications/submarine-dismantling-project-interim-storage-of-intermediate-level-radioactive-waste>

The SDP's Consultation Document and its supporting reports (including the SEA Environmental Report) and the programme of local exhibitions, workshops and briefings and national events were designed to address these requirements. The Consultation Document also made it clear that the MOD was *not* consulting on:

- Decisions that have already been taken, for example, how and where the submarines will be dismantled
- Other aspects of dismantling and waste management; there are already established practices for recycling materials and managing hazardous and other types of radioactive wastes.

## **2.2. Consultation Period**

Given that the consultation ran over the Christmas and New Year holiday period, and in view of the volume of material and the complexity of the subject, the consultation period was extended beyond the originally intended 12-week period to 14 weeks. This extension was in line with the decision made under similar circumstances during the previous SDP public consultation and allowed a comprehensive consultation and a full programme of events.

The consultation opened on 14 November 2014 and ran until 20 February 2015. Two rounds of local events were held in each area in an effort to give as many people as possible the opportunity to participate. A large proportion of the local events were held in the first half of the programme (between November and December 2014) so that residents and community representatives would have ample time to learn about the project and examine the consultation materials and then ask further questions if necessary. A number of individuals who came to earlier events returned to later events to talk to the team about questions they had and to provide feedback. The MOD adopted a flexible approach and provided additional meetings when requested.

Assuming that stakeholders with a professional or wider national interest would prefer to read the consultation materials and then use events to test their understanding and to challenge the team on points of detail, the national workshops were held during the second half of the programme (in January 2015). These were designed to target specific areas of interest to specialists, regulators and other key stakeholders.

## **2.3. Designing the Consultation**

The programme for the Consultation was designed in discussion with relevant local authorities, site stakeholder groups / local liaison committees, shortlisted site owners and operators and other key stakeholders, to draw on experience of how best to engage potential consultees. Local Authority Statements of Community Engagement were also reviewed for initial guidance.

The SDP routinely liaises with relevant statutory bodies, including regulators such as the Office for Nuclear Regulation (ONR), the Environment Agency (EA) and the Scottish Environment Protection Agency (SEPA); other government departments such as the Department for Energy and Climate Change (DECC); the Nuclear Decommissioning Authority (NDA) and the Scottish Government. These stakeholders were specifically consulted on the development of the Consultation programme and reviewed materials relating to their areas of expertise.

SDP's aim was to be consistent with Government guidance on good practice<sup>3</sup> and build on the experience of previous SDP consultation procedures, continuing to achieve high standards of stakeholder and public engagement whilst at the same time maintaining focus and avoiding unnecessary complication. For instance, SDP took on board recommendations about achieving value for money by building in pre-engagement with key stakeholders to develop appropriately focussed public engagement programmes.

The SDP Advisory Group Sub-Group was used to pilot all consultation materials and provide independent input into the consultation design.

SDP also took note of guidance which emphasised the need for project teams to consider the demands placed on consultation participants and other stakeholders who would often be committing their own time and energy to helping MOD achieve an outcome that is both technically sound and deliverable in practice. These included technical specialists invited to the national events in Birmingham and Glasgow, who were reimbursed for any expenses incurred.

Finally, experience from previous SDP and other comparable nuclear sector consultations were reviewed for good practice, including the NDA's recent consultations on the consolidation of ILW into interim storage. The project team is grateful for the openness and advice of these other project team engagement specialists.

## **2.4. Roles**

The exhibition materials and consultation documents were prepared by the SDP project team, which comprises MOD staff and external technical and engagement specialists, and published by an MOD DE&S multimedia team.

The exhibitions were staffed by members of the SDP project team and serving Royal Navy submariners, with experts from regulatory bodies and shortlisted site staff/representatives in attendance. Instinctif Partners, the independent stakeholder engagement specialists, were sub-contracted to provide exhibition logistics and workshop facilitation and recording. Their role was to ensure all comments raised were captured and queries addressed.

Comments were collated by Instinctif Partners and then passed to the SDP project team for analysis. The project team is responsible for this Post-Consultation Report.

## **2.5. Consultation Oversight**

In 2007, an independent SDP Advisory Group was established (comprising a cross-section of individuals from industry, professional bodies, specialist professions, academic institutions, local government organisations, non-government organisations (NGOs) and community-based organisations (CBOs)) to provide constructive challenge and advice to the project team on future consultation and decision-making processes. The formats of both this, and the previous SDP consultation, have been based on the Advisory Group's original recommended template.

In 2013 the Advisory Group ceased regular meetings but delegated a Sub-Group of members to monitor the development of the ISS Consultation and the parallel SEA. This enabled a smaller number of specialist members to have more detailed and frequent engagement with the project team. They operate under a non-disclosure agreement to enable them to review draft consultation documents, including a draft of this report.

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<sup>3</sup> See <https://www.gov.uk/government/publications/consultation-principles-guidance>

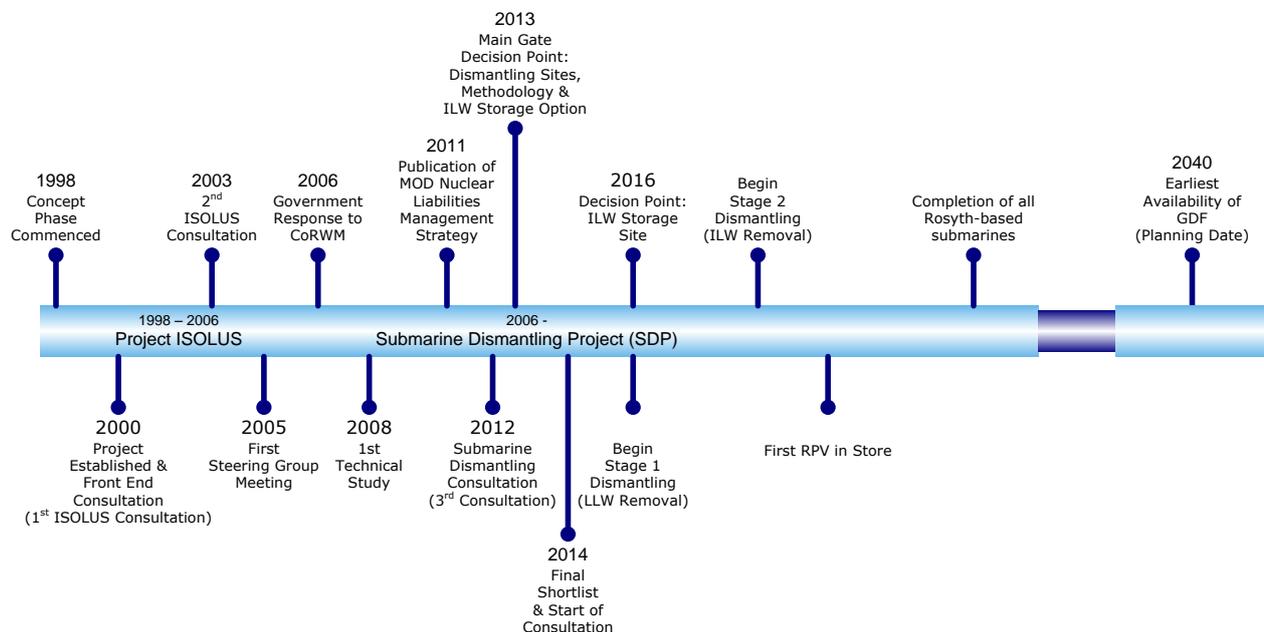
The Sub-Group was closely involved in the detailed design of the ILW storage site consultation events and the development of the consultation materials. It sent observers to the workshops that the MOD conducted as part of the initial options analysis process and to local and national consultation events. The Sub-Group observers report and a list of Sub-Group members can be found at Annex I.

### 3. Consultation Activities

This section describes the main consultation activities with details of venues, dates and attendance levels.

#### 3.1. Programme

The timeline below shows the Project activities leading up to and including the public consultation and the key milestones beyond:



#### 3.2. Notification

A ministerial announcement covering the start of the consultation on the site for interim storage of ILW was made on 16 October 2014 and the information placed on the SDP website. Notification thus took place about four weeks before the start of the public consultation and was the first formal step in the consultation process.

Local elected representatives (including Members of Parliament, Members of the Scottish Parliament and elected local authority members) were notified directly and offered a project team briefing. Other stakeholders identified in the project’s database were notified of the dates and arrangements for the consultation events, and encouraged to participate. The SDP’s web pages were updated in the run up to the consultation period with technical background and pre-engagement reports. A press release was issued with information about the consultation plans (Annex A).

### 3.3. Publicity for Local Events

Full page newspaper advertisements were placed in the local media (see Table 1) around two weeks in advance of the first round of events. For an example of a published newspaper advertisement, see Annex C.

Site	Newspaper	Publication Date
AWE	Reading Post	29 October 2014
	Reading Chronicle	30 October 2014
	Newbury Weekly News	30 October 2014
	Basingstoke Gazette	30 October 2014
	Basingstoke Observer	5 November 2014
Capenhurst	Chester Chronicle	20 November 2014
	Chester Leader	25 November 2014
	District Standard	20 November 2014
Chapelcross	Annandale Observer	14 November 2014
	Annandale Herald	13 November 2014
	Moffat News	13 November 2014
Sellafield	Whitehaven News	5 December 2014
	Times and Star	4 December 2014
	Westmorland Gazette	4 December 2014
	North West Evening Mail	4 December 2014

Table 1: Local Exhibition Newspaper Adverts

Newsletters were sent to local residents and businesses in the vicinity of each site, giving details of the SDP programme, what was being proposed and the consultation schedule (for distribution see Table 2). The distribution area was advised by the sites and the local liaison committees and was not simply based on population density in the area. There was a balance to be made between the recommended distribution area and proportionate costs. The newsletters gave dates, venues and timings for the public exhibitions and workshops, and invited people to reserve places on the workshops, either by post, email or telephone. For an example, see Annex C.

Site	No. of Newsletters
AWE, Aldermaston and Burghfield	13,000
Capenhurst	13,000
Chapelcross	4,050
Sellafield	32,000

Table 2: Newsletter Distribution

### 3.4. Local Public Exhibitions

Public exhibitions were held local to each shortlisted storage site (for details of events see Table 3). The venues were selected taking into account proximity to the site, accessibility to local residents and availability of public transport links. With the exception of Chapelcross, this resulted in using more than one venue. Exhibitions were scheduled to allow people at each site an opportunity to attend during the day or evening and, in some cases, at weekends.

In addition to the exhibition, a range of hardcopy literature (including the Consultation Document, associated factsheets and the consultation questionnaire) was available to take away. MOD staff, including members of the project team and subject specialists, were present to listen to feedback, answer questions and discuss any concerns. Feedback forms were provided for visitors to complete.

All events were open to everyone but local stakeholders and other potentially interested people and organisations known to the team were specifically invited, including elected representatives, trade unions, local and parish councils, local special interest groups and community networks. The first hour of some of the exhibitions was used to brief elected representatives.

Site	Venue	Date	Times	No. of attendees
Aldermaston	AWE Recreational Society	17/11/14	12.00 – 20.00	79
	Tadley Community Centre	22/11/14	11.00 – 15.00	72
	Tadley Community Centre	23/1/15	11.00 – 17.00	42
Burghfield	Village Hall	18/11/14	11.30 – 19.30	110
	Community Sports Association	20/11/14	11.30 – 19.30	32
	Community Sports Association	22 /1/15	11.30 – 19.30	15
Chapelcross	Victoria Halls Complex	28/11/15	12.00 – 20.00	74
	Victoria Halls Complex	29/11/14	10.30 – 15.00	34
	Victoria Halls Complex	16 /1/15	12.00 – 20.00	52
Capenhurst	Craxton Wood Hotel	9 /12/14	12.00 – 20.00	27
	Craxton Wood Hotel	10 /12/14	12.00 – 20.00	37

	Craxton Wood Hotel	20 /1/15	11.00 – 20.00	37
	Capenhurst & Ledsham Village Hall	11 /12/14	13.00 – 17.00	35
Sellafield	Civic Hall & Masonic Centre	17 /12/14	12.00 – 20.00	41
	Civic Hall & Masonic Centre	28 /1/15	12.00 – 20.00	32
	Beacon Museum	18 /12/14	12.00 – 20.00	48
	Beacon Museum	27 /1/15	12.00 – 20.00	62

Table 3: Local Exhibitions

### 3.5. Local Workshops

Facilitated workshops proved very useful during the previous SDP consultation, with good discussion and interaction and were highly rated by both participants and project team members. The public exhibitions were therefore supplemented in each location by workshops to engage members of the public with the consultation questions and allow them to explore, more fully, any areas of interest or concern.

Local workshops were held at all the public exhibitions, with the exception of Capenhurst and Ledsham Village Hall which was an addition to the programme and with no suitable room available at the venue. The workshops are listed in Table 4, with the number of attendees listed. Eight workshops with no bookings are not shown. The notes are collated in Annex D.

The workshop format was based on those conducted during the previous consultation.

- Workshops lasted up to 1.5 hours. Introductory presentations were followed by an independently-facilitated and recorded discussion / question session which could focus on one or more specific topics according to participants' interests. Members of the SDP team were present at these workshops to take questions and inform discussion. Opportunities were built into the format so that people were able to join a workshop after it had started or participate in the discussions for as long as they wanted to, and then leave before the session finished if they needed to.
- Participants were enrolled on the workshops prior to and during the exhibition days. The workshops were advertised in local newspapers, outlined as part of the exhibition invitation letter, and highlighted at the exhibitions. Registration in advance was encouraged but registration on the day was also possible.

Site	Venue	Date	Workshops	Attendance
Aldermaston	AWE Recreational Society	17/11/14	3	29
	Tadley Community Centre	22/11/14	2	17
	Tadley Community Centre	23/1/15	2	15
Burghfield	Village Hall	18/11/14	3	25
	Community Sports Association	20/11/14	3	17

	Community Sports Association	22 /1/15	1	5
Chapelcross	Victoria Halls Complex	28/11/15	2	6
	Victoria Halls Complex	29/11/14	1	3
	Victoria Halls Complex	16 /1/15	3	15
Capenhurst	Craxton Wood Hotel	9 /12/14	3	19
	Craxton Wood Hotel	10 /12/14	2	22
	Craxton Wood Hotel	20 /1/15	3	25
Sellafield	Civic Hall & Masonic Centre	17 /12/14	3	15
	Civic Hall & Masonic Centre	28 /1/15	3	19
	Beacon Museum	18 /12/14	3	18
	Beacon Museum	27 /1/15	2	10

Table 4: Local Workshops

### 3.6. National Workshops

Two facilitated national workshops were included to allow key issues to be discussed in detail from a national perspective, at the International Conference Centre in Birmingham on 6 January 2015 and at the Scottish Exhibition & Conference Centre in Glasgow on 8 January 2015. These were open to anyone who wanted to attend but were aimed at those who had a strategic or specialist interest in the project.

Invitations were sent to key stakeholders, including local authorities, MOD internal stakeholders, NGOs, regulators and technical experts. Attendance at these events by these groups is detailed in Table 5.

The workshop format was again based on those conducted during the previous SDP consultation.

- The national workshops ran from 11am to 4pm. Facilities were available earlier for those who wanted to preview materials, and later for those wishing to continue informal discussions. The opening plenary session included the welcome and introduction to the day and an overview of the project and consultation process. Participants were then divided up into two groups which rotated through workshops on the following four themes:
  - Assessment Process Strategy
  - ILW Store and Transport Container
  - Planning and Permitting
  - Environmental Assessment
- The national workshops were open to all stakeholders who wished to participate but prior registration was strongly encouraged to ensure venue capacity was not exceeded.
- The national workshops were advertised within the consultation materials, on the website and at consultation events. The project team also extended direct invitations to appropriate individuals / groups.

