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ISM

SUBMARINE DISMANTLING PROJECT

Intermediate Level Waste Storage Site Selection: Approach to Public & Stakeholder Engagement

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Amendment History

Issue	Date	Details of Amendment	DCCF
1.0 (draft)	August 2013	New document based on discussion paper SDP: LLW Storage Site Selection - Approach to PSE (Issue 0.5, April 2013).	
1.0	February 2014	Updated for release as part of pre-engagement.	
2.0	June 2014	Updated to reflect Pre-engagement and other stakeholder input.	
2.1	September 2014	Minor editorial changes and changes made for consistency with the SEA..	

Distribution

SDP Virtual Team
SDP Scrutiny Meeting Members
SDP Advisory Subgroup Members
SDP Consultation web pages (as PDF)

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1. Introduction

1.1. Scope

- 1.1.1. This report outlines the Submarine Dismantling Project's (SDP) proposed approach to Public & Stakeholder Engagement (PSE) during those parts of its decision making process concerned with the selection of an interim storage site for the Intermediate Level radioactive Waste (ILW) arising during dismantling, which SDP assumes is limited to the defuelled Reactor Pressure Vessels (RPVs).
- 1.1.2. It summarises the SDP's PSE objectives and previous consultation programmes before setting out the proposals for the next phase.
- 1.1.3. Its main target audience is SDP project team members and other organisations involved in project delivery but it will also be circulated for information and comment to external stakeholders and the wider public. It should be read in conjunction with the project Approach to Decision Making document, which describes the SDP context and the proposed Storage Site selection process as a whole.
- 1.1.4. Acronyms and key references are listed in Annexes A and B respectively.

1.2. This Issue

- 1.2.1. The main changes in Issue 2.0 of this report were improvements to the text and strategy suggested by stakeholders during Pre-engagement, including clarification of the background to SDP's consultation principles. Issue 2.1 adds a small number of editorial and other detailed changes made mainly for consistency with the SEA.
- 1.2.2. The body of the report was written before screening started and therefore remains in the future tense.

1.3. PSE Objectives

- 1.3.1. The approach to PSE set out in this strategy paper is intended to meet stakeholder and community needs for information and engagement whilst providing MOD with the factual input and insights into different views and perspectives that it needs to make its decisions. Its objectives are to provide stakeholders and wider communities with:
- The information they need to understand the project, the options, the decision making process, and MOD's proposals.
 - The opportunity and the information they need to engage with the project and inform MOD's decision making process.
- 1.3.2. The principles underpinning MOD's PSE programmes set out in previous consultation documents still apply. These commit the SDP team to:
- Being genuine, as open as practicable, fair and inclusive;
 - Delivering a 'proportionate' PSE programme;
 - Building on, and sharing, previous experience; and
 - Complying with regulatory and MOD procedural requirements.
- 1.3.3. The aim is to be consistent with Government guidance on good practice¹ and build on the experience of previous SDP consultation procedures, continuing to achieve high standards of stakeholder and public engagement whilst at the same time maintaining focus and avoiding unnecessary complication.
- 1.3.4. In designing its PSE programme, SDP has also referenced other sources of information on best practice, including the SAFEGROUNDS good practice on local stakeholder involvement² developed to support the engagement of nuclear site communities in option assessments (though originally in the contaminated land context).
- 1.3.5. The SAFEGROUNDS guidance emphasises the importance of proportionality, by which it means that the level of engagement should reflect the significance of the issues and the level of interest or concern in the community. SDP has followed its advice, that project sponsors can achieve value for money by building in pre-engagement with key stakeholders to develop appropriately focussed public engagement programmes.
- 1.3.6. The guidance also emphasises the need for project teams to consider the demands placed on consultation participants and other stakeholders who will be committing their time and energy to helping (often in their own time) achieve an outcome that is both technically sound and deliverable in practice.
- 1.3.7. In the SDP context, it will be important to keep a focus during PSE on the decision that needs to be made (i.e. the selection of the storage site) but it will be necessary to bear in mind and respect the fact that local communities and other stakeholders may link issues and decisions in ways that the MOD does not. They may also want to comment on issues that do not form part of the SDP project team remit.

¹ See <https://www.gov.uk/government/publications/consultation-principles-guidance>

² SAFEGROUNDS: Community Stakeholder Involvement. CIRIA, 2011.

2. Previous PSE Initiatives

2.1. Pre-SDP Engagement

2.1.1. There were two major public consultations associated with SDP's predecessor, the project for the Interim Storage of Laid-Up Submarines (ISOLUS). Between 2001 and 2004, two consultation exercises were conducted: the 'Front End Consultation' (FEC) and the 'Consultation on ISOLUS Outline Proposals' (CIOP).

- The FEC explored factors that members of the public and other stakeholders believed should be taken into account when developing a solution for submarine initial dismantling.
- The CIOP then considered proposals put forward by four industry groups to meet the project's requirements.

2.1.2. In each case, consultation was followed by the publication of a post-consultation report summarising the comments received. After the post-consultation analysis was complete, the MOD published a Response to Consultation report which explained how the comments had been taken into account and what the MOD's position now was.

