



NGO Forum Minutes
Wednesday 19th September 2018
Church House, Westminster, London
13:00 – 15:45

1 Introductions

Craig Lester, BEIS Deputy Director Nuclear Directorate, (deputising for Stephen Speed) opened the meeting with Professor Andrew Blowers, Co-Chair of the Forum. Professor Andrew Blowers noted that the Forum membership was well represented at the meeting although apologies had been received from a number of members.

Actions from the previous meeting (18 May 2018) were reviewed. One action remains outstanding; a paper from NFLA regarding security at nuclear sites has still to be sent to BEIS secretariat for distribution to the relevant policy team. Other items raised during this introductory session of the meeting included:

- Clarification on the meeting agenda, and the items to be discussed, which included siting, a policy update on the Geologic Disposal Facility (GDF), the Nuclear Sector Deal (NSD) and progress with the updated National Policy Statement for Nuclear (NPS EN-6). An item on radiation risk was removed from the agenda due to ongoing legal proceedings regarding mud dredging activities at Hinkley Point C.
- Disappointment from some members of the Forum that neither the Co-Chair, Stephen Speed, or the Business and Industry Minister, Richard Harrington, were able to attend the meeting.
- A request for clarification on BEIS' policy on on-shore wind.

BEIS Action: Provide an update to the Forum on BEIS' current onshore wind policy.

2 Geologic Disposal

A policy update on progress with the Geological Disposal Facility (GDF) was provided by BEIS:

- BEIS Select Committee scrutinised the National Policy Statement (NPS) over the summer. They issued a call for written evidence and held an oral evidence session in July. The resulting report was published on 31 July.
- The Select Committee was broadly supportive, but recommended changes to the NPS.
- The Lords debated the NPS on 6 September and the motion was passed unopposed.
- BEIS is currently developing its response to the recommendations and to the public consultation on the NPS that took place earlier this year. BEIS aim to



publish these responses and lay the final NPS in Parliament by the end of the year.

- There is ongoing discussion on the role of local authorities in the process.

In discussion the following points were raised by NGO Forum members:

- Clarification on whether BEIS were aware of problems with international facilities arising from corrosion of internal containers.
- Members questioned why BEIS were pursuing a GDF – in their view, waste should be immobilised for near surface storage. BEIS responded by noting that waste management policy was based on advice provided by the Committee on Radioactive Waste Management (CoRWM) and as a result BEIS believe that GDF is the safest option for disposal of higher activity radioactive waste. A forum member asked if the NPS contained clarification on waste from new build reactors and associated timescales. BEIS noted policy development was currently underway and no further clarification could be provided at this stage.
- Whether concerns raised in consultation responses are being considered. BEIS responded by noting that the HMG response to the public consultation are currently being developed.
- The Forum questioned if there were still opportunities available to comment on the NPS before it reached parliament. BEIS responded that although there were no more consultations planned, debates in the House of Commons (HoC) are a platform for constituents' views to be represented. The Forum shared their concerns on this noting that debates are often poorly attended. They also questioned whether MPs are adequately briefed on the technical issues raised by GDF.
- The potential for EA to involve EDF in GDF related meetings as EDF hold expertise in dry cask storage.

3 Low Level Radiation Risks

The Forum shared concerns that BEIS are failing to adequately engage with members on radiation issues.

The following points were raised in discussion:

- An application to review the Justification of the EPR had been unsuccessful. The Forum felt this was disappointing and unhelpful.
- Recent events in Wales regarding the removal of mud from the Bristol Channel to Cardiff Bay outlined the potential health effects of particulate radiation.

BEIS noted that the Forum had been offered a meeting with Umran Nazir (Deputy Director, Decommissioning, Radioactive Materials and Geological Disposal



Programme, BEIS). The Forum agreed that this appeared to be an acceptable proposal and would explore the offer. Several forum members requested to be invited to this meeting.

4 Nuclear Sector Deal

BEIS outlined the purpose of the Nuclear Sector Deal (NSD) and its context in relation to the Industrial Strategy and other Sector Deals.

Key points raised by BEIS included:

- The NSD is one of 6 sector deals. Sector Deals aim to increase productivity, aid regional development and skills growth.
- The NSD is industry led and aims to achieve a step-change for the nuclear industry. The NSD sets out commitments by the sector on cost reduction (30% for nuclear new build; 20% for decommissioning) and diversity (40% female inclusion in the nuclear sector), all by 2030.
- While the route to achieving some of the targets in the NSD are clear, others are to be more clearly defined during the implementation phase of the deal, which is currently being designed by the sector with HMG.

NGO Forum members made several general comments about the Nuclear Sector Deal, including whether and when there would be a Sector Deal for renewables, the costs associated with waste, the costs of decommissioning and clarity on achieving NSD goals. Specific points focused on entries to the Advanced Modular Reactor competition and defining the Government's commitment to a lasting contribution to hosting communities.