A breakdown of the attendance at each workshop is given at Table 5.

<b>Site</b>	<b>Birmingham</b>	<b>Glasgow</b>
<b>Local Authorities:</b>		
Allerdale Borough Council	-	2
Argyll and Bute Council	-	1
Basingstoke and Deane Borough Council	1	-
Cheshire West and Chester Council	1	-
Hampshire County Council	1	-
Nuclear Free Local Authorities	1	1
Nuclear Legacy Advisory Forum	1	-
Plymouth City Council	1	-
Reading Borough Council	1	-
West Berkshire Council	1	-
<b>Site owners/operators:</b>		
AWE	2	-
CNS	1	1
Nuclear Decommissioning Authority	1	1
<b>Industry:</b>		
Babcock	2	2
Nuvia	1	1
<b>NGOs:</b>		
CANSAR	1	-
Nuclear Information Service	1	-
Nuclear Submarine Forum	-	1
<b>Other Government Departments:</b>		
Department for Communities and Local Government	1	-
Department for Energy and Climate Change	1	-
Environment Agency	2	-
Naval Base Clyde	-	1
MOD	2	2
Scottish Government	-	1
<b>SSGs/LLCs:</b>		
Hunterston Site Stakeholder Group	-	1
<b>Regulators:</b>		

Office for Nuclear Regulation	2	3
Scottish Environment Protection Agency	-	1
<b>Others:</b>		
SDP Advisory Group	2	2
	<b>27</b>	<b>21</b>

Table 5: National Workshops Stakeholder Attendance

### 3.7. Elected Representatives and Local Authorities

Briefings were offered to MPs, MSPs, local authorities and councils. The briefings given by project team members are listed at Table 6:

Site	Council	Date(s)
AWE	Tadley Town Council	9 February 2015
Capenhurst	No requests	
Chapelcross	Dumfries and Galloway Council	21 November 2014
	Dumfries and Galloway Council (exhibition workshop given over to council members)	16 January 2015
Sellafield	Copeland Borough Council	2 December 2014
	Cumbria County Council	28 January 2015
	Copeland Local Committee	

Table 6: Local Authority Briefings

Local authorities have the power to scrutinise proposals that may affect their area, potentially including special hearings. The MOD offered to brief local authorities and cooperate with such hearings but none took the MOD up on the offer.

Local authorities may have chosen to organise their own events or an opinion survey, as Fife Council did during the previous SDP consultation but, again, none did.

### 3.8. Site Liaison Bodies

Site stakeholder groups and local liaison committees do not represent the whole of the community but are an important vehicle for two-way communication between the SDP team and local stakeholders at the shortlisted sites. Working closely with site owners and licensees, the SDP team accounted for these groups' input into the design of the public consultation and gave briefings at their meetings when invited to do so. The main bodies are listed at Table 7.

Site	Audience	Date(s)
AWE	Local Liaison Committee	6 June 2014
		17 September 2014

		11 March 2015
Capenhurst	Local Liaison Committee	26 November 2014
Chapelcross	Site Stakeholder Group	4 June 2014
Sellafield	Sites Stakeholder Group	5 August 2014
Devonport	Local Liaison Committee	17 July 2014
		4 December 2014
Rosyth	Local Liaison Committee	29 April 2015

Table 7: SSG/LLC Briefings

Devonport and Rosyth dockyards are not on the storage site shortlist. However, their local communities do have an interest in a successful outcome for the RPV store programme and so their local liaison committees were briefed by SDP staff on progress with consultation and the project generally.

### 3.9. Workforce Briefings

Established internal communications arrangements were used to inform staff at shortlisted sites of the plans for consultation and to encourage them to participate, and to encourage others in the community to do so. These included staff newsletters, intranet announcements and management briefings.

The information provided was the same as that available more widely and there was no preferential access to the consultation. The SDP team supplied materials and briefings on request.

Site	Audience (approx) no. of employees
Burghfield	100
Aldermaston	300
Chapelcross	100
Capenhurst	40 (CNS staff)
Sellafield	Sellafield declined the offer of a workforce briefing but an email was sent out to all staff from the site communications team

Table 8: Workforce Briefings

## 4. Key Documents

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### 4.1. Consultation Document

The Consultation Document, its key questions and supporting material were the focus of the consultation. While all comments were welcomed, participants were encouraged to submit them in a way that could be directly related to the document and the questions listed within it. This helped the SDP team to reliably collate similar comments together and apply them to its further analysis of the options.

The Consultation Document provided sufficient information and explanation for non-experts to understand the project, the decision-making process and the options being considered. Hard copies were available at public consultation events both locally and nationally and it was available to download from the SDP web pages. Copies were sent to libraries and council offices close to candidate sites as detailed in the next section. The principle sections comprised:

- Background and the Submarine Dismantling Project
- RPVs and containers
- Transporting the RPVs and containers
- Interim storage
- Regulation and planning and permitting procedures
- Strategic Environmental Assessment
- The AWE Sites (Aldermaston, Burghfield)
- The NDA Sites (Chapelcross, Sellafield)
- Capenhurst
- The dismantling sites
- Site comparison studies and differences between sites
- Public consultation plans

Taking into account comments on the previous SDP consultation, feedback forms were simplified and were available both as a pull-out from the Consultation Document and as a separate pro-forma. Government website constraints prevented the project from offering an online comment facility and also meant that social media was not used to reach a wider audience.

The nine questions asked of the public on the feedback form were designed to encourage free comment while ensuring that all relevant aspects were considered. They were:

- Do you have any comments or views on the proposed RPV storage arrangements?
- Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues.
- Do you have any comments or views on transport, regulation or planning issues?
- What do you think are the main issues that we need to consider with each site?
- Once a site is chosen, what do you think will be the most important issues for the potentially affected community?
- What are your views on our approach to deciding between the shortlisted storage sites?
- Do you have any comments on the stages that will follow this consultation?
- Do you have any comments about the conduct of this consultation or the information provided?
- Are there any other comments you would like to make?

Contact information for the project team (to make enquiries, register for events or request hard copies of documents) and the freepost address for submitting comments were widely publicised and included as appropriate on all consultation documents.

## 4.2. Consultation Document distribution

The Consultation Document was published online at the start of the consultation on 14 November 2014 and hard copies were distributed to groups of stakeholders in advance of local events as follows:

- LLCs / SSGs:
  - AWE LLC
  - West Cumbria SSG
  - Chapelcross SSG
  - CNS LLC
  
- Council offices:
  - West Berkshire Council Offices
  - Reading Council Offices
  - Basingstoke and Deane Borough Council
  - Cheshire West and Chester Council
  - Cumbria County Council
  - Whitehaven, Copeland Borough Council
  - Cleator Moor, Copeland Borough Council
  - Millom, Copeland Borough Council
  - Allerdale Borough Council
  - Dumfries and Galloway Council
  
- 21 parish councils (details available on request).
- 51 local libraries (details available on request).

## 4.3. Strategic Environmental Assessment

Following statutory consultation and in parallel with pre-engagement, the scope of the SEA was updated. The findings of the Environmental Assessment stage were documented in the SEA Environmental Report.

The SEA Environmental Report was published in full, with a Non-Technical Summary to help make the potential environmental impacts clear to people. The scope of the environmental topics assessed is summarised below:

- Radiological Discharges / Exposure
- Biodiversity and Nature Conservation
- Population
- Health and Well-Being
- Noise and Vibration
- Geology and Soils
- Water
- Air
- Climate Change and Energy Use
- Coastal Change and Flood Risk
- Transportation
- Waste Management
- Land Use and Materials
- Cultural Heritage
- Landscape and Townscape

## 4.4. Supporting Information

One of the lessons learned from the previous SDP consultation was that the volume of information and the number of different documents meant that stakeholders found it hard to find the information they were looking for, notably on health and safety and environmental impacts. For this public consultation, therefore, the aim was to provide more focussed supplementary documents.

Particular attention was paid to the overall information structure and better use was made in the Consultation Document of links and references to online resources. In addition to the Consultation Document and the SEA Environmental Report, seven further reports were published as well as a total of seventeen factsheets covering a range of topics including safety, RPV container and managing radioactive waste and local factsheets covering site-specific information. However, it was not expected that members of the public would read all of these documents but select the topics of most interest to them.

Previous factsheets were updated, and new ones prepared, to provide an introduction to key topics and to provide more detail where required. They were generally closely aligned with the relevant sections of the Consultation Document or SEA. Factsheets were prepared so that people could take what was relevant to them which minimised the content of the Consultation Document.

The full list is given in Annex B and comprised:

- Two key supporting information documents (SIDs) provided more detail. One covered the proposed store, RPVs and their transport arrangements and the other covered planning and permitting regimes
- Two additional reports, published prior to the start of consultation as part of pre-engagement, provided more detail and background on the project's approach. One covered decision-making, including an annex on option assessment criteria. The other covered the approach to public and stakeholder engagement
- Two reports covered the shortlisting process. The Criteria and Screening Report outlined screening of potential sites and a response to feedback received during pre-engagement

Two further documents were flagged for future issue: the current Post-Consultation Report, Response to Consultation and a Post Adoption Statement to be issued following the announcement of the selected storage site.

All public consultation documents were available as electronic 'pdf' files, thus rendering them more accessible for those using screen readers. Printed copies and some alternative electronic file formats were available on request.

## 4.5. Collation of Comments

Comments were received via feedback forms, letters, notes taken during the workshops held at the events and from formal submissions.

The approach to the collation and analysis of comments is based on the model used for the previous SDP consultation. Comments and questions were captured, acknowledged, recorded in a structured database, and fed into the project team for assessment. They were tagged by origin, topic/perspective, and relevant option assessment area.

Comments via questionnaires or electronic media were encouraged for ease and accuracy of processing but 'free format' verbal or written comments were also welcome.

Many comments did not necessitate any action beyond the original acknowledgement. For those few that did, a link was provided to the appropriate document or an individual response was prepared. This was undertaken as soon as practicable after receipt and these responses were tracked to enable performance to be monitored.

As previously mentioned, reports were produced from the local and national workshops and are being published through inclusion as annexes to this Post-Consultation Report.

The MOD stated that any comments received after the closing date for the consultation would, if practicable, be considered by the project team. In practice, this applied to only a few late comments, all of which were included in the project database.

## 5. Media Coverage

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In addition to the adverts placed in local newspapers, the public consultation resulted in a certain level of media interest, particularly around the shortlisted sites. In many cases the media coverage simply outlined the details of the consultation events, although in some a subjective opinion was given.

A summary of the media coverage is outlined below:

- **BBC1 South**, 17 November 2014 – Ran a piece regarding the AWE consultation which focussed largely on the GDF and its significance for the SDP.
- **BBC Radio Berkshire**, 17 November 2014 – The chair of Aldermaston Parish Council stated in a radio interview that if AWE Aldermaston were chosen as the site to store waste from nuclear submarines he would like to see the local area compensated.
- **Chester Chronicle**, 21 November 2014 – *‘Ministry of Defence to exhibit proposals on radioactive waste coming to Capenhurst’*. Piece announcing the start of SDP consultation.
- **News and Star**, 8 December 2014 – *‘Consultation into storing radioactive waste from nuclear subs at Sellafield’*.
- **Basingstoke Gazette**, 22 January 2015 – *‘Consultation deadline looms for plan to store radioactive waste at AWE’*.
- **CFMRadio** – Piece on the radio station at the time of a protest on 27 January 2015 at the Whitehaven event giving details of the event and the protest.
- **Private Eye**, 6 February 2015 – *‘Radioactive waste, sub plot’*. A satirical piece suggesting obscurity and a lack of transparency in selecting an ILW storage site.
- **Chester Chronicle**, 6 January 2015 – *‘Capenhurst: Have your say on plans to decommission nuclear sub scrap’*. Piece announcing the end of SDP consultation.
- **Basingstoke Gazette**, 18 February 2015 – *‘Tadley Town Council backs AWE Aldermaston bid to store radioactive waste’*.
- **Itv.com/news/border**, 24 February 2015 – *‘Local authorities argue against storage of dismantled nuclear submarines’*. The local authorities for both Sellafield and Chapelcross have formally objected to the storage of the RPVs, saying that it would not benefit their area.
- **Border TV**, 24 February 2015 – *‘Local authorities argue against storage of dismantled nuclear submarines’*. Copeland Borough Council is opposing plans to bring submarine waste to Sellafield.
- **BBC News**, 24 February 2015 – *‘AWE Aldermaston nuclear waste deadline expires’*. Announcing the end of consultation.
- **InCumbria** (website), 24 February 2015 – *‘Sellafield not the place to store waste from submarines’*. Reported the views of Copeland Borough Council.
- **Newbury Today**, 2 March 2015 – *‘AWE Aldermaston emerges as increasingly likely nuclear submarine waste site, after consultation ends’*.
- **BBC Future**, 30 March 2015 – *‘How do you dismantle a nuclear submarine?’*. A generic piece on the disposal of submarines at the end of their life.

## 6. Next Steps

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### 6.1. The Decision-Making Process

The MOD is committed to taking all the views received during this public consultation into account as it makes its decision on the storage site for the submarine RPVs. Part B of this report summarises the responses received which are being fed into a formal site assessment before the MOD forms its recommendations about the way forward and its chosen RPV storage site<sup>4</sup>.

The final storage site recommendation must be put forward in a business case for approval by the relevant authorities in the MOD.

Once these decisions have been made, the MOD will publish a Response to Consultation report demonstrating how the consultation responses have been taken into account and explaining the way ahead for the project. A Post-Adoption Statement will also be published, describing how environmental considerations and responses to the SEA specifically have been integrated into the final decision.

Further approval for specific activities will be required from the planning authorities and independent regulators and government before preparations for the construction of the store and initial dismantling of the first submarine can start.

### 6.2. Planning Application

Following a decision by the MOD on the storage site, a planning application and supporting information will be prepared for the proposed RPV store by the operator of the site and submitted to the relevant Local Planning Authority.

The planning application will detail the proposed development including the function, size, shape, elevations and supporting infrastructure.

The planning application will be accompanied by an Environmental Statement under the Environmental Impact Assessment (EIA) regulations. Where alternative options have been considered, the Environmental Statement will include an outline of the main alternatives and an indication of the main reasons for the choice made, taking into account the environmental effects. The EIA also ensures that the public are given early and effective opportunities to participate in the decision-making procedures. The public will be able to view and comment on the planning application and the Environmental Statement.

### 6.3. Initial Dismantling

The radioactive waste from a decommissioned submarine includes Low Level Waste (LLW) such as contaminated pipework, and the RPVs which are classified as Intermediate Level radioactive Waste (ILW) for storage purposes. Stage 1 of the initial dismantling of the submarines will remove the majority of the LLW, as the first step in the dismantling process. The removed material will be sent for disposal via existing routes.

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<sup>4</sup> The assessment process is set out in the project's Approach to Decision-Making report, downloadable from <https://www.gov.uk/government/publications/submarine-dismantling-project-interim-storage-of-intermediate-level-radioactive-waste>

Once an ILW storage site is selected and relevant approvals obtained, the project will proceed to remove the remaining radiological waste from the first submarine. Recycling the remainder of the submarine will follow so the MOD can refine its understanding of the industrial, regulatory and commercial processes so that lessons learned can be applied prior to placing the contracts to dismantle the remaining submarines.