2.2. SDP Engagement on Initial Dismantling

2.2.1. Since the project was re-named as the SDP, there has been one major public consultation with associated pre-engagement and follow-up engagement activities.

- There was a period of pre-engagement in 2010 to 2011 on decision making and PSE plans. A site screening paper was placed in the public domain and a rolling programme of briefings was started for local authorities, elected representatives, and nuclear site local liaison committees/site stakeholder groups. The SDP also consulted Statutory Consultees on the proposed scope of the Strategic Environmental Assessment (SEA).
- The main Submarine Dismantling Consultation (SDC) ran from October 2011 to February 2012. It included: a consultation document and supporting information; 'road show' events and workshops for communities in and around candidate sites; two national stakeholder workshops; and online comment.
- Follow-up discussions were held with stakeholders following these activities. Some stakeholders were also involved in the post-consultation option assessment through the use of alternative weightings in the sensitivity analysis, though this was part of the assessment process and not part of the PSE programme.

2.2.2. The MOD published all SDC responses on the internet unless otherwise requested. It recorded each response in a database and coded them for detailed processing and analysis. The MOD released the SDC Post-Consultation Report in July 2012.

2.2.3. A further series of briefings for stakeholders followed the announcement of the first round of decisions and the release of the SDC Response to Consultation report in March 2013. These briefings explained how the SDC affected the MOD's decision making and what the next steps would be. This was not specifically identified as a PSE programme, though in practice it was managed as one.

2.3. Future Engagement at Initial Dismantling Sites

- 2.3.1. Stakeholder engagement on initial dismantling approach and initial dismantling sites did not end with the announcement of the MOD's decision. Although they will be led by the initial dismantling contractor / site licensee rather than the MOD, the subsequent planning and permitting processes will provide further opportunities to comment upon any site-specific proposals.
- 2.3.2. There is also a requirement to make a submission to Office for Nuclear Regulation (ONR) under the Environmental Impact Assessment for Decommissioning Regulations (EIADR).
- 2.3.3. ONR's Guidance³ explains that the preparation of the EIADR should be a collaborative exercise including stakeholder input. There will be considerable overlap with work already done on the SEA and its associated engagement, so the aim will be to avoid duplication and ensure consistency of approach.
- 2.3.4. There may also be engagement in respect of ship recycling. Details have yet to be agreed but anything associated with planning or permitting will be the responsibility of the ship recycler rather than the MOD.

3. ILW Site Selection PSE Overview

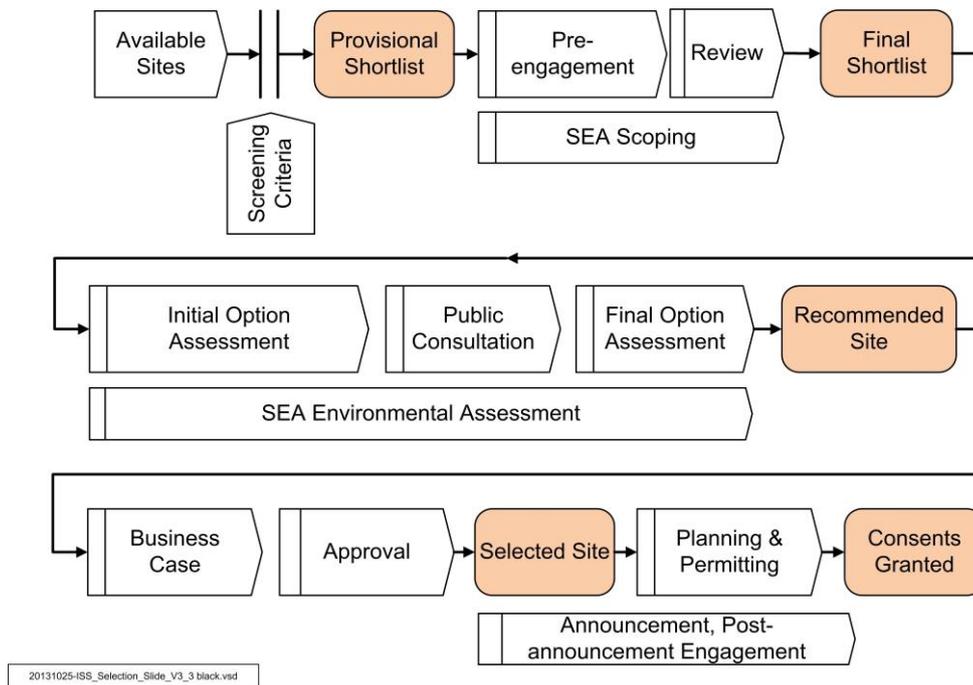
3.1. Context within Storage Site Decision Making Process

- 3.1.1. Stakeholder engagement is an ongoing activity, but there are three points in the programme where more structured PSE with a broader scope is envisaged in relation to Storage Site selection. This section explains how these activities integrate with decision making. Subsequent sections then provide more detailed information on each of them in turn.
- 3.1.2. The main elements of the Storage Site decision making process are:
 - Confirmation of an Storage Site Shortlist based on updated screening criteria;
 - Detailed option assessment to then identify a specific recommended Storage Site; and
 - Submission to the MOD's Investment Approvals Committee of a Business Case Review Note (BCRN) containing the recommendation.
- 3.1.3. There are PSE activities associated with each of these, shown on Figure 1 below. The timescales quoted below are indicative only and may be subject to significant change e.g. depending on overlaps with the Scottish Referendum.
 - **Pre-engagement:** the first phase comprises a nominal month of pre-engagement with local authorities and other stakeholders on screening, future PSE plans, and SEA scope (spring 2014).
 - **Public consultation:** the second phase is the main 12 week public consultation, to review and comment on the evidence base and preliminary information from the detailed option assessment (autumn 2014/15).

