

# Response form

Please use this form to respond to this call for evidence on Managing Radioactive Waste Safely: Review of the Siting Process for a Geological Disposal Facility.

The closing date for the submission of responses is **10 June 2013**.

Responses can be returned by email (preferable) or post.

Email address: [radioactivewaste@decc.gsi.gov.uk](mailto:radioactivewaste@decc.gsi.gov.uk)

Or by post to: The Managing Radioactive Waste Safely team  
Department of Energy and Climate Change  
Room M07  
55 Whitehall  
London  
SW1A 2EY

Name	
Organisation / Company	Arup
Organisation Size (no. of employees)	
Organisation Type	
Job Title	
Department	
Address	
Email	
Telephone	
Fax	

Would you like to be kept informed of developments with the MRWS programme?	Yes
Would you like your response to be kept confidential? If yes please give a reason	No

The Government is interested in your views on the geological disposal facility site selection process outlined in the 2008 Managing Radioactive Waste Safely (MRWS) White Paper. To assist us you may wish to consider the following issues in your response:

- What aspects of the site selection process in the MRWS White Paper do you think could be improved and how?
- What do you think could be done to attract communities into the MRWS site selection process?
- What information do you think would help communities engage with the MRWS site selection process?

## Overview

The development of a Geological Disposal Facility (GDF) brings with it a wide range of benefits and concerns for any potential host community. Jobs and economic activity are the obvious advantages as infrastructure is built and later managed and maintained. Equally, the local population will have perfectly legitimate concerns about safety and security and these must be addressed quickly and clearly.

Detailed economic and societal evaluation can often be used to demonstrate real advantages to the prospective host community; however the benefits message can be rapidly subsumed by negative issues raised early on in the process.

## Balancing the early stage vision

It is clear that a strong, cogent and compelling vision must be developed from the outset. This vision must robustly demonstrate the advantages to any potential host community. The detailed evaluation must also be frank about the potential disadvantages to maintain credibility but it is establishing this balance that is critical.

The human element is critical. If development is to proceed, concerns must be addressed and the benefits must be clear before any project will gain the assent of the community.

As it stands, however, the planning process can make it difficult to make a persuasive case in favour of development before negative issues gain traction. The development process relies on community champions, local politicians or other proponents engaging in discussions and taking the high profile step of registering an Expression of Interest (EOI) at a stage where they have insufficient tangible non-generic evaluation of the benefits which could accrue to the Volunteer Community. In this respect there is an imbalance, because the disadvantages associated with hosting the GDF are reasonably well articulated in both a factual and emotive sense, while the advantages are less clear or simply not articulated in a tangible local context.

### Early stage cost/benefit balance

The second key challenge comes in terms of ensuring a balance between Volunteer Community costs (dis-benefits) and benefits over the whole engagement process. Throughout the process, and specifically when moving through the decision gates at the end of each Stage (e.g.: Expression of Interest, Decision in Principle), there is a step change increase in dis-benefit which needs to be carefully balanced by a mix of real contemporary advantage and clearly envisioned future benefit.

This challenge is most acute at the critical early stages of the process when the benefits are less evident. Later in the process there is typically a greater balance however. For example, construction disruption is countered by construction jobs and associated infrastructure development. Equally, waste transport, possible repackaging and surface marshalling provide an ongoing economic stimulus to the local community while the long term (intergenerational) advantages and disadvantages will be less evident by virtue of being 'business as usual'.

The most undesirable effect of this early stage imbalance is that dis-benefits are not adequately offset or countered by clear advantages, so there is little local political incentive to defend the dis-benefit. This can be particularly challenging when the disadvantages manifest during one political cycle whereas the demonstrated benefits accrue at a later stage, perhaps during the tenure of a political successor. This is a recurring challenge in politics generally, but examining ways to mitigate its impact in the GDF context could well pay dividends.

### A potential engagement process

While the Volunteer Community methodology has significant merit, as we have seen it is difficult to engage potential host communities positively without providing clear evidence of the advantages associated with lodging an Expression of Interest.

In addition, while certain communities are well versed in the GDF process and its potential outcomes, others are likely to have insufficient contextual understanding of the volunteer case. Generic descriptions of benefits such as '550 jobs for 100 years', 'improved transport infrastructure', or 'development of high technology support service industries', are insufficiently specific or tangible for communities unfamiliar with the benefits that accrue from hosting such facilities.

To encourage early and positive community engagement, we advocate a process that delivers a local, specific, objective and balanced vision for the GDF right from the start. The process would cover approximately 15 district-sized areas across England and Wales (in conjunction with Welsh Government) and would involve creating well-researched and objective evaluation packs for each site that would provide the basis for objective early stakeholder briefing.

In a similar way to any other economic impact assessments or regional development plans, these GDF Briefing Packs would be open to discussion and challenge. The evaluations would also retain their key advantage, which is to articulate the likely spectrum of local community advantages in a balanced manner while outlining the associated risks and disadvantages in a sensible manner.

