

## **NuGen response to DECC's Consultation on the Review of the Siting Process for a Geological Disposal Facility**

NuGen welcomes this opportunity to respond to the Department of Energy and Climate Change's consultation on the review of the siting process for a Geological Disposal Facility.

NuGen is a UK nuclear company owned by GDF SUEZ and IBERDROLA. NuGen's Moorside project focuses on the development of a new generation nuclear power station of up to 3.6 GW on land in West Cumbria, North West England.

NuGen recognises that major investment is required in the UK to respond to the dual challenges of securing future energy supplies and achieving reductions in CO2 emissions. We believe that nuclear energy has an important role in meeting these challenges and must be part of a balanced future energy mix delivering stably-priced and clean low-carbon energy for the UK's future.

NuGen can draw on the extensive experience of its two respected international parent companies and is committed to putting safety at the forefront of its Moorside project.

NuGen will work in partnership with the local community in West Cumbria and will look to maximise employment and skills opportunities in the region, as we gradually progress our Moorside project.

NuGen is a leading member of the Nuclear Industry Association, which intends to make its own submission to this consultation.

As one of the three main developers of new nuclear build in the UK, NuGen is happy to take this opportunity to put forward our own response here.

### **Overview**

NuGen supports the Government's proposals for revising and improving the siting process for a geological disposal facility. The construction to full commercial operation of a Geological Disposal Facility is of paramount importance for the UK's new-build programme in which NuGen plans to be a major developer.

NuGen closely observed the previous process at close quarters, and being a developer focusing solely on West Cumbria we were close to some of the issues and shortfalls around the previous process. We witnessed the disappointment of some of our key stakeholders in Copeland and Allerdale – stakeholders who are closest to our plans to build new reactors in the area.

We recognise the widespread frustration when that the previous process stalled – and would call for greater clarity on the decision-making process, and more up-front information on risks and benefits, in order to allow any representative authorities interested in becoming involved the chance to have the greatest amount of information on the process at their disposal from an early stage.

Our view is that the revised process will facilitate a much better understanding by potential volunteer communities of the complex issues. We understand the new process makes provision for providing, from a very early stage more information on the socio-economic impacts that such a project will have for the development of the local community, as well as the issues associated with the construction and operation of the final facility, leading to more informed decision making.

### **Consultation Questions**

**1: Do you agree that a test of public support should be taken before the**

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

Yes. NuGen agrees. Measuring public support for hosting a GDF before the Right of Withdrawal is given up would be a positive principle in ensuring a robust and democratic approach.

With reference to the means of testing public support our opinion is that the one used should be one with the least potential for being challenged afterwards. It should be clearly set-out with an emphasis on clearly communicating the issues to the community involved.

With regard to timing of the test, we believe the priority is to measure the public support when the greatest amount of information is available on the developments that would be made possible to the community by accepting to host the GDF, and the socio-economic impact that the construction and operation of the GDF will have for the community, and as well the issues associated. This suggests it should take place as near as possible to the end of the 'Focusing' phase.

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

Yes – NuGen agrees.

Just at a critical time, when more information was required during the previous process for stakeholders to make a more informed decision, misconceptions about the right to withdraw were partly responsible for a breakdown in support to continue.

NuGen believes that clearer information, direct from Government, should be provided to the process, and give any interested parties the confidence and guarantee that momentum through the process is not an actual commitment to build the repository. Greater information and clarity should be the goals – underscored by the right of withdrawal.

We agree with Government that it makes sense to undertake a national public awareness and engagement programme, including the 'Offer' to interested communities, before initiating the 'Learning' phase. Setting out the information proposed for the Offer will be important in enabling interested communities to understand both the process, and importantly the potential benefits associated with hosting a GDF in their locality.

At NuGen we support the view that the democratically elected body "closest" to, and most affected by the decision, (both geographically and economically), should be the "Representative Authority".

**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?**

Yes. Communities will only participate in the site selection process if they have confidence that they will be effectively engaged and involved in the process. Any concerns about the key issues – including the potential risks and benefits – must be properly considered and resolved.

At NuGen we say that information, communication and clarity must be the backbone of this process. It is what all local authorities wishing to get involved in this process would expect as a minimum.

We were reminded by nuclear industry advocates, including trades unions and major employers in Cumbria at the time of the previous process, that a lack of a "national champion" – ie a high-level, nationally recognised advocate for the process, was not visible. We at

NuGen agree with the Nuclear Industry Association's view that this lack of a clear advocate added to the previous confusion and misconceptions. We would urge the Government to play a much more robust and visible role in any new process, to ensure all local communities fully understand the process.

The UK nuclear industry has an enviable international reputation when it comes to regulation – and at NuGen we would like to see ONR and bodies like the Environment Agency take a more central role in communicating on the associated issues of constructing a GDF facility.

We also share the NIA's view that the Committee on Radioactive Waste Management (CoRWM), which has the relevant skills and was specifically set up to provide independent scrutiny and advice on the long-term management of higher activity radioactive waste, would be an appropriate body to perform the type of independently-verified information any local authority would need during this process.

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

Yes, NuGen, as a new nuclear developer undertaking our own geological assessments as part of site characterization for our Moorside project in West Cumbria, would of course subscribe to the view that Geological suitability is probably the most important factor in a Community's decision whether or not to participate in the MRWS process.

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

Yes. The development of a National GDF is of course a development of national importance. It is performing a national service on behalf of the UK. It is entirely appropriate for GDF to be considered through the nationally significant planning regime as set out in the Planning Act, 2008.

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

Yes, we broadly agree with the Government's amended approach. It makes perfect sense for any community engaging in the process to have the most accurate possible picture of the waste types and volumes at an early stage in the process which, based on currently announced plans of the developers, includes a maximum of 16GWe new nuclear spent fuel. However we would note that the Government has not ruled out the possibility of further nuclear development beyond this

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

Yes we do endorse the proposed approach.

The earlier the communities are provided with a clearer overview of the socio-economic benefits associated with the construction of such a large scale national infrastructure project, the better.

In this respect we would suggest enhancing the information provided within the 'offer' at the upfront stage of the process with findings of similar socio-economic performed in other countries, to the applicable extent, as these would enhance the Communities' understanding of the potential socio-economic benefits from hosting GDF.

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**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?**

Yes. We agree that the revised approach, enabling potential socio-economic and environmental effects to be addressed earlier in the process, would help communities in their assessment and debate.

**Do you have any other comments?**

No other comments from NuGen.