³ Available at <http://www.hse.gov.uk/nuclear/eiadrguidance.pdf>

- **Post-approval:** the last phase encompasses a range of engagement and feedback activities following approval and announcement of the Storage Site decision (expected 2015/16).

3.1.4. Dialogue involving site owners, local communities and other stakeholders will be necessary on a site-by-site basis throughout the assessment phase, not just during formal PSE periods. Early engagement with planning authorities is also anticipated. Care must, however, be taken to ensure that all interested parties or bodies are afforded comparable opportunities to comment upon, and shape, the decision making process.



3.1.5.

Figure 1: Storage Site Decision Making Process

3.2. Responsibilities

- 3.2.1. Any consultation activities around specific sites will be jointly-sponsored and plans will be developed in liaison with the site owner. Consultations will have to recognise existing engagement frameworks and draw on site owners' and site licensees' understanding of stakeholder needs and preferences.
- 3.2.2. The currently assumed responsibilities for PSE design and delivery are as follows:
- Pre-engagement will be mainly delivered by the SDP project team;
 - Public consultation will be managed by the SDP project team and will involve team members and MOD experts in a variety of roles. Planning and delivery will also require significant specialist contractor support;
 - Post-approval feedback will be delivered by the SDP project team.

4. Pre-engagement

4.1. Context

- 4.1.1. A screening report was placed in the public domain at the equivalent stage before the Submarine Dismantling Consultation (SDC), and stakeholders have expressed a desire for this approach to be followed again. There is also a regulatory requirement to consult statutory authorities on the SEA scope which will include the shortlist. As a result, the shortlist will be made public.

4.2. Objectives

- 4.2.1. Pre-engagement gives stakeholders and the wider public an early opportunity to understand how the process is developing. It also gives them a chance to help shape the site comparison studies and the main public consultation.
- 4.2.2. The MOD also wants to take this opportunity to set out any provisional conclusions concerning sites that are not being taken forward for detailed assessment because they are either unavailable or unsuitable for an ILW store.
- 4.2.3. The MOD will therefore publish reports at the start of pre-engagement summarising the results of the ILW site selection process to date and setting out its initial plans for public and stakeholder engagement and site assessment. Local and national stakeholders will be invited to comment on their contents (see 4.4.5 below). Members of the wider public are also welcome to contribute.
- 4.2.4. The final shortlist and SEA scope will be confirmed once pre-engagement feedback and the results from ongoing analysis have been considered.

4.3. Programme

4.3.1. Pre-engagement activities and durations will be confirmed in due course, but the table below illustrates a possible distribution of effort and activities.

Pre-engagement event / activity	Sequence
Key documents complete & approved for release	T-2 weeks
Pre-engagement starts	T+0
Documents released, website live	T+0
Stakeholder briefings / Pre-engagement stakeholder meetings	T+1 to 6 weeks
SEA Statutory Consultees workshop(s) if required	T+2 to 6 weeks
Pre-engagement ends	Sometime after T+7 weeks (tbd)

Table 1: Pre-engagement Programme

4.4. Activities & Documents

4.4.1. Pre-engagement will be managed as a separate and time-limited engagement opportunity. It will comprise a minimum of one month pre-engagement activities with local authorities and other stakeholders and the wider public.

4.4.2. Table 1 illustrates a typical programme for a seven-week period to take account of the possibility that it spans a holiday period but in practice Pre-engagement will not actually be 'hard closed' until the project team is ready to confirm the final shortlist.

4.4.3. A summary of activities and key documents is given below; the details are at Annex C.

Activities

4.4.4. Current assumptions are that the main engagement activities will include the following:

- Place the key documents on the project web pages;
- Write to Leaders and Chief Executives of potentially affected local authorities;
- Notify via email all the organisations and individuals on the project stakeholder database;
- Offer briefings and updates to elected representatives, local authorities, and local liaison / site stakeholder groups;
- Two Pre-engagement stakeholder meetings focussed on future assessment and PSE plans;
- SEA 'Statutory Consultees' workshop(s), if there is sufficient demand.

Key Documents

- 4.4.5. Current assumptions are that the key documents to be published as part of Pre-engagement will be:
- Approach to Decision Making – an overview of the decision process for selection of an ILW storage site;
 - Criteria & Screening Report (CSR) – a description of the work done to date on ILW storage site screening;
 - Strategic Environmental Assessment (SEA) Scoping Report – the proposed scope for updating the SDP's Strategic Environmental Assessment, which will be issued to the relevant UK Statutory Bodies and Devolved Administrations for comment;
 - Approach to Public and Stakeholder Engagement – the current document – an overview of how the MOD intends to engage the public and stakeholders as part of its decision making process.

