

MRWS review – questions and responses

- 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?**

It is not clear what new engagement mechanisms are being proposed to encourage new communities to express an interest initially. The proposed approach document still seems to be a 'passive' process and making more information available online may well not translate into communities seeking further engagement.

It is not clear what DECC will be doing to actively encourage communities to consider participating within the MRWS process to start with.

- 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.**

It is not clear what the boundary / decision point is for entering the 'learning' phase, and if there even needs to be one, especially if this new process is envisaged to be a more continuous one. The avoidance of a community having to make any kind of 'formal' decision would be beneficial, with a community being able to request more detailed reports as part of 'finding out more' currently outlined in / section 2.14 / bullet point three. Decisions can then be made on factual evidence and not unsubstantiated claims.

Section 2.20 "*...not least to enter the process initially.....*", this should be downplayed and communities should be able to request the geological and socio-economic studies as part of their considerations of the issues, without having to make any kind of decision regarding their participating within any kind of process. The first decision should only be made when entering the 'focusing' phase, at which point the community would have a very good understanding of the potential effects / impacts.

Sections 2.53 to 2.58. There seems to be a significant amount of overlap in named attendees between the 'steering group' and 'consultative group' and there would be a risk that the same individuals would end up as part of the same groups all the time, creating a lack of differentiation from a public perspective, plus negating the proposed role of the member of the consultative partnership 'channel' role.

The Steering group, which includes RWMD, would then signal for the developer (also RWMD) to submit a planning application for borehole drilling. In this scenario, there may be a perception of too much impartiality.

It is unclear what decisions would be made on how to move from the early 'focusing' stage into spending significant amount of tax money on site investigations. Previously the step between MRWS stage 4 & 5, but this now seems to be 'blurred', yet very important localising decisions will need to be made at this point and the framework for how these will be made outside of 'big' Government decision points should be outlined.

- 3. Do you agree with this proposed 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, especially a more prominent role for RWMD as this reflects the role of SKB in the successful Swedish programme by allowing the implementer to provide information to local people directly.

4. Do you agree with this proposed approach to revising roles in the siting process set out in the White paper? If not, what alternative approach would you propose and why?

In paragraph 3.11, bullet point 2, the proposed approach outlines how a high level geological report could be produced as part of the learning phase.

A key consideration is whether a community needed to make any formal 'decision' to enter the learning phase. If it did, then as recognised in paragraph 3.4, an understanding of geological information may well be needed in advance, however, if 'formal' decisions to enter the learning phase can be avoided, then this would be appropriate.

The key message, which would need to be constantly reiterated, is that any consent by a community to undertake any initial reports, in no way would commit the community to taking it further if it decided not to.

In the focusing phase, the proposed approach recognises the benefits of merging what was previously MRWS stage 4 (Site Assessment) and MRWS stage 5 (Site investigations). However, it is not clear what the decision making process would be to transition from an 'area wide' community assessment to a much more focused 'site based' investigation, involving very localised operations and a significant increase in expenditure now that this step has been removed.

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

Yes, I agree with the proposed approach.

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, I agree with the proposed approach.

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

The recognition of earlier community benefits payments is welcome, but I feel there is a case to release benefits to any community that enters the learning phase. Inevitably, this would lead to 'nugatory' Government expenditure where communities decide not to progress; however, there is a desperate need to energise local communities at this very first step to start engaging with the process at all.

If the commitment to provide clear, tangible, positive benefits to community to just show an initial interest, it may lead to a range of communities within whom to enter into dialogue with, which in turn provides more opportunities for the MRWS process to be successful and therefore would be a worthwhile up front investment.

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, I agree with this approach and feel that it is a very positive step to see health explicitly identified as one of the issue to be covered. Embracing 'health' in its wider context has the potential to significantly mitigate impacts and extenuate the positive effects of GDF implementation within a local community.

With all of these assessments, it would be worth considering how these assessments will continually be building upon each other throughout the process, rather than just 'one-off' assessments to meet certain planning requirements.

The 8-17 year schedule estimates shown in this consultation document for the combined learning and focusing stages will enable a thorough consideration of a local community's socio-economic, environmental and health status.

The holistic understanding achieved through this work, should be captured, stored and made available to the public / local communities in such a way that facilitates decision making and ongoing stakeholder engagement. GDF implementation can then be measured against a clear 'baseline', therefore allowing transparency on the positive and negative impacts in the later stages.