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ISM

SUBMARINE DISMANTLING PROJECT

Intermediate Level Waste Storage Site Selection: Response to Pre- engagement

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Amendment History

Issue	Date	Details of Amendment	DCCF
0.1	May 2014	First working draft	
0.2	May 2014	Draft for project team review	
1.0	June 2014	For public release	

Distribution

SDP Virtual Team
SDP Advisory Subgroup Members
Pre-engagement participants
SDP consultation web pages (as PDF)

Executive Summary

- 1.1.1. The MOD's Submarine Dismantling programme (SDP) is developing a solution for the dismantling of 27 Royal Navy nuclear submarines, once they have left naval service and have been defuelled, and the safe interim storage of the intermediate level radioactive waste (ILW) arising.
- 1.1.2. Now that Main Gate Business Case approval for the initial dismantling site and approach has been obtained, a further stage of analysis and public consultation is necessary to determine the ILW storage site.
- 1.1.3. The first of three main points in this decision-making process where structured public and stakeholder engagement activities are envisaged is Pre-engagement with Statutory Bodies, devolved administrations, local authorities, elected representatives and established site stakeholder groups on shortlisting, future assessment and engagement plans, and the scope of the Strategic Environmental Assessment.
- 1.1.4. Pre-engagement is now complete and this report summarises the many useful comments made both during the two Pre-consultation stakeholder workshops and directly to MOD. It also provides feedback to stakeholders on the changes made to option assessment and engagement plans as a result.
- 1.1.5. The main themes are:
 - ILW transport
 - Community benefits
 - Approach to planning & permitting
 - Responsibility and accountabilities
 - Generic comments on screening and assessment
 - Generic comments on public and stakeholder engagement
 - Comments on SEA scope
 - Stakeholders' site-specific comments

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1. Introduction

1.1. Background

- 1.1.1. The MOD's Submarine Dismantling programme (SDP) is developing a solution for the dismantling of 27 Royal Navy nuclear submarines, once they have left naval service and have been defuelled, and the safe interim storage of the intermediate level radioactive waste (ILW) arising.
- 1.1.2. The MOD formally announced on 22 March 2013 that the following decisions had been made: initial submarine dismantling will take place in situ at both Devonport and Rosyth; Reactor Pressure Vessels (RPVs) will be removed and stored intact; and a revised approach to selecting an ILW storage site will be taken forward.
- 1.1.3. Now that Main Gate Business Case approval has been obtained, a further stage of analysis and public consultation is necessary to determine the ILW storage site. The first of three main points in this decision-making process where structured public and stakeholder engagement activities are envisaged is Pre-engagement. This is an important pre-cursor to Public Consultation entailing early discussions on shortlisting, future assessment and engagement plans, and the scope of the Strategic Environmental Assessment.
- 1.1.4. Pre-engagement is now complete and this report summarises the many valuable comments made both during the two Pre-consultation stakeholder workshops and directly to MOD. It also provides feedback to stakeholders on the changes made to option assessment and engagement plans as a result.
- 1.1.5. The MOD is once again grateful to all those stakeholders who gave their time to participating in Pre-engagement and for their valuable advice. Significant improvements have been made as a result and SDP's decision making will be better for it.

1.2. Report Structure

- 1.2.1. The remainder of this report comprises a description of pre-engagement activities followed by a summary of the main cross-cutting and site-specific themes emerging and MOD's response. There is a list of acronyms in Annex A and a list of key references in Annex B.

2. Pre-engagement

2.1. Introduction

- 2.1.1. Pre-engagement gives local authorities, elected representatives, site stakeholder groups and other stakeholders from potentially affected communities and elsewhere an early opportunity to understand how the process is developing and, by commenting on published project documents, a chance to help shape the site comparison studies and the main Public Consultation.
- 2.1.2. This section briefly describes the publications, workshops and briefings which together comprised the Pre-engagement programme. This programme was developed with stakeholder input through the mechanism of the project's independent Advisory Group and its specialist Subgroup as described in the SDP 'Approach to PSE' report.
- 2.1.3. Pre-engagement started with the publication of the Provisional Shortlist on 13th February 2014 and ended on 30th April 2014. The latter date is the cut-off for comments summarised in this report but the project team will endeavour to take account of any comments received afterwards.

2.2. Publications

- 2.2.1. To inform the Pre-engagement process, the MOD published¹ on 13th February 2014 reports summarising the results of the ILW storage site selection process to date and setting out its plans for the remaining steps in the process. These reports were:
- a. Approach to Decision Making – an overview of the decision process for selection of an ILW storage site;
 - b. Approach to Public and Stakeholder Engagement – an overview of how the MOD intends to engage the public and stakeholders as part of its decision making process;
 - c. Provisional Criteria & Screening Report – a description of the work done to date on ILW storage site screening; and
 - d. Strategic Environmental Assessment (SEA) Scoping Report – the proposed scope for updating the SDP's SEA, which had been issued to the relevant UK Statutory Bodies and Devolved Administrations for comment.
- 2.2.2. An additional report was published on 4th April after the first Pre-engagement workshop in response to requests for more detailed information on assessment criteria:
- e. Assessment Criteria Overview – a description of the work done to date on ILW storage site screening. This document was issued as an annex to the 'Approach to Decision Making' report already released for public comment.

¹ The SDP Pre-engagement web page is <https://www.gov.uk/government/publications/submarine-dismantling-project-interim-storage-of-intermediate-level-radioactive-waste>

2.2.3. Download figures are not available for individual documents but as of 30th April 2014 the number of views of SDP's consultation page is as follows.

February	475
March	239
April	248
Total	962

Table 1: SDP Website Page Views²

2.3. The Workshops

Invitations

2.3.1. Letters announcing the shortlisted sites and giving notice that Pre-engagement had started were sent out to:

- Elected representatives;
- Local authorities; and
- Site stakeholder group chairs covering candidate storage sites.

2.3.2. Nominations were invited for two Pre-engagement stakeholder workshops. Workshop invitations were also sent to:

- Members of the independent SDP Advisory Group (which includes NGO representatives³);
- Regulators (as observers);
- Candidate storage site licence companies and site owners.

Format

2.3.3. The two Pre-engagement Workshops were independently facilitated by Instinctif Partners acting under contract to the Ministry of Defence (MOD). The facilitators were 'non-technical' and 'non-advocate'. Their role was not to achieve consensus or resolve issues but rather to ensure the whole range of views, concerns and comments were explored and captured.

2.3.4. There were two breakout sessions at each workshop with two separate groups rotating around the key topics that were the focus for this element of Pre-engagement.

- a. Breakout Session 1 covered ILW storage site assessment strategy. The SDP team gave an introductory presentation on the site selection process, screening criteria and the provisional shortlist. Technical experts from MOD were present to provide technical information, if required.

² Google analytics data from Government webmaster.

³ Non Governmental Organisations - in this context, mainly campaign groups with an interest in nuclear matters.

The session was then opened to discussion and questions. In particular, participants were asked for their views on the screening process, the assessment process as a whole and the factors that should drive MOD's decision making.

- b. Breakout Session 2 covered the Approach to Public Consultation. The SDP team gave an introductory presentation on MOD's approach to Public and Stakeholder Engagement (PSE) and outlined proposals for Public Consultation on the final shortlist of sites. Technical experts from MOD were present to provide technical information if required.

Participants were asked for their views on the principles and values that underpinned MOD's proposal for PSE, the breadth and scope of the proposed Public Consultation, the accessibility of information and whether they thought that they, and the people they represented, could comment or participate openly in the process.

- 2.3.5. The workshops concluded with a summary of the issues that had been raised and how MOD proposed to respond to them, an outline of the next steps, and a final plenary discussion.

Event Details

- 2.3.6. The first workshop was held at the 'Bristol Filton' Holiday Inn on 25th March 2014, aimed primarily at stakeholders associated with AWE sites and any interested stakeholders from the Devonport initial dismantling site.
- 2.3.7. The second workshop was held at the North Lakes Hotel, Penrith, Cumbria on 9th April 2014, aimed primarily at stakeholders associated with the Capenhurst, Chapelcross and Sellafeld sites, and any interested stakeholders from the Rosyth initial dismantling site.
- 2.3.8. There were 14 stakeholders at Bristol and 31 at Penrith. All were either from national organisations or associated with candidate storage sites; none were associated specifically with initial dismantling sites. All the main types of stakeholder expected by the MOD were otherwise represented at one or other workshop.
- 2.3.9. A report of the two events, including lists of participants and the points made, is included in Annex C.

Evaluation

- 2.3.10. The SDP project team's impression was that participants' feedback on the day was positive. Feedback to team members suggested that participants' aims for the day had been generally satisfied but such impressions can be misleading so provision was also made for more structured feedback.
- 2.3.11. At the end of the workshops each delegate was given an evaluation questionnaire to seek their views on the events. Seven questionnaires were completed following the Bristol workshop and five following Penrith. The feedback was generally positive with useful suggestions for improvements at future events and for further information which would be needed by stakeholders.

- 2.3.12. In addition, two members of the SDP Advisory Group attended as observers. They provided detailed written comments on the format and content of the workshops and will report back to the next project Advisory Group subgroup meeting.

2.4. Briefings

- 2.4.1. Face to face briefings / feedback opportunities were offered in the letters to MPs and MSPs announcing the shortlisted sites and giving notice of pre-engagement. There is an on-going briefing programme but in April 2014 there was one combined briefing for two MPs from potential storage sites and a briefing for House of Commons Defence Committee members.

- 2.4.2. There will be follow-up briefings during May-July for the site stakeholder groups at potential storage sites, updating them on the results of Pre-engagement and next steps.

2.5. Direct Feedback

- 2.5.1. Consultation documents also offered the option of direct feedback by phone, email or post direct to the project team.
- 2.5.2. There was only one significant direct email correspondence, with an NGO representative concerning additional information on criteria and related matters.

