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1 Introduction

This report has been prepared by the Technical Review Group (TRG) to inform the Partnership's assessment of a judgement against criterion 5 in its work programme¹.

Criterion 5 is: whether the Partnership is confident that the siting process is sufficiently robust and flexible to meet their² needs.

The work programme lists five items as 'what we are looking for' in order to be able to make that judgement:

- a) Acceptable process of moving from 'possibly suitable areas' to specific potential host sites
- b) Provision for 'pause points' to allow more work to be undertaken at a potential Community Siting Partnership's request (CSP)
- c) Acceptable nature of (and limitations to) the Right of Withdrawal (RoW)
- d) Acceptable CSP process can be defined
- e) Acceptable degree of Government commitment to sustain the process

The report covers:

- Work completed
- Commentary on the issues
- Conclusions and recommendations
- Annexes A and B

Annex A addresses items 'a' and 'd' of 'what we are looking for' and reflects the outcome of the Partnership seminar on the siting process on 6 June. Annex B contains a written clarification from DECC about item 'c' (RoW).

2 Work completed

The most substantive Partnership work on criterion 5 has been on the overall framework for the next stage of the siting process (Stage 4, 'desk-based studies') and on associated principles for community involvement.

This work is most relevant to 'a' above (areas to potential sites) and includes:

¹ 'Work Programme for MRWS Partnership 2010/11', Document 13.1

² 'Their' is interpreted to refer to the current Partnership.

- Preliminary consideration of NDA proposals for Stage 4 (Docs 56 and 58)
- PSE1 identifies issues to take into account (Doc 61)
- Preparation of Doc 75 with preliminary suggestions for local options for stage 4 and potential principles for community involvement
- Partnership discussion of early drafts of Doc 75, with particular emphasis on principle 6 (Docs 82 and 93)
- Doc 75 published, with potential principles for community involvement agreed as suitable basis for discussion in PSE2
- PSE2 outputs on siting process and principles (eg Doc 132 and PSE2 Report, Doc 157)
- The Partnership seminar on 6 June (see Annex A to this report)

On 'b' ('pause points'), no specific work has been done to develop thinking about formal 'pause points'. Instead, the issue has been subsumed under Doc 75's proposals for process robustness, including sufficient opportunity for issues and concerns to be addressed.

Consideration of 'c' (RoW) has included:

- Verbal assurances from DECC, with reference to the June 2008 MRWS White Paper (WP) (DECC briefing note Doc 81, and Docs 38 and 58)
- Scepticism in PSE1 that Government will honour the WP commitments to RoW (Doc 61)
- A clarification from DECC with regard to RoW (see Annex B, which was initially published as Appendix 3, Document 139).

Consideration of 'd' (CSP process) has included:

- Partnership acknowledgement that there could be more than one CSP if a DtP is taken (Doc 82).
- Doc 75 references to various CSP Stage 4 tasks and a principle about membership flexibility (to accommodate representatives from potential host communities and wider local interests as identified).
- Steering Group agreement that a 'lessons learned' document should be prepared, based on a review of operation of the existing Partnership from the independent evaluator, Wood Holmes.
- The Partnership seminar on 6 June (see Annex A to this report).

On 'e' (Government commitment):

- Despite the severity of public spending cuts, funding for the GDF programme has been largely preserved.
- The Steering Group has taken the view that there are no additional reassurances that they can realistically ask from DECC at this stage in the process. They note: (a) the process has cross-party support in central government; (b) the continued commitment to the principle of voluntarism and the right of withdrawal as set out in the White Paper; and (c) the continued funding provision for the Partnership's work. The Steering Group believes that the additional reassurances that are

required lie in the specific agreements being sought with DECC about Inventory and Community Benefit principles (which will be reported in separate Partnership Assessment Reports).

