

Dear Sirs,

Thank you for the opportunity to provide comments against the public consultation on the Review of the Siting Process for a Geological Disposal Facility. Please find my responses to the questions posed in the consultation below.

**Question 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, I concur that it is appropriate to test local public support prior to the Right of Withdrawal lapsing. However, I believe that the method by which public support is gauged should be consistent with the method by which public support is gauged for other large infrastructure projects and proportionate with the magnitude of the decision in question.

I would urge the Government to use caution when selecting the method by which public opinion is gauged. For example, I think it would be wholly inappropriate and disproportionate for any kind of referendum to be held on this matter as other decisions of far greater gravity are regularly made without the benefit of a referendum.

Furthermore, I feel that referendums are inherently biased towards those with an obstructive bent, in what I call the 'Trip Adviser effect', in that, individuals with a mild or strong negative stance will be more compelled to voice their opinion than those with relative indifference or a mildly positive position, with a view to punishing those whom they feels are responsible for their displeasure.

As such, I would recommend that a policy of implied support is adopted, such that, those with an objection to proceeding beyond the 'Right to Withdrawal' point are invited to express said objections. If, on review, there are an appropriate number of credible objections, this should be considered as public opinion falling on the side of not continuing in the process.

I believe that a suitable window of time should be allocated for objectors to formulate a response, and for these responses to be assessed, immediately prior to the point at which the Right of Withdrawal is lost.

**Question 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.**

The Government's revised approach appears to be sensible and an improvement on the current process. In particular, I support the Government's intention to raise awareness of geological disposal on a national level before seeking volunteers – I see this as being absolutely critical to the success of the whole endeavour.

I think placing representative authority with District Councils is appropriate and also consistent with the Localism Act 2011, allowing power to be exercised at the lowest practical level. Whilst I think it is fair that County Councils are consulted, I think that their influence on the decision should be limited – if local public opinion is gauged and the primary and secondary costs associated with the GDF are met (see my response to question 7), it is difficult to see what additional value can be added to the decision making process from the County Council level.

I concur that all reasonable costs relating to running the decision making process and community engagement exercises are met by Government. This should prevent the potential long-term benefits of participating in the process from being clouded by the near- term costs.

Question 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?

#### UK Government

I concur that the role of the UK Government is to actively raise awareness of the siting process.

#### NDA/RWMD

I envisage NDA and RWMD championing geological disposal as part of their remit for decommissioning the UK's civil nuclear facilities, and as such I agree with the consultation paper.

#### Local Government

I believe that the role of the local government as agents of the members of the public they have been democratically elected to represent, and the responsibilities I would associate with this role, are clearly articulated in the revised process.

#### Regulators

I believe that the Office for Nuclear Regulation and Environment Agency should actively support the Government as part of their national drive to raise awareness. I believe this can be achieved without the regulators prejudicing their independence. I would expect to Government's awareness raising exercise to major on the role and robustness of the UK's regulatory regime such to give the public confidence that the construction, operation and ultimately the closure of a geological disposal facility would be conducted in safe manner. The regulator would be called up on to provide veracity (or otherwise) to the Government's description of the regulatory regime.

Question 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?

As a general observation, a great deal of emphasis is placed on the 'Geological' in 'Geological Disposal Facility' in the consultation and other supporting documentation. I do wonder if this is appropriate. Ultimately, the GDF will be an engineered solution to disposing of radioactive waste. Whilst some geologies will undoubtedly be more suitable and will require less of an engineered solution than other geologies, ultimately, the solution will always be heavily reliant on feats human engineering.

Given the apparent lack of potential host communities, it strikes me that the Government may not be in a position where they can investigate a range of geologies in order to select the optimum. Further to this, such an undue focus on geology may serve to dissuade communities from participating in the process. I would suggest that the Government produces a paper that will likely indicate that there will seldom be an area of the UK where an engineered disposal facility could not be achieved, whilst also identifying any areas where the geology may make it not reasonably practicable to do so (e.g. where providing an engineering solution to the challenges posed by the local geology is cost prohibitive).

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

A GDF must be considered as a Nationally Significant Infrastructure Project, and as such I concur that the approach to planning should be governed by the nationally significant infrastructure planning regime.