4.5. Reporting

- 4.5.1. A summary of comments received will be published on the SDP web pages when Pre-engagement is complete. Previously published reports will be reviewed and reissued as appropriate.
- 4.5.2. The final SEA scope will be set out in the updated SEA Environmental Report issued in support of the main public consultation.

5. Public Consultation

5.1. Context

- 5.1.1. The public consultation will be the main engagement opportunity during the storage site selection process. The aim is to consult stakeholders and the wider public in order to:
- Inform them about progress since the last consultation;
 - Ask for their views on screening and the shortlist, the benefits and impacts of the different options, and the proposed approach to completing the analysis;
 - Identify any other issues or concerns that might influence the MOD's decisions;
 - Seek the views of stakeholders and the wider public on the environmental effects of the proposals, set out in the SEA Environmental Report.
- 5.1.2. The previous public consultation sought views on the MOD's proposed choice of dismantling approach and site, and type of storage site. On that occasion, the Consultation Document provided information on the options and their performance against the assessment criteria. It also set out the provisional decision logic.

- 5.1.3. However, for the storage site selection, no proposal on the specific storage site can be made until after public consultation is complete. This is because the SDP team will not be in a position to make a proposal until stakeholder and wider public views are better understood. In particular, the ‘Other Contributory Factors’ (OCF) analysis depends on consultation input and may have a significant influence on the decision. The Consultation Document will therefore set out the options and information on sites, but will not identify a recommended site.

5.2. Public Consultation Programme

- 5.2.1. Public consultation activities and durations will be confirmed in due course, but the table below illustrates a possible distribution of effort and activities.

Public consultation event / activity	Sequence
Formal stakeholder and public notification	T-4 weeks
Key documents completed and approved for release	T-2 weeks
Consultation starts	T+0
Consultation Document released, website live	T+0
‘Road show’ events	T+ 2-4 and 6-8 weeks
National stakeholder event(s)	T+5 weeks
Storage Site Consultation ends	Sometime after T+12 weeks (tbd)

Table 2: Public Consultation programme

- 5.2.2. A summary of activities and key documents is given below; the details are in Annex D.

5.3. Activities & Documents

- 5.3.1. Public consultation is expected to run for a minimum of twelve weeks, extended if necessary to allow for holiday periods and to give time to run events at all the sites.
- 5.3.2. Dismantling activities and sites no longer have to be included and the team can build on previous PSE experience. In this respect, stakeholder and public consultation activities may be more focussed than the SDC equivalent. However, there are new challenges. For instance, the project will be engaging communities (who may have had no prior contact with SDP) at multiple potential storage sites, whereas for the SDC there were just the two initial dismantling sites under consideration.
- 5.3.3. The scale and design of the engagement will have to be consistent across sites and convey equivalent information but must also be appropriate to different types of site owner and stakeholders. Existing arrangements and approaches may therefore be a constraint under some circumstances.

Activities

- 5.3.4. The details of the public consultation programme will be developed in due course with input from stakeholders and the wider public during Pre-engagement and from the MOD's specialist contractors. However, for planning purposes the SDP is working on the basis that it will be modelled around similar activities to those undertaken in the SDC, including:
- Place the key documents on the project web pages;
 - Write to Leaders and Chief Executives of potentially affected local authorities;
 - Notify via email all the organisations and individuals on the project database;
 - Offer briefings and updates to elected representatives, local authorities, and local liaison / site stakeholder groups;
 - Draft a consultation document plus factsheets and supporting technical information;
 - Run open public exhibitions and workshops near each shortlisted site;
 - Run additional workshop(s) targeted at national-level stakeholders;
 - Deliver oral or written updates to local liaison / site stakeholder groups;
 - Send out newsletters and individual invitations to participate;
 - Set up dedicated web pages to provide access to supporting technical information and event details;
 - Engagement with local media and press releases;
 - Complete post-consultation analysis of comments.

Key Documents

- 5.3.5. Current assumptions are that the key documents will be as follows. Details are provided at Annex D.
- The Consultation Document
 - The Supporting Information Document
 - The updated SEA Environmental Report
- 5.3.6. The Supporting Information Document (SID) will summarise the available information on the options in more detail than the Consultation Document, including on issues of potential concern to the public such as expected level of radioactive discharges.
- 5.3.7. Factsheets will be available, covering specific topics from the Consultation Document.

5.4. Post Consultation Report

- 5.4.1. Public consultation concludes with the issue of the Storage Site Post-Consultation Report in electronic and hardcopy formats. This summarises the consultation process and inputs gathered.

5.5. Evaluation

- 5.5.1. As with the SDC, the project team will seek feedback after the consultation period on the running of the consultation and its various events. The team will ask for feedback from those who provided responses to the public consultation, from SDP Advisory sub-group members and from other stakeholders. This will allow the SDP team to evaluate its effectiveness and improve future PSE programmes. Where relevant, lessons learned from this evaluation will be shared across the MOD and wider Government.