2.6. Publication of Comments

- 2.6.1. SDP has committed to publishing on its web page a digest of comments received. For Pre-engagement, the project team's judgement is that this is most usefully done by publication of the current document with the Workshops Report in Annex C.

3. Main Comment Themes and MOD Responses

3.1. Introduction

- 3.1.1. The following comprises the SDP's perception of the main themes emerging during Pre-engagement (including SEA Scoping) and its proposed response. Improvements to Pre-engagement workshop formats and published documents are not covered below⁴ but improvements to future equivalents are.
- 3.1.2. Readers should refer to the workshops report in Annex C for the original comments made at the two Pre-engagement workshops and MOD's response to questions.

3.2. RPV Transport

- 3.2.1. The assessment and implications of reactor Pressure vessel (RPV) transport (including routes and distance) were major themes in SDP Pre-engagement workshops, as they had been in NDA consultations linked to ILW consolidation. In particular, participants argued that transport should be more explicit within option assessments, including comparison of road and sea transport alternatives. Consultation materials must be clear about potential risks and impacts on local communities, and about who would pay for any required infrastructure work.
- 3.2.2. MOD agrees with these suggestions. SDP's assessment criteria trees have been modified accordingly. Many Operational Effectiveness (OE) criteria have been broken out into separate storage and transport sub-criteria and a new Other Contributory Factors (OCF) sub-criteria has been added under the 'public confidence' heading. These changes are detailed in the re-issued 'Assessment Criteria Overview' report now published on the project Pre-engagement webpage. Modifications have also been made to the planned scope of the main Public Consultation Document and supporting factsheets.

3.3. Community Benefits

- 3.3.1. There was a great deal of discussion at the Pre-engagement workshops about potential employment benefits and (particularly at Penrith) additional negotiated benefits for a host community. There was also a request for greater clarity about who would pay for any improvements required to local infrastructure.
- 3.3.2. The MOD's expectation is that the SDP store will have very little impact - either positive or negative - on the host community. Furthermore, any negotiations associated with the planning process would be the responsibility of the chosen contractor, not the MOD.
- 3.3.3. However, the MOD recognises that the wider balance of potential 'costs and benefits' is important to stakeholders. It is also aware of the NuLEAF initiative mentioned in the workshops, to develop proposals on behalf of its member local authorities for a wider national voluntary framework for community benefit contribution schemes. A factsheet summarising the MOD's position is therefore being prepared.

⁴ Many changes were made to presentations etc. in response to comments and an additional report published (see para 2.2.2 above)

3.4. Approach to Planning and Permitting

- 3.4.1. A wide range of comments and questions related to the planning and permitting processes which SDP or its contractor will be undertaking. There was a general feeling that the project should clarify key aspects of its approach in both these areas and present the information in some detail (sometimes site-specific detail) to local communities to support the Public Consultation.
- 3.4.2. The MOD agrees with the general thrust of these comments and has put in hand work to prepare both a new overview document and new factsheets.

3.5. Responsibility and Accountabilities

- 3.5.1. Some comments and questions related to the different involvement of site owners and operators/licenses in the process to date and (alongside the MOD) in the forthcoming Public Consultation.
- 3.5.2. These matters were clarified for participants but there remained questions concerning future responsibility and accountability for the RPVs which MOD agrees need to be covered explicitly in future consultation materials. Modifications have therefore been made to the planned scope of the main Public Consultation Document and supporting factsheets.

3.6. Generic Comments on Screening and Assessment

- 3.6.1. The comments made under this heading generally related to specific criteria and the treatment of particular themes as discussed above. More general suggestions were, however, also made which would help the MOD improve the structure and the transparency of the future assessment process.
- 3.6.2. The MOD accepts that improvements can be made and SDP will (for example) now make explicit in the updated Criteria & Screening Report the existence of a review point after the first phase of initial analysis data collection at which any site failing a detailed OE or Investment Appraisal threshold test could be removed from further consideration, even though it had satisfied the screening criteria.
- 3.6.3. The project's detailed assessment strategy will be updated and reissued internally. It will address higher levels of decision making and the consequences of failing to identify a clear single best site, and will reference future decisions that will need to be made e.g. regarding the RPV cut-up facility and ship-breaking sites. These issues will also be included in public consultation documents.

3.7. Generic Comments on Public & Stakeholder Engagement

- 3.7.1. A variety of useful suggestions were made which would improve the project's PSE strategy (as set out in the 'Approach to PSE' report) and its implementation at local level. These will be taken into account in revisions of project documents and - in due course - detailed engagement planning. The added complexity if consultation straddles Christmas has been noted.

- 3.7.2. Some new stakeholders will be added to the project's databases, including additional neighbouring local authorities, and opportunities to improve engagement with local media will be explored. Key messages will be reviewed. MOD will respond positively where it can to invitations to engage with local authorities and liaison groups etc.
- 3.7.3. The MOD recognises the importance of making it clear that it is listening to comments and providing consultation feedback. As a result of comments made, it has reviewed its proposals and the current report - which was not originally going to be published as a stand-alone document - is one outcome.

3.8. Comments on SEA Scope

- 3.8.1. The SEA scoping report was circulated to statutory consultees as per the Environmental Assessment of Plans and Programmes Regulations 2004 and some non-statutory consultees. Responses were received from:

- The Environment Agency (EA)
- Scottish Environmental Protection Agency (SEPA)
- Scottish Natural Heritage (SNH)
- Historic Scotland
- Scottish Directorate for Local Government and Communities
- Natural Resources Wales
- Department of the Environment Northern Ireland
- Public Health England

- 3.8.2. They were generally supportive of the SEA process and of the proposals for ILW storage on existing licensed sites. The statutory bodies provided additional baseline data for individual sites and commented on the scope of the SEA. Examples of comments include the following:

Comments from EA

- “we agree with the proposal for interim storage on an existing nuclear site”
- “It is important that MOD and the operators of the shortlisted sites fully assess the impacts of interim ILW storage over the lengthy lifetime of this stage of the SDP i.e. up to the point where a permanent disposal option is available and can receive SDP ILW”
- “It is important that the eventual SEA examines the interactions between MOD's impact and that of the historical baseline for each site as well as current and future plans for the site(s) i.e. cumulative impacts.”
- “Our view is that interim storage of submarine ILW at AWE Aldermaston would have minimal environmental impact at this site. It would however be of benefit for the SEA to view SDP against the major developments which have already taken place and which are planned for this site over the next 10 or so years and also to consider storage of ILW in relation to the existing and future plans for managing nuclear weapon programme ILW.

- Re AWE Burghfield: “a future SEA should address existing flood management measures in greater detail”
- Re AWE Burghfield: “Depending on the location of a potential store, there will be a need for thorough land characterisation due to the historical activities undertaken on this site as a conventional ordnance establishment. The presence of several conventional contaminants would need to be determined and a waste plan developed for their management.”
- Re Capenhurst: “Our view is that interim storage of submarine ILW at this site is likely to have minimal environmental impact at this site. It would however be of benefit for the SEA to view SDP in relation to the major developments which have already taken place and which are planned for this site over the next 10 or so years.”
- Re Sellafield: “Our view is that specific interim storage of submarine ILW at this site is likely to have minimal environmental impact. However, it is important to us that any new development of ILW storage does not cause Sellafield Ltd to be distracted from making progress with the major hazard and risk reductions programmes at Sellafield....”
- Re Sellafield: “the assessment of nearby protected sites has not considered the newly designated Cumbria Coast Marine Conservation Zone. Public bodies must take account of these new designations when decision making.”
- Re Sellafield: “there is potential that a marine plan may be in place for that coast by the time permissions are sought”. They recommended that the Marine Management Organisation is added to the list of consultees.
- The EA emphasised that “It is important that the full remit of the Water Framework Directive is considered”.

Comments from SEPA (Chapelcross site only)

- “Figure 2.2 states that the transport of all 27 Reactor Pressure Vessels (RPVs) from the Rosyth and Devonport sites to the interim Intermediate Level Radioactive Waste (ILW) and from the ILW store to the final disposal facility falls within the scope of the SEA. We agree with this approach, but would highlight that submarine ILW is not included in the scope of the Scottish Government Higher Activity Waste policy; this point should be made clear in the SEA Environmental Report. “
- “It should be noted that if the site has no nuclear use we would require the site to be returned to a satisfactory state to take due account of the land and groundwater contamination referred to in Section 5.7.8.” And “we would recommend that the SEA should assess the environmental effects associated with future site uses where (i) a nuclear option is proposed and (ii) a nuclear option is not proposed.”
- “Given the long term nature of the ILW store, it is important that full cognisance of projected climate change is factored into site choice and site design.”
- “The scoping report focuses almost entirely on radioactive waste and makes little reference to management of controlled wastes more generally.” And “We recommend that the impacts associated with all waste generated during construction and decommissioning the ILW store should be factored into the assessment.”

- “We recommend that under the “Potential Pathways for Effects from ILW Storage” an additional pathway that should be considered is the mobilisation of radioactive contamination during site decommissioning and clean up for land, buildings, groundwater etc.”
- “We would recommend that the Key Environmental Protection Objectives in Annex 3 for Transport (page 99) include reference to the proximity principle. “

Comment from SNH

- SNH recommended an update to the Habitat Regulations Assessment (HRA) but commented that “we would suggest that the alternative candidate sites to the plan are also screened as part of an updated HRA. If there is no connectivity or pathway between a proposal and a Natura site such proposals could be screened out as having no likely significant effect and the reason for this set out in the HRA record”.