When the MOD is satisfied that the appropriate processes for dismantling and ILW storage are proven, the project will seek internal MOD approval to dismantle the remaining submarines.

#### **6.4. Ongoing Information for Communities**

The SDP team values and supports the activities of site stakeholder groups (SSGs) and local liaison committees (LLCs) in relation to both new programmes and current facilities. They have an important role, offering constructive challenge on health, safety and environmental issues and programme delivery generally. Members are regularly briefed on topics relevant to the site and have the opportunity to question senior site and staff and regulators, as well as reviewing the information presented from the Radioactivity In Food and the Environment reports. SDP has been, and will continue to be, involved in the local liaison committees and site stakeholder groups of the five shortlisted sites and the dismantling dockyards. Until a decision on the location of the store is made, the SDP's contact with these bodies will continue to focus on consultation topics and the provision of information.

Once the decision on the store has been made and the recommended site has been contracted, liaison on RPV store planning and construction and subsequent operational matters will become the responsibility of the site owners and operator. MOD will continue to work with the recommended site's LLC/SSG as appropriate to support ongoing engagement with the community.

## **7. Learning from Experience**

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### **7.1. Project Team Review**

The project team has conducted an internal 'lessons learned' review of its approach to public and stakeholder engagement based on the experience of this consultation and feedback received from participants. These lessons are the views of the SDP team only. Issues raised include the following:

- The consultation events were generally well received and the local communities appreciated the opportunity to provide feedback to MOD.
- SDP offered pre-consultation briefings to local councils, site workforces and site LLCs/SSGs which were very useful in building relationships and in gaining feedback from those whose views and responsibilities will have a major influence on the deliverability of the project.
- Technical expertise available at each of the workshops was invaluable, facilitating constructive conversations on particular topics and expert answers to detailed questions.
- Some of the site operators received feedback that the number of consultation events was in excess of the level of risk from the store and therefore locally had the impression that the risk was greater than the reality.
- Inclusion of the Regulators (ONR, EA, and SEPA) was valuable. They could provide an independent viewpoint on specific safety related questions.
- The two national workshops were very useful in terms of reaching the key NGOs. A more visible approach to inviting them and earlier clarity over expenses arrangements would have been helpful.
- Some venues not centrally located within the local communities were less well attended. MOD will consider in the learning from experience process whether additional channels should have been used to reach other constituencies and age groups.
- The MOD should look at ways of attracting young people in this digital age, since it has been acknowledged that digital media were not used to publicise the events to a wider audience.
- Team training in consultation technique, presentation material and technique and media training was essential and enabled a professional consultation to be delivered.
- The attendance of experienced, serving Royal Navy submariners at all events was found to be very reassuring to the public.
- The MOD learned from the public the importance of ensuring any announcements are communicated.

### **7.2. Sub-Group and Advisory Group Review**

Members of the project's independent Advisory Sub-Group attended the national workshops and a sample of local exhibitions and workshops. They provided useful detailed feedback as the consultation proceeded and a final summary statement (Annex I).

The full Advisory Group may be reconvened in due course for the MOD to give an update and gather Advisory Group feedback.

## Part B – Summary of Comments

This part comprises the SDP team’s summary of more than 2500 individual points made and questions asked by individuals and organisations participating in the consultation process within questionnaire responses, longer submissions and workshop meeting notes.

The SDP team has attempted to provide a fair and readable summary of the comments for internal and external stakeholders. The team has tried to stay true to the respondents’ views, even where they could mislead or appear to be based on assumptions that the team believes are factually incorrect. This is not a standalone document and assumes some prior knowledge of the project, specifically the information contained in the Consultation Document. This is a challenging task but this summary attempts to do justice to the breadth, strength and number of comments received but the raw data of all comments received is available in the annexes for anyone wishing to reference a comment’s source.

This type of summary ensures no points are lost and all are treated equally within the project team’s analysis, which is very important. However, the way in which responses have been split is inevitably subjective and the balance of points made may not be directly related to the balance of respondents’ positions. For example, someone opposed to the store project may have summarised their views in one line whereas a supporter may have listed a dozen different reasons (or vice versa). Some sections in Part B are relatively long because of the variety of points made, whereas some positions with significant support can be summarised much more briefly. Therefore, it should be noted that the length of text in any section is not necessarily a reflection of the significance of the points made within it.

The comments recorded within this document reflect only those raised during events workshops, in written feedback forms and written submissions. It is the consultation team’s view that questions raised at the exhibitions, in conversations with the project team outside of the workshops, largely focused on project scope, security, transport and community benefits. However, residual concerns were sufficiently addressed for them not to subsequently record them on a feedback form.

For all these reasons, although we have also included summary statistics on individual points made below and added some observations on the balance of opinion on some key topics, the MOD thought it important to publish the source material (where respondents agreed to it) as annexes so that interested parties can verify the conclusions/themes.

### General Comment Area:

Project scope and key stages	561	23%
Assessment process & options	544	23%
Strategic Environmental Assessment	348	15%
Public & Stakeholder Engagement	311	13%
Site suitability *	231	10%
Safety & security	222	9%
Planning, policy & permitting **	172	7%
	<b>2389</b>	<b>100%</b>

\* Points relating to specific sites not covered under the other headings

\*\* Includes negotiated benefits. Socio-economics more generally covered in Assessment.

As can be seen in the detailed breakdown in Annex J, there were some cross-cutting themes which attracted comment under a number of different questionnaire headings. For instance, there are almost 300 transport-related points in the database, mostly submitted against four main distinct topic areas: the local access routes set out in the SEA (over half the transport points); transport arrangements and mode (eg sea transport options); changes to the assessment framework to accommodate transport issues; and transport safety and security.

## 8. SDP Programme

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This section covers points made on:

- the scope and overall programme for the RPV store project
- questions and observations on technical aspects of the RPV and its container
- transport arrangements
- the store
- possible future size-reduction and repackaging activities
- disposal in a Geological Disposal Facility, in accordance with the UK government's policy for the disposal of higher activity radioactive waste

### 8.1. Project Scope

A range of comments were received relating to the requirement for a submarine dismantling project, what its scope should be, and comments relating to future classes of submarine and their disposal.

Many of the individual respondents at all sites and organisations submitting responses seemed to recognise that the SDP is necessary and that it should be done sooner rather than later. For instance, it was noted that dismantling the submarines was important to reducing overall risk and liability. One response stated that the submarines cannot be left afloat and supports the MOD's plans to dismantle them.

The MOD was asked why decommissioning hadn't been planned for at the time the submarines were built. There were also some queries that the problem has not been addressed already and that it appears to have taken a long time to get to this stage. Conversely, one respondent asserted that by leaving them stored afloat it may have the effect of concentrating minds, resulting in stopping the production of more radioactive waste.

Several responses noted that SDP's general approach appeared to be a good solution to the problem but some were critical of particular aspects of the project as described below.

There was some surprise that there are as many as 27 submarines to be dismantled. There were also questions about the specifics of the vessels, such as how old they are, whether they are submarines that carry Trident and how many submarines there are in total in the Navy's fleet. Further questions related to the maintenance of the submarines while they are afloat.

There were also some relatively general points and questions about submarine propulsion, for example, was it only submarines that had these reactors and could submarines be powered by other fuels.

#### 8.1.1. Future Classes of Submarine

Future classes of submarine are not included in SDP (as outlined in section 1.1) but many responses referred to them, as either a problem that needs addressing and for which a plan should be produced, or as a potential challenge to SDP's limited scope of 27 RPVs, especially if a planned GDF was delayed (see Section 8.7).

Questions asked about future classes included clarification about the future disposal of the RPVs to a GDF. Several respondents asked whether the store would be limited to the 27 SDP RPVs if future classes' RPVs could not be sent directly to a GDF, for example, because of delays. There was some concern that the first 27 RPVs could be the 'thin end of the wedge', setting a precedent for the storage of future RPVs so some suggested that they must be specifically excluded from the store.

### **8.1.2. Wider Points on Nuclear Issues**

A number of points, about a third of which were in submissions from organisations, expressed a range of negative opinions on the replacement of the nuclear deterrent, Trident, and other new nuclear submarines.

Some respondents, including NGOs and Nuclear Free Local Authorities (NFLA), made the point that SDP is only needed because the Navy operates nuclear submarines in the first place. The operation of nuclear submarines in the past has generated nuclear waste which is going to have to be dealt with but the continued production of nuclear waste from future classes was not acceptable. One comment suggested that any further development of the UK's nuclear powered submarine fleet must be put on hold until a publicly acceptable plan for the management/disposal of existing submarine ILW has been officially adopted.

Several commented that the construction of new nuclear powered submarines, which will generate further radioactive waste, raises very different political and ethical issues to the disposal of legacy wastes. It was suggested that the Government's Committee on Radioactive Waste Management had reached a similar conclusion regarding higher activity radioactive waste generally. A respondent was concerned that alternatives to nuclear energy for powering submarines were not being investigated.

Other points related to the principles and risks of generating radioactive waste from any source, especially when the radioactive waste problem 'could never be solved' or as one response argued, could be, but never would be, solved because of 'political short-termism'.

### **8.2. SDP Programme**

Responses on the timescales for different activities, for example, the length of the store life are covered elsewhere in the relevant sections. The responses below relate to the programme more generally.

Several responses urged the MOD to keep to its timetable and not to let the project slip or costs escalate, so as to maintain stakeholder confidence, although one response suggested that nothing should be done 'in haste'. A further response urged that the announcement of the RPV storage site should be on time, to minimise uncertainty for communities around the shortlisted sites.

One response 'deplored' the lack of past progress and another asked about the progress of decommissioning on other MOD programmes. Specific questions were asked about the dismantling rate, the timing or duration of defuelling, the rate and timing of RPV transports and store operation. Two responses asked whether the rate of RPV removal could be increased. The MOD was asked how long it would take to build the store and why only one RPV will be moved per year.

Some comments reflected on the very long timescales involved in this project; quite possibly, it was suggested, beyond the lifetime of many of those taking part in the consultation.

### **8.3. Initial Dismantling**

One respondent asked how many submarines still need defuelling.

Another asked for confirmation that HMS Swiftsure is the first boat to be dismantled and that lessons would be learned from it for future boats. A further respondent asked why this had been chosen as the first submarine.

Other questions for the MOD included why the radioactive waste could not be removed when they are brought in for maintenance, where the two Trafalgar class submarines to be stored at Faslane would eventually be cut up (for recycling), and whether dismantling requirements were considered when the submarines were built.

Other points referred back to decisions already taken. For instance, one reminded the MOD of previous options for storing intact reactor compartments above ground. Another respondent asked why the RPVs are being stored whole and not being size reduced and packaged at this stage.

Questions about the dismantling sites included whether Rosyth and Devonport naval dockyards would be closed as a consequence and whether it would be Babcock doing the dismantling. One respondent questioned whether Barrow-in-Furness had been considered as a site for dismantling the whole submarine due to its convenient location to Sellafield, a shortlisted site.

One response asked how the remaining 90% of the submarine will be recycled and if selling the recovered material would cover the cost of the store. Another suggested that it would be easier to carry out the dismantling and recycling process at Devonport and Rosyth and asked whether the intention was to use a UK or an overseas shipbreaker.

One suggestion was that a submarine could be preserved in order to 'aid connection of society to the nuclear sub programme.'

## **8.4. Reactor Pressure Vessels and Container**

Questions about the physical characteristics of the RPVs included whether the temperature of the RPVs is an issue, how big and heavy they are, whether they are dry and if the core barrel will be kept inside during storage. The MOD was asked about the RPV head, including whether it would be activated and whether Intermediate Level Waste could escape when it was removed. A further question concerned the moderator used when the reactor was in service.

RPV radiological characteristics were mentioned in several responses, some of which were quite technical, including questions about the relationship between the isotopes present and the ILW classification and the potential for absorbed tritium to be released into the RPV body. Some respondents suggested that the MOD should publish a report substantiating its conclusions in respect of tritium levels.

Half-lives were also mentioned in several other responses, including how much decay has already occurred and what the dose rate outside the RPV would be now without shielding. MOD was asked whether the RPVs would still be Intermediate Level Waste by 2040 or whether decay would allow a lower classification.

Two respondents wanted a comparator to aid their understanding of the dose rate, for example, a comparison to the dose rate when having an x-ray. The MOD was also asked to explain the difference between the terms 'activated' and 'contaminated' and some more fundamental questions about the nature of radioactive decay.

Responses relating to decontamination of the RPVs tended to be more technical in nature. These included whether it was possible to electro-deplete the radioactivity. One response asked if further decontamination could be attempted and another asked what decontaminations would already have taken place.

Two responses asked about the difference between IP2 and Type B containers, for transporting and storing the RPVs. Other questions related to the criteria used to decide the container, how the container type will be determined and who would make the decision. The MOD was asked whether the different routes from Rosyth and from Devonport to the store would affect the decision.

The MOD was asked what the container 'drop withstand' and fire resistance requirements would be and what the different test regimes were for the different container types.

## **8.5. RPV Transport Arrangements**

This section covers the choice between the main transport options considered. Local road access and environmental impacts are covered with other SEA matters in Section 11.8 and the use of transport criteria in the option assessment is covered in Section 9.3.3.

In respect of road transport, one respondent pointed out that there are dedicated 'high load routes' across the country and asked how big the loads would be. Several asked whether a police escort would be required. The remainder of the questions under this heading related to the number of transports per year, whether it will be a private company transporting it, how fast they will travel and who will be notified when the transportation takes place.

A number of comments asked whether sea transport would be an option, particularly in relation to Sellafield. Many of them suggested that sea transportation would be quicker and safer. Ellesmere Port was also suggested because it already had port handling facilities and was close to Capenhurst. Another suggestion was that sea transport would also be a more efficient transport method for Chapelcross, possibly using Barrow to dock the RPVs. It was also suggested that a combination of sea and road transport could be used to reach Aldermaston.

Three respondents suggested that rail transport could be the best option and another asked if there would be any benefit from airlifting the RPVs.

Two responses asked about the specialist equipment that would be needed to transport the RPVs once the site had been chosen.

## **8.6. RPV Store**

The RPV store concept and programme were mostly well received and comments suggested it seemed to be well thought out, though there were clarifications sought on what site specific issues would need to be taken into account as described elsewhere eg flood risk and generic hazards that would need to be taken into account in the safety case eg seismic withstand and aircraft impact.

Questions asked about the proposed store programme included several about store construction duration.

More specific store questions about the store design included whether it would be above or below ground, if the store would be camouflaged and if landscaping would be used to hide it. Questions relating to the design of the store included to what extent the local community will be able to shape the detailed design, whether the final design could look very different than the one proposed throughout the consultation. The MOD was asked whether the store would be subject to monitoring and whether the atmosphere within the store would be controlled.

The MOD was asked about the store dimensions and whether the size might be increased to accommodate additional waste. The MOD was asked about the implications of 'shared storage' alongside other wastes (see also Section 9.6) and whether the need for a new building could be avoided by extending an existing store.

Long term maintainability was raised as an issue and the MOD was asked what would happen in the event of Government cutbacks and whether it would compromise the maintenance of the store. A respondent expressed disappointment that a surface interim store was being proposed for the RPVs and not 'ultra-safe underground storage'.

Some asked about the suitability of the store given the need for a 100-year design life. Views on the desired store life were typically linked to perceptions of GDF availability as discussed in more detail below, leading some to suggest that the store should be built with a design life of considerably greater than 100 years. The point was made that, given the uncertainty about a GDF, site security could need to be maintained for 100 years and asked whether the MOD was confident that this would be the case.