6. Post-Approval Feedback

- 6.1.1. After the initial dismantling announcement, a Response to Consultation report was issued explaining how public consultation had influenced the MOD's decision making and what the next steps would be. An SEA Post Adoption Report explained how the findings of the SEA were reflected in the decision. Their release was accompanied by face to face stakeholder briefings and a communications programme to inform consultation participants of the outcome.
- 6.1.2. These initiatives were well received and so something similar is envisaged after the storage site announcement is made. A Response to Consultation report and an SEA Post Adoption Report will be issued and there will again be a programme of briefings.
- 6.1.3. The Post-Consultation and Response to Consultation Reports will be written for public domain release but published in the SDP project document format. This is in line with practice in other Government Department / Agency consultations.

7. Ongoing Stakeholder Engagement

7.1. Overview

- 7.1.1. The SDP's engagement activities are underpinned by an ongoing programme of background work that provides information to stakeholders and potentially affected communities, and captures their concerns and other views. This will continue through the storage site selection phase and will include the following:
- Project team liaison with local authorities and stakeholder groups associated with potentially affected communities;
 - Ongoing work with project advisory and stakeholder groups;
 - Liaison with Government departments and regulators;
 - Provision of news and information to registered stakeholders;
 - Media liaison.
- 7.1.2. As with previous phases, background engagement will be carried out in collaboration with site owners and operators where appropriate.

7.2. Local Communities

- 7.2.1. The communities most involved in the process so far have been the initial dismantling sites i.e. Plymouth and Rosyth and their neighbouring areas. In the current phase of decision making, a wider range of communities and local authorities will become involved as individual potential ILW storage sites are identified and assessed.
- 7.2.2. A rolling programme of briefings started with the announcement in March 2013 of the initial dismantling sites. It will continue until after the announcement of the storage site and the completion of post-approval feedback. The target audiences include local authorities, elected representatives, and local stakeholder groups.
- 7.2.3. The existing Devonport and/or Rosyth LLCs have been important focal points for engaging local stakeholders on the initial dismantling activity. A wider range of stakeholders around candidate ILW storage sites will now be engaged through their existing stakeholder groups. The SDP recognises that membership of stakeholder groups varies and stakeholder groups do not necessarily involve all of the important stakeholder constituencies.
- 7.2.4. The views of these local bodies will be supplemented by the wider perspectives of the members of local government associations participating through the project's national level advisory bodies and networks (see below).
- 7.2.5. A separate communications plan will ensure that contact is maintained with the media (in particular, media local to shortlisted sites) and that they have the information they need to report on the programme, thus helping keep communities informed. This will be a key channel for dissemination of SDP proposals and progress to the public.
- 7.2.6. Separate arrangements are also required to inform and engage MOD internal stakeholders and (through site owners and operators) staff at shortlisted non-MOD sites.

7.3. Project Advisory Bodies

- 7.3.1. An SDP project Advisory Group (AG) was set up with specialist SEA and Engagement Subgroups in 2007 to offer constructive challenge and advice to the project team. Membership was drawn from industry, local government, academia and campaign groups etc. It made a big contribution to the success of the SDC in particular, and has supported the development of the forthcoming equivalent.
- 7.3.2. The AG continues to monitor the process but is not due to meet again, except on an extraordinary basis, until the Storage Site Selection process is complete. In the meantime, the specialist sub-groups have been combined and, operating under a non-disclosure agreement, continue to provide constructive challenge and expert advice on decision making and stakeholder engagement processes. Observers from the combined sub-group will continue to be invited to key MOD workshops and meetings and will provide feedback to the wider AG.

7.4. Other Government Departments & Regulators

- 7.4.1. There has been regular liaison with NDA and its sponsoring departments throughout the development of the decision making and PSE processes and this would increase in the event that any NDA sites are shortlisted.
- 7.4.2. More generally, the SDP team works closely with other Government Departments and with the Devolved Administrations through routine meetings and telephone conferences arranged according to the programme need.
- 7.4.3. The SDP also engages with its regulators through a Regulatory Interface Forum to ensure that all regulators are fully briefed on the project and a common view is reached on both regulatory jurisdiction and the application of regulation to the project's plans and activities.

7.5. Associated Communications Activities

- 7.5.1. The PSE programme is focussed on providing information about the decision making process to communities and other stakeholders and seeking their input. The storage site selection project is only one aspect of the wider SDP and there may be a variety of communication activities linked to other aspects.

7.6. Additional Sources of Information

- 7.6.1. Individuals or organisations have been able to register their interest in receiving project updates/newsletters and event invitations. This will continue. Stakeholders may also contact the project team directly at any time, whether or not there are any formal PSE activities running.
- 7.6.2. The SDP content on the MOD's web site will provide information on the project itself and the approach to decision making, as well as previous rounds of PSE⁴. It will also have links to supporting documentation for ongoing or forthcoming PSE programmes. Other Government web pages provide guidance on the process for making a formal request for information held by the MOD under the Freedom of Information Act and Environmental Information Regulations.

8. Planning & Permitting

- 8.1.1. Following site selection, there will be further opportunities for consultation and engagement led by the chosen contractor / site licensee as part of the planning process. These will relate to site specific proposals within Town & Country planning applications and regulatory applications.