Question 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?

I think the Government's clarification of the proposed inventory for geological disposal is sensible and suitably forward-looking. One point of note is that I do not believe there is a need to distinguish between spent oxide fuel and spent MOX fuel (as spent MOX is spent oxide fuel). A more sensible distinction might be spent oxide fuel and other waste streams generated from the management of the UK's plutonium stockpile (as, if the current rhetoric is to be believed, the Government's preferred position of reusing of plutonium as MOX is facing challenge from other methods) – this would cover spent metallic fuel, vitrified waste, and all manner of other wastes, including the effluents from any conversion activities.

I encourage the option for multiple geological disposal facility sites to be adopted – this would necessitate a statement on how the inventory would be divided amongst multiple sites. I think a multiple -sites approach would help invalidate the argument that 'community X' is becoming the UK's 'nuclear waste bin'. Further to this, it demonstrates an inherent confidence in Government that the first geological disposal site will be successful and the benefits of hosting the site will be accentuated, such that other communities will come forward to host future sites. This would, in turn, help to remove doubt from potential host communities that by siting a geological disposal facility, all of the Government's eggs are in their basket, and thus they would be subject to creeping project scope and waste inventory.

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

Regrettably, it is on the subject of community benefits where I am most at odds with what has been set out in the consultation paper. For most comparable, nationally significant, major infrastructure projects, communities would be vigorously competing to win the right to host said infrastructure projects in order to reap the associated socio- economic rewards.

The notion that communities should be artificially rewarded for hosting the Geological Disposal Facility only helps to perpetuate the view that the exercise is fraught with danger, and thus some form of recompense is required – this is clearly not the case – the strict regulatory regime in the UK will ensure that any doses experienced by workers and the public will be well within internationally accepted limits. I do however recognise that a (rather unfortunate) precedent has been set by the previously proposed process.

A pragmatic solution to this may be to offer potential host communities 'cost neutrality'. By this, I am suggesting that the costs associated bolstering of local infrastructure and services to cope with the additional demand being placed on them during the construction and operation of a GDF is met by national coffers, rather than local funds. Intuitively, this would include services and infrastructure such as transport, housing, recreational and public health facilities, but may also extend to educational facilities (national centres of excellence for geology and radioactive waste disposal perhaps?). This, I believe, would serve to provide the additional incentives previously promised (though I remain steadfast my position that they are not required) and would provide clear touch points back to the original project. Work to assess what additional services and infrastructure the host community would require could be undertaken during the 'focussing' phase.

I believe that this approach of providing cost neutrality to the community will help the Government swerve a potentially contentious issue around the definition of the 'host community'. Under the approach to community benefits proposed in the consultation document, the host community is not clearly defined. This, I fear, will occasion a number of 'communities' besides the Government's envisioned host community laying claim to the benefits allocated to the project. By only funding

community projects that directly support or relate to the GDF project (whilst also benefiting the community) the Government can ensure that the community benefits are promulgated amongst those with a genuine stake in the GDF project.

With respect to the timing of the release of benefits to the community, clearly based on the response above, I am not in favour of releasing benefits at a predetermined time – rather, when cost attributable to the project is due to be incurred. I do however believe that ‘softer’ benefits, such as agreements to appoint organisations local to the community, where possible, to undertake ground investigation works for example. This would provide incentives to potential host communities to take part in the process prior to the cessation of the Right to Withdrawal.

[Question 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?](#)

I agree with the Government’s intention to bring forward consideration of socio -economic benefits outlined in the consultation paper. The general (non-site-specific) socio-economic benefits should be independently ascertained and substantiated in time to support the national awareness-raising exercise advocated in the consultation paper. A more detailed, site- specific evaluation of the socio -economic benefits should be conducted, as is stated in the consultation paper, once a relatively limited number of credible host communities have been identified. It may be prudent to have these socio -economic analyses undertaken by an independent third-party, such that the community have a high degree of confidence in the benefits identified.

[Question 9 – Do you have any other comments?](#)

I have no further comments at this time.

Many thanks,

Greg Wilkinson

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