Several comments addressed decommissioning the store at the end of its life. Two respondents asked what will happen to the store once the RPVs have been removed and another suggested that the MOD would need to ensure the clean-up of the site is thorough and effective. One congratulated the MOD for planning the decommissioning in advance.

### **8.6.1. Store Inventory**

Although the strength of feeling varied, there was clearly some concern around every site that RPV storage might set a precedent for the storage of other defence wastes and generally becoming the default destination for the MOD's radioactive legacy wastes.

Some saw a risk of SDP's wastes being the 'thin end of the wedge', meaning the MOD must give specific guarantees in this respect and store capacity should be limited to that needed for the 27 SDP RPVs. The proposed storage facility for submarine ILW should be a standalone facility used exclusively for that purpose and the possibility of sharing store capacity (including from non-MOD sources) should be explicitly excluded from future consideration.

Some comments suggested a firm MOD commitment should be given to emptying the store by a given date. One respondent said that whatever site is chosen, a clear, binding commitment to eventual removal and disposal elsewhere of the RPVs needs to be given and 'backed up legally'.

### **8.6.2. RPV Repackaging**

Some responses related to the contingency allowed in the store footprint for a repackaging facility, should one be required, to repack the RPVs for transport from the RPV store to a size reduction facility or direct to a GDF for disposal.

These sought or offered clarification on what might be involved or what equipment might be required for repackaging. One local authority noted that this was an issue where further detail would be required during the next phase in respect of the chosen site. The MOD was asked who would pay for on-site handling and repackaging.

Some suggestions were that the MOD needed to explain the need for repackaging better, one noting that it was not for radiological reasons or because the container had degraded but because transport regulations may have changed. The MOD was asked about the size of the replacement container.

Others asked for more information on the nature of the repackaging activities and any associated risks, including the possibility of contamination on the outer surface of the RPV or inner surface of the container. One respondent suggested that the proposed store building seemed to offer inadequate containment during the repackaging process.

There were also comments on the space being allowed, with a suggestion that it might not be adequate.

### **8.6.3. Size Reduction**

Some asked about, or commented on, the possibility of direct disposal in a GDF without size reduction (cutting up into smaller pieces) for most of the stored RPVs. One response emphasised the need for a consistent message on the potential requirement for size reduction. A respondent noted that radioactive decay while in store may allow parts of the size-reduced RPVs to be disposed of as LLW.

Two further responses asked whether the larger PWR2 RPVs in the store would definitely require size reduction before disposal.

In terms of timing, one response questioned the timing of size reduction and another asked whether size reduction was determined by the SDP schedule or would wait until the GDF was available.

A respondent said that size reduction would be a major technical challenge for which remote handling systems may be necessary. Questions were asked about the MOD's responsibilities and the inclusion of size reduction in the project costs. Another response suggested that SDP could draw on Sellafield's experience to determine and cost the best approach and another suggestion was that the original decision not to size reduce before storage might be revisited as technology developed.

Some comments related to the optimum location for a size reduction facility, whether just for the RPVs or for civil wastes and noted that it would have to be a nuclear licensed site. Some asked open questions about future plans, including where and when the size reduction would be done. Others had opinions on the linkage between store and cut-up facility siting, for example, that where the RPV will be cut up should be important to the ILW store siting decision. One response pointed out that Sellafield was an example of an existing site suitable for size reduction. Another suggestion was that a size reduction facility could be at the GDF site.

Some responses suggested that size reduction could be on the same site as the RPV storage, for example, to avoid additional transport and double handling. The possibility of size reduction being on the same site concerned other people, who questioned the potential impacts and the possibility that a size reduction facility at the storage site might lead to other wastes coming for processing.

Other respondents asked what the process would be if a decision were made at a later date to add size reduction capability at a storage site and whether there would be another consultation and planning application.

A number of responses explored the implications of adding a size reduction facility, noting, for example, that any transport implications to and from a size reduction facility would need assessing.

## **8.7. RPV Disposal and a Geological Disposal Facility**

Although the level of concern varied, the final disposal site for the RPVs (in a GDF) was a recurring theme in responses from people local to all the potential storage sites.

Several questions simply asked where a GDF was going to be located and when it would be ready, but many referred to project assumptions about the earliest emplacement date in a proposed GDF, typically expressing scepticism that, although it may seem a long way off, it could well be substantially later.

Some respondents questioned whether a GDF was the best option for disposal, arguing that it is not based on proven technology and a few suggested that no safe site would be found for the GDF. One suggested that this meant there was no real end date for SDP.

Others pointed out that SDP is unlikely to be one of the earliest priorities for emplacement into a GDF, further adding to the project's timeline assumptions. One response, for instance, believed the target availability date would not be met and that even then priority would be given to higher hazard wastes from Sellafield. It concluded that the store should be designed to last at least 150 years or more. There was some discussion about whether it could be called 'interim' storage whilst a final disposal date remains uncertain.

Some other respondents supported the existing, or an accelerated, GDF concept. Several stressed the imperative for the Government to address the GDF issue as a matter of urgency and it was suggested that the MOD should press the relevant government departments to develop a credible policy for the long term management of radioactive wastes.

One response suggested that if GDF timings were known, afloat storage could be extended to remove the need for an interim store. An alternative view was that continuing afloat storage would 'keep the pressure up' and thus help deliver a GDF.

Many more responses asked about the consequences of GDF delays and the likelihood or implications of extending RPV interim storage periods. For instance, might it delay site decommissioning or increase SDP costs. One respondent raised the point that local communities should understand that the realistic likelihood is that the waste will be stored at the site for an indefinite, rather than interim, period, and the MOD must provide honest information about this. Another was concerned that a delay to the implementation of geological disposal would delay the decommissioning of Chapelcross if there were an RPV store on site.

### **8.7.1. Alternative Disposal Routes**

Some respondents suggested possible alternatives to geological disposal routes, including the existing Low Level Waste Repository (LLWR) or a future equivalent. One suggested that the RPVs were not as active as the wastes a GDF was designed to accommodate.

Others sought confirmation that, if Chapelcross were to be chosen, the RPVs would still go to geological disposal and would not be stored 'near source near surface' under existing Scottish civil radioactive waste arrangements.

Sea disposal for the RPVs was mentioned and one respondent asked the MOD whether the option might be investigated if legislation changed again.

## **8.8. Management of Other Radioactive Wastes**

There were a variety of responses on the Project's handling of radioactive waste other than the RPVs, mainly seeking additional information.

A range of responses asked about the nature and existing arrangements at Sellafield for storing the nuclear fuel removed from the reactor before the SDP process starts. The possibility of the RPV store handling spent fuel or high level wastes had clearly been of concern to some respondents and others expressed relief that this was not the case.

A summary of the responses relating to the RPVs themselves was included above as Section 8.4 but there were also a few more general questions about the physical nature of the ILW and whether it could be recycled.

All radioactive wastes, apart from the RPVs, are expected to be Low Level Waste (LLW) or Very Low Level Waste (VLLW). A variety of questions were asked, and points made, about their nature, management and disposal. Questions were asked about the amount, definition and proportion of different sorts of wastes arising from the submarines, including the classification of items such as heat exchangers and primary circuit water. A few questions were also asked about the scheduling of LLW removal.

The MOD was also asked to explain in more detail what steps will be taken to manage and dispose of LLW and VLLW. One NGO, for instance asked the MOD to clarify what radioactive wastes would arise outside the RPV and explain what steps will be taken to manage them. It stressed its view that they should be concentrated and contained, not diluted and dispersed.

A respondent made the point that projected waste volumes might be preliminary judgements until work has been started on the first submarine and that more detailed calculations would be needed in due course. Other respondents suggested that, whilst no ILW is expected outside the RPV, this assumption still needed to be validated and the possibility still had to be taken into account.

Most responses concerned with LLW disposal were seeking confirmation that it would go to the Low Level Waste Repository (LLWR) in West Cumbria or, in one case, where it would go after the LLWR was full. Two questions related to the potential for smelting LLW to concentrate the activity for disposal in the LLWR.

A few questions related to the way civil equivalent wastes are managed and will be disposed of, including the Sizewell 'B' RPV. One response noted the similarities between MOD and civil requirements and suggested that both will benefit from interim storage because handling technology will evolve during the time that they are stored.

## 9. Option Assessment Process

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This section covers comments and questions on the various elements of the option assessment process and comments on the way assessment and screening criteria have been interpreted in the context of individual sites.

### 9.1. Decision-Making

The transparency of the assessment process was raised as very important by several respondents which should include the public availability of the assessment criteria, weightings and scores as well as any public opposition.

The screening process already undertaken to select the five shortlisted sites was generally praised, including a comment that the project team took account of earlier comments on excluding clearly inappropriate sites from the process and therefore enabling a focus on assessment of realistic candidate sites.

A majority of the comments, responses and questions on the validity of the subsequent option assessment process set out in the Consultation Document were supportive. It was typically seen as logical and thorough with an acceptance that a storage site needs to be found. One response, for example, said that the approach to engagement adopted by the SDP, and the rigour of the site selection process, has much to commend it.

### 9.2. Relative Importance of Criteria

A range of comments asked about, or expressed a view on, who should actually take the final decision and on what basis. A few suggested that it should be treated as a technical decision and not be taken on a purely financial basis.

Several responses suggested that cost was the most important factor in the decision-making process, in order to minimise cost to the taxpayer. Some emphasised the need for a cost-effective solution and cost management. Others were concerned that cost would play too big a role. A respondent suggested that limited weight should be attached to cost and the MOD must be able to demonstrate that the final decision was not made for predominantly commercial reasons. Others recommended that cost-effectiveness must not be too narrowly defined, it should take account of local socio-economic drawbacks or benefits.

Others felt that a site should be selected on the basis of safety and security and where the environmental impacts are shown to be the lowest. Another response suggested that wider considerations, such as impact on the chosen sites' interim and final end states, land use and community acceptance, would seem to be the most important factors with another suggesting that the site will need to have the infrastructure in place for the long term.

Some respondents suggested that the final decision would actually be a political one and that consultation input might therefore not make much difference (see also Public and Stakeholder Engagement in Section 15). Some respondents were sceptical of the influence of the technical assessment and that the site that makes 'the least fuss' will be selected. The MOD was asked about the potential impact of a change of government in May 2015.

There were several questions about the timescales for the assessment and site announcement. Other comments included concern that the decision should not be rushed. It was suggested that the MOD does not yet have sufficient information to make robust decisions and that time should be allowed to consider 'the whole picture'. Some people asked whether there was an order of preference for the sites yet, or even a preferred site. Several respondents believed that the decision had already been taken and that the public consultation was therefore a public relations exercise.

The MOD was asked about its contingency plans, for example, in case the chosen site subsequently dropped out of the running or planning permission were refused ie would the MOD be taking forward a 'back-up site' and what would happen if the planning authorities at all potential sites said no.

### **9.3. Analytical Framework**

One response said that they weren't clear about how Investment Appraisal (IA), Operational Effectiveness (OE), SEA and Other Contributory Factors (OCF) will be weighted in the final evaluation and how these weightings will reflect majority consultation views. The MOD was asked which of all the criteria are really going to matter to the MOD, as opposed to those things that will matter to a member of the public and whether there will be a gap analysis of the differences between them.

An NGO submission included a comprehensive list of principles against which it suggested the MOD should test its options.

The MOD was also asked who would be doing the analysis, and about third party and regulatory oversight of the process and the data used.

Some responses addressed the scope of the Investment Appraisal, including the need to include the cost of retaining a qualified workforce to meet the obligations of a licensee. It was suggested that the MOD should ensure that the cost of repackaging and size reduction is properly accounted for in the assessment of the full lifecycle cost of the project. Two respondents thought that the cost differential between the sites would be minimal and therefore not a big differentiator.

In relation to the Operational Effectiveness element of the site assessment, questions were asked about how the Multi Criteria Decision Analysis (MCDA) process will work, including how the weightings will be arrived at. One response asked if there will be opportunities for providing alternative weightings and how the sensitivity testing will work. Another respondent asked that since the weighting/scoring process has been set up and implemented by the MOD, what opportunities there were for independent scrutiny and validation of the process. Comments were also made on the closeness of the current site initial data comparison.

General points about the OCF analysis included a comment that OCF is generally more qualitative, rather than quantitative and that it provides a useful differentiator.

Responses also included questions or suggestions relating to criteria within the OCF framework, including public confidence, equity, planning frameworks, safety performance, planning risk, project deliverability and stakeholder positions.

#### **9.3.1. Population Density**

The general thrust of the comments suggested that population density and/or distance from major population centres should be added to the list of criterion. The aim would be to capture collective environmental and socio-economic impacts (including any house price impacts) and minimise collective risk should there be an accident. Some thought population density may also add to transport challenges.

The general sense was that larger communities should be avoided but one response noted that the project may actually have a disproportionate (negative) effect on a smaller community whilst another suggested that a community benefits package may have a proportionately greater benefit for residents in a smaller community.

In terms of specific sites, comments relating to population density were most often made in relation to Aldermaston and Burghfield. They included a comment regarding the distance from Reading and the amount of residential housing close to both sites which means that siting the storage site there could have a detrimental effect on house prices and therefore the RPVs should be stored on a site away from urban housing.

Examples were given of new housing developments that needed to be taken into account, most often in the Capenhurst context. These included local future plans for large areas of residential housing and a school off Ledsham Road to the west of, and very close to, the site.

### **9.3.2. Space and Infrastructure Availability**

One of the SDP screening criterion was that there must be space available on the site, though the precise location need not be determined until site-level data collection is completed in mid-2015.

Several responses asked whether the land area, supporting infrastructure and on-site access was available at their local site. In some cases, responses suggested additional conditions, including that any store location should be within the existing site fence, should not affect local amenities or, in one response, compromise the site's main purpose.

Some respondents seemed to have had the impression that their local site had sufficient spare land and access infrastructure while others had the impression that it did not (most often in the Sellafield context). One response drew attention to likely local resistance if West Cumbria were chosen but with a store location away from the main Sellafield site.

Copeland Borough Council also raised a concern about Sellafield's capacity stating that 'the Council's concerns do not arise from from Sellafield's capability to manage the interim storage of the ILW but the sites capacity to accommodate a large store on a site where there is a significant competing demand for space to accommodate development which is of far greater value to the Country's decommissioning and nuclear related development requirements and ambitions.'

Other responses asked questions about, or commented on, specific potential store locations within the site boundary, for example, a preference for consolidating ILW storage at Aldermaston within the Nuclear Storage and Processing Area and one suggested that for security reasons the store should be in or near the centre of the site.

The point was also made that the location must also have the correct geology.

### **9.3.3. RPV Transport**

Responses were made on RPV transport under a variety of headings and different aspects are covered in other areas of this report. This sub-section covers responses relating to the use of transport distance within the assessment framework.

Several responses suggested that total transport mileage should be an important factor in the option assessment, choosing the shortest and safest route possible. Others suggested that the relative accessibility of the sites should also be considered. Some suggested that the proximity principle favoured the AWE, Aldermaston and Burghfield sites. One NGO's view is that, based on transport distances, both Sellafield and Chapelcross should be ruled out as candidates for the storage of submarine ILW and that the MOD should focus on Aldermaston and Burghfield.

One response queried the reason for the importance being given to transport distance and another asked whether it was total mileage or the length of each individual journey that was most relevant.

Others explicitly referenced the relationship between transport distance and cost, including questions on the difference between the transport costs for different sites and what proportion of overall costs transport would account for.

The MOD was asked whether the GDF location and associated post-storage transport would be a factor. Most of those offering an opinion suggested that a GDF location needed to be known before the store siting decision is made. One suggested that it was a factor but not a discriminator.