3 Commentary

On the overall framework and principles for Stage 4, and what we are looking for point 'a' (areas to potential sites), the TRG wishes to highlight that:

- The issues involved in potential approaches to Stage 4 are critical, complex and difficult.
- There is a strong ethical dimension relating to the fairness of the siting process.
- Discussions within the Partnership on drafts of Document 75 demonstrated a range of views about the roles of potential host communities³. Principle 6 (“only move to site specific investigations if there is credible local support”) was initially a sticking point, but consensus was developed around a suitable wording for discussion in PSE2.
- The Partnership has acknowledged that more thinking needs to be done around integration of proposals for Stage 4 with spatial planning requirements.
- The siting process was a major topic in PSE2. Gosforth and Ponsonby Parish Councils expressed strong concerns that the proposals in Document 75 are not consistent with the voluntarism approach (see Annex A, Section 2). CALC agrees that changes are required.
- There is an expectation that the Government framework for Stage 4 will be sufficiently flexible to allow an approach appropriate to West Cumbria to be developed. The Government will be consulting on Stage 4 proposals in July/August.

Finding an appropriate way forward in the context of such a range of issues represents a considerable challenge. The TRG suggests that the Partnership should strive for a constructive, deliberative and consensus-building approach to developing its thinking on a way forward. This would help increase the prospects that a fair, robust and workable siting process can be developed, and minimise the risks of dispute between Partnership members.

On ‘what we are looking for’ point ‘a’, Annex A to this report sets out TRG proposals for identifying an acceptable process for moving from ‘possibly suitable areas’ to ‘potential site areas’ (see Annex A Sections 4, 5, and 6). These proposals reflect the outcome of the Partnership seminar on 6 June and address:

- the meaning of voluntarism in Stage 4
- principles for community involvement and
- steps in the initial identification of potential site areas and potential host communities.

³ This report uses the definitions of the three ‘levels of community’ as set out in the MRWS White Paper of June 2008, Box 6, p48 (decision making bodies, host communities and wider local interests). For potential host communities, this is “The community in which any facility will be built can be termed the ‘Host Community’. The ‘Host Community’ will be a small geographically defined area, and include the population of that area and the owners of the land. For example, it could be a town or a village.”

The TRG considers that these proposals provide the basis for developing an acceptable process for moving from possibly suitable areas to specific potential host sites.

On 'b' (pause points), the TRG believes that there is no need for the provision of *formal* pause points in the siting process. This is because the siting process is based on voluntarism and rights of withdrawal. The TRG also notes the Partnership's direct experience of pressing a 'pause button' in the current process and that 'pause points' have not been highlighted as a point of significant concern in PSE.

On 'c' (RoW), the TRG believes that the verbal assurances and written clarification from DECC are adequate. In particular, the clarification from DECC in Annex B confirms that the RoW would be available to DMBs up to the end of Stage 5 (surface investigations).

On 'd' (CSP process), Section 7 in Annex A to this report sets out high level proposals for the organisational arrangements for taking a siting process forward. Although these high level proposals could provide the basis for developing acceptable organisational arrangements, the Partnership seminar on 6 June indicated that further discussion is required to develop more detailed proposals.

On 'e' (Government commitment), TRG endorses the Steering Group's view that there are no additional reassurances that can realistically be asked of DECC at this stage.

4 Conclusions and Recommendations

TRG recommends that the Partnership:

- 1) endorses the meaning of voluntarism in Stage 4 as expressed in the second perspective in Section 4 of Annex A;
- 2) adopts the revised principles for community involvement as set out in Section 5 of Annex A;
- 3) endorses the early steps in the identification of potential sites areas and potential host communities as set out in Section 6 of Annex A; and
- 4) agrees that the organisational arrangements established immediately after any DtP should not initially be called a CSP, and that further discussion is required to develop thinking on those arrangements based on the factors identified in Section 7 of Annex A.

Overall, subject to further discussion on the organisational arrangements that would be established after any DtP, the TRG concludes that the Partnership should be confident that the siting process is likely to be sufficiently robust and flexible to meet its needs. It therefore also recommends that the Partnership:

5) endorses this overall conclusion.

ANNEX A: THE INITIAL IDENTIFICATION OF POTENTIAL SITE AREAS, INVOLVEMENT OF POTENTIAL HOST COMMUNITIES AND ORGANISATIONAL ARRANGEMENTS FOR TAKING THE PROCESS FORWARD

1 Introduction

This annex is based on a TRG paper that was considered at the Partnership seminar on 6 June. The annex reflects the outcome of the discussion at the seminar.

The annex focuses on two key 'what we are looking for' points from the work programme. These are:

- an acceptable process of moving from 'possibly suitable areas' to specific potential host sites
- an acceptable 'Community Siting Partnership' (CSP) process can be defined.