BEIS responded by highlighting that there may be a Sector Deal for renewables in the future as many sectors are currently in discussion with BEIS. In response to the clarity of the NSD, BEIS noted that this will follow and that the NSD is intended as a high-level document setting out ambitions in headline form, with the routes to implementation still to be determined. BEIS assured the Forum that the nuclear sector and HMG are committed to achieving the goals set in the NSD. BEIS noted that the technologies present in the AMR Competition are: Generation IV designs, such as High Temperature Gas-cooled Reactors, Molten Sodium Reactors, Molten Lead Reactors, Molten Salt Reactors and one fusion reactor.

5 New Nuclear Siting

BEIS discussed the National Policy Statement for New Nuclear, to facilitate nuclear power stations at sites capable of deployment between 2026 and the end of 2035.

Key points highlighted include:

- The current NPS (EN-6) identified 8 sites which were suitable until 2025 and BEIS are working on a new NPS for the period following 2025. The new NPS only applies to sites which will host 1 or more new reactor at 1GWe per unit



and will be valid from 2025 to 2035. BEIS will consider smaller reactors separately.

- BEIS noted that the purpose of the NPS process is to assess at a high-level, the technical safety, environmental and operational issues associated with siting which can be assessed at a national level to provide a level of confidence in the potential suitability of sites.
- The criteria act as a preliminary sift to focus development at locations most likely to be suitable for deployment and provide an opportunity for national consultation and parliamentary scrutiny.
- The NPS process is intended to supplement, but not replace, the mandatory processes and assessments (such as nuclear site licensing, environmental permitting, development consent and Environmental Impact Assessment) which must take place prior to deploying a nuclear power station and which examine the suitability of the proposed development in detail.
- The recent government consultation on the arrangements for the siting of nuclear power above 1GW single reactor capacity for the period beyond 2025 considered the proposed process and the updated high-level criteria to be used to assess potential sites to be listed in a new nuclear National Policy Statement (NPS) covering deployment of nuclear between 2026-2035.
- The purpose of the consultation was to achieve a finalised siting **criteria** and **process** for listing sites in the new NPS.
- As part of this consultation, there was a three-hour workshop in February with the NGO Forum. A summary of the views from the NGO Forum gathered during this session was taken on board as part of the consultation response, as well as the separate representations that were submitted by individual NGOs.
- The consultation resulted in several clarifications and improvements to both the siting criteria and the process for assessing and designating sites in the new NPS, and the Government response now:
 - sets out the list of potentially suitable sites in the current NPS which will be carried forward through to the draft new NPS (subject to them meeting updated siting criteria, demonstrating deployability by 2035 and updates of their underpinning environmental assessments).
 - The finalised siting criteria and process for listing sites in the new NPS and in any future NPS.
 - 2035 as a new 'capable of deployment by' date to focus on those sites most likely to come on stream in good time to contribute to our goals on climate change and energy security.
 - There will be no new site nominations window until the 2020s.
- Following assessment of the sites against the finalised siting criteria, the draft NPS including list of potentially suitable sites will be subject to public consultation and parliamentary scrutiny. The types of local consultation events



undertaken for the equivalent EN-6 consultation were highlighted as an example of potential engagement for the new NPS, but it was noted that this was subject to decision.

The Forum presented a short video showing coastal regions around Sizewell and noted the importance of coastal processes on coastal nuclear projects. The following points were raised in discussion:

- The NGO forum expressed concerns that the NPS appears to be a developer's charter and site applications should be in the public domain.
- The Forum questioned whether there should be a provisional licence following site nomination; this would be related to waste management and site operator stakes.
- The Forum asked if all responses to the public consultation will be published and if developer comments will also be published.
- Why NPS EN-1 has not been reviewed following the introduction of new technologies, as NPS EN-1 was first considered in 2008 and published in 2011. The Forum argued that ionising radiation is a larger debate and should play a role in the forming of an NPS.
- The Forum noted that EDF has made significant changes following Fukushima and asked whether this was included in the updated NPS.
- The Forum requested information from EDF about the size of the dry store in Sizewell, including information about elevation above sea level.

The Forum also discussed criteria considered to be key in relation to climate change:

- Sites in areas of flood zone 3 should be excluded, including sites nominated until 2025 (considering the impacts of climate change significant for deployment after 2025).
- Expressed concern over the scale of sea defences proposed by EDF for Sizewell C, suggesting that this was required as a result of erosion.
- Areas of Outstanding Natural Beauty should be considered as new exclusionary criteria.

Additional comments included:

- Developers should consider the size of the construction site and access to the site during the planning process.
- Housing in the Leiston-cum-Sizewell area should be treated as part of the Emergency Planning Procedure.
- Disappointment over how the Wylfa project is proceeding, as the site was cleared without a Development Consent Order (DCO).