More respondents commented on transport risk. All these responses stressed its importance, sometimes asking about the safety case and sometimes also referencing security. Some respondents thought that the risks associated with any radioactive waste transport were too high, including the possible impact of a terrorist attack. Nuclear Information Service and others highlighted that transporting radioactive material is one of the nuclear industry's riskiest activities.

## 9.4. Site Ownership and Role

One respondent asked how the differences between NDA sites and commercial sites would be managed within the assessment process.

A few questions were asked about contractual arrangements with the storage site generally, though rather more related to the potential use of a commercially-owned site (all are operated by commercial businesses). Others asked about the potential for a company (or other government-owned site) to make a profit.

The long timescales caused some people to question the feasibility of dealing with a commercial business and the importance of long term funding to maintain safety. If a commercial site were to be used, some argued, then the tendering process must be transparent and (in one case) that local firms must be involved. Another response emphasised the need for competition in order to achieve value-for money.

Some respondents sought clarification as to whether the MOD retained or transferred responsibility for the RPVs once they entered the store or, in one case, who would have responsibility for the wastes if the site owner went out of business. Some respondents said that the waste should be stored on an MOD site, rather than with a commercial company. One asked if SDP regarded Sellafield as a partial MOD site.

Some responses related to the importance, in the option assessment, of sites' current role in handling and storing radioactive waste and the potential impact of additional storage (particularly in the context of Burghfield, which currently does not have any).

A few general comments were made about the need to take into account the impact of an RPV store on future site use and decommissioning dates but most comments on this topic were made in a specific site context (see Section 9.8 below).

## 9.5. Impact of Policy Frameworks

Most of the responses under this heading were not strictly commenting on a policy matter, but on a political position ie the current Scottish Government's previously stated opposition to the storage of the RPVs in Scotland noting that the Scottish Higher Active Waste policy does not apply to defence wastes. Additional responses with a similar theme were also made in support of specific positions in the Chapelcross context (see Section 10.4).

Some asked about the implications but it was suggested that the Scottish Government's opposition may make the choice of Chapelcross problematic.

Others referred specifically to the uncertainty about the potential for Scottish independence in the longer term and the impact it might have on SDP. More comments referred explicitly to the Scottish Government's role in the planning process and the risk it might represent to SDP's programme.

Some made the point that the Scottish Government's position to be nuclear free was 'democratic' and should be respected even if there were no strict policy requirement to do so. Others linked positions on SDP to positions on nuclear weapons. These included the view that since Scotland wishes, by a substantial majority, not to have nuclear weapons it should not be expected to deal with radioactive waste from military ordnance in any form.

There were a few responses that emphasised the need to treat Scottish and English communities equitably which might not be the case if objections from one community were weighted higher than those from others. Transparency would be required to avoid this impression. One response made the point that it is 'the UK's waste' and the site selected should be the 'safest and most economical' irrespective of geography. Two asked why waste transfer from Scotland to England was acceptable, presumably on the basis that the reverse was not.

Other responses dealt with UK and MOD radioactive waste management liability more generally, including that decommissioning of the submarines should start as soon as practicable and should be the most cost effective solution for the UK taxpayer. Two respondents asked about SEPA's position and the regulatory framework.

## 9.6. Storage Options

A number of responses followed up on SDP's current assumption that SDP will build a single, standalone store for the RPVs, suggesting that sharing an existing store or building a new shared store would be a logical solution, potentially also saving money and time.

One response suggested that the public may prefer to see separate storage, not shared, and another argued that the project should not overcomplicate things by giving a site multiple options ie by considering both separate and shared storage.

A further possibility was that the store need not necessarily be operated by the site owner. This comment related specifically to Sellafield, noting that the site is very busy and asking if there was an option for another company to implement the store programme on the site.

Some asked about, or suggested the possibility of, two stores instead of one, perhaps one in the north and one in the south to reduce transport distances. Some linked this idea with storing the RPVs at the dismantling sites rather than a separate storage site (see below).

## 9.7. Alternative Sites

Initial dismantling of the submarines will be at Devonport and Rosyth. They were ruled out at the screening stage as potential RPV storage sites but a number of respondents asked about their practicability and/or argued that they were the logical storage sites on proximity grounds.

A number of responses, including a detailed submission from the LLWR team, suggested that the GDF was not the only potential disposal route and that, given the timescales available for radioactive decay, near surface disposal at the LLWR or elsewhere may become a possibility. Therefore, the LLWR should be included as an option. One respondent suggested that the RPVs could be stored at the dockyards until this was possible. LLWR's submission noted that SDP's plans would require construction of at least one more major nuclear facility (eg for size-reduction) and suggested that the MOD should consider whether near-surface disposal could be an alternative to interim storage and GDF disposal.

One respondent thought that it may be better to 'spread the risk' by using a new site with no current nuclear activity.

There were also a few suggestions regarding alternative sites including Westminster, the Isle of Dogs and a redundant supermarket building.

There were a number of questions and comments about the practice in other countries, including whether SDP could use overseas facilities or whether submarine wastes arising overseas might end up in the RPV store. The use of an overseas storage site has been screened out by the MOD but some responses sought more information on the legal position or the status of facilities and suggested possibilities. It was suggested that dismantling in the US would avoid security problems since the reactor technology originated there. Conversely, a respondent asked why the UK would not consider radioactive waste imports.

## 10. Site Specific Comments

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This section of the report covers:

- Those points which simply comprise a statement of support or opposition for a specific site (or both AWE, Aldermaston and Burghfield sites without distinguishing between them)
- Those site-specific questions, points and arguments which cannot conveniently be collated under one of the other headings

The responses received almost always contained a range of separate points, the majority of which could be interpreted as opposing or supporting the use of one or other sites.

No conclusions should be drawn from the quantity of text for each site since this is due to the complexity, breadth and diversity of the comments made and not levels of engagement or numbers of comments received.

### **10.1. AWE, Aldermaston**

Two points contained statements simply objecting to the use of AWE sites with no supporting justification. A few provided grounds for objection not covered elsewhere in this report, including the suggestion that AWE sites are inherently less safe for being inland, 'on transport grounds', or because the AWE sites are 'near major population centres' (see Section 9.3.1 for more on population density).

One response noted that AWE, Aldermaston was not subject to flooding, another suggested that the site was 'well situated' in terms of road access, and another thought local opposition would be lower because so many people work at the site. Several responses stated that they were happy to have the store at AWE, Aldermaston, some because they already have the expertise and security in place and some because they already store ILW.

Three comments referenced concerns over planning constraints, one from an organisation concerned about possible constraints on its expansion and two were concerned about possible constraints on housing developments whilst a further response asked about site capacity for the store.

An NGO stated that 'more honest and frank information needs to be given to communities close to AWE sites about activities at the sites and the risks they pose, and in particular about radioactive waste generation and holdings at AWE, Aldermaston and Burghfield and how these may change as a result of any warhead replacement programme and the AWE site decommissioning programme.'

A number of responses supported the use of AWE, Aldermaston and Burghfield sites (without distinguishing between the two sites), or Aldermaston specifically. Where the points have reasons, they most commonly included: because the site met the SDP functional and programme criteria; already managed radioactive waste and had the necessary knowledge and expertise; or offered a lower safety and security risk.

### **10.2. AWE, Burghfield**

Some respondents referenced the fact that Burghfield does not currently store radioactive waste and one Burghfield response referred to AWE's safety record. Another noted that Burghfield was not suitable because it already has a 'high volume of hazardous material'. There were some objections to the use of Burghfield which did not give any specific reasons but others provided grounds for objection not covered elsewhere in this report.

One respondent raised the issue of the requirement for an increase in the size of the nuclear licensed site area which they considered undesirable stating that the MOD should instead be seeking to reduce the footprint of its nuclear activities.

Several points expressed concern about the potential for flooding at AWE, Burghfield. These are covered in discussion on the SEA (see Section 11.8.2).

### **10.3. CNS, Capenhurst**

Topics raised around the Capenhurst site included: current waste management and storage activities; decommissioning status; did this constitute 'bringing a nuclear reactor to site'; and a variety of operational matters of interest to site neighbours.

One response pointed out that Capenhurst was the only commercially-owned site on the shortlist and two further points asked questions about the views of site management and the commercial implications, including on any possible future sale of the business. One response was concerned that SDP would change the status of the site by adding more military wastes.

Two comments suggested that Capenhurst would be suitable because the store would not change the status of the site and because it was 'already dealing with this sort of product'.

Nine respondees thought the site unsuitable although in most cases without specific justification. One response showed opposition by asking the consultation staff if they would be happy to have the RPVs stored in their back yard.

Some provided grounds for objection not covered elsewhere in this report, including: population density and new development; safety and environment; the potential for this store to set a precedent and for more and more waste coming to Capenhurst; and perceptions of the area (potentially affecting house prices). One response simply pointed out that all the other sites were more accessible and/or remote and were thus to be preferred.

#### **10.4. NDA, Chapelcross**

A number of points expressed concern about the potential for adverse socio-economic impact and the lack of compensating community benefits at Chapelcross, and on Scottish policy and political perspectives.

A high proportion of local points in the database (about 30 items) objected to the potential use of Chapelcross, some in rather more direct terms than generally encountered elsewhere. The local authorities and site stakeholder group sent submissions opposing the use of the site on the basis of the benchmark proposals presented.

Some respondents seem to have held a more positive view. One respondent suggested that the waste itself would not be a major issue for the public. One suggested the site was suitable because of its experience with waste handling and storage and another thought there would be a jobs benefit and one that the low population and low level of opposition would lead to MOD choosing Chapelcross. Three others were either supportive or not concerned.

Local respondents seemed to appreciate that the RPV store would be built alongside the comparable store planned for Chapelcross' own ILW but there were nevertheless concerns that, perhaps not only because of the additional volume but also because of the different sources and destinations of the wastes, that the proposals would delay the start of the 'care and maintenance' phase or eventual site clearance. Some said that it felt like a reversal of the direction of decommissioning or that it added to a problem they thought large enough already.

The points were made that Chapelcross was not a 'working site' and had no future nuclear use whereas the other shortlisted sites were and did have and that the Chapelcross area was at a sensitive stage in its strategy to mitigate the impact of the decommissioning process by creating other forms of economic and business growth close to the site. An RPV store would be an unhelpful addition in this context.

One response suggested renewable energy would be a better use of the site, although another pointed out that some renewable options also had drawbacks, for example, the number of lorry movements in the case of a biomass plant.

Another issue for many of the Chapelcross respondents was the risk that the RPV store, even given that it were safe, might provide a precedent for further waste imports (contradictory to Scotland's policy), which could in turn damage perceptions of the area and thus reduce the likelihood of new businesses locating there.

Some points included grounds for objection not covered elsewhere in this report, including: contamination of water supplies; environmental impact; health concerns; and fairness ie that Chapelcross has already had its fair share.

A number of final points relating to Chapelcross could not easily be categorised. One reflected on the nuclear weapons connections of the site, one asked about the decommissioning of the Chapelcross reactors and one sought assurances that records of MOD wastes would be kept as they are for civil wastes. One response commented on the 'emotional considerations' linked to the Lockerbie bombing.

## 10.5. NDA, Sellafield

The local authority (Copeland) sent a submission opposing the use of the site on the basis of the benchmark proposals presented and making the point that Sellafield should not become the default option for the storage of nuclear waste.

Some concern was expressed that, in the perceived absence of a coherent national strategy on radioactive waste management, Sellafield appears to be treated by government and industry as a general repository for the UK's radioactive waste, often referred to as a "dump". The response felt that it was not appropriate to reinforce this impression or add to the waste inventory at Sellafield by selecting the site for the interim storage of radioactive waste from submarine dismantling.

A majority of local responses acknowledged that Sellafield would be a suitable site and, in some cases, that it was the best choice. One commented that there is a strategic imperative for Sellafield Ltd to retain nuclear skills and knowledge, going on to suggest that SDP is used as a showcase at Sellafield to help retain skills.

Some added caveats, for example, regarding community benefits (see also Section 13) and there were also some objections. One response felt that the focus should now be on improvements to current surface storage of waste at Sellafield to accommodate the Submarine Dismantling Project in order to improve things for the future.

Several comments suggested that Sellafield already had storage facilities and extensive experience of managing radioactive wastes, many going on to suggest that this also makes Sellafield the best option. One respondent said that Capenhurst and Chapelcross do not have the same experience, that at Chapelcross they are plant operators and not decommissioners, and at Aldermaston they do not have large scale decommissioning.

Several points suggested that the RPVs were low risk and/or low volume compared to what was already stored, though one respondent went on to express concern that this meant Sellafield would be regarded as 'the soft option'.

Several points emphasised that Sellafield already held most of the nation's radioactive waste but should not become the default option for storage of nuclear waste, especially in the absence of additional benefits to the local community.

Whilst accepting that Sellafield already had these facilities and waste management experience, several comments referred to the potential challenges of building an RPV store on a site that was already crowded. Copeland Borough council's submission in particular made it clear that its concerns about the project did not arise from Sellafield's capability to manage the RPVs but from the site's capacity to accommodate the store when there was significant competing demand for space from nuclear activities and waste management projects of 'far greater value' to the UK and local area.

Three further points, and a question to the NDA, referred to the potential for the RPV store to distract the site from more important hazard reduction projects or decommissioning generally.

One point asked about the potential for reusing redundant process buildings for RPV storage and another observed that there was potential for shared storage in existing facilities but that this would be a very expensive solution.

One further comment objected to the use of Sellafield if it increased the likelihood of a GDF being built nearby. Three drew the MOD's attention to rail, air and sea transport options. One mentioned a proposal to build a pair of PRISM reactors<sup>5</sup> at Sellafield to treat the plutonium stockpile and one commented on Sellafield's discharge license in respect of Uranium.

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<sup>5</sup> For further information on PRISM reactors visit: <http://gehitachiprism.com/what-is-prism/>

# 11. Strategic Environmental Assessment

A Strategic Environmental Assessment (SEA) was carried out by the MOD and an Environmental Report (ER) with a Non-Technical Summary (NTS) was published, in line with regulatory requirements, on 14 November 2014 alongside the SDP Consultation Document on potential sites for interim storage of SDP Intermediate Level Waste.

The scope of the SEA includes environmental and health and safety impacts, local transport routes, and socio-economic impacts. It is a statutory requirement for the MOD to consult on the SEA Environmental Report. This section contains a list of those bodies, both statutory and non-statutory, with whom the MOD also consulted.

Those bodies who responded seemed generally content with the Environmental Report. Some provided helpful comments, including some comments on the Post-Adoption Report and also the Environmental Impact Assessment which the selected site operator must undertake as part of a future planning application with suggested mitigation to be taken forward to project level.

The public consultees provided a range of comments but the main recurring themes were:

- Radiological impacts on the local community
- Traffic and transport impacts, mainly in the areas local to the candidate sites
- Flood risk
- Socio-economic impacts of the interim ILW store

This chapter reports on comments received during the consultation period on the SEA ER , including responses to the following question asked in the Consultation Document:

‘Have you any comments on the Strategic Environmental Assessment or other information presented on environmental issue?’

## 11.1. Background

The ER and NTS were sent to the ‘Consultation Bodies’ and other bodies, organisations and persons (‘Public Consultees’) which in the MOD’s opinion ‘are affected or likely to be affected, or have an interest in the decisions involved in the assessment and adoption of the plan or programme concerned’ (as defined in the SEA Regulations) ie in this instance the SDP assessment of potential sites for interim storage of SDP Intermediate Level Waste.

