



December 2013

## Consultation Response

GDF Siting Process Consultation  
Department of Energy and Climate Change  
Room M07  
55 Whitehall  
London  
SW1A 2EY

19<sup>th</sup> December 2013

Dear Sir/Madam,

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

The Civil Engineering Contractors Association (CECA) welcomes the opportunity to respond to the above named call for evidence.

CECA provides the voice for those companies who create, improve and maintain the UK's vital transport and utility networks. Our membership of more than 300 companies together delivers an estimated 70-80 per cent of all infrastructure construction work carried out nationwide. Our industry supports the employment of around 200,000 people with annual activity worth up to £25 billion.

CECA welcomes the Government's commitment to ensuring that nuclear power plays a key role in the UK's long-term, low-carbon energy strategy.

Nuclear power is an essential part of the energy mix going forward to 2050. The consequence of this is the effective treatment and storage of waste as recognised by Government policy. CECA therefore believes that it is incumbent on the Government to find a long term solution to the disposal of nuclear waste.

CECA is supportive of proposals for the development of a Geological Disposal Facility (GDF). However, in order to ensure that the Government's policy objectives are met, there must be an informed public debate on how and where the waste will be deposited. Understandably there remain concerns around the legacy of nuclear waste and issues surrounding safety are at the forefront of people's minds. CECA believes that any public debate must seek to address communities' concerns using independent and impartial evidence.

At the same time the benefits that would arise from siting a GDF in a particular locality must also be highlighted. In particular CECA believes that the rewards should be greater than the consequences of the investment.

In our response, we have focused on the areas in which we believe we can add the most value. We especially welcome the Government's commitment to addressing lessons learnt from the previous GDF siting exercise. We trust that you find our comments helpful and that they will be taken into consideration.

Yours sincerely,



Alasdair Reisner  
Director of External Affairs  
Civil Engineering Contractors Association

**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.**

CECA strongly believes that community consultation is a key part of the UK's democratic process. Achieving community buy-in is essential and we believe the proposals outlined in the consultation reflect the lessons learnt from the previous GDF siting exercise. We agree that a test of public support should be taken before any representative authority loses the right of withdrawal. This will ensure that the views of the community are fully represented after an informed and publicly available information gathering process.

We are not in a position to suggest what may be the most appropriate means of testing public support. However, we believe that the decision should be made before any major expenditure of public funds is spent on investigations at a potential site. We note that any further work would be subject to the usual regulatory and planning processes, which continues the democratic process.

**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**

CECA agrees with the amendments proposed. A key part of the selection process in attracting suitable areas will be the community benefits gained from hosting a GDF. These improvements must be clearly outlined to local authorities and communities. CECA believes that remote areas with high levels of unemployment, for example, would stand to benefit from the development of a large business nearby. Not only would jobs be created onsite, but opportunities would also arise as a result of a stronger local economy.

There is a view that those regions who already host nuclear power stations or see themselves as energy centres may be more open minded to the siting of a GDF in their locality.

**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?**

CECA agrees with the revised approach, taken as a result of lessons learnt from the previous siting exercise. We believe that this approach would generate strong public debate to help potential communities make an informed decision as to whether to continue investigations into hosting a GDF site. We would suggest that Local Enterprise Partnerships play a key role in any consultative partnership.

**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?**

CECA accepts the proposed approach to assessing geological suitability as part of the MRWS siting process. We especially welcome the reflection on lessons learnt from exercises in Shepway and West Cumbria.

CECA believes that there is a desire for more geological information earlier in the siting process and that a step-by-step process is required to minimise costs. Therefore a process of elimination is required to ensure that only very strong contenders are shortlisted for the most in-depth exploration.

For more information, please contact CECA director of external affairs  
Alasdair Reisner on 020 7340 0450 or enquiries@ceca.co.uk

**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?**

CECA believes that the development of a GDF in England should be sought through the nationally significant planning regime as set out in the Planning Act 2008.

A GDF is an infrastructure development on a major scale and of national significance. It is exactly the type of project for which the nationally significant planning regime was established. The fact that the final decision is made by the Secretary of State maintains democratic accountability.

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

CECA believes that addressing concerns over the means of transporting nuclear waste also plays an essential role here. When communities are deciding to host a GDF, it is essential that, at the same time, an informed discussion is had on how and when any waste is transported which addresses all safety and security concerns.

**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?**

CECA supports the proposed approach and would like to stress the importance of offering an extremely detailed benefits package to communities. This should include job creation estimations and local economic growth predictions as well as focusing in detail on improvements to social infrastructure. A detailed and thorough offer is key to ensuring that communities make an informed decision on the potential advantages and disadvantages of hosting a GDF.

**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?**

CECA supports the proposals and stresses the importance of taking into account issues such as potential effects on house prices, businesses and tourism, and designated areas of scientific, heritage or landscape interest. One solution would be to provide more information at an early stage in the siting process, to reduce uncertainty around the potential effects of a GDF.

For more information, please contact CECA director of external affairs  
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