Regarding the accident at Fukushima, BEIS explained that the Secretary of State at the time requested a review of the circumstances of the accident to see what lessons could be learnt. One of the conclusions of this review was that there was no need to change siting strategies.

Further comments from the Forum included:

- There is no visible change in the NPS strategy.
- NPS EN-1 regarded as out-of-date. A changing environment in terms of available technology is not reflected in the NPS strategy. The rise of renewables changes the context of nuclear power.
- A request for clarity on the climate-change forecasting that BEIS use.
- One member expressed that the current NPS approach is “an exercise in continuity and wish fulfilment”, stating that most criteria are discretionary and too flexible
- Questions regarding the use of Imperative Reasons of Overriding Public Interest (IROPI), in particular how it is determined and the situations in which it can be used.
- Due to the marine conservation zone, flood risk zone 3 and complex cooling water requirements, it would be favourable to not proceed with the new reactor at Bradwell.
- Whether it is possible that sites from the current NPS will be removed.
- Dislike of the all-encompassing phrase ‘Campaign Response’ in BEIS documents.

The Forum raised the following points in relation to climate change, with a focus on Hinkley Point:

- A sea wall between Hinkley Point A and B was built to “protect nuclear site”
- The most recent climate change evidence points to faster sea level rise and to greater heights, which puts nuclear sites and fuel stores at risk
- Businesses along the coast at Hinkley are closing due to climate change related cliff erosion and risks to their infrastructure.
- Opposition to waste storage at Hinkley Point was noted.
- Events at Fukushima were worsened because TEPCO ignored historic evidence of the height of tsunamis in the Fukushima region.
- Concerns that HMG may not be factoring rising sea level into their assessment for siting new nuclear power stations.

The Forum stated the importance of sea level rise predictions and stressed that these must be taken into consideration. Following this, the Forum inquired when sea-level predictions are due to be released.



BEIS Action: Provide an update to the Forum on the climate change predictions used in the site assessments

BEIS noted the comments raised by the Forum, and the helpful summary provided by TASC in advance of the forum. A written response to TASC's summary will be provided in due course.

BEIS Action: Provide a written response to the summary provided by TASC on New Nuclear Siting

The Forum inquired whether there will be a revision to the NPS considering the context for nuclear. BEIS respond stating that a new NPS will include the need case for nuclear.

BEIS highlight that there is currently a meeting scheduled between the authors of the *Civil Nuclear Perspectives* paper and BEIS economic analysts to evaluate costs of nuclear energy. Comments on climate change forecasting are evaluated separately and will be acknowledged via an earlier action in this meeting.

6 Meeting Close

The Co-chairs thanked the Forum for their attendance and input. Co-Chair Professor Andrew Blowers noted the productive discussions that had taken place and thanked BEIS for fielding knowledgeable officials. The secretariat was also thanked for their organisation of the meeting.

An action arose following the close of the meeting:

BEIS Action: Provide clarification on the Geological Disposal process:

- 1) Will results from the Working with Communities exercise be made available?**
- 2) When can communities make an expression of interest?**

6.1 Actions Summary

BEIS Action: Provide an update to the Forum on BEIS' current onshore wind policy

BEIS Action: Provide an update to the Forum on the climate change predictions used in the site assessments

BEIS Action: Provide a written response to the summary provided by TASC on New Nuclear Siting

BEIS: Provide clarification on the Geological Disposal process:

- a. Will results from the Working with Communities exercise be made available?
- b. When communities can make an expression of interest?



7 Attendees

Attendees	Organisation
NGOS	
Prof. Andrew Blowers	Blackwater Against New Nuclear Group (BANNG)
Varrie Blowers	Blackwater Against New Nuclear Group (BANNG)
Rod Donington-Smith	Cumbria Trust
Ian Ralls	Friends of the Earth
Mike Taylor	Together Against Sizewell C
Jo Brown	Parents Concerned About Hinkley
Richard Bramhall	Low Level Radiation Campaign
Ruth Balogh	West Cumbria and North Lakes Friends of the Earth
Sue Aubrey	Stop Hinkley
Alan Jeffrey	Stop Hinkley
Rita Holmes	Ayrshire Radiation Monitoring Group
Peter Banks	Blackwater Against New Nuclear Group (BANNG)
External Attendees	
Alan McGoff	Environment Agency
Caroline Richards	Environment Agency
Bill Hamilton	Nuclear Decommissioning Authority/Radioactive Waste Management
Daniel Jones	Office for Nuclear Regulation
BEIS Officials	
Craig Lester	BEIS
Richard Sargent	BEIS
Jon Robinson	BEIS
Dawn Armstrong	BEIS
Lindsey Butterworth	BEIS
Daisy Ray	BEIS
Samuel Ha	BEIS
Matthew Kirby	BEIS
Joshua Scott	BEIS
Henry Primarolo	BEIS
Ian Cullen	BEIS