The consultation bodies (statutory) and other consultation bodies (non-statutory) are set out in the table below. These consultees had previously been requested to comment on the scope of the SEA.

Type of Consultee	Consultee Organisation
Public consultation bodies (as required by SEA legislation)	Environment Agency (EA) English Heritage (EH) Natural England (NE) Scottish Government Historic Scotland Scottish Environment Protection Agency (SEPA) Scottish Natural Heritage (SNH) Welsh Government (WG) Cadw (Welsh Government Historic Environment Service) Natural Resources Wales (NRW) Department of the Environment’s Environment and Heritage Service (Northern Ireland)

Type of Consultee	Consultee Organisation
Other consultation bodies (non-statutory)	Office for Nuclear Regulation (ONR) Department for Communities and Local Government (DCLG) Department of Energy and Climate Change (DECC) Department of Environment, Food and Rural Affairs (Defra) Department of Health (DoH) Department for Transport (DfT) Public Health England (PHE) Nuclear Decommissioning Authority (NDA) Marine Management Organisation (MMO) Marine Scotland (MS)

At the same time the ER and NTS were made available on the internet to enable all interested parties, including the public, to comment as part of the consultation process. In addition, paper copies were made available at all consultation events.

Once the MOD has announced the preferred site for interim storage of Intermediate Level radioactive Waste, the MOD will publish a Post-Adoption Report, setting out how the SEA and consultation responses have been taken into account in its decision-making.

Written responses were received from the following: Environment Agency (EA), Historic Scotland, Scottish Environment Protection Agency (SEPA), Scottish National Heritage (SNH) and Natural Resources Wales (NRW). The full submissions from the consultation bodies can be found in Annex F.

## 11.2. Environment Agency

The Environment Agency commented, amongst other things:

‘We have reviewed the SEA Environmental Report and supporting consultation documentation.

We have concluded that an ILW Store could be constructed and operated at any of the candidate sites in England without a significant adverse impact on people or the environment.

All four candidate sites in England (Atomic Weapons Establishment (AWE) Aldermaston, AWE Burghfield, Sellafield Limited and Capenhurst Nuclear Services) could be taken forward. However, AWE Burghfield might present the greatest challenge in terms of flood risk management.

There appear to be no overriding issues which would have such a significant impact on specific site selection or construction that it could not be resolved during detailed assessment, permitting, planning and construction.

At Sellafield, Capenhurst and AWE Aldermaston a store could be constructed on the existing Nuclear Licenced Sites (NLS). At AWE Burghfield the current NLS is not large enough to accommodate a store. If this site were selected the size of the NLS would have to be increased. Regulatory responsibility for the area covered by the nuclear licensed site lies with the Office for Nuclear Regulation (ONR), with whom we would work as part of any NLS extension process. It is essential that flood risks would need to be considered and assessed in some detail if AWE Burghfield is selected as the preferred site.

We note that consideration has been given to the impact of transporting ILW from the sites where the waste will arise. Normally, the proximity principle would be relevant to choosing sites for waste storage. The Ministry of Defence has indicated that at this stage it is not possible, due to uncertainty of the location for a future Geological Disposal Facility and a potential size reduction facility (should that be required), to assess fully concerns about the locations for storing and managing this waste i.e. the proximity principle for waste management.

We note that the points we raised in our March 2014 response to the SEA Scoping Study have been addressed in the SEA environmental report and documents prepared to support the SEA and consultation. We welcome the Ministry of Defence addressing the impacts of interim ILW storage over the lifetime of this stage of the Submarine Dismantling Project (SDP), i.e. up to the point where a permanent disposal option is available and can receive SDP ILW, including construction of a robust, weatherproof facility.

We have discussed with the SDP team how the Ministry of Defence should take into account cumulative development on candidate sites where construction of an ILW store might need to be viewed alongside significant non-SDP development. This is particularly important at AWE sites and at Sellafield. Housing and other development near AWE Burghfield and offsite development at Sellafield, including a proposed new nuclear power station at Moorside, adjacent to the existing NLS, need to be taken into account.

We expect to see detail in future site specific reports, indicating how the impact from store construction and operation might affect adjacent offsite developments. We would expect to see this through a site specific Environmental Impact Assessment (EIA) for the selected interim storage site and ILW Store.

Our main comments relate to minimising the environmental impact during construction and operation of an interim ILW store:

- The Ministry of Defence and the site operator need to address the potential risk of flooding to offsite property prior to the start of any construction. Specifically, the Ministry of Defence and the Atomic Weapons Establishment (AWE plc) would need to address this at AWE Burghfield as this site is most at risk from flooding (as occurred in 2007) and parts of the site lie in Flood Zone 3a. AWE is developing a robust flood alleviation scheme and additional mitigation including the purchase of land for a sacrificial management scheme to avoid flooding of the site. We have a particular interest in this and wish to be kept informed as it is delivered
- Minimise conventional environmental impact, such as noise and dust, during construction
- Manage potential historic radiological and/or conventional contaminants during pre-construction activity
- Manage waste during construction and operation

The Ministry of Defence has undertaken detailed assessment of the waste form – solid metallic material – and has concluded that there will be no aqueous or gaseous radioactive waste arising from storage. We agree with the Ministry of Defence’s initial assessments that there should be no radiological discharges resulting from the normal operation of an interim ILW store. We will make our own assessment when a specific site and storage option, including storage container, are known.’

### **11.3. Historic Scotland**

Historic Scotland commented, amongst other things:

‘I have reviewed the Environmental Report on behalf of Historic Scotland in its role as a Consultation Authority under the above Regulations (Section 12(6)). Please note that our view is based on our main area of interest for the historic environment in Scotland.

I found that the Non Technical Summary presents the assessment of this project in a clear, concise and accessible manner. I note that, of five storage site options, one is located in Scotland, at Chapelcross, Dumfries. The assessment identified no significant effects on the historic environment from the Chapelcross storage site option, and I am content to agree with these findings.

I can confirm that we do not have any detailed comments to offer.’

## 11.4. SEPA

SEPA commented, amongst other things:

'Our principle concern relates to the identification of potential effects in Scotland and ensuring that any such effects are appropriately mitigated and monitored. As such, our response to the ER focuses on the assessment of the Chapelcross (NDA) site which is located in south-west Scotland, where SEPA has regulatory responsibilities.

The predicted environment effects of the plan are clearly set out and described in an easy-to-follow manner. We are satisfied that the relevant environmental issues have been considered and agree with the findings, in particular, that there are likely to be no significant environmental effects associated with the discharge or disposal of radioactive waste from the Reactor Pressure Vessel stores.

The exception to this is the consideration of environmental issues related to the management of controlled and hazardous waste arising from the Submarine Dismantling Project (SDP) which has been excluded from the assessment. At the scoping stage we recommended that the impacts associated with all waste generated during construction and decommissioning of the ILW store should be factored into the assessment.

Decommissioning of the ILW storage may generate significant waste streams and may include contaminants and hazardous substances typically associated with shipbreaking that have the potential to have significant environmental effects. In response to our scoping comments the author's state (page 214-215) that the SEA has considered the issues from other waste arising's at an appropriate level at this stage and referenced the Scottish Governments Higher Activity Waste policy.

We note that this has been carried through to the waste management topic assessment, which says that that most of the waste generated during decommissioning would be steel and concrete (which would be recycled) and only predicts a minor negative impact for other waste types. Table 11.2 states that this could be mitigated through standard considerations at the planning stage in the EIA and associated CEMP.

Although we consider that the environmental issues related to the management of controlled and hazardous waste arising from the SDP project could be significant and should have been assessed as part of the SEA, we are content that this can be covered at the project stage through the EIA process and CEMP. As highlighted in paragraph 1.7 of our response we recommend that this is included as one of the mitigation measures that needs to be addressed at a lower level.

We are content with the level of baseline information that has been presented and have no further comments to make.

We are generally supportive of the mitigation measures for the Chapelcross site. These measures are generic across all of the sites and will be delivered at the project stage as part of the Environmental Impact Assessment (EIA) process.

SEPA notes that page 17 of the consultation document concludes that the potential environmental effects arising from the construction, operation and decommissioning of an RPV store apply to all sites, but do not discriminate between any of the five short-listed sites.

Also, the SEA concludes that no significant SEA issues specific to Chapelcross were identified.

SEPA agrees with the conclusion that there are likely to be no significant environmental effects associated with discharges or disposals of radioactive waste from the RPV store.

However, if Chapelcross is selected as the site for the RPV store, SEPA would expect the site operator, currently Magnox Ltd, to assess the effects of any discharges or disposals from the RPV store and use Best Practicable Means to ensure doses to the local population and the environment are as low as reasonable achievable.

As Scotland's environmental regulator, SEPA believes that the environmental effects to be of utmost importance and would wish MoD to update these effects as the project progresses and more specific information about the RPV store becomes available.'

## **11.5. Scottish Natural Heritage**

Scottish Natural Heritage commented, amongst other things:

‘We have only considered the Environmental Report where it relates to impacts within Scotland in line with our remit from the Scottish Government.

We note that the Environmental Report has taken account of our scoping comments and clear details have been provided of the changes that you have made.

We have no further comment to make or concerns to raise having reviewed the Environmental Report.

We are satisfied that the full range of relevant environmental issues/concerns and key trends have been correctly identified. The assessment of likely significant effects on the environment has been carried out satisfactorily. We are satisfied with the level of mitigation and monitoring proposed given the low level of environmental impacts previously identified in the Environmental Report.

We look forward to reviewing the details of the EIA and CEMP for the Chapelcross site should that be required in due course.’

## **11.6. Natural Resources Wales**

Natural Resources Wales commented, amongst other things;

‘NRW has reviewed the Strategic Environmental Assessment (SEA) Environmental Report and supporting consultation documentation. We acknowledge that none of the preferred site options proposed within the consultation are in the boundary of Wales, however we have considered it with respect to potential impacts on the environment of Wales.

As noted in our response to the previous MOD Scoping Report for ILW Storage Site Selection that out of the 4 proposed options for a site in England to store the ILW, the one of the most interest to us is that of the existing Capenhurst site in Cheshire which is close to the border of Wales.

We note and accept, based on the information provided from the MOD’s initial assessments, that there are not anticipated to be any significant effects likely to result during construction, operation and decommissioning of the interim ILW storage at any of the candidate sites. Moreover from the information provided, there would not be any radiological discharges from the SDP interim ILW storage site that would require amendment to the existing environmental permits or authorisations on any of the proposed sites.

We recognise that it would be our colleagues from the Environment Agency, the Office for Nuclear Regulation, the Defence Nuclear Safety Regulator (DNSR) and Local Planning Authorities whose remit and vires (sic) would lie with a proposed ILW store at Capenhurst. However were the Capenhurst site selected for the storage of the ILW, given its proximity to the River Dee and Bala Lake Special Area of Conservation (SAC) and The Dee Estuary SAC, Special Protection Area (SPA) and Ramsar Site, we would welcome the opportunity for an increased engagement programme with the Ministry of Defence and our regulatory partners going forward to understand and determine the potential impacts (if any) on the Welsh Environment from any proposed activities in England associated with the project.

This would include further engagement on habitat assessments particularly for those receptors detailed above and, where applicable, see any future site specific reports including how the impact from the construction and operation of the facility might affect the environment in Wales. We would like to seek assurance that a proposed ILW site at Capenhurst would be managed appropriately and that all the necessary regulatory requirements and controls were implemented.’

## **11.7. Other Comments Received by SEA Topic Area**

### **11.7.1. Process and Scope**

There was widespread recognition that potential environmental impacts were an important consideration for local communities and should therefore be taken into account in siting decisions.

Other groups and individuals who commented on the SEA process and scope also generally agreed with it. One comment was that the study 'seemed like overkill'. Another comment believed that the strategic environmental assessment was relatively robust and sound because the MOD followed advice given by the SDP Advisory Group and Sub-Group in specifying and undertaking the assessment.

Not everyone agreed with the approach and / or scope. It was suggested that size reduction and associated transport issues, including onward transport at the end of the interim period, should have been within the scope of the SEA as opposed to within potential future EIA studies and another that the repackaging should also have been included in the SEA.

Most comments on the contents of the SEA relate to local transport but there were other scope-related comments. For instance, a range of topics or projects were suggested where cumulative impacts from other projects should be considered within the SEA including possible new nuclear build near Sellafield, a local incinerator near Capenhurst, fracking in Dumfries and Galloway, and fuel storage near AWE. One response disagreed with the scope on the basis that the SDP process should have been linked to other key MOD issues, including Trident. Cumulative impacts from SDP and other future wastes should have been assessed for Aldermaston. A response suggested that regional issues should be better covered.

Other responses suggested that the precautionary principle approach to risk management had not been properly addressed and that future hazards could not, in reality, all be anticipated. Also, that the key sustainable issue ie the very long timescales over which radioactive waste has to be managed is not addressed and, in a few responses, that radioactive waste management could never be acceptable.

### **11.7.2. Population, Health and Well Being**

Key topics for participants under this SEA heading were store and transport safety and socio-economic impacts. Given the number of such comments, they are covered in separate sections below (Sections 11 and 12 respectively).

Routine discharges and off-site radiation levels were also of interest. The Environment Agency stated that 'there should be no radiological discharges resulting from the normal operation of an interim ILW store.'

Some responses were concerned that there might be an increase in radiation. One respondent asked for more clarity about what this meant for the closest neighbours. Two mentioned the need to also take natural radon levels into account and one suggested that the SEA appeared to underplay the dangers of low-level radiation.

One respondent stated that 'Thirty years ago the then district medical officer identified a leukaemia cluster in this area' (AWE area) and asked the MOD to comment.

There was a question about the status of a decommissioned discharge pipe at Chapelcross.

A further response suggested that it was important to be clear about what the 'worst case scenario' would be, which might differ between sites.

A variety of points were raised regarding monitoring regimes including its importance for public confidence. One response stated that there was a big difference between the need to monitor the site for 40 years and 100 years. Another respondent said that the public has access to radiation readings local to the Ellesmere Port incinerator and asked whether there will be something similar for the store.

### **11.7.3. Coastal Change and Flood Risk**

No responses made any reference to coastal change.

Several people expressed general concerns about the problems of climate change and the increased potential for flooding.

Several comments expressed concern that AWE, Burghfield was an unsuitable site due to flooding risk. There was also a comment expressing concern about the use of Aldermaston which referenced a historical flooding incident there.

One response expected any flooding issues to be addressed through the EIA, should Burghfield be selected, but another pointed out the importance of getting a clear understanding before that point because there was a risk another site would have to be chosen, necessarily incurring additional cost and delay.

A few comments referenced ongoing flood prevention work but others said that the problem remains or is even (one comment suggests) potentially worsening. On the other hand, one local respondent who had recently been flooded was reassured that contamination of the river was not a risk.

#### **11.7.4. Cultural Heritage**

In respect of AWE sites, comments included questions about the protection of Grims Bank and the setting of Aldermaston Manor. A comment was made that the level of detail in the Environmental Report in respect of Aldermaston Court was inadequate. Ongoing monitoring for potential impacts was requested.

The Capenhurst Pinfold was also mentioned, including highlighting that the route shown goes through Capenhurst village where there are some 90-degree bends and a pinfold structure, which is a monument that would be at risk of being hit.

Dumfries and Galloway Council pointed out some “factual inaccuracies and omissions” in the Chapelcross section of the Environmental Report in relation to some of the region’s heritage assets, including the Castle Loch Special Protection Area which is within the 10km zone, the start of Hadrian’s Wall which is within the 5km zone, and various on-site relics from previous use as a WW2 airfield.