In order to address these points, the annex covers the following:

Section 2	The siting process and PSE2 findings
Section 3	A reminder about Stage 4 and the nature of potential site areas
Section 4	The meaning of voluntarism in Stage 4
Section 5	Revised principles for community involvement
Section 6	Steps in the initial identification of potential site areas and potential host communities
Section 7	Organisational arrangements for taking the siting process forward
Section 8	Summary

2 The Siting Process and PSE2 Findings

Various discussions in PSE2 focused on the draft principles for community involvement proposed in Document 75. These draft principles were that all parties in the siting process will:

- 1) Ensure that there is a timely and effective process for identifying and involving potential affected communities, including potential host communities
- 2) Ensure that the membership of the CSP is sufficiently flexible to accommodate representatives of affected communities as they are identified
- 3) Strive for a constructive, deliberative and consensual process, with an emphasis on effective communication, engagement, joint working, respect for divergent views and reasoned weighing of evidence and arguments
- 4) Draw on local knowledge and expertise in timely and effective ways
- 5) Secure the most equitable collective outcome for host communities, DMBs and wider local interests, including the distribution of benefits
- 6) Only move to site specific investigations if there is credible local support
- 7) Respect the final decisions of DMBs

In the main, participants in PSE2 appeared content with these principles. It should be noted that very little comment was made on Principle 6, which could be taken to indicate that the Partnership's strenuous efforts to find an appropriate, consensual, form of words, has resulted in a Principle that most people feel comfortable with.

The highlights from PSE2 were:

- the suggestion that the principles should address the need for community empowerment, ownership of the process and decision-making power;
- that the definition of community should be broader than that based simply on geographical boundaries;
- the desire for a clear understanding of how the siting process would work in practice, including clarity about who the decision-makers are; and
- identification of a series of factors that might be taken into account in moving forward with a siting process (for example, additional screening criteria).

The major challenges in PSE2 came not on the principles, but on the options for initial identification of potential site areas and host communities, and on the form of post-DtP organisational arrangements. These challenges were made by representatives of Gosforth and Ponsonby Parish Councils (G&PPCs) at a meeting with a Partnership member.

In particular, Doc 75 states that early tasks in Stage 4 to narrow down potential areas and generate a preliminary long list of potential sites might include:

- a CSP working group using a limited number of additional screening criteria (*for example* exclusion of areas of high population density, environmental assets and nationally designated landscape areas); and
- a CSP working group reviewing existing site allocations in Local Development Frameworks and the Minerals and Waste Development Framework.

Representatives of G&PPCs interpreted potential approaches built on these bullets as top-down approaches that would be imposed on potential host communities, thereby contravening the principle of voluntarism. Although this was not the intention (as demonstrated by the Principles, particularly Principle 6), this interpretation strongly suggests there is a need for greater clarity about the nature of such approaches.

Representatives of G&PPCs also make the point that a post-DtP body cannot rightly be called a 'Community Siting Partnership' (CSP) until representatives of potential host communities are members, alongside the DMBs and wider local interests. They argue that this view reflects the White Paper's three pronged definition of community.

Proposals that address these points are set out below.

3 A Reminder about Stage 4 and the Nature of 'Potential Site Areas'

If Decisions to Participate (DtP) are taken, the siting process would move into Stage 4, which Government calls 'Desk Based Studies in Participating Areas'. Stage 4 is seen as having two main aspects:

- identifying potential site areas
- assessing potential site areas

The purpose of assessment would be to enable decisions to be taken about which potential site areas will be carried forward to Stage 5, involving surface based investigations.

The Government is shortly to publish a consultation document on proposals for a national framework for Stage 4. The Government will stress that the process for identifying potential site areas must be structured, evidence based and open and transparent. It will highlight that the framework for identifying potential site areas is intended to be flexible, so that participating communities can develop an appropriate local process.

In thinking about what a local process would look like, it is also important to take into account that:

- a potential site area will be a combination of a surface site and a volume of host rock for the underground facilities;
- surface and underground facilities could be separated by a considerable distance (NDA's current planning assumption is around 10km distance between surface and underground facilities⁴);
- although it should be possible to identify potentially preferred rock types in a participating area in Stage 4, it is very unlikely that the level of available geological data would be sufficient to accurately determine where the underground facility might be located;
- even in Stage 5 (surface based investigations) areas of about 10 square kilometres under which the GDF could be built would be being considered.