Comments from Public Health England

- “The SEA seeks to identify a single site for storage of the RPVs. An option should be presented which allows the creation of multiple smaller ILW stores for the RPVs that can be considered on an equal footing with a single larger store.”
- “Although a decision on whether size reduction facilities are required and therefore where such facilities should be sited has yet to be considered it would be prudent to have sufficient space available at ILW temporary storage sites for the reduction to take place before onward shipment to the GDF.”
- “Assumptions about implementing ILW Storage include the transport of RPVs to a size reduction facility. There is no indication that such a facility could be adjacent to the ILW store.”
- “Annex 4: Rationale for Amendment of the SEA Objectives and Guiding questions. PHE-CRCE supports the creation of a separate category identifying radiological discharges and exposures. However, PHE-CRCE suggests that the category title.”
- “Greater clarity is required over the expected character and extent of any assessment into both the projected operational impact of transporting waste and running the facility, and potential accidents on route to the site or following emplacement.”
- “Annex 6: Guideline Assessment Criteria by SEA Category. The ‘Radiological Discharges’ category should be renamed ‘Radiological Discharges and Exposures’. It is not clear how the guidance assessment criteria may be combined or used in a way that may be compared between categories. In addition, the major negative category for radiation exposures has two test conditions related respectively to routine operations and an accident event where the accident event in particular is unspecified making it unclear what potential events are to be considered.”
- “Within the major negative category under ‘Radiological Discharges’ criteria the test for routine operations would exceed the dose criteria source constraint for the operation of new sites and if met would not simply be a major negative but would preclude the option entirely from further consideration. PHE-CRCE suggests that, instead of applying a test that would preclude the option, a more stringent threshold is applied. For example, although the project envisages that

storage of the waste will be temporary, the waste may be held under minimal supervision for some decades and the source constraint of 0.15 mSv advised by PHE-CRCE for permanent disposal could be adopted for screening purposes. The second test option considers the consequences of an unspecified accidental event but does not provide any quantification of the potential level of risk that should not be exceeded. It is suggested that the option is rephrased as 'Option results in a risk exceeding 1:100,000'."

Comments from other statutory consultees

- Natural Resources Wales also comment that they "would welcome further consultation on the HRA screening of the candidate sites, at the appropriate time."
- Department of the Environment Northern Ireland, Historic Scotland. Scottish Directorate for Local Government and Communities responded but made no specific comments.

3.8.3. The project's SEA team will consider and respond to the above comments and include additional baseline information supplied by the Statutory Consultees in the SEA Environmental Report. The SEA Environmental Report will be available for the start of Public Consultation.

3.8.4. The SEA will cover the application of the proximity principle but there will also be an extended discussion and analysis in the OE and OCF analyses of the trade off between proximity and other objectives.

4. Stakeholders' Site-Specific Comments

4.1. Introduction

- 4.1.1. Site-specific comments were made during the workshops and during stakeholder briefings. They are summarised below for each site in turn, with a recap of any Site Owner or SDP caveats noted in the Criteria and Screening Report and their current status.
- 4.1.2. No recommendations for additional shortlist sites were received, although there were a number of questions at the workshops seeking clarification about the reasons why sites declared available by the owner had subsequently been screened out - particularly Dounreay, including with reference to the changes to its expected quiescence date (see the Criteria and Screening Report for more detail).
- 4.1.3. Though important issues were raised for consideration during the next phase of assessment, no information was tabled which changed the MOD's views on screening. Work subsequent to the workshops may, of course, still result in changes to the shortlist up until the date when it is formally announced.
- 4.1.4. Note that further assessment of a site may be halted at any point if it can be shown to fail an 'unacceptable performance' threshold test, even if it has been included in the Final Shortlist.

4.2. Aldermaston

- 4.2.1. The MOD has noted AWE's advice that both standalone and combined SDP/AWE store options are possible.
- 4.2.2. Relatively few of the comments in Annex C related to Aldermaston and none are judged by the SDP team significant enough to caveat its inclusion on the shortlist.

4.3. Burghfield

- 4.3.1. The MOD has noted AWE's caveat for the Provisional Shortlist that there is no ILW currently stored on site and that a site licence extension would be required.
- 4.3.2. Several Pre-engagement comments related to Burghfield, typically expressing an expectation that subsequent detailed analysis would lead to it being deselected on the basis that ILW storage would be undesirable there on principle (e.g. ILW storage should not be added to a site where there is no current ILW storage regime) or because Burghfield is vulnerable to particular hazards (e.g. flooding).
- 4.3.3. The SDP team takes these issues seriously and has confirmed that all the issues mentioned in the workshops and briefings will be covered by future assessment. An initial assessment will be completed before public consultation.

4.4. Capenhurst

- 4.4.1. Neither the site owner nor SDP caveated Capenhurst's inclusion on the Provisional Shortlist.
- 4.4.2. Relatively few of the comments in Annex C related to Capenhurst and none are judged by the SDP team significant enough to caveat its inclusion on the shortlist.

4.5. Chapelcross

- 4.4 The MOD has noted NDA's caveat for the Provisional Shortlist that there are factors such as quiescence⁵ which would need to be taken into account for Chapelcross during detailed option assessment.
- 4.5 In the event, the main theme for site-specific comments was the potential impact of the Scottish Government's (SG) likely position and the magnitude of any consequential project risk.
- 4.5.1 The SDP team liaises regularly with other UK Government departments and the SG. It is therefore aware of the SG's perspective on the use of Chapelcross. There is scope to take position statements into account within both the OCF framework (e.g. 'National Political Positions') and the cost and risk assessment frameworks (e.g. 'Risk to Programme').

4.6. Sellafield

- 4.6 MOD has noted NDA's caveat for the Provisional Shortlist that Sellafield is already engaged in a complex waste management programme and that this may have implications which would need to be taken into account during detailed option assessment.
- 4.6.1 Relatively few Pre-engagement comments related to site-specific issues but the challenges were raised of delivering a store to SDP's programme on Sellafield in the context of an existing store programme, much of which might be judged higher priority by regulators.
- 4.6.2 The SDP team is working with the site owner and licensee to clarify the potential impact and an initial assessment will be completed before public consultation.
- 4.6.3 Sellafield stakeholders emphasised the need for community benefits (see Section 3.3 above).

⁵ Quiescence is an interim state prior to final decommissioning when activities on a nuclear site are mainly limited to maintenance and monitoring only.

5. Next Steps

5.1. Final Shortlist

- 5.1.1. Pre-engagement is now complete. The project team has reviewed the points arising and any other developments since the earlier screening workshops and will confirm a Final Shortlist for future Ministerial announcement.
- 5.1.2. When the announcement is made, the Criteria & Screening Report setting out the shortlisting logic will be updated to Issue 2 and placed in the public domain. Any significant changes to the shortlist will be fed back to local authorities, and to others who made comments.
- 5.1.3. In line with its PSE strategy and recommendations from stakeholders, the SDP team will continue to engage on an ongoing basis with local authorities, established site stakeholder groups and elected representatives on the design and preparations for the main Public Consultation.

5.2. Future Option Assessments & Consultation

Readers are directed to the project's updated 'Approach to Decision Making' and 'Approach to Public and Stakeholder Engagement' reports for a description of future option assessment and public consultation.

Annex A Acronyms

DE&S	Defence Equipment and Support
ILW	Intermediate Level Waste
MOD	Ministry of Defence
NDA	Nuclear Decommissioning Authority
PSE	Public & Stakeholder Engagement
RPV	Reactor Pressure Vessel
SDP	Submarine Dismantling Project
SEA	Strategic Environmental Assessment

Annex B Key References

All references listed below are available from the www.gov.uk website. SDP reports can be found via two web pages:

<https://www.gov.uk/government/publications/submarine-dismantling-project-interim-storage-of-intermediate-level-radioactive-waste> for current ILW storage site selection consultation documents and supporting reports; and

<https://www.gov.uk/government/consultations/consultation-on-the-submarine-dismantling-project> for previous consultation documents and supporting reports.

Title	Reference/ Version	Date
SDP: ILW Storage Site Selection Assessment Criteria Overview <i>Description of the work done to date on ILW storage site screening.</i>	Issue 2.0	June 2014
SDP: ILW Storage Site Selection Final Criteria and Screening Report <i>Overview of the screening process and the shortlist of sites for detailed assessment.</i>	Issue 2.0	June 2014
SDP: ILW Storage Site Selection Approach to Decision Making <i>Overview of the ILW storage site decision making process.</i>	Issue 2.0	June 2014
SDP: ILW Storage Site Selection Approach to Public & Stakeholder Engagement <i>Overview of the public and stakeholder engagement activities during the ILW storage site selection process.</i>	Issue 2.0	June 2014
ILW Storage Site Selection Strategic Environmental Assessment Scoping Report <i>Proposed scope of the updated project SEA and subsequent Environmental Report.</i>	Issue 1.0	February 2014

Annex C Pre-engagement Workshops Report

SUBMARINE DISMANTLING PROJECT CONSULTATION

Pre-Engagement Workshops

**Holiday Inn Bristol-Filton,
Bristol BS16 1QX
25 March 2014**

**North Lakes Hotel,
Penrith CA11 8QT
9 April 2014**

Workshops Report

1. Introduction

1.1 Background

In October 2011 the Ministry of Defence launched a public consultation on the strategic options for dismantling redundant nuclear submarines.

The Submarine Dismantling Consultation (SDC) ran for 16 weeks from 28 October 2011 to 17 February 2012, seeking the views of local people in the areas around candidate sites for submarine dismantling as well as the wider public and stakeholders nationally, on three key questions:

- How the radioactive material is removed from the submarines;
- Where the radioactive material is removed from the submarines;
- Which type of site is used to store the Intermediate Level Waste (ILW) awaiting disposal.

It also sought views on its Strategic Environmental Assessment (SEA) of the options. A report was published documenting the consultation process and provided a summary of the responses received. Having taken account of views and comments received, on 22 March 2013 the MOD announced key decisions on the project. It was announced that, subject to the process being successfully demonstrated in several years time, initial dismantling of the submarines will take place at both Devonport and Rosyth Dockyards and that the Reactor Pressure Vessel (RPV) which contains the ILW from each submarine will be removed for interim storage.