⁴ The SDC equivalent is still available, at <https://www.gov.uk/government/consultations/consultation-on-the-submarine-dismantling-project>

Annex A: Abbreviations

AG	Advisory Group
BCRN	Business Case Review Note
CIOP	Consultation on ISOLUS Outline proposals
CSR	Criteria and Screening Report
DE&S	Defence Equipment and Support
EA	Environment Agency
EIADR	Environmental Impact Assessment of Decommissioning Regulations
FEC	(ISOLUS) Front End Consultation
ILW	Intermediate Level (radioactive) Waste
ISOLUS	Interim Storage of Laid-Up Submarines
MOD	Ministry of Defence
NDA	Nuclear Decommissioning Authority
OASP	Operational Analysis Supporting Paper
OCF	Other Contributory Factors (analysis)
ONR	Office for Nuclear Regulation
PSE	Public & Stakeholder Engagement
RIF	Regulatory Interface Forum
RPV	Reactor Pressure Vessel
SDC	Submarine Dismantling Consultation
SDP	Submarine Dismantling Project
SEA	Strategic Environmental Assessment
SEPA	Scottish Environment Protection Agency
SID	(Option Assessment) Supplementary Information Document

Annex B: Key References

Title	Originator	Version	Date
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SDP: (SDC) Consultation Document <i>Public Consultation Document supporting the 2011 Submarine Dismantling Consultation.</i>	MOD/ISM	Issue 1.0	October 2011
SDP: Strategic Environmental Assessment (SEA): Environmental Report <i>Report of potential environmental impacts. Includes Non-Technical Summary.</i>	MOD/ISM	Issue 1.0	October 2011
SDP: (SDC) Post Consultation Report <i>Follow up to 2011 Submarine Dismantling Consultation summarising the comments made.</i>	MOD/ISM	Issue 1.0	July 2012
SDP: (SDC) MOD's Response to Consultation <i>Follow up to 2011 Submarine Dismantling Consultation, setting out MOD's decisions and how consultation had influenced them.</i>	MOD/ISM	Issue 1.0	March 2013
SDP: ILW Storage Site Selection: Approach to Decision Making <i>Overview of the ILW storage site decision making process.</i>	MOD/ISM	Issue 2.0	June 2014

Annex C: Pre-engagement Activities & Documents

1. Plans for public consultation activities will continue to develop and change but this Annex provides more detail on current thinking.

Introduction

2. Good practice, as understood by the MOD and confirmed by stakeholders, is that a period of pre-engagement should be scheduled before the main option assessment and public consultation starts. This is to allow input into framing (i.e. what questions the assessment should ask about the shortlisted sites), and to get a better idea of how communities and other stakeholders should be involved and what sort of events and information people would find most useful.
3. Pre-engagement will give stakeholders an early opportunity to understand how the process for site selection is developing and - by attending briefings or commenting on project documents - to help shape the site comparison studies and the main public consultation.
4. At the same time, the MOD will set out any provisional conclusions reached concerning sites that are not being taken forward for detailed assessment because they are either unavailable or unsuitable for hosting the SDP ILW store.
5. In parallel, the draft Updated Scoping Report for the forthcoming Strategic Environmental Assessment (SEA) will be issued to statutory consultees and will also be available for comment by other stakeholders and the wider public.
6. Considering the wider SDP programme, it is possible that storage site Pre-engagement may overlap with PSE associated with initial dismantling regulatory applications. This will require careful coordination - since PSE on these regulatory applications will be led by Babcock, the ONR and the EA/SEPA, rather than SDP. There may, however, be opportunities for synergy e.g. through joint briefings to stakeholders.

Activities

Stakeholder Briefings

7. The project team will offer briefings to elected representatives, local authorities and site stakeholder groups associated with shortlisted sites. Other requests for briefings will be fulfilled where practicable.
8. Resources are limited, so where possible briefings will be combined. The Pre-engagement period will be extended if more time is needed to deliver all briefings.

Pre-engagement Meetings

9. There will also be two 'national' level Pre-engagement meetings organised and led by the MOD's SDP project team with contractor support. A broad range of perspectives is desirable so members of the project Advisory Group and Subgroup will be invited, along with representatives of site stakeholder groups and local authorities associated with shortlisted sites.
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10. The focus will be on planning the public consultation programme. These are not consultation events, and no stakeholder should feel significantly disadvantaged in subsequently arguing their case if they do not attend.
11. Independent facilitation and reporting is preferred, on the grounds of transparency and best use of project team resources.
12. Based on the SDC model, the workshops might run from mid-morning to late afternoon (although facilities might be available earlier for those who want to preview materials, and later for those wishing to continue informal discussions). The opening plenary session will include the welcome and introduction to the day and an overview of the project and consultation process. Participants will then be divided into groups to address key topics in rotation.

SEA Scoping Workshops

13. If there is sufficient demand, there will also be one or two workshops on the draft updated SEA scope for statutory consultees, organised and led by the MOD's SEA team.

