

Dear Sir/Madam. This is a consultation response to the Review of the Siting Process for a Geological Waste Disposal Facility.

This response is made by the Shared North Wales Minerals and Waste Planning Service, who provide a collaborative service for the North Wales Authorities of Anglesey, Conwy, Denbighshire, Flintshire, Gwynedd, Snowdonia National Park Authority and Wrexham on minerals and waste planning matters. This response is made as a technical officer response, and does not necessarily reflect the views and opinions of any individual local planning authority, or of their elected members.

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.

Response Generally supportive of the approach, however, a sufficiently long period should be allowed to ensure communities which may be initially undecided or sceptical, are able to engage fully with all stakeholders who make up a community. The initial reaction from a given community may be adverse, but once properly informed of risks and benefits, the level of support may increase. Need to have mechanisms in place to measure the views of the silent majority to balance a more vocal lobby who may not support GDF. Community support can only be assessed after a reasonable period of engagement and participation has taken place.

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.

Response The decision making process is clearer, and engages relevant community stakeholders.

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?

Response The revised roles in the siting process are sensible.

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?

Response The general approach is supported.

We note that the geology of many areas of the UK is extensively mapped and known in three dimensions due to mining and borehole information, and if areas are known to have fundamental issues that makes them unsuitable for a GDF in the 200-1000 metre depth zone, it seems to be wasteful of public money and people resources to unnecessarily engage with communities beyond the initial stages where there is no realistic scope of being able to host such a facility, or where one would require prohibitively expensive engineering or mitigation solutions.

The process also need to evaluate the management of mining/excavation wastes, which may be a considerable volume. High strength rock may be able to be used to supply the aggregates market, or

held in storage for such uses. Lower grade rock could be put to flood alleviation uses, or used to remediate contaminated land or infill old quarry voids elsewhere. The siting of large volumes of rock waste on site may cause local problems, so mining waste storage, disposal or utilisation options off site must be considered. These can offer benefits in their own right. The long term structural integrity of rock chambers must also be assessed, together with de-watering options and safe management of any such pumped water.

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

Response The use of the National Infrastructure Project procedures would be expected for the main project. Consideration of all elements as a single project has attractions, but would a separate application be made for the totality of the exploration stage in advance of any main application for a GDF? There are existing mechanisms to enable exploration via permitted development and planning permission for "mining" related exploration that could be utilised, however, if a detailed programme of exploration is developed and fully consulted /engaged in advance, this could be handled by the Planning Inspectorate as part of a National Infrastructure project. We note that the drilling of drilling boreholes to evaluate geology for a GDF raises no issues that are different to drilling a water abstraction well, mineral exploration borehole, or testing ground conditions for built development, and applications for exploration drilling could be dealt with by the relevant local planning authority.

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?

Response The clarification of the baseline inventory and communication is welcomed.

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

Response The approach is generally supported. Community benefits can be direct and indirect consequences associated with a GDF, eg, employment and existing infrastructure upgrades, eg, highways, rail links, flood defences, etc, as is appropriate. Communities must also be able to bid for funding for local initiatives to fully engage and benefit the community; and these should include both capital and revenue based community benefits. Initiatives could extend to improving local needs such as local housing needs and local infrastructure. Trusts or bodies must be set up to administer and audit this to ensure all sectors of a community are able to benefit, and that the benefits are being implemented.

Some concern is expressed that any community funds spent during the focusing stage could be recovered in the event that a GDF is not built.

How would such funds be recovered, and in particular if funds were spent on informing and engaging the wider "community"?

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?

Response Targeted approach with levels of assessment pitched at the level of information necessary and proportionate to each stage of the process is sensible. It allows potential mitigation needs and solutions to be identified at an earlier stage, and such mitigation may be a positive benefit. Assessment of socio-economic factors at an early stage can take account of the local demographics of a community, and better target needs and impacts on the community and identify solutions and positive benefits at an earlier stage in the process, and thus enable the community to be engaged to shape such benefits at an earlier stage.

9. Do you have any other comments?

Response

a>The amendments are generally welcomed.

b>The definition of a community must be clearly defined to avoid public confusion.

c>The process should stress that at the present time a number of

c>existing

communities are subject to a network of temporary surface and near surface installations which are vulnerable to security breaches, man made or environmental events, and a GDF will significantly reduce these risks.

d>The UK does not have a good record of full and balanced proactive

d>public

participation, and the importance of public engagement cannot be over emphasised to avoid media social media misinformation and sensationalism.

A fair and balanced debate is essential.

e> Funding must be made available to communities who engage in the

e> process

to enable necessary staffing and resources to be put into place to carry out the necessary engagement.

f> Clarification of how the process would apply to devolved administrations, including community funding.

g>Allowance must be made for the potential for initial reluctance of

communities to engage until information has been actively disseminated and the community engaged to allow them time to properly consider whether or not to make an expression of interest in hosting a GDF. As a proportion of the total time a GDF project will take to be commissioned, spending an extra year, for example, in the government siting engagement programme stage may enable more communities to properly engage in the process, and thus offer greater scope for potential locations for GDFs that have community support.

Yours Sincerely

On behalf of the North Wales Minerals and Waste Planning Service | Gwasanaeth Cynllunio Mwynau a Gwastraff Gogledd Cymru

Gary Nancarrow

Manager (Minerals & Waste)/ Rheolwr (Mwynau a Gwastraff) Environment Directorate | Cyfarwyddiaeth yr Amgylchedd

Flintshire County Council | Cyngor Sir y Fflint County Hall | Neuadd y Sir Mold | Yr Wyddgrug CH7 6NF

Tel | Ffon: 01352 REDACTED

Fax | Ffacs: 01352 756444

www.flintshire.gov.uk | www.sirryfflint.gov.uk