It was also announced that: the process for selecting a specific site for the interim storage of the RPVs would start; that the MOD would consider all existing nuclear sites in the UK, including those owned by the MOD, Nuclear Decommissioning Authority (NDA) and industry; and that the selection of a storage site for the RPVs would be subject to public consultation.

The MOD has now undertaken an initial assessment of both the availability and suitability of all existing UK nuclear sites ('the long list') and published a provisional shortlist of sites for further assessment.

1.2 Pre-Engagement

The SDP is committed to being as open and transparent as possible and recognises that in order to deliver an effective public consultation there is a need to engage early with stakeholders to discuss the process for assessing sites and engaging local communities.

In line with good practice on public consultation, the MOD has therefore entered a period of pre-engagement with local authorities, elected representatives and established site stakeholder groups. MOD is seeking their views on shortlisting, on the criteria that should be considered during the main assessment of shortlisted sites, and the shape of the forthcoming public consultation.

Following this period of pre-engagement, the MOD will publish the final shortlist of sites that will be used as the basis for detailed option assessment and public consultation. Public consultation will be carried out locally around each candidate site, and nationally, and is

planned to start in late 2014 and run into early 2015. Details of public consultation events will be publicised nearer the time.

1.3 Pre-Engagement Workshops

As part of its pre-engagement programme, MOD held two Pre-Engagement Workshops, the purpose of which was to:

- Inform delegates of the context of SDP, present the next steps and process to reach a recommended site.
- Provide a forum and means for participants to consider, comment and influence the criteria that should be included during the main assessment of each shortlisted site.
- Provide a forum and means for participants to consider, comment and influence the shape of the formal public and stakeholder engagement addressed by Public Consultation locally around each shortlisted site and nationally.

The first Pre-Engagement Workshop was held at the Holiday Inn Bristol Filton on 25th March 2014. The second Pre-Engagement Workshop was held at the North Lakes Hotel, Penrith, Cumbria on 9th April 2014.

1.4 Facilitation

Both workshops were facilitated by Instinctif Partners acting under contract to the Ministry of Defence (MOD). The facilitators were 'non-technical' and 'non-advocate'. Their role was not to achieve consensus or resolve issues but rather to ensure the whole range of views, concerns and comments were explored and captured.

In order to maximise the opportunities for discussion and sharing of views, there were two breakout sessions at each workshop with two separate groups rotating around the key topics that were the focus of this stage of the Submarine Dismantling Consultation.

1.5 Feedback

Comments and discussions at the workshops were captured and reported as part of the post-consultation report, to be published by MOD after the consultation has finished.

Comments made at the workshops, whether verbal or written, have not been attributed to individual participants unless specifically requested.

Two members of the SDP Advisory Group attended as observers on behalf of the Advisory Group. They provided written comments on the format and content of the workshops.

During the breakout sessions, the facilitators recorded comments made by participants on A5 Post-It notes. Participants were also invited to write their comments. These comments were displayed in the breakout rooms.

At the end of the workshops all A5 Post-It notes were collected by the facilitators from each room and have been written up in this workshop report which has been organised according to the key topics covered by the breakout sessions.

1.6 Evaluation

Participants were also each given evaluation questionnaires which they were invited to complete following the workshops.

1.7 Participants: Bristol

The following took part in the Bristol Workshop:

Ministry of Defence

Tom Baldwin
David Collier
John Davis
Linda Eadie
Andrew Gorringer
Chris Hargraves
Mark Sanderson
Simon Tinling
David Wilcox
Becky Winston

Stakeholders

Peter Burt	Nuclear Information Service
Gina Collman	AWE
Neil Fagan	URENCO UK Ltd
Darren Knowles	HSE
Cllr Carol Jackson-Doerge	West Berkshire Council
Bryan Lyttle	West Berkshire Council
Di McDonald	Nuclear Submarine Forum
Matthew Meldrum	West Berkshire Council
Shelly Mobbs	SDP Advisory Group
David Nelligan	Capenhurst Nuclear Services
Les Netherton	SDP Advisory Group
Cllr Garth Simpson	West Berkshire Council
David Slater	Capenhurst Nuclear Services
Cllr Brendan Sweeney	NuLeAF

Instinctif Partners

Chris Brown
Harry Hudson
Victoria Lewis-Stephens
Farah Pasha
Seamour Rathore

1.8 Participants: Penrith

The following took part in the Penrith Workshop:

Ministry of Defence

Tom Baldwin
Mark Ball
Christine Bruce
David Collier
John Davis
Linda Eadie

Chris Hargraves
Lucy Samuel
Mark Sanderson

Stakeholders

Cllr Renee Bebbington	Capenhurst and Ledsham Parish Council
Dominique Casson	Cumbria Constabulary
Jim Cochrane	Scottish Environment Protection Agency
Gemma Davies	Capenhurst Nuclear Services
John Groves	Copeland Borough Council
Cllr Mark Hackett	Nuclear Free Local Authorities
Stephen Haraldsen	SDP Advisory Group; Nuclear Institute
Richard Harding	Cumbria Constabulary
Ron Hargreaves	West Cumbria Sites Stakeholder Group
Chris Hindle	Cheshire West and Chester Council
Cllr Allan Holliday	Copeland Borough Council
Brian Hough	Nuclear Decommissioning Authority
Les Netherton	SDP Advisory Group
David Loudon	Nuclear Decommissioning Authority
Janette McGregor-Williams	Capenhurst Nuclear Services
Sean Marshall	Magnox Ltd
Shelly Mobbs	SDP Advisory Group
David Moore	West Cumbria Sites Stakeholder Group
Sean Morris	Nuclear Free Local Authorities
Cllr Ronnie Ogilvie	Chapelcross Site Stakeholder Group
Rory O'Neill	Sellafield Ltd
Ian Park	Chapelcross Trades Union Representative
Cllr Craig Peacock	Chapelcross Site Stakeholder Group
Steven Rogers	Dumfries and Galloway Council
Howard Rooms	Sellafield Ltd
Cllr David Southward	Cumbria County Council
David Slater	Capenhurst Nuclear Services
Jason Syers	Dumfries and Galloway Council
Jane Tallents	Nuclear Submarine Forum
Cllr Joyce Tomlinson	Capenhurst and Ledsham Parish Council

Instinctif Partners

Chris Brown
Harry Hudson
Victoria Lewis-Stephens
Cyra Parkes
Seamour Rathore

2. Pre-Engagement Workshops

2.1 Format

Each workshop opened with an introduction from John Davis, SDP Programme Manager, who explained the purpose of the workshop, what the Submarine Dismantling Project is, the type of waste that will be generated by dismantling and the history of the project. He recapped on the decisions that had been announced in March 2013 in relation to removal of radioactive material from submarines and where this would take place, and the type of site that should be used to store, on an interim basis, the Intermediate Level radioactive Waste awaiting disposal in the Geological Disposal Facility.

Victoria Lewis-Stephens (Instinctif Partners) introduced the team and the format for the day. In order to maximise the opportunities for discussion and sharing of views, participants were divided into two groups for breakout sessions, with the groups rotating around the key topics that are the focus of this stage of the Submarine Dismantling Consultation.

Breakout Session 1 concerned ILW Storage Site Assessment Strategy. David Collier gave an introductory presentation on the site selection process, screening criteria and the provisional shortlist. Experts from MOD were present to provide technical information, if required.

The session was then opened to discussion and questions. In particular, participants were asked for their views on the screening process, the assessment process as a whole and the factors that should drive MOD's decision making.

Breakout Session 2 concerned the Approach to Public Consultation. Linda Eadie gave an introductory presentation on MOD's values for Public and Stakeholder Engagement (PSE), the previous consultation that had taken place and outlined proposals for Public Consultation on the final shortlist of sites. Experts from MOD were present to provide technical information if required.

Participants were asked for their views on the principles and values that underpinned MOD's proposal for PSE, the breadth and scope of the proposed Public Consultation, the accessibility of information and whether they thought that they, and the people they presented, could comment or participate openly in the process.

The workshops concluded with a summary of the issues that had been raised and how MOD proposed to respond to them and an outline of the next steps. Participants were then invited to ask questions or give comments, and to complete an evaluation form on the workshop.

3. Bristol

3.1 Breakout Session 1- ILW Storage Site Assessment Strategy

The following comments and questions were noted during the breakout sessions, followed by responses and further comments made, or recorded on Post-it Notes.

3.2 General comments/questions

Is the cost projection based on 100 years of possible operations?

- The cost model assumes GDF from 2050, so the analysis is based on that. Cost analysis by the MOD takes into account many factors and risks.
- There is a complex and comprehensive cost analysis process.

There was a discussion of what 'OCF' (Other Contributory Factors) could include. It was noted that public consultation would provide a significant input to this. The OCF assessment is objective but not quantified.

Do you know what the transport mode to the GDF will be from the various sites?

- The same assumptions have been made for all sites but there has been no final decision.

Regarding the SEA (Strategic Environmental Assessment), will a response to statutory consultee comments be published?

- Statutory consultee comments will be collated and the responses will be documented and published in the SEA.

Is there consultation with any of the NGOs (for example, CND and Greenpeace)?

- Yes, there is a deliberate focus on NGOs. They are often also part of the local liaison groups for sites.

3.3 What are your thoughts on the Screening Process?

No specific comments were made regarding the screening process.

3.4 What are your thoughts on our assessment process as a whole?

In terms of Land Use planning the MOD will need to state why you don't think this will be a National Infrastructure project. Local waste plans consider VLLW and LLW, so should it be for the local authority to consider?

- Legal advice has been that the National Framework doesn't apply.

There is a belief this could be regarded as a waste operation and local plans would not cover this.

- It is storage and not disposal.
- It was agreed that there is a need to get this aspect clarified.
- Some sites are in two-tier authority sites (district and county) and this could create a potential issue.