Key Documents

14. The key reports for Pre-engagement are:
 - Approach to Decision Making – an overview of the decision process for selection of an ILW storage site;
 - Criteria & Screening Report (CSR) – a description of the work done to date on ILW storage site screening;
 - Strategic Environmental Assessment (SEA) Scoping Report – the proposed scope for updating the SDP's Strategic Environmental Assessment, which has been issued to the relevant UK Statutory Bodies and Devolved Administrations for comment; and,
 - Approach to Public and Stakeholder Engagement – the current document - an overview of how the MOD intends to engage the public and stakeholders as part of its decision making process.
15. All Pre-engagement documents will be available as electronic 'pdf' files, but printed copies (included in large text format) and some alternative electronic file formats will be available on request.
16. The Screening Data Report, which underpins the CSR, will not be released. This is because it contains commercial and other confidential information from site owners.

Comments Received

17. The MOD's experience is that during Pre-engagement, when there is a focus on process design, the stakeholders likely to be most involved are local authorities and government bodies or agencies, local liaison / site stakeholder groups, and community groups.
 18. The MOD will be asking particularly for comments on its screening and PSE processes, but it is also likely that there will be comments relating to the merits of particular sites and whether they should or should not be on the shortlist.
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19. If the comments relate to the screening process or the decisions made to date, the SDP team will assess them at the end of the comment period. If the comments cannot be addressed until more detailed analysis has been carried out, or if they relate to wider technical or socio-technical aspects of radioactive waste, they will only be considered when the relevant analysis starts. For reporting purposes, these latter comments will be added to those received during the main ILW storage site consultation period.
 20. No comments will be discarded as being 'out of scope' during either Pre-engagement or the main public consultation, though some may have to be forwarded to other parts of the MOD for consideration.
 21. A summary of comments will be posted on the web (subject to the respondent's approval) as soon as practicable after Pre-engagement finishes and feedback will be given to stakeholders on any emerging themes.
 22. The processes and data bases used for handling comments will be 'live' in time for pre-engagement, to test them in advance of the main consultation and to facilitate the handling of pre-engagement comments.
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Annex D: Public Consultation Activities & Documents

1. Plans for public consultation activities will continue to develop and change but this Annex provides more detail on current thinking.

Activities

Notification

2. Notification typically takes place about one month before the start of the public consultation and is the first formal step in the consultation process.
3. All stakeholders identified in the project's database will be notified of the dates and arrangements for the consultation events, and encouraged to participate. The website will be updated in the run up to and throughout consultation period. Email updates will be sent to those who registered to be kept up-to-date via the website, and a press release will be issued with information about the consultation plans. The arrangements for specific events will also be advertised separately.
4. Local elected representatives (including Members of Parliament, Members of the Scottish Parliament and elected local authority members) will be notified at the start of the consultation period.

Stakeholder Briefings

5. The project team will subsequently offer briefings to elected representatives, local authorities and site stakeholder groups associated with shortlisted sites. Other requests for briefings will be fulfilled where practicable. Resources are limited, so where possible briefings will be combined.

Local Public Exhibitions

6. Public exhibitions will be held at venues convenient for the communities associated with shortlisted storage sites. The venues will be selected taking into account accessibility to local residents and availability of public transport links.
 7. In addition to the exhibition, a range of hardcopy literature (including the Consultation Document and associated factsheets) will be available to take away. MOD staff, including members of the project team, will be present to listen to feedback, answer questions, and discuss any concerns. Feedback forms will be provided for visitors to complete.
 8. The exhibitions will each be advertised in local newspapers two weeks in advance.
 9. All events will be open to everyone, but the SDP team will specifically invite those local registered stakeholders and other potentially interested people and organisations known to team. These will include elected representatives, strategic partnership / initiative member organisations, trade unions, parish councils, local special interest groups and community networks.
 10. Letters will also be sent to residents in streets close to the candidate sites two weeks prior to the local exhibitions, informing them of the consultation arrangements.
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'Third Party' Events

11. Local authorities have the power to scrutinise proposals that may affect their area, potentially including special hearings (although the formal process differs in England and Scotland). The MOD will cooperate with any local authorities that initiate such a scrutiny process.
12. Local authorities may also choose to organise their own events or an opinion survey, as Fife Council did during the previous SDP consultation. The MOD will support them to the extent that it is practical to do so.

Contact Information

13. Contact information for the project team (to make enquiries, register for events or request hardcopies of documents) and the FREEPOST address for submitting comments will be widely publicised.

Local Workshops

14. Facilitated workshops proved very useful during the SDC and were highly rated by both participants and project team members. If it proves practical and there is sufficient demand, the exhibitions will therefore be supplemented in each location by a number of workshops to engage members of the public with the consultation questions and allow them to explore, more fully, any areas of interest or concern.
15. The workshop format will be developed in due course, but may be based on those conducted during the SDC:
 - Workshops lasted up to 1.5 hours, constituting introductory presentations followed by a facilitated discussion / question session which could focus on one or more specific topics according to participants' interests. Members of the SDP team were present at these workshops to take questions and inform discussion. Breakpoints were built into the format so that people were free to join a workshop, participate in the discussions for as long as they wanted to, and then leave as they wished.
 - Participants were enrolled on the SDC workshops prior to and during the exhibition days. The workshops were advertised in local newspapers, as part of the exhibition invitation letter, and at the exhibitions. Registration in advance was encouraged but registration on the day was accommodated if there was space available.