#### **11.7.5. Landscape and Townscape**

Some comments were received regarding landscape and townscape under the SEA heading. Others made the general point that visual impact would be important and that landscaping and onsite location would be important factors. In respect of AWE sites, further comments referred to the importance of building design and to the flat landscape around Burghfield. Two comments made similar points about the flat and unspoiled landscape around Chapelcross, with greater potential for visual impact (and noise). In contrast, one comment noted that a small building as proposed by the SDP would probably not be noticed at Sellafield.

#### **11.7.6. Biodiversity and Nature Conservation**

One comment noted the importance of potential impacts on habitats/wildlife.

#### **11.7.7. Noise and Vibration**

A number of comments were received on this topic. The main theme was that the project would need to minimise conventional environmental impact such as noise, dust, visual impact and transport nuisance during construction. A point was made that the Environmental Report did not explicitly cover these issues for Aldermaston village and Tadley but another response suggested construction issues would be very minor and in any case there was a significant amount of other local construction.

#### **11.7.8. Geology and Soils**

One comment noted that potential historic radiological and/or conventional contaminants would need managing during pre-construction activity.

### **11.7.9. Water**

There was a number of comments on this topic under the SEA heading. One suggested that tritium pollution at Chapelcross was getting into waterways and the surrounding ground. Another said that however unlikely it might be, consideration should be given to contaminants finding their way into the River Thames and thus into London's water.

### **11.7.10. Air**

There were no comments on this topic under the SEA heading

### **11.7.11. Climate Change and Energy Use**

Climate change comments were mostly associated with flood risk (see below). A point was made that the possibility of a delayed GDF start date means that potential climate change effects would need assessing over a longer timescale. A technical question was asked about the inclusion of emissions from concrete.

### **11.7.12. Waste Management**

There were no comments from public consultees in addition to those made by SEPA above.

### **11.7.13. Land Use and Materials**

There were no comments on this topic under the SEA heading but comments were made in individual site contexts about the impact on other potential uses of the land in respect of Sellafield and particularly Chapelcross (See Section 10.3.4).

## **11.8. Local Transport and On-Site Infrastructure**

### **11.8.1. Local Transport Routes**

About half of responses relating to local transport routes focussed on the importance of local RPV transport route selection / assessment and the rest commented on the adequacy of local roads for this purpose and what changes to local roads might be required, including any upgrades needed at the Devonport and Rosyth ends.

The first of these groups of comments covered both the importance of a viable access route for the RPVs / possible changes to local roads and the importance of managing disruption to the local community from the one to three RPV transports per year and the possibility of more construction traffic in the shorter term.

Some responses included specific points or questions, including the importance of early engagement with local authorities, the degree of certainty about route adequacy required before a site is selected, and whether the proposed transport routes are already used for comparable activities / loads. The MOD was asked what impact transports might have on homes along the transport route and some questioned the safety of transporting the RPVs (see Section 11.5 below).

Another respondent suggested that the construction traffic would only be the same as for any building project and some felt that with so few transports a year it really wasn't a big issue.

### **11.8.2. AWE, Aldermaston and Burghfield**

Two responses stressed the need to ensure that there is an effective traffic management plan in place such that disruption and road closures and diversions are minimised. Specifically in relation to the AWE sites, a comment was made that a robust transport plan must be in place to prevent disruption to local businesses and schools.

A number of the responses from the AWE communities suggested that narrow, busy local roads around Aldermaston and Burghfield in particular may be inadequate for RPV transport vehicles. Canal and railway bridges were most often raised as the major problem. Another respondent notes that local road network is under-funded and already 'grid-locked' by current AWE employees.

One response suggested that HGV routing to AWE sites must be from the M3 to the south. Queries specific to the Aldermaston site related to the A340, one asking if the Hampshire part of the A340 was adequate and another questioning the specifics of the transport route. Another questioned access from the A4.

Some of the same comments were made in the context of Burghfield; although the route (from the M4) would be different, responses again identified bridges and bends that could be problematic. One response noted that there was significant existing HGV traffic (not AWE traffic) which already made the local roads difficult.

### **11.8.3. CNS, Capenhurst**

Fewer responses questioned the access into Capenhurst but four did suggest there would be problems, for example, with narrow roads and bridges and some concern about taking the RPVs through Capenhurst village. One thought there was an error in the trunk route proposed, and one pointed out that there was already transport of radioactive material associated with other processes onto site from Ellesmere Port. Another pointed out that the construction traffic for the Tails Management Facility (TMF) is not allowed through Capenhurst village. A further response suggested that one transport a year would not affect the community greatly.

### **11.8.4. NDA, Chapelcross**

There was less concern about the adequacy of road access at Chapelcross. Two responses were concerned about local transport and one response objected due to the grounds of proximity to residential areas and unsuitable and unsafe local road networks. Two others suggested that site access was good.

### **11.8.5. NDA, Sellafield**

Four responses suggested that the general state and configuration of local main roads was poor and (in one case) that the SEA analysis inadequate in relation to the potential negative impacts of transporting RPVs through Cumbria's constrained road network. It was suggested that the A595 which serves Sellafield is in need of major investment and RPV transports would exacerbate the deterioration. The new nuclear power station (near Sellafield) was also raised in the context of local transport routes, with it adding to traffic, along with seasonal tourist traffic.

Other responses emphasised the potential local disruption from RPV transport. One also highlighted the need for joined up thinking with two other projects planned ie a new power station and its connection to the National Grid.

### **11.8.6. Site Infrastructure**

Only two responses addressed on-site infrastructure, noting that service roads and other infrastructure would be important aspects in the decision-making process.

## 12. Safety and Security

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Store and transport safety and security were major themes in consultation responses.

### 12.1. Store Safety

Questions/comments relating to store safety were raised by several respondents.

The MOD was asked how cost would affect decisions regarding safety. It was stated that a key requirement to be considered for each site is demonstration that the ALARP (As Low As Reasonably Practicable) principle has been satisfied both for routine hazards and risk arising from fault scenarios.

Comments relating to the safety of the RPV store ranged from those who felt that the store was less hazardous than other activity already taking place on the sites and that the MOD's plans were robust and safe, to those who believed that the MOD was downplaying the safety risk. Several responses suggested that risk to the public, including any release into the environment, must be one of the key issues to consider and others that they can see it as being nothing but negative. A number felt reassured about the safety of the store after attending the exhibition. Another respondent made the points that the activated metal of the RPVs is not nearly as dangerous as the spent fuel and that most of the radioactivity in an RPV is on, or within, the inner walls.

One respondent pointed out that other countries have looked at very isolated sites for their stores which the respondent believed meant they must have a fear of accidents and are keeping them away from people for this reason. The implication was that proposing to store the RPVs near population centres must not be safe. Two comments questioned how they could be safely stored above ground for up to 100 years given that long term safety appeared to require them to be disposed of through emplacement deep underground in a GDF.

Fukushima was raised in terms of whether the store would take in post-Fukushima recommendations, in terms of earthquake protection.

At more than one site, there was concern about aircraft impact or a terrorist attack on a store with 27 RPVs and questions were asked about the implications for the local community.

### 12.2. Site Safety Management

Another group of responses related to site safety management and project management performance, particularly at AWE sites and Sellafield where local media had recently covered regulatory comments about the progress of risk-reduction projects.

Three responses highlighted the importance of the site safety record and urged the MOD to look closely into site safety records and their capacity to build and manage the facility.

One respondent expressed confidence that AWE has the expertise to manage the waste but nine responses expressed concern about safety management or project delivery capacity, some referencing 'regulatory action'. Two made the specific point that it would not be wise to add to the load on a site that was in this position. One respondent said that 'with the obvious added risks of a private company operating the AWE sites (with their profit motive), it is vastly more necessary for the various 'watchdogs' to do their jobs properly and thoroughly.'

Another suggested that 'AWE, Aldermaston has a legal obligation to reduce its hazardous footprint to the local community and environment, and does not have a perfect record in this respect, this must be considered of high importance.'

A further response said that 'radioactive leakage to watercourses not unknown from these sites'.

An NGO stated that 'The current situation is unsatisfactory and improvements are necessary at AWE. If Aldermaston is selected as a candidate site then, at the very least, we will expect to see MoD commit publicly to an action plan for dealing with shortfalls in performance at AWE and contingency arrangements for dealing with the situation if improvements are not made.'

Local authorities and unions, amongst others, expressed confidence in the Sellafield's capability to manage radioactive waste safely but local NGOs and others argued that there were shortcomings in the site's ability to manage the wastes it had and construct new plant, so it would not be wise to add to the burden.

Copeland Council was satisfied that the wastes could be managed safely at Sellafield, although it thought Sellafield should have other priorities.

One comment from Capenhurst referred to past industry waste management practice, noting that things had improved but that there was still a difficult legacy at Sellafield.

Some local responses referred to safety management incidents at Chapelcross but there was less emphasis here on the safety or project management problems a new store might bring. One asked if the MOD were taking into account the quality of the workforce because 'Chapelcross probably has the best workforce in the country'.

### **12.3. Worker Health and Safety**

Recognition of the importance of worker health and safety was implicit in many comments on store safety generally but there were also some more specific points. Three responses asked about the dose rate in the store and the shielding provided by the RPV and the container. One expressed surprise that workers were exposed to any radiation and one hoped that manning would only be intermittent.

### **12.4. Site Security**

Security arrangements for the storage site were seen as important by many respondents and several asked questions about proposed security arrangements.

For example, questions were asked about responsibility for security, with one response expressing a preference for MOD-led security. Other questions included whether there would be an 'air exclusion zone' and whether there is a security regulator, for example, DNSR.

The MOD was asked whether the existing AWE arrangements would be sufficient but most site-specific questions related to Chapelcross, largely focussing on the implications of site decommissioning. Attention was drawn to the changes to security arrangements that might follow.

The MOD was asked how potentially reduced levels of security at Chapelcross would be factored into the site assessment process. Another respondent asked about the difference in security scoring between the sites and suggested that one would expect security to be the same across all sites.

Various security risks were mentioned but the threat of terrorism was the most common concern raised. Some responses expressed the view that the RPVs would not be a likely target for theft or terrorist attack. Another response agreed the risk was low. One noted that they would still have symbolic value as a target and another thought an above ground store too vulnerable.

Other responses asked questions about the range of security threats being assessed by the MOD and suggested scenarios that should be taken into account, including sabotage and two mentioned information security. Two respondents referred to the Lockerbie attack and raised a concern that the RPVs could be targeted by a suicide attack.

### **12.5. Transport Safety and Security**

There were a range of views on transport safety and security. Some suggested that transport would pose little or no risk to the community whilst others believed that they would be a terrorist target. Others thought that transporting radioactive nuclear material was inherently dangerous in the event of an accident.

Several questions were asked about the security arrangements, including the need for an escort and whether communities along the route would be informed.

## **13. Socio-Economics and Community Benefit**

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Socio-economics and community benefit attracted comments at all sites.

The majority of responses on adverse socio-economic impact were linked to Chapelcross and the majority of responses on the need for offsetting socio-economic benefits were linked to Chapelcross and Sellafield as described below. However, there were comments which did not stress the impact on any particular site.

The major socio-economic themes were concerns about the low economic benefits of the project in terms of jobs and the threats to new investment from the addition of a (or another) radioactive waste store to the site. Several responses simply noted the very low numbers of new jobs and there were questions about whether there would be any benefit at all for local residents. One comment stated that any planning permissions should include socio-economic issues and another that if the transport containers were built locally it would be a big benefit for the local community. The potential impact on property values was a further general concern.

NuLeAF provided a thorough analysis in their submission and encouraged the MOD to support the operator of the site in providing a 'Section 106' package to mitigate the impact, both real and perceived, of hosting a store for the Intermediate Level Waste. It quoted the Sizewell B Dry Fuel Store as an example, where the building was over and above what had been agreed under the original planning agreement.

Many responses held the view that if the local community were getting nothing out of hosting the store, it would not be worth having it. One asked if there would be a planning performance agreement ie support for the council that hosts the site.

### **13.1. Site Level Comments on Socio-Economics**

#### **13.1.1. AWE, Aldermaston and Burghfield**

One response noted that local economic impact would be an important consideration, two said the reputation of the local area needed to be maintained, one was concerned that the wrong location on site would affect Aldermaston Court, impacting current plans to restore it as a viable local business, and one asked whether any local facilities would be lost. A further response saw a potentially higher profile for the nuclear sector as a positive matter. One response raised concerns about reduced house prices in the area as a result of the store.

#### **13.1.2. CNS, Capenhurst**

There were no site-specific issues under this heading.

#### **13.1.3. NDA, Chapelcross**

Most respondents from Chapelcross thought the RPV store raised different issues from the storage of the site's own ILW.

All those responding under this heading for Chapelcross were concerned that the addition of the RPV store to the site could change perceptions of the site and the wider area and thus compromise initiatives intended to attract new businesses to an area that needed them. Several responses referred to the risk that Chapelcross would gain a reputation as a default storage location or suffer by association with other waste management sites such as Sellafield.

The MOD was asked what negative impact the construction of the store would have on the local economy. A respondent suggested that tourism and food processing in particular are huge economic drivers in the area and that a new nuclear waste storage facility would seem to be incompatible with them. Another suggested that Annan has 'suffered' enough with reduced house prices and housing stock that is difficult to sell.

A respondent suggested that there could be benefits to be had from siting the store at Chapelcross but they would need to be 'sold' to the local area. Generally however, respondents seemed to feel that the potential risks outweighed the insignificant local benefits. The Dumfries and Galloway Council and the Site Stakeholder Group oppose a store at Chapelcross for this reason.

#### **13.1.4. NDA, Sellafield**

The balance of comments were different at Sellafield. Respondents by and large did not consider that the addition of the RPV store would damage the reputation of the area, given the site's major role in nuclear material processing and radioactive waste management. One did suggest that the store could risk compromising the site's aspiration to focus on waste management and processing.

Some respondents were explicit about the area's socio-economic dependency on Sellafield. One response suggested that 'people who protest about these things' do not live in the area and were not dependent on the site for jobs. One response noted that the focus should now be on improvements to current surface storage of waste at the Sellafield site to accommodate the Submarine Dismantling Project. Explicitly positive comments included the feeling that interim storage could lead to bigger things in the future and that if it creates another 10-20 jobs then it would be welcomed.

There was also a strong theme running through the responses that the community would not accept that radioactive wastes should be sent to Sellafield 'by default' and that a national role in such matters should be rewarded with significant benefits packages, including one associated with the RPV store. One respondent felt that "enough is enough" and the choice of Sellafield for this purpose would only enhance the 'nuclear dustbin' image.

One response suggested that communities around other potential sites did not understand the potential impacts and would reject the RPV store proposal.

Other respondents from Sellafield urged the MOD to support other site / local nuclear-related initiatives as there were no direct benefits from the store. One suggested that the MOD ought to consider procuring the containers from the area local to the site as part of the local benefit package and another that construction must support apprenticeships for local people. The MOD was asked where any additional workers needed would come from and whether the site would train local people or bring them in from elsewhere.

### **13.2. Site Level Comments on Community Benefit**

#### **13.2.1. AWE, Aldermaston and Burghfield**

Some responses from AWE in relation to community benefits mentioned fairness as the basis for benefits and another suggested that benefits would be needed to give elected representatives something positive to put before constituents.

Some suggested that little benefit could be expected because of the low impact of the store and one asked the question about what the benefits would be and whether they should be welcoming it. A local resident said that the issue for Tadley is that as there cannot be any development because of the emergency planning zone the area could not receive any 'planning gain' benefits.

Around three times as many argued that there should be some community benefit, some making specific suggestions (eg sports facilities) or offering alternative approaches.