What due diligence has been and will be carried out in the next stage?

- MOD are getting into detailed discussions with the site owners to work through all the criteria and are visiting all the sites.

Where is the line of demarcation between site owners and managers of sites?

- Discussions around this have already started with the full involvement of all parties.

A politician's question is likely to be 'what is in it for my community?'. Are any community benefit packages in mind?

- These are issues that need to be clarified for the public consultation.
- The site operator will be responsible for the planning application and any associated negotiations.
- It was felt that this should be taken into account during the site selection process.
- Consultation should give some feedback on this possible risk area.

There is a need to explain what will actually happen clearly and spell it out in the consultation.

- This was noted and agreed by all.
- The current baseline assumption is that this is a storage facility and if there were to be any cutting up of the RPVs it would take place elsewhere.

A comment was made that it is good to hear that it is not anticipated there will be any significant radioactivity outside of the site. This was noted.

It was commented that there should be a cross-reference back to the national site selection criteria for nuclear sites.

Transport

Road transport seems to be assumed, with rail ruled out and no mention of sea transport.

Why?

- Transport by sea is not ruled out, but road transport is expected as it reduces handling, as it will have to go on to road trailers anyway, and on cost grounds.
- The practicalities of transport could be analysed further.
- MOD will make sure sea transport is not precluded.
- It is an abnormal load but it is not particularly big and usually only one movement per year.

The relationship between site owners and operators was raised. What is the MOD plan to actually get things done and do the work?

- This will have to be discussed further.
- A commercial strategy will have to be developed.
- The project is not at the contract level yet.

Is MOD biased according to whether the site owner is Government or commercial?

- No, it is a 'clean' and transparent optioneering process.

3.5 What factors should drive our decision-making?

If a pressure group objects to a site, how does that impact on the decision-making process?

- The influencing factors are insights and ideas. Pressure groups have helped MOD to take the right things into account. People have helped to shape the process and the issues to consult on.
- The Advisory Group is a good forum for things to be hammered out and a sub group has helped MOD re-shape the process.
- The Advisory Group feels they have had some influence and seen progress made.

- MOD has previously looked at how pressure groups, advisory groups and others would weight the various factors being considered to gain an insight into different ways of thinking.
- MOD has to ensure that no particular group has an undue influence.

A participant commented after the discussion that there is a need to ensure that the totality of waste arisings, circa 2,700 tonnes of ILW, is *not* a national planning infrastructure project.

Following from this there is a need to ensure/establish whether the project is a waste management project, or a storage project, so that it is either a county planning matter or district planning matter, to avoid any legal challenge, problems or delays later in the process.

3.6 Breakout Session 2 - ILW Storage Site Assessment Strategy

3.7 General comments/questions

Is consultation on the Strategic Environmental Assessment (SEA) going ahead as part of the broader options consultation?

- MOD has to consult statutory consultees and this is happening now.
- Anyone can comment on the scope of the SEA now.
- The SEA will then be produced and a version will be ready for the public consultation phase.
- The option assessment depends on the SEA.

3.8 What are your thoughts on the Screening Process?

The screening process set out seemed to be a strange way of doing this – a negative rather than a positive assessment. It was felt to be strange to just seek to ensure that nothing was wrong with the sites.

- MOD had consulted on which sort of site so they had a framework. The feedback was not to discriminate by the sort of site.
- MOD said this was the way screening normally worked.
- Then MOD came up with the process and could not think of a better process to use. MOD has tried to be scrupulously fair.
- You may have spoken to the owners but did you speak to the licensees?
- MOD has been dealing with the site owners. These may not be the site licensees.
- Site owners undertook the first screening and then MOD cross-checked this.
- It was questioned who is in control? This should be the licensee.

MOD stated that if they now identify factors that say a site on the provisional shortlist should actually be screened out before, then MOD would screen the site out before the shortlist was finalised.

- It was felt that this could be made clearer.

To move to the next step, MOD now need clear data and engagement with the sites. On site licensing, what would be the MOD position on extending the boundary of a site licence?

- This applies to Burghfield.
- This needs detailed consideration.
- MOD would need to really understand the implications for timescales, the practicalities, etc.

It was noted that there will be different parameters to consider and MOD has to get this right, e.g. transport, etc.

Has MOD given a commitment that it will be within the licensed boundary of a site?

- Any proposal must be checked to confirm it is on the licensed site.
- There are regulatory and policy issues around this.

Can MOD explain more about the control arrangements? The responsibility between site owners, operators and MOD.

- MOD has overall responsibility for the waste.
- MOD has not decided on the commercial strategy yet. This decision will come later.
- The individual site situations can be complicated, but there are ways of managing this.
- Security of tenure is recognised within the process.

In terms of the nature of Burghfield and Aldermaston, MOD noted that there is a great deal to consider during the further detailed option assessment for those two sites following this discussion.

Is there an opportunity for MOD to sit down and brief/discuss this with MPs and councillors?

- Yes. There will be meetings with many stakeholders.
- Relevant MPs have all been contacted and briefings will take place.

A question was raised after the discussion that if some sites on the provisional shortlist are likely to be non-runners, does this meet the MOD PSE 'proportionality' test?

3.9 What are your thoughts on our assessment process as a whole?

How are you planning on carrying out the assessment process going forward?

- MOD will refine its functional specification and then it will be an iterative process to compare site options against the specification and each other.
- There is plenty of opportunity for challenge within the process.

It was stated that it is always worth asking, 'Is there anything else you'd like to mention or anything we've forgotten in the consultation?'

Participants were reassured that the assessments will include workshops so issues and questions will come out through this process.

Who makes the final decision? Is it the Secretary of State for Defence or the wider cabinet?

- It will go to the Secretary of State for Defence.
- The detail of the decision making at that level has not been finally decided.

3.10 What factors should drive our decision-making?

There were no comments made on this question during the discussion, but afterwards a participant felt that MOD should clarify what the position is regarding the extension of a nuclear licensed site boundary to include a waste store. It was considered that there are factors that make it desirable not to extend the existing licensed site boundaries. It was queried whether a commitment had been given to this extent.

3.11 Breakout Session 1 - Approach to Public Consultation

3.12 What do you think of the values/principles?

- MOD needs to clarify what is meant by a 'proportionate' consultation programme. If there's a cost issue regarding local authority time, it might be useful to make this clear from the outset.
- There was consensus among stakeholders regarding the need for more detail about the stated values and a clearer explanation of the first two bullet points (*1. Be genuine, as open as practicable, fair and inclusive. 2. Deliver a proportionate PSE programme.*). In particular, defining key words such as 'inclusive' is important as these are open to interpretation. One way of doing this could be to expand the first and second bullet points into a number of bullet points. In addition, MOD needs to include how the values will be implemented.
- Some stakeholders were unsure as to whether the third and fourth bullet points could be considered as core values at all, and there were concerns that the final point comes across as 'negative'. (*3. Build on, and share, previous experience. 4. Comply with regulatory and MOD procedural requirements.*)
- Suggestions included 'reframing' the final point so that it sets out how MOD will adopt high standards throughout the engagement process (perhaps based on what has been learned from the previous consultation).
- Adding 'learning about good practice' and 'learning to influence MOD's decision,' would be useful additions, although there were concerns that the term 'learning' was not necessarily helpful.
- What's important to the public is that they are being listened to and heard: that should be a value. Learning doesn't necessarily give the public the sense you're listening.
- It was generally felt that MOD needs to be much clearer and more explicit in the wording of its engagement principles and values.
- Reference to MOD taking a proactive approach to the engagement process also needs to be included.

How will you ensure that these values are maintained throughout the process?

- Through constant review. A monitoring process will be critical to managing the consultation process on-going. We need to make it clear that in the last round everyone's comments were addressed. However, it was difficult to capture the 'totality of commitment'.

3.13 What do you think of the scope?

There were concerns that timing the consultation around the Christmas holidays risks criticism over the transparency of the whole exercise. It was therefore suggested that flexibility was needed for add-on events to account for time lost over Christmas.

- MOD explained why it was necessary to time the consultation period over the Christmas holidays, as it had to take place after the Scottish referendum and before local elections.

How many local site exhibitions will you be doing?

- The approach to PSE Report sets out proposals. The consultation period can be extended to cover holidays, etc.
- There was consensus on the 'absolutely critical' role that local authorities and parish councils had to play in helping MOD to ascertain prime locations for the consultation events and to determine the number of events. It was suggested that MOD could also tap into existing community events as an extension of its own consultation; this way, it would have a better chance of engaging with hard-to-reach groups, feedback could be captured in a more familiar environment and therefore potentially increase authenticity of the data.
- It was felt that MOD should also talk to neighbouring local authorities around the Aldermaston and Burghfield sites, such as Basingstoke and Deane Borough Council, Wokingham Borough Council and Reading Borough Council, as well as those directly affected.

Do exhibitions have to take place during 12-week period?

- MOD clarified that time constraints exist; nonetheless, there was recognition that it needed to work with local authorities to select best timings.

How was the mailshot area decided last time?'

- MOD explained how it had previously worked with authorities to decide areas to target, admitting that the cost factor played a role in deciding the number of properties targeted in the previous consultation round. There was a suggestion from local authority officials that MOD should review its mailshot strategy, as, although residents might understand correspondence from MOD, they might not necessarily think to attend events. There was consensus that the mailshot should be part of the pre-engagement dialogue with local authorities. To reinforce the message MOD could offer to talk to parish councils two weeks after the mailing has been sent and use existing local authority channels to publicise events, such as press offices, Twitter feed, etc.

3.14 What are your views on accessibility of information?

There was consensus that the local media can play a positive role in engaging local communities as many people still read local papers. It was felt that MOD should invest in engaging the local media in a more in-depth, 'meaningful way', to create a much more informed story around the consultation exercise.