National Workshops

16. Two facilitated workshops (held in Glasgow and Birmingham) were included in the SDC to allow key issues to be discussed in detail from a national perspective. These were open to all stakeholders and members of the wider public but were aimed at those who had a strategic or specialist interest in the project.
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17. If there are equivalent Storage Site national workshops, the format will be developed in due course but may be based on those conducted during the SDC:
- The national workshops ran from 11am to 4pm (although facilities were available earlier for those who wanted to preview materials, and later for those wishing to continue informal discussions). The opening plenary session included the welcome and introduction to the day and an overview of the project and consultation process. Participants were then divided up into groups to address each of four key topics in rotation.
 - The national workshops were open to anyone who wished to participate but prior registration was required to ensure venue capacity was not exceeded. If demand had exceeded capacity, the SDP team would have sought to accommodate it so that all interested parties had the opportunity for face to face discussion.
 - The national workshops were advertised within the consultation materials, on the website and at consultation events. The project team also extended direct invitations to appropriate individuals / groups.

Local Site Liaison / Stakeholder Groups

18. Local liaison / site stakeholder groups do not represent the whole of the community but are an important vehicle for two way communication between the SDP team and local stakeholders. Working closely with site owners and licensees, the SDP team will seek these groups' input into the design of the public consultation and will try to include them in briefings and workshop sessions where they express an interest.

Employee Communications

19. Established internal communications arrangements will be used to inform staff at MOD sites of the plans for consultation and to encourage them to participate. These include staff newsletters, intranet announcements and management briefings. The information provided will be identical to that available more widely and there will be no preferential access to the consultation.
20. Information for employees at potentially affected non-MOD sites will be provided by site owners through their own communications routes. The SDP team will, however, supply materials or briefings on request.

Key Documents

Consultation Document

21. The Consultation Document, its key questions and supporting material will be the focus of the consultation. While all comments will be welcomed, participants will be encouraged to submit them in a way that can be directly related to the document and its questions. This will help the SDP team to collate the comments it receives and apply them to its further analysis of the options.
22. The Consultation Document will provide sufficient information and explanation for non-experts to understand the project, the decision making process and the options being considered. Hard copies will be available at public consultation events both locally and nationally and it will be available to download from the SDP web pages. Copies will also be sent to libraries and council offices close to candidate sites.
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23. Taking into account comments on the SDC equivalent, feedback forms will be simplified and, if it proves practicable and cost-effective, will be available online.

Supporting Information

24. A provisional Operational Assessment Supporting Paper (OASP) was released to support the SDC, containing the provisional option assessment results and drawing provisional conclusions about the preferred option. For the reasons already described in the main text, this time it will probably not be possible to draw robust conclusions in advance of public consultation so there will be no provisional OASP.
25. One or more Supporting Information Documents (SID) will therefore be published summarising available technical or process information in more detail than the Consultation Document.
26. One of the lessons from the SDC was that the volume of information and the number of different documents meant stakeholders found it hard to find the information they were looking for, notably on health and safety and environmental impacts. For this public consultation, therefore, the SID concept has been developed and fewer, better focussed, supplementary documents will be produced. The SEA will contain information on radioactive emissions and discharges. Particular attention will be paid to the overall information structure and better use will be made in the Consultation Document of links references to on-line resources.
27. All documents and materials for the public should be clear and concise but at the date of publication of this PSE document, it is considered that only the Consultation Document and factsheets need be considered for publication in anything other than project report format.
28. All public consultation documents will be available as electronic 'pdf' files, but printed copies and some alternative electronic file formats will be available on request.

Factsheets

29. The SDC factsheets will be updated and new ones prepared to provide more detail or an introduction to key technical questions where required.

SEA Environmental Report

30. Following Statutory Consultation in parallel with pre-engagement, the scope of the SEA will be updated and the Environmental Assessment stage will begin. The findings of the Environmental Assessment stage will be documented in the SEA Environmental Report which will be a key supporting document for public consultation.

Comments Received

31. The approach to the collation and analysis of comments is currently assumed to be based on the SDC model. As the consultation process proceeds, comments and questions will be captured, acknowledged, recorded in a structured database, and fed into the project team for assessment. They will be tagged by origin, topic/perspective, and relevant option assessment area.
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32. Comments via electronic media will be encouraged for ease and accuracy of processing but verbal or written comments will also be welcome.
 33. Subject to the respondent's approval, comments will be posted in batches on the project web pages, probably collated by question number or topic area to maximise the value to other participants.
 34. Many comments will not necessitate a response beyond the original acknowledgement. For those that do, a link will be provided to the appropriate document or an online 'Q&A', or an individual response will be prepared. This will be undertaken as soon as practicable after receipt and these responses will be tracked to enable performance to be monitored.
 35. Reports will be produced from all of the events held and, subject to agreement from the participants, will be published on the website.
 36. Any comments received after the closing date for the consultation will, if practicable, be considered by the project team.
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