Objective GDF Briefing Packs will support and enable community representatives to form their own views based on balanced, informed and locally specific information. This differs from the current approach which relies on generic, non-specific advantages being compared with specific local disadvantages and discourages any engagement with the GDF process.

It is important that the GDF Briefing Packs are prepared in an objective, transparent and consistent manner. They must also be grounded in the issues and realities of the district to which they relate. This will help replace emotive speculation with informed debate among local communities.

The GDF Briefing Packs could then be openly discussed with the general public and potential local champions, as well as those who may constitute the DMB (Decision Making Body).

The GDF Briefing Packs would describe a high level economic development vision based on GDF volunteerism. They would cover objectively determined locations so that any suggestion of pre-determination does not hold weight. There is a case for objectively selecting particular locations for study, while also retaining the clear principles of the Volunteer Community approach.

### Developing the GDF Briefing Packs

To develop the GDF Briefing Packs, we suggest the initial use of a broad GIS (Geographical Information System) -based evaluation tool. This could be developed to include elements such as excluded geology, transport networks, complementary industrial sectors or other features. A GIS-based system could provide the framework to identify 15 or more Districts for development, as well as providing the foundation for specific GDF Briefing Packs. There is also the opportunity to open up the GIS information on a web-based platform as part of a wider stakeholder engagement process.

In the interests of transparency, there would be a need to objectively define and document the exclusionary and discretionary parameters used in the high level GIS-based evaluation. We would suggest the protocol is used for high level definitions only, rather than attempting to use GIS as the sole tool for developing the Packs. Subjective considerations such as likely enthusiasm, potential credible local champions, absence of strong previous objection to GDF may also be considered as part of the broader evaluation. There should

also be an opportunity for credible community partnerships or other community representatives to indicate their wish for a GDF Briefing Report to be provided for their pre-EOI consideration.

District specific GDF Briefing Packs would be developed in the same way that other infrastructure and economic development plans are developed. Each Pack would offer balanced insights into both the opportunities and challenges presented to a particular District.

The GDF Briefing Packs could form the basis of direct discussion with potential local champions to enhance understanding, interest and engagement. This could then support the submission of an Expression of Interest.

The advantage of this approach is that it may engage some communities which previously gave only superficial consideration to being a Volunteer Community. This process would also provide a balanced and evidenced overview of the specific local attributes and issues involved. This will make for more effective community engagement in comparison with a generic approach which can tend toward negative assumptions in the initial stages.

#### Other focus areas

While recognizing precedent activity in West Cumbria, there is a case for encouraging collaboration with apolitical advisory partners. For example, Local Enterprise Partnerships (LEPs) are well placed to draw together important local issues with the advantages of being a Volunteer Community. LEPs can develop a compelling narrative that integrates a development route map with wider sub-regional development plans.

While the planning process rarely operates completely outside the political sphere, the process is more likely to be effective if non-aligned actors have the opportunity to champion the vision based on informed factual analysis.

The formulation and legitimacy of the Decision Making Body (DMB) is another aspect of the process worthy of closer examination. While some precedent may have been set in Cumbria, further consideration is merited in terms of the DMB composition. Clearly, we have to recognise the relative benefits and disadvantages that accrue at different levels in the community – parish, district and county levels, for instance. As such, it is important that the DMB is democratically robust and representative of the local community and longer term public policy priorities.

## Conclusion

We submit that even an early stage Expression of Interest by a Volunteer Community requires significant work to develop local engagement and political momentum.

Without the data to drive support in the early stages of the development process, an information vacuum can form that may generate uninformed and often negative speculation.

The best way to combat this challenge is to articulate and disseminate balanced, informed and objective information that highlight the benefits and address potential concerns in a sensible manner.

We also believe that it is better to focus efforts on highlighting a spectrum of specific short, medium and long-term local advantages rather than mounting a defence against each and every dis-benefit.

Developing GDF Briefing Packs for potentially receptive communities will provide a solid basis for a balanced debate about the positive and negative aspects of hosting a GDF.

We believe that this approach will engage a broader range of potential Volunteer Communities while providing the basis for a balanced and well-informed democratic debate.

In conclusion, this response proposes a process that could help selected communities understand the potential benefits in sufficient detail to arouse their interest in taking the GDF process to the next stage. Issues of trust and fear must be addressed throughout this process by, for example, communicating clearly the concepts of scientific uncertainty, using trusted authorities to give independent perspectives, and providing objective evidence from various views, both negative and positive.

However, in order to find communities that will be open to engagement in the first place, these issues of trust and fear will need to be dealt with at a wider scale within society, not just with specific communities. To address the issues of public trust, the messages about nuclear waste disposal need to be presented as impartial, inclusive, and properly scientific. They should ideally be conveyed by trusted authorities who do not have an interest in any particular outcome. This transparency and clarity will also help to address issues of fear, but addressing fear also requires a deeper understanding of its causes. A deeper understanding of the concerned stakeholders and their issues will ensure that messaging reaches the right audiences and in the right language. Importantly, this public level approach to addressing stakeholder concerns will allow the discussions to move from the concept of nuclear GDF, towards whether GDF is appropriate for a particular site and its community.

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