Utilising local councillors and MPs to raise awareness was also seen as an effective way of increasing scope. Ideas on how this could be done included briefing politicians and then asking them to talk about the consultation publicly, through social media outlets and writing letters to the local press. Special attention needs to be paid to ward and parish councillors as they are most likely to be contacted by press for comment. Email is the preferable mode of contact with councillors. It was also suggested that MOD should 'look broader' and do its own research on who its stakeholders are.

- MOD agreed with the need to ensure ward and parish councillors were aware, as well as executives and portfolio holders.

Are you planning on doing focused engagement with special interest groups (eg, young people) and who will be the custody holder for this?

- MOD noted this as an action to consider, alongside exploring how to engage the full spectrum of the community.

3.15 Do you feel you can comment openly?

There was very little response to this question initially.

- Participants felt that it was important for MOD to make sure that people could comment openly, but it is more about 'how they feel they will be listened to'. It would be in MOD's interest to ensure that people feel listened to, and it is worth emphasising how comments will be registered, that people are still able to comment outside of workshops, and clarifying how this will be fed back. It might also be worth demonstrating how previous feedback was addressed.
- MOD needs to communicate in 'Plain English'.
- There may be some limits to what people will feel comfortable discussing; certain topics are better for separate discussion rather than in an open forum.
- MOD needs to consider how LAs, NGOs and other organisations can assist with this process in a constructive way. Addressing potentially emotive issues early on might help prevent any issues escalating.

Will the regulators attend?

- We will encourage them to come.

3.16 Post-it notes comments/questions

- It will be important to strike a balance between consultation in rural areas (i.e. the immediate vicinity of the potential storage sites) and urban areas which are slightly further afield
- First point on values: break down into four points –
 - Genuine
 - Open as practicable
 - Fair
 - Inclusive

And say a little more about what you mean by these terms

- Third bullet point: I'd like to see this reframed as a value in 'Learning'
 - What people think about factors MOD may not have been aware of locally
 - On how to disseminate and improve good practice through MOD and the sector
- Fourth bullet point: Would be stronger if it gave a commitment to best practice rather than merely regulatory and procedural requirements
- Yes – MOD is to be commended on its approach to this project
- Factsheets: Need to be seen as balanced and specific

3.17 Breakout Session 2 - Approach to Public Consultation

3.18 General questions/comments

When will you announce the final shortlist of sites? How many sites does it involve?

- MOD confirmed that the shortlist currently includes 5 sites. That number may or may not change in the final shortlist.

A participant stated 'It's not easy for a council to sell this to residents. The fact that this scheme presents no public health issues is a key message that needs to be communicated.'

Participants were surprised that vehicle movements associated with the scheme were lower than they expected. It was felt that this, along with making clear that the building will be single storey, were core messages. One stakeholder suggested that an architect's impression would be useful in helping to contextualise the scale of development.

- Long-term economic benefits were considered to be 'negligible' due to the low job provision associated with the development. Participants agreed that any 'high worry factor' attached to the project can be reduced by dissemination of clear information and meaningful engagement with local liaison groups from the outset.
- There were concerns that the long-distance transport routes might be an issue, and MOD needed to consider which communities should be consulted in this regard. There was agreement that the specifics of the routes will need to be included in the fact sheets; in particular, it would be important to get the message across that transport is relatively low risk. There were a range of views as to which communities to target regarding transport routes and how to go about accounting for transportation in the site assessment. County councils and unitary authorities were considered to be a good starting point.

3.19 What do you think of the values/principles?

- There was consensus that MOD's values and principles had been applied at the workshop.
- The word 'proportionate' was considered to be important. It was also felt that MOD 'doesn't need to do more' in terms of its values and principles, its focus needs to be on targeting the 'right people'.

3.20 What do you think of the scope?

- Clear communication set out in plain English, publishing a 'glossary of terms' to familiarise people with the more technical aspects (in particular acronyms) and the need to contextualise information to make it more relevant were all suggestions put forward to help improve the scope.
- It was felt that people need to be informed that this will not involve nuclear waste disposal, and therefore scrapping use of the term 'waste' could help MOD distance itself from any associated connotations. However, this was countered by a stakeholder who felt 'if you lose it, people will say you're trying to hide it'. It was agreed that 'waste management' was more accurate than 'waste disposal'
- Using headline statistics such as 0.2% of UK National Inventory would help MOD dispel fear.

3.21 Views on accessibility of information

- Radio was suggested as a helpful medium with broader benefits than print media. It was also suggested that press releases needed to cater for all forms of media.
- Local planning authorities' notification lists for a licensed site were also considered a good starting point for the dissemination of information. MOD needs to clarify that its address data is up to date and tap into local authority resources to distribute information, i.e. via council offices and through wider community groups. It certainly shouldn't worry about 'giving out the same message two or three times'.

3.22 Do you feel you can comment openly?

- Participants generally felt that they could comment openly; aside from this, there was very little discussion on this question.

3.23 Additional discussion

How many people will be involved in the consultation events?

How will you identify stakeholder groups? What about the ones that you know, and those that asked to be informed?

What does MOD want to get out of this?

Would you choose a site because you had no adverse reactions? Does that suggest you've not done your job properly or that you've run the consultation well?

There was a fear that if MOD only receives positive responses it suggests that it hasn't allowed people to raise questions. MOD needs to consider whether this process will stand up in a judicial review.

Are you in the position to do anything in the community – a community benefits package?

MOD's articulation of a desire for stakeholder meetings was considered succinct and powerful; it would be good for it to be used as a headline opening.

Transport benefits need to be addressed in the public consultation document. It is worth issuing reminders to stakeholders due to 'festive distractions' and it would be worth considering extending the period to account for lost time over Christmas.

MOD needs to '*spell out the message that there will be minimal radioactive gas impact*'.

A local authority representative was unsure as to whether MOD needs to hold separate events for Aldermaston and Burghfield.

3.24 Post-it notes comments/questions

- Consultation database in planning online ability to connect.
- Need to be clear on long-term economic benefits in our communities.
- Engage with local planning authorities. Make use of notification lists.
- Fact sheets need to be available ASAP for local groups.

- Need to talk to the Devonport and Rosyth communities about the outgoing transport loads through their streets.

4. Penrith

The following comments and questions were noted during the breakout sessions, followed by responses and further comments made, or recorded on Post-it Notes.

4.1 Breakout Session 1- ILW Storage Site Assessment Strategy

The following comments and questions were noted during the breakout sessions, followed by responses and further comments made, or recorded on Post-it Notes.

4.2 What are your thoughts on the Screening Process?

There has been a statement by the SNP to the effect that 'Submarine waste should not be stored in Scotland'. Was this taken into account in the screening process?

- Current policy was taken into account for screening, but MOD did not take into account - at this stage - other statements that were not current policy.

Why were the dockyards not included, as these allow sea transport? Couldn't the Government enable these to be used?

- The dockyard sites are not in MOD control and the site owner chose not to make them available.

Were the naval bases considered?

- These were assessed and found not suitable.

Is there a plan to reduce the number of sites for public consultation?

- The current position is that all five sites will be included in the consultation.

Is there any scope to go back to the option of using one of the dockyard sites?

- No.

Is there an option of just sinking the submarines?

- Sea dumping regulations stopped this as an option.

Surprised that Chapelcross came through the assessment: how did Chapelcross get there?

- Screening was based on whether there are any reasons - based on the screening criteria - the site could not be used. No such reason was identified.

4.3 What are your thoughts on our assessment process as a whole?

Does the MOD have to consult by law? Or can it just do what it wants?

- MOD has to consult for the SEA. The MOD does not have to do this specific form of consultation on the site selection.

There seems to be an omission of an economic impact assessment?

- This will be included in the SEA.

In the assessment, if you don't score one site as the clear winner, could it be that a two-site option would be viable? For example, Scottish waste going to one site and English waste going to another site?

- The economics of a two-site solution did not stack up in the preliminary studies.

Why are the RPVs not cut up before transportation?

- Several reasons, including economics, and the feedback from consultation was that there should be a minimum of intrusion.
- A size reduction facility would be expensive, hence it makes sense to wait for this and not to develop one now, especially if it proves possible to dispose of the RPVs in the GDF in one piece.

The NDA have experience of moving very large loads. Would this sort of transportation be capable of being undertaken?

- Local factors will be part of individual site assessments.
- Moving loads of this weight is relatively common.

Bringing loads in by barge could make a big difference.

Technically you can do almost anything but it is the OCFs (Other Contributory Factors) that will make the difference (economics, etc). There should be some community gain for the site.

The OCFs will be what could upset the apple cart.

What weighting are you going to give to the different components in the detailed assessment process?

- It is a complicated process and there are a lot of things to consider. The details are in the documents on the web pages.

Is there a danger of weighting too heavily the things you can measure mathematically, whereas the OCFs can be much more subjective?

- Yes, that is a danger to guard against.

Dumfries & Galloway has a regeneration strategy and this project would need to fit in well with this strategy.

- This would need to be considered in the assessment.

If you do not consult properly on the OCFs then these can come back to bite you, as has been seen before.

- The approach used to assessing OCFs after public consultation last time was hugely beneficial.

There is a huge difference between these sites, so can you compare and analyse these things (the OCFs) clearly?

- It is not easy to compare such different factors but it has to be done.

If the recommended site is in England, and there is a two-tier authority, will the MOD be able to deal with the appropriate tier of authority and will MOD consider this carefully?

- Yes.

When is this classified as waste? Does the MOD retain responsibility for this?

- The MOD retains ultimate responsibility.

On the timescale, we haven't heard much that would stop any of the five sites before the June consultation. So should we expect all of these five sites for the consultation?

- Screening may result in five sites on the final shortlist, but something may come up in detailed assessment in the future which means consideration of a site would be stopped before consultation.

There is a Chapelcross SSG meeting on 6 June that the MOD could give a presentation to, if Chapelcross is still on the list.

