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Bradwell for Renewable Energy

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

By

Bradwell for Renewable Energy (BRARE)

Bradwell for Renewable Energy is a community based organisation with membership throughout Essex. It began in 1986 in response to concerns over the Long Term Safety review of the Magnox reactors then in operation. When the site closed it turned its attention to input on decommissioning and in renewable energy opportunities for the county.

The members have been sent information on the issues with an invitation to feed back. They have also been encouraged to reply as individuals. Some members have taken up this offer.

## Introduction

This is part of a conversation with the Energy Minister and the House of Lords Select Committee on Science and Technology on 10 December 2013. The words marked in yellow are for particular attention.

**Michael Fallon MP:** *Let me be clear. I am the Minister responsible for nuclear issues. I am directly accountable for them and I am accountable to both Houses of Parliament for them.*

**Michael Fallon MP:** *Last time the two communities most directly affected did buy in and they voted in favour of the scheme. The problem was that the county council, which of course contained members from the other side of the county who were not directly affected, voted against it. Looking back on it now, I think that was extremely unfortunate. They did not have a direct interest in it and they effectively were able to veto the project.*

*What we are looking at now is making sure that that direct interest of the immediate local communities—the district councils concerned—should dominate the process and we should not allow it to be vetoed by some wider group that does not have a direct interest. That is what we will be consulting on. There are a number of options in the consultation process and we need to see how we can learn from that aspect of it and give communities more confidence to engage in the process, while still retaining the voluntary principle that this should be for communities to step forward and want to host rather than Government directing them to host.*

[Select Committee on Science and Technology House of Lords Nuclear Follow-up  
Tuesday 10 December 2013 <http://www.parliament.uk/documents/lords-committees/science-technology/Nuclearfollowup/ucST101213Fallon.pdf> ]

The above interchange with Rt Hon Michael Fallon, who, as he says, is in charge of the whole radioactive waste management process and is accountable to Parliament, illustrates the problems of policy makers and of the general public in the arrangements for the siting of a GDF. It is obvious from the above that the Government, in spite of paying lip service to voluntarism, did not get the decision it wanted. The initial Partnership worked its way to a decision culminating in withdrawal. This was a legitimate right enshrined in the agreed process. Therefore it can be said to have succeeded.

Michael Fallon has a limited view of who has “direct interest”. It looks as if he is treating the process as a local planning application typical of what local councils have to deal with on a regular basis. The trouble is that, given the nature of the waste to be managed, and the size of our tiny, heavily populated island, it is “our” Lake District, “our” Norfolk Broads, “our” Exmoor, “our” Black Mountains, wherever we live. Nobody in the United Kingdom will live more than a few hundred miles at most from a GDF. It is no good citing Yucca Mountain, or the GDF in a remote Finnish landscape the situation is further aggravated by the fact that we have greater levels of toxicity than most nations, with a smaller space to put it in.

**Q1 Do you agree that a test of public support should be taken before the representative authority loses the Right of Withdrawal? If so, what do you think would be the most appropriate means of testing public support, and when should it take place? If you do not agree with the need for such a test, please explain why.**

Yes, providing there has been an iterative process of deep and wide public involvement, in stages, up to that point, otherwise there will be little trust and understanding. We are not certain about the “learning and focussing” method, as that suggests a linear exploration that may well exclude options further down the line. The “test of public support” would arise naturally from previous learning experiences. This has to be in depth and contact has to be made in numerous ways. The staging method is more suitable. The Right of Withdrawal should be made as late as possible, given the long -term explorations needed of the geology and geography of the area. This must be left as late as possible. Unfortunately this is not reflected in the Revised document.

The problem, as hinted in the introduction, will be how to define who the public is, and how much attention should be given to, say, those on a nuclear waste transport route, or those who depend upon the ecology of their environment for a living. A test of public support should be shored up by “critical friends”, experts in their field, paid for by the process, together with the input of all manner of community organisations and NGOs. Joint Fact Finding should be the norm.

Our experience of working alongside companies wishing to site on- shore wind farms in our area may be useful. This is a relatively simple procedure, as compared to a GDF. However no stone was left unturned. There were meetings with local elected leaders, talks to community groups, street stalls and door- to- door canvassing of opinion. This last was particularly revealing, as people, from the familiarity of their own doorstep, engaged passionately and with surprising knowledge. It is really useful to hear the intimate, informal, practical information of, say a fisherman who has worked the local waters all his life. The importance of geology, geomorphology, hydrology and the safeguarding of people’s environment cannot be overstated. It is no good to just talk about “socio economic benefits”. People are passionate about where they live. Many, whether pro or against, did not believe that socio economic benefits would deliver. They had a pretty cynical view of such offers. Many people do not necessarily have the time or inclination to go to evening meetings. But everyone goes to the supermarket. There needs to be much more imagination shown on public engagement if the process is serious about voluntarism. You must go to the public, wherever that may be. If all that spadework is done, then a “test of public support” will have an authentic outcome and will arise in an organic way.

Proven **independence** in the provision of information is the key. We found that the public has very little trust in “the authorities”. There must be a full recognition of the uncertainties and downsides, with no attempt to “sell”. The public will sniff this out at once.

Alongside the appropriate method for the Right of Withdrawal is the need for the public to be confident in the decision making body itself. It is alarming that the County Council input has been downgraded. District Councillors would never normally expect such an important decision to rest on their shoulders. That is not their remit. We understand that appropriate support would be given. But that runs the risk of the choice being influenced by the information providers and “experts” rather than the Councillors, who might have little knowledge and not trust their own judgement. . Any decision made in bad faith, such as an attempt by Government to influence the process, will not work.