Two suggested reducing the radiological burden from other AWE site facilities in some way as a form of 'radiological off-set' benefit; decommissioning of redundant facilities could be accelerated, operational radioactive waste production could be reduced, or the frequency of 'high hazard activities and experiments' could be reduced.

### **13.2.2. CNS, Capenhurst**

There were only two responses associated with Capenhurst on this topic, one commenting on the lack of benefit in return for the store and one suggesting local roads should be improved, including pedestrian and cycling routes.

### **13.2.3. NDA, Chapelcross**

Many of the responses from the Chapelcross area made the point that unless there was a benefit to the area, especially given the potential adverse balance of socio-economic impact (see above), there would be no local support. The cost savings to MOD from the project ie in no longer having to maintain the submarines afloat were mentioned, suggesting that some of these savings could be put into the local community. Some responses argued that other developers do provide benefits.

### **13.2.4. NDA, Sellafield**

Around 20 responses were received from the Sellafield area on this topic, all supporting the argument that, given the low number of jobs involved, a benefits package was justified and in several cases stating explicitly that without one the store would not be acceptable. The point was made that many are accepting of the Sellafield site but are also aware of the community funding provided in return. Local people would therefore want to know what benefits would be provided in return for the RPV store. Expectations on what should be provided seemed to vary, up to major new infrastructure eg a hospital or improvements to the local roads.

## **14. Policy Planning and Permitting**

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The SDP information pack covered the planning application process that must follow a decision on the RPV storage site. Some respondents explicitly made the point that this was a key step.

### **14.1. Planning Application and EIA**

Some general points and questions were recorded on general planning application matters, including: which was the local planning authority, what planning consents are required, what the timescales might be, whether there was any link to GDF planning consents, and what the process would be if planning applications were refused.

Other comments referred to matters of scope, suggesting that the process should be open and that MOD should not use 'defence exemptions' to avoid local scrutiny. Respondents suggested that all planning applications submitted as part of SDP should follow normal planning processes and, in order to build trust with local communities, no exemptions should be sought. Regulatory permits, Environmental Impact Statements, and other material supporting planning applications should likewise provide full disclosure of information to the public, with no exemptions applied.

As previously described, a number of responses asked questions, or expressed concerns, about the possibility of a subsequent extension of the store to include RPVs from later classes of submarine to accommodate a size-reduction facility or if there were long GDF delays. Some seemed to imply, or specifically stated, that there should be planning constraints preventing the selected site from being used for ILW from other sources.

Some respondents sought clarification on the role of the site-level Environmental Impact Assessment (EIA) in the planning application process and how it would be prepared.

Others noted that specific issues will need to be covered in the EIA. One response urged that 'all issues' should be covered and another asked whether local transport routes would be included. Planning approval must be seen to reflect all issues, not just aesthetics.

## 14.2. Community Engagement

Some responses commented on the importance of, and asked questions about, the community engagement that forms part of the planning application process.

Other responses suggested such consultation must engage and actively inform the wider community, reaching out beyond 'statutory consultees'. Local site stakeholder groups and local liaison committees offered a useful route for early engagement but it was acknowledged that the engagement needed to be broader than that. A question was asked regarding how much engagement would be required of the site operator.

There were a few questions about the potential influence of public opinion on the planning decision. The point was made that once the planning application is submitted, it will be decided on material planning grounds.

## 14.3. Issues

Particular challenges or interactions were identified in some cases including the impact of the project on site Detailed Emergency Planning Zones (DEPZ) and the significance of the Scottish Government's role in the planning process.

Comments were made about the implications of the project on the AWE site DEPZ. Wokingham Borough Council and Aldermaston Parish Council in particular asked whether the project would affect the Aldermaston DEPZ zone, and in the absence of any other impacts, this was a major influence on their views on the project.

Several responses sought further information from the project team or the ONR. Some were concerned about the possible impact of the current DEPZ on development, including the possibility that the proposed store would make local aspirations for future boundary relaxation less likely. One response suggested that if the risk of incident at Aldermaston is sufficient to impact on new housing development within the zone, then ILW should not be stored there. A further response linked DEPZ issues to limitations on the extent and application of 'planning gain' benefits for the community.

Comments were received about Scottish Government's nuclear policy and position, as well as their potential role in the planning process for the use of Chapelcross. One respondent commented that the MOD view seems to be that it should not prevent Chapelcross being proposed because planning permission can only be refused on the basis of clear planning grounds. The MOD was asked whether this was still true if the Scottish Government called-in an application for its own determination.

## 14.4. Regulatory Consents and Oversight

Responses to the Policy Planning and Permitting issues (including some regulators' submissions) were linked to regulatory frameworks and practice, including: the role of DNSR in respect of RPV transportation and the responsibility of Ministers for safety; whether safety and environmental regulators had been involved to date; how oversight would work in practice and whether licensing would cover the full store design life.

One response noted that the project would have to work within the current legislative framework 'despite its shortcomings'.

A number of specific questions were asked about the need for changes to existing licence and permit arrangements. One asked if the MOD would have to say how they are finally disposing of the waste in the store permit application and one respondent stated that the project's approach to environmental permitting needs reviewing as it does not appear to reflect the impact of the site licence on the responsibility for storage of waste.

Some issues were raised which related to specific sites, for example, the need to extend the nuclear licensed site area if Burghfield were chosen.

The point was made that taking a narrow view on activities covered by safety cases and permits may lead to delays at the back end and that all expected activities on the site should therefore be covered.

A few questions were asked about the need for discharge permits, some specifically referring to implications of there being no discharges. One view was that the Environmental Agencies should be encouraged to run a public consultation exercise as part of this store permitting process. NFLA agreed that the environmental agencies should be encouraged to run a public consultation exercise, even if one were not legally required.

The English and Scottish environmental regulators and Natural Resources Wales all commented on their respective roles in the process and noted some of the detailed licensing and permitting steps that would be involved. See the copies of the submissions in Annex F for the detail.

## 15. Public and Stakeholder Engagement

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### 15.1. Scope and Approach

Irrespective of whether they would support a store at their site, responding individuals and organisations generally showed strong support for the SDP's commitment to engagement and appreciated that it had been a comprehensive consultation. The consultation was welcomed and some said it had reassured them that the level of risk was low. Several commented on the openness of the MOD during the consultation.

Most respondents seemed to feel that the consultation was proportionate and some said so explicitly.

Others thought the level of consultation was 'overkill' given the level of risk. Some of these felt the MOD had no choice, because it was forced into a disproportionate consultation or because it was inevitable given the subject matter. Others perhaps felt the MOD should not have invested so much; for instance, one felt there should have been no consultation and another thought that the process should be quicker. In relation to specific sites, several queried why the MOD was consulting on these wastes given the apparently more hazardous nature of other wastes or activities on site. Some suggested that nobody would want the store 'in their back yard'..

The cost of consultation was a particular issue for some of these respondents. One queried the need for 'unnecessary expenditure' on consultants. There were questions about roles, including whether the independent workshop organisers/facilitators were needed. In contrast, one participant suggested that the whole consultation should have been run by an independent body and another doubted whether the results would be properly represented by the MOD.

The Project's independent advisory Sub-Group have always operated under a non-disclosure agreement but one consultee (not involved in the Sub-Group) sought assurance that this did not amount to 'gagging'.

### 15.2. Relevance

There were a range of opinions regarding whether the consultation could contribute any useful input and, if it could, whether that input would have any impact on the MOD's decision.

A number of respondents thought themselves, or others, insufficiently qualified or knowledgeable to make a sensible contribution and others noted the level of apathy from many members of the public. One respondent thought that while it was useful to have the consultation they doubted anyone was in a position to make any real criticism. Another expressed concern that the importance of jobs on the site for local communities made it hard to obtain an unbiased view of the implications.

A few people asked for assurance that their views would be taken into account and that a decision had not already been made or asked what weight would be given to majority views/opinions arising from the consultation process. Copeland Borough Council urged the MOD to demonstrate the adequacy and effectiveness of consultation through thorough appraisal and weighting of concerns and opinions. There were comments from people who were sceptical about the use MOD would make of their input, even to the extent that the decision has already been made or that consultation is 'a PR stunt'.

Some felt that the key messages about safety were not 'getting through' and may lead to concern over safety/security being over-weighted or that a reaction against eg 'anything nuclear' might dominate, perhaps misrepresenting the overall local view but also perhaps inadvertently damaging the reputation of the area.

Some asked the MOD whether ‘community consent’ would be required or emphasised the role of engagement in helping ensure communities do not feel that radioactive waste from submarines is being imposed on them against their will, thus improving the chances of success for the project. Some of them suggested that the project should only proceed with the consent of the local population.

## **15.3. Consultation Events and Materials**

### **15.3.1. Exhibitions and Workshops**

A number of responses on public stakeholder engagement topics said they found the consultation and the information provided was clear and that the consultation process appeared to have been conducted in an open and professional way. Some respondents described the consultation as ‘excellent’. The Environment Agency (EA) commented that feedback from the SDP team was consistent and that the quality of both the materials and the staff representing the project were high. SDP staff were knowledgeable and willing to engage on any aspect of the project.

One respondent thanked the MOD for the opportunity to respond to the consultation and another stated that they were pleased that the MOD was seeking the views of the public before making a decision and there was some support for initiatives which will ‘stimulate a mature and informed debate’. NFLA welcomed the MOD’s strong commitment to consultation within the process for selecting an ILW storage site. Copeland Borough Council welcomed the robust consultation. In a few cases, respondents contrasted this consultation with others held locally or by MOD (see also discussion later in this section).

Local workshops were particularly useful for SDP in understanding local views and seem also to have been useful to participants. Those who attended workshops largely felt that they were useful.

A majority of those commenting on them made positive, often very positive, comments, typically using terms such as ‘professional’, ‘clear’ and ‘open’. The workshops were generally said to be well-presented and informative. Others remarked that comments were listened to with an open mind and questions answered fairly.

However, there were some concerns. Several people asked how many local people attended the exhibitions. Some respondents commented on the relatively small numbers (in their view) or were concerned about local apathy. One noted that that the engagement could end up as a ‘box ticking exercise’ if sufficient feedback was not forthcoming. A few respondents commented on the use of technical language and acronyms in workshops and two respondents queried the clarity of the explanations of proposed local RPV transport routes at the events they attended.

The use of a hotel near Capenhurst was questioned on the grounds of cost and pedestrian access, and problems with the lift during one of the Chapelcross exhibitions resulted in comments from several people on access for physically disabled people and for mothers with pushchairs. A participant thought there should have been an additional meeting in Reading for the AWE sites.

Several responses suggested that greater efforts were needed to raise local awareness of the consultation, including suggestions regarding a wider mailshot area, media coverage, social media and targeting specific audiences. One asked the MOD to consider re-publicising the consultation and extending its duration. One participant made the point that more publicity was required for communities with little previous awareness of radioactive waste issues. Local media coverage attracted little comment, though one response did express concern at the potential for misinformation causing unnecessary concern.

The two national workshops in Birmingham and Glasgow had different, specialist audiences. One response asked about the reason for these locations (which were remote from the potential sites) but only one comment was received on the format, suggesting they were unnecessarily long.

### **15.3.2. Information Available**

The majority of responses on information provision seemed to appreciate the scope and presentation of the information available and found the exhibition boards and document pack clear and appropriate to their needs.

One respondent felt that they didn't have enough information to comment and there were a range of suggestions for further information that could have been provided. The main issue was the radiological profile of the RPVs, particularly the radionuclides present and the current and future levels of radioactivity. It was suggested that a comparator to aid understanding of the dose rate, for example, a comparison to the dose rate when having an x-ray would have been useful. A simpler explanation of the nature of the ILW was suggested by one response. No technical challenges to the MOD's analysis were received but the point was made by several responses that more detail would have facilitated independent assessment of the level of risk posed by the waste.

Other participants suggested that more information on costs, safety analysis, MOD internal safety regulation and planning application processes would have been helpful and/or improved confidence. One suggested that emphasising that the RPVs would be defuelled was important and would serve to reassure the public. Two responses asked for more contextual information on radiation dose, one suggested more poster information on discharges, one asked for a better project narrative, and another pointed out an error in the radiation and health factsheet, which was subsequently corrected. More information about how environmental factors would be used in the assessment process would also be useful and the slide could be improved.

Two responses suggested that more effort should have been put into explaining the wider context, including political perspectives, GDF timescales (which attracted many comments) and existing site hazards. Others asked for more information on shortlisting, the store design and size, and DEPZ implications. More information was suggested on future decisions on container design and assumptions about repackaging as these could influence the site decision. Several responses suggested that the costs associated with each of the sites should be made public before a final decision is made.

The point was made that not everyone could attend the exhibitions and so better internet arrangements would have helped. The limited Government website facilities were criticised by some including the organisation of information and the lack of an online response form or a Word response form that could be downloaded and returned via email.

## **15.4. Future Public and Stakeholder Engagement**

Most of the responses under this heading related to those elements of future public stakeholder engagement that would be part of the planning process and thus the responsibility of the operator of the chosen site.

Most respondents emphasised the importance of ongoing communication and openness, with structured consultation where appropriate. People reasoned that communication must be proactive, and involve local authorities, and elected representatives. Further work should proceed in an open and fair way with the public being kept informed, respondents' comments suggested. In their submission, NuLeAF was keen that the level of engagement is maintained and the operator at the chosen site understands the importance of ongoing engagement with the host community. NFLA was keen that the process continue with each of the five shortlisted sites and to remain fully open and transparent as the shortlist is 'whittled down further'. One response suggested that any future information would inevitably be 'propaganda'.

The general view of those that commented on this topic seemed to be that ongoing engagement is essential so that trust is built up and maintained and concerns about potential downsides addressed. The level of concern about the project will be influenced by the level of trust and goodwill and respondents' comments indicated that this should not be taken for granted.

Respondents made the point that the extent of the concerns regarding safety, security and environmental impact are difficult to predict and will vary over time in accordance with the level of trust between the community and the operator. Addressing the public's view of any potential downsides would be an important issue for a locally-affected community and respondents suggested that negative feedback from pressure groups would need to be managed.

Other responses stressed the need for ongoing and additional information, including suggestions that any setbacks to the programme must be dealt with openly and it must be 'honest information as opposed to public relations spin'. In order to allay potential concerns, respondents suggested that MOD should monitor and report on radiological and environmental performance regularly to the public and thus address any local concerns.

Some members of the public and organisations (notably the NGOs) thought that MOD engagement with communities on strategic issues other than SDP was currently inadequate. Some suggested that it was the first time that local communities had been comprehensively consulted and that the MOD should take encouragement from this consultation programme and learn lessons to improve day-to-day stakeholder engagement arrangements. NGOs also highlighted that they are not always represented on Local Liaison Committees.

Some responses commented on the role of local liaison bodies, suggesting that they should operate more openly and be kept informed about the project or they could provide feedback to the site operator, who should in turn be responsive to any concerns raised. No matter what level of knowledge respondents had of the planning process, they wanted to be kept informed of the progress of the project and involved in any follow-up consultations during the planning application stage.

## **15.5. SDP Team**

Comments from the majority of people indicated that they found the SDP team approachable and fair. Workshop presenters were described as open and approachable and comments about the wider team typically used terms such as 'professional', 'informed', 'helpful' and 'patient with a genuine desire to listen'. A suggestion was made that all members of the team should have read all leaflets available to the public and other responses expressed the need for greater technical understanding of what was being stored and the boundaries of the project.

The presence of the regulators was appreciated by exhibition and workshop attendees and provided some reassurance.



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