- Yes.

Will the consultation rank the five sites

- No. But the consultation materials will set out the MOD's view on the pros and cons of each site.

4.4 What factors should drive our decision-making?

This will be a cradle to grave solution, so there are some basic requirements that need to be asked. Is it sure that the final grave will be able to accept the RPVs in their current state?

- The current assumption is that they will have to be cut up and MOD retains the responsibility for them.

In their present state are they ready for transport?

- No, they are being kept within the submarines as this is the safest place for them.

So could there be some surprises when they come out of the submarines? What if there is additional contamination?

- We don't expect any real surprises, beyond usual degradation, etc. The project assumption is that we do not expect to get a product with alpha contamination. But risk analysis is part of our studies.

The MOD should ensure that the site is able to deal with the unexpected.

Given potential transport, etc are MOD determined that there is a single site option or could a multi-site option be viable?

- Due to the cost, building a multi-site option has been ruled out as things stand.
- However, if there are current stores that are not full, potentially it could be stored across multiple sites.

In addition to transport mode, distance needs to be a factor. Is sea transport an option? Has the travel distance been put into the criteria?

- The baseline is road transport, but sea transport is not precluded.
- Main roads shouldn't be a problem. Just the local roads near to the site that may need work and these will be assessed.

This first step has to be done as there is no storage space, but what happens when you have identified storage space and then there is the potential this could slip down the priority/funding list?

- This is part of the project's risk analysis.

The thought is that we are moving to the final shortlist of the credible options now and the next stage moves you on to the preferred options. Is this correct?

- Yes.

The mention of increased security levels was a surprise. Is this right?

- Not sure yet on required security levels.

4.5 Breakout Session 2 - ILW Storage Site Assessment Strategy

4.6 General comments/questions

Could the commercial refusal of dockyards to be assessed be to do with their hope that they might end up storing the submarines for longer?

There was a discussion around the commercial decisions of the dockyards not to be involved and the possible reasons for this.

It was said that the first RPV would go into the store around 2022 and then the process would continue at about 1 per year. So when will all this be in the store?

- It would be likely to take around 27 years.

Would the store just be accepting one per year?

- It is envisaged to be about 1 per year but there may be some slight changes to this, for example in the early years during the change from demonstration to steady state.

4.7 What are your thoughts on the Screening Process?

The private sector looked at this and felt there wasn't anything in it for them, so what is in it for us, the public, with the MOD and NDA sites?

The transparency of the process is vital. The MOD need to be upfront about what was on offer during the screening process to commercial operators.

- It was just about screening out sites and nothing was on offer to them.

We have seen NDA put forward Sellafield as a possible site without consulting the local area.

There should have been some consultation so it was known what the local community would expect.

Your selection hasn't looked at proximity at all.

4.8 What are your thoughts on our assessment process as a whole?

Within the assessment process you need to look at the social and economic benefits of the sites, as this is purely about taking the waste and not going alongside other aspects of the process that could provide benefit. We previously had benefits of the whole process, not just taking the waste.

The MOD will need to be able to put up front what the local benefit will be when you go out to consultation.

The NDA has just selected a preferred bidder for the Magnox PBO role and the proposals included all the socio-economic benefits. With the SDP process there is a real conflict.

There are not many jobs with this so it has to be proven there are other benefits to the local community. The public need to be clear on the MOD position on this.

There is the element of the site owner receiving a fee for this. Will the fees be different for the various site owners?

- This is an issue for resolution.

At the stage of the final recommendation does the site get to know how much it is worth to them, as they may not want it?

- The costs of building and maintaining the site, and additional charges, will be better understood through the assessment process which is done in conjunction with site owners.

At what point is the transportation built in to the assessment? There is an impact on the community if RPVs are transported by road. Some infrastructure work may be needed.

- Statements will be made on this and on the routes for each of the sites.

The need for size reduction was discussed.

Some bridge strengthening work may be needed for road transportation. Who will pay for this?

- These costs will be considered within this project. It is not something that would be expected to be funded by others.

When will the consultation on this start, with Highways, etc?

- Engagement is part of the planning process.

Another related cost is the possibility of things like coastal erosion, hydrology, etc. Is this being considered?

- It is in the SEA.

The community perceptions of risk are quantifiable.

- Opinion survey work could be undertaken as part of the process but it is not in SDP's plans.
- In the last consultations a local authority commissioned a poll.

Will you have weightings based on the different areas, including OCFs?

- Cost and performance are combined to give a c/p ratio, then OCFs are taken into account in the decision logic.

We can see that the MOD will give different weightings to the functional objectives, OCFs, etc. The modelling of this is quite crucial. How MOD captures the relative importance of things is crucial. Can we have sight of the models to be able to comment on them and the specific way in which the information is handled? Will they be in the public domain?

- In most cases, yes.

Mileage travelled may be similar for all the sites, given that the RPVs will be coming from two sites, Devonport and Rosyth. The public perception about the impact of this transport at the site it goes to will be less than that at the originating sites, as they are already aware of such transport.

The SEA will consider local transport routes and the local arrangements in place. The MOD should put higher weightings on the impact at the dispatch end.

Sellafield is used to nuclear material moving in and out but not 100 tonne loads.

Road closures will be an issue for the receiving site area.

Who is going to be responsible for the actual build of the new buildings?

- The site licensee will be responsible for the construction process and also the planning.

Why has sea transport been excluded on the basis of additional handling?

- Sea transport is not ruled out.

Some sites may have the potential for a shared store, rather than having to build a completely new store.

- Yes.

Given that some elements cannot be measured, who will decide on it then?

- A clear recommendation will be made to the Minister who will make the final decision, on the basis of the assessment results and an overall decision logic. In terms of the OCF assessment we are not convinced this cannot be done by a statistical assessment. Could we see the research papers that have been published around the general approach to the statistical models?
- If anyone wishes to discuss this in detail, contact the project team, who will be happy to share this information.

Is there a possibility of using multiple sites, if costs were shown to be cheaper?

- The MOD sees no likely advantage in building multiple small stores.

Why not put in five planning applications now and see where each authority goes, to allow quicker selection?

Clear proposed socio-economics need to be understood and proposals made to communities, apart from regulatory planning benefits. This has to be prepared going into public consultation.

4.9 What factors should drive our decision-making?

A benefit is the reduction of risk, which could be different for each site, so should be considered. For example, it could reduce some of the radioactivity around sites.

Have you ruled out transporting it in some other way, for example by sea?

- No, this is not ruled out.

Some sites may be more difficult to access by road, for example Sellafield, and journeys to others will be longer.

- This will be considered and details will be in the public consultation.

At some stage this will be subject to scrutiny, so bear this in mind. Remember the assessment of Fukushima.

- All this will be put in the public domain.

Would the company with the site licence have to take the planning application through?

- Yes.

Some benefits may not be able to be entertained as part of the planning application process.

Apart from the taxpayer, where does the bill for all this go? What if planning is refused, who pays these costs?

- The project is funded by the MOD. Project risks will be covered by contractual arrangements.

What are the costs of this project?

- We will be as open as it is possible to be regarding this.

Will this reduce the overall costs, as the submarines are no longer having to be stored?

- Yes.

Could this process be speeded up by phasing the work? For example, by starting with

Rosyth earlier to clear out the submarines from that site and gain savings?

- The current proposal is for a phased programme.

Is this only for the MOD submarines and not for any other nuclear powered submarines?

- Yes, this is for MOD submarines only.

4.10 Breakout Session 1 - Approach to Public Consultation

4.11 Do you feel you can comment openly?

The background presentation was very valuable before doing the breakout sessions.

It is open; does not feel restricted.

Relaxed, good discussion; informal, which is positive.

Yes, but the people here have an understanding. When you go out to the public, chairing workshops will be a challenge. Make sure there is knowledge in the room.

- At the last public consultation it was well managed. The smaller the groups, the better.

The group agreed that the presentation followed by the discussion was right; there was a good balance in the structure.

4.12 What do you think of the values/principles that underpin our proposals?

This was not discussed.

4.13 What do you think of the breadth/scope of the proposed public consultation?

Statutory bodies should be consulted sooner rather than later.

Consultation needs to be national as well as local.

Use the existing forums; it is not necessary to create new ones.

Need to give detailed information on the background behind proposals and the reasoning behind why each site has been selected, as it will be a surprise for many.

Need to be aware consultation for some sites will be new to some people.

There is a need for a local engagement strategy for each site: produce individual Stakeholder Engagement Plans.

MOD needs to identify the key stakeholders at each site. You mention elected members: some local authority members are 100 miles away from the site. Using Site Stakeholder Groups (SSG) is key. On the final sites be specific on how and who you engage with. For example, at the NDA sites, e.g. at Chapelcross, communication should be via the SSG, not just elected representatives.

Some sites will involve two tiers: county council and borough council. Councillors will want to engage on different issues and it will be a challenge to 'marry' local authority needs.

Consider two types of engagement:

- 1) Local authorities/elected members – consider planning issues.
- 2) Community (via SSGs) and a wide range of local organisations – range of issues, e.g. transport.

Consultation process also needs to engage with wider statutory bodies, e.g. transport bodies.

Must factor in site trade unions.

With some issues (e.g. transport) a wide variety of communities will be affected, not just those local to the site.

It's not just local people that will be interested. Consider national interest and the wider context questions: e.g. who's waste is this?

- That's why we are doing national workshops, to get a broad representation.

Do you think two national workshops are enough?

This is ok; but you need to ensure they are well publicised, e.g. through the national media.

Make sure there is an opportunity to comment.

There is a marked difference between the amount of consultation done in EU countries. The MOD may like to learn lessons from this. There needs to be an educational element, a real desire to help people understand. Better informed debate and issues discussed in considerable depth give different attitude/better outcomes. Is there enough consultation here? It is moving in the right direction, but having a small series of discussions can be counterproductive and lead to uninformed decision making if issues are not discussed in depth.