**Q.2 Do you agree with the proposed amendments to decision making within the MRWS siting process? If not, how would you modify the proposed phased approach, or, alternatively, what different approach would you propose?**

No. As it stands, the Steering Group is formed of interested parties, such as the Government and the NDA. The decision- making body should not be part of the process, as that will be seen by the public to be biased. There should be a disinterested body of relevant stakeholders to oversee the process.

The Consultative Partnership should be dynamic and pro-active, commissioning research and investigations. It should be acting as Consultant on the public’s behalf.

As mentioned above, a wider constituency than that of District Council should be involved in the decision- making. The public around a proposed site will be passionately interested, and, given the general lack of interest in, and even antipathy by the public towards local government in general it will need to see a clear and convincing **information trail** on work done by these bodies.

This is where the **regulatory bodies** have an important part to play. They must be seen to be more active and to show clarity in the governance of the project.

**Q.3 Do you agree with this approach to revising roles in the siting process set out in the White Paper? If not, what alternative approach would you propose and why?**

No. The revised roles have resulted in a diminution of voluntarism and dissemination of knowledge. There is a culture in this country of ignoring views that are not of the governing class. They are tolerated and accepted, but not acted upon, in particular the area of uncertainties, which the public are interested in above all else. In the previous attempt there was a closing down of effective openness in the dissension over geological and hydrological issues. Such uncertainties need to be faced and acknowledged.

**Q.4 Do you agree with this approach to assessing geological suitability as part of the MRWS siting process? If not, what alternative approach would you propose and why?**

In an effort to give voluntarism “a good name” we believe it was a mistake to invite all comers, when at the outset some parts of England and Wales would evidently be unsuitable due to geological, geographical, geomorphologic and hydrological factors. To cite just one example, due consideration must be given to erosion, sinking and the dangers of tidal surges, such as has recently happened along the East Coast.

**Q.5 Do you agree with this approach to planning for the geological disposal facility? If not, what alternative approach would you propose and why?**

It is a mystery to us why it has been decided to bring the GDF into the national planning process, with an NPS. This is a one-off activity with acute national and local interest. What is the point of having a generic characterisation? Furthermore it will be easier for national decision making to override local concerns, as in the National Policy Statement for new nuclear power stations, with its concept of Imperative Reasons of Overriding Public Interest. This will take away the flexible spirit of discovery with the community and relevant agencies. Although at the DECC/NGO meeting in November we were assured that no community would

be forced to take the GDF, it is necessary for us to have an explanation of the logic behind this move.

**Q.6 Do you agree with this clarification of the inventory for geological disposal- and how this will be communicated to the volunteer host community? If not, what alternative approach would you propose and why?**

No. At present there is insufficient discussion, firstly on how the waste in the most parlous state at Sellafield will be made safe enough to store. Then there is the possible inclusion of wastes such as Mox and plutonium, and possible substitutions, which at the moment remain unidentified. The public needs to be informed of the nature of new build wastes, whether it be the result of 16 GW or 75GW of nuclear electricity production, as presently proposed. They need to have much more knowledge than has been given so far. The whole process needs to consider the outlying sites that will house new build wastes, too hot to handle, on their doorsteps for up to 100 years.

The alternative plan we would propose is to deal with the many seemingly intractable problems of legacy waste. The logic is: it is here and we have to deal with it. This prospect could be more attractive to a community who wished to do the nation a service. Our view is that no new wastes should be contemplated until there is a proven route for their management.

As for new build, CoRWM suggested that there be a separate consultation. One of our members asked a question of DECC that never got answered: what if a community was happy to host legacy waste but was not prepared to accept new build waste? This is a likely scenario.

**Q 7 Do you endorse the proposed approach on community benefits associated with a GDF? If not, what alternative approach would you propose and why?**

People will be concerned about the future for their children and grandchildren. There needs to be some type of Trust fund to ensure that those in the future are looked after. With regard to choosing projects, care must be taken to ensure that these are genuine benefits, and not a substitute for lack of funding out of general taxation.

**Q 8 Do you agree with the proposed approach to addressing potential socio-economic and environmental effects that might come from hosting a GDF? If not, what alternative approach would you propose and why?**

People are very proud of and attached to their immediate environment. They are the experts. Screening should respect this, so that fragile areas such as national parks are excluded from the effects of such an undertaking.

Again, we have advocated a position of good faith, however hard that is to achieve. Any manoeuvring and national meddling will put paid to this, and the outcome of the project will be fail because of a lack of trust.

**Q9 Do you have any other comments?**

We are very disappointed by the turn of events. A very promising scenario involving, firstly, CoRWM then the Partnership and Voluntarism, has been downgraded into a manipulative process guaranteed to deliver a GDF at Sellafield, come what may.

This leads to an inflexible linear approach that ignores a public discussion on why above ground storage (necessary for new build waste at the very least) is not suitable, and on the possibility that there may be several sites for different purposes.

Geological and hydrological issues are unresolved, and there needs to be an open and transparent discussion on the relationship between barrier engineering and geology.

There needs to be a clearer steer from central Government, in particular from the Secretary of State for Energy, on the relationship between Government, providers, and the general public and which roles they play.

**Openness and Transparency**

**Willing to Listen**

**Willing to Imagine**

**Flexibility**

**Independent Advice**

**Thoroughness of Purpose**

**Good Faith**

This consultation response has been endorsed by the Members of Bradwell for Renewable Energy (BRARE)

Val Mainwood

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