Need proper debate.

- Clear factsheets will be produced
- We think we are being open, honest, and transparent. We need to consider taxpayers' money; the MOD has to strike a balance.

Depth is the issue; this doesn't necessarily have to be funded by the MOD.

The consultation has been going on for a long time. However, one delegate raised that for some sites/areas, it's relatively new.

Public meetings can be poorly handled; these often just 'get people's backs up'. It's easy to become defensive and justifying rather than listening and engaging. Be careful of how this is handled; it is an opportunity to listen, not promote/preach.

Often at public consultations people feel that 'no-one took any notice'; be mindful of this.

People need to feel they are being listened to.

- Comments will be tracked, and responses given.

People will need to understand it's not a consultation about a planning application; make it clear it's an option assessment.

What about community benefits? Are there any? E.g. jobs, financial benefits.

These should be considered and clearly communicated now; consider as part of this process; not just as part of the planning process.

Community benefit could drive/influence site selection. Needs to be 'on the table' before you go to public consultation.

- Social impact will be considered as part of environmental assessment, jobs, etc.

People need to understand the costs. Will you be providing this information? E.g. regarding transportation; the public will need to know if the MOD or the local authority would be funding any upgrades needed to routes.

- Responsibilities will be clear.

It's good you are looking ahead (additional storage); make it clear why you're doing it.

Why is there the requirement for extra capacity at the site? The size of storage is an issue.

Further consultation on this is required.

Need to be clear on regulation.

4.14 Views on accessibility of information

Consider digital workshops; online discussion/forum; online consultation. Physical events aren't always the best solution in geographically challenging areas.

- We are proposing two exhibitions at each site – any feedback?

Time of year is a concern – in the lead-up to Christmas.

Consider different time options, e.g. afternoons and evenings; different days of the week.

- We have an issue with fitting consultation around the Scottish referendum and national/local elections; if we leave it until later there would be a significant delay.

Questions/issues that will be raised:

- Why are you not storing at more than one site?
- Why this site?
- Is this the thin end of the wedge?
- Public health issues

- Natural disasters

You need to have a comprehensive Q&A.

Be prepared for wider comments/questions.

In depth and clear/open/honest information will be needed.

There are two types of people who will want different information: 1) technical; 2) practical.

Make it clear the 'big risk' contents have gone; this is just the casing.

Explain this process is common practice.

A community will have an emotional reaction; this needs to be understood/taken into consideration, e.g. they will be affected by what else has happened in the world.

- Public confidence is important.

4.15 What other methods could we use to deliver information?

- Digitally/online
- Local radio
- 60% of people get their news from the television; not everyone reads a local paper
- Don't under estimate local media. In some areas local papers are well read; consider taking out a supplement (e.g. four pages with feedback)
- Need to try to get fair and balanced press coverage prior to consultations; need to better manage information you are releasing
- Educate the local media
- Liaise with Sellafeld; they understand the local media and could give advice
- Use national media
 - We do use other comms teams.
 - We must liaise with each site and its site stakeholder group to understand the key local press.

People will need to be available to discuss the reports.

Need to provide the public with reference points/contacts like 'local champions' for each site if they have follow-up questions.

Diagrams are useful.

Laminated print outs available around the room.

Avoid acronyms; layman's terms.

4.16 Other Questions/Comments

Queries were raised regarding the sites and shortlist.

- MOD gave overview answers, but said this will be discussed in Breakout Session 2.

4.17 Delegate Post-It Notes

- MOD SDP Project presentation required to the Chapelcross SSG quarterly meeting on Friday 6 June 2014.
- Must factor in site trade unions
- Room format poor. People on the sides had to look around others to see the screen.

The need for an understanding of the science involved and safety of products.

Education for people who know very little about the waste – high, low or none and the dangers or not.

4.18 Breakout Session 2 - Approach to Public Consultation

4.19 Do you feel you can comment openly?

This was not discussed.

4.20 What do you think of the values/principles that underpin our proposals?

Build on previous experience; learn from previous consultations.

We (an SSG) weren't aware of the SPD until now; failure in the system.

Got to make sure you're not 'leading' people; in this morning's session it was felt we were being led.

Need to facilitate discussion well.

The presentation was quite technical; it came across as if this was more important than the workshop/discussions.

It will be difficult to control this format (workshops) with the public.

Many of the public may be antagonistic.

Waste is politicised; you will get polarised debate when you do local events.

You need to be better at giving feedback throughout the process; otherwise it's just an information gathering exercise.

Give responses to the questions raised.

4.21 What do you think of the breadth/scope of the proposed public consultation?

Make sure there isn't a gap between now and the formal public consultation; don't go quiet.

You will need to have a well-informed audience. Share information with people in this room.

Be open and available

- We will liaise with those at each site, including the SSGs and local authorities, and give briefings, updates, meetings.

- Who should we consult with?
 - Local authorities
 - SSGs
 - Trade unions
 - Other economic regeneration agencies, who may not be statutory consultees
 - Local Enterprise Partnerships; may have a different view to local authorities; consult with them
 - In Scotland local authorities have consultation engagement criteria; check that you meet these
 - Cumbria Centre of Nuclear Excellence

The DECC model of consultation on Geo Disposal was cited as a very in-depth programme that went on for three years, and this approach was not recommended. Others agreed.

This is the first time I've heard this being linked to the GDF. In which case you can take Sellafield off the shortlist. You're making a direct link between the two.

- It is a store until we get to the final disposal site.

You need to make this clear.

- How?

Don't link the two: store and GDF.

Speak to the National Grid, about how they are managing consultation.

People will be cynical and draw conclusions.

Regarding process. There is lots of consultation with lots of parties. I note a report will be published at the end; isn't this a bit thin? You are heavy on upfront process, but thin on feedback. There needs to be a process on how comments have been taken into account throughout; live dialogue, 360 degree, rather than 180 degree.

Give ongoing feedback.

I don't recall any other consultation; as far as I'm aware this has been the first one.

How did local authorities feed into past consultation? This must have been high level, not local level.

- When previous consultation was undertaken, the sites hadn't been selected, so we couldn't 'go local'. MOD representatives then spoke about the other consultations and site selections.

You need to consider lessons to be learnt. The public aren't as informed; the information needs to be easy to understand. You will need to outline how sites were selected.

Consultation must be site specific, not generic.

- We will provide fact sheets (overview) through to full reports. Process at previous consultations was described.

Need to clearly explain the community benefits and dis-benefits.

Social and economic benefits must be 'over and above site essentials'.

The public often want to discuss the wider issues, so be prepared for this.

When is the planning date for public consultation?

- We plan to start in December.

Concern raised about consulting over Christmas.

Be aware SEPA has an application in to dispose of LLW, so will also be consulting on submarine waste.

There is a proposed consultation on grid connections around that time too.

4.22 Views on accessibility of information

The press usually attend SSG meetings, which brings issues to local attention. It's an opportunity to get your message in the paper/out there.

You need to provide pre-information prior to the consultations, so people are up to speed.

- What else can be done to publicise the consultation and provide information?

Fife and Plymouth Councils were cited, which have Advisory Groups who meet regularly, and were therefore 'ready for it' when it came to public consultation.

Make sure the audience is aware what has previously been discussed; educate people on the journey so far, so you can maximise the consultation.

Don't be afraid to give technical information, if required.

Make layman's comparisons; give context, e.g. dose of radioactivity is similar to xyz.

Have experts to hand at consultations.

4.23 Other Questions/Comments

Is it a store or a waste disposal site? This will determine whether a planning application goes to the county or district council.

- It's an interim store.

Will the RPV be going into the GDF in bits, or intact?

- MOD talked about the GDF and gave a technical overview of the baseline assumptions and opportunities.

Chapelcross SGG requested the MOD gives a presentation at its 6 June 2014 meeting.

West Cumbria SSG also require a presentation at meetings.

- MOD will contact SSGs at all of the sites to offer presentations at forthcoming meetings.

Local authorities may also then want separate/additional briefings.

5.0 Summary

MOD SDP will consider all comments received at and following the workshops. In particular, the following key themes have been noted and will be addressed before and at the Public and Stakeholder Engagement programme which will take place in late 2014/early 2015.

Transport

- Information on routes for loads
- Consultation with authorities/communities en route
- Possibility of sea transport
- Consultation with Rosyth and Plymouth authorities and communities for outgoing loads

Planning

- Clarity needed on the basis of the planning submission (ie. storage as opposed to disposal): relevance of Local Waste Plans
- Question of jurisdiction with two-tier authorities

Community Benefits

- What will be available for communities hosting the store?
- This needs to be made clear upfront at the PSE - could affect site selection

Screening

- Clarity needed over possibility of screening out sites before PSE
- Need to take account of LAs' own strategies, eg re regeneration
- Local benefits should be taken into account
- Make available background information used to prepare the OCF assessment

Sites

- Can licensed boundaries be extended?
- Demarcation between site owners and managers
- Need for extra capacity needs explanation/consultation

PSE

- Is cost an issue in determining appropriate degree of consultation?
- MOD should work closely with LAs, PCs, SSGs re exhibition timings, venues, etc and use of existing channels/forums
- Local engagement strategy for each site
- National as well as local consultation
- Consider digital consultation where sites are in remote areas
- Be aware of neighbouring LAs
- Brief MPs, cllrs, ward members, SSGs in advance
- Work with special interest groups, all sectors of the community, trade unions
- Work with local media (press and radio)
- Provide sufficient background information in advance - many people at sites not familiar with previous consultation
- Use plain English and provide glossary
- Prepare fact sheets well in advance
- Listen to people - give feedback on how comments have been taken into account
- Be aware of Christmas holiday period - possible need for extra events
- Consider other consultations taking place
- Maintain flow of information between workshops and PSE to avoid vacuum