These features provide an added level of complexity. In particular, they mean that:

- surface facilities could be sited in areas screened out by the high level geological screening exercise undertaken by BGS; and
- desk-based studies in Stage 4 are likely to focus on relatively large geological volumes, rather than specific underground sites.

For Stage 4, it is therefore likely to be necessary to think about *groups of potential host communities* for the surface and underground facilities across relatively large potential 'site areas', rather than in terms of a single, specific, potential host community sitting above a specific underground site.

The implications of these points are discussed further below.

4 The Meaning of 'Voluntarism' in Stage 4

If a DtP is taken by the Principal Authorities at the end of Stage 3, then those authorities will have volunteered West Cumbria to participate in the next stage of the MRWS process. A key question that then arises is how should the concept of 'voluntarism' be applied during the identification of potential site areas and the involvement of potential host communities in Stage 4?

One perspective is that a general invitation to participate should be issued to local communities, thereby allowing specific potential host communities to take their own initiative to put themselves forward for consideration. In this interpretation, the body that does the inviting does not identify, approach or encourage any specific potential host communities to put themselves forward.

In its simplest form, however, this approach is not integrated with spatial planning requirements, nor does it take account of the possibility of identifying volumes of potentially preferred rock types. It might also be incompatible with the Government's anticipated requirement for a structured and evidence based approach. Furthermore, it is likely that many local communities would not feel they have the information and understanding of the process that would enable them to step forward. There are therefore major doubts that it would produce a robust and workable process.

⁴ NDA has provided a statement on separation distance which explains the nature of the planning assumption, how it has been calculated, how flexible it is and how the assumption should be used in planning (Doc 169, April 2011). The statement explains that the 10km figure is not a maximum distance and could potentially be extended. It states that during the identification of potential site areas the separation distance will be considered but should not be regarded as a limiting factor.

A second perspective is that the key aspect of 'voluntarism' is that potential host communities should give their consent, or express their willingness, to participate in the siting process. In this perspective, whoever carries the process forward after a DtP would actively seek interested communities willing to enter into discussions (including approaching specific potential host communities), but specific steps would have to be taken at an appropriate time to establish that the communities concerned do actually consent or are willing to participate in the process.

This perspective on the key aspect of 'voluntarism' is consistent with, but builds upon, the principles discussed in PSE2 with their reference to only moving forward if there is credible local support. It is intended to complement and inform the decision-making role of the DMBs.

Participants in the 6 June Partnership seminar were broadly comfortable with the second perspective, recognising that its application in practice should be guided by the principles for community involvement (see next section) and involve the sorts of early steps set out in Section 6 below. Participants also made the point that its application in practice might vary as appropriate to different administrative or geographic areas.

5 Revised Principles for Community Involvement

Based on the output from PSE2 and discussion at the seminar, the following revised principles for community involvement are proposed:

- 1) Ensure that the siting process is developed in a way that inspires confidence and engenders a sense of ownership of the process on the part of potential host communities and wider local interests⁵.
- 2) Ensure that there is sufficient time, resources and an effective process for identifying, involving and empowering potential host communities and wider local interests.
- 3) Ensure that organisational arrangements after any decision to participate are sufficiently flexible to effectively involve representatives of potential host communities and wider local interests as they are identified.
- 4) Strive for a constructive, deliberative and consensual process, with an emphasis on effective communication, engagement, joint working, respect for divergent views and reasoned weighing of evidence and arguments.
- 5) Draw on appropriate specialist knowledge, including local knowledge and expertise in timely and effective ways.
- 6) Secure the most equitable collective outcome for host communities, DMBs and wider local interests, including the distribution of benefits.
- 7) Only move to site specific investigations if there is credible local support.
- 8) Respect the final decisions of DMBs.

⁵ Again, the terms 'host communities' and 'wider local interests' are as defined in the MRWS White Paper, June 2008, Box 6, p48.

The outstanding comment from PSE2 about the principles concerns the need for clarity in decision-making powers. This is implicit in principles 7 and 8, and explicit in Section 7 below.

6 Steps in the Initial Identification of Potential Site Areas and Potential Host Communities

Although it would be inappropriate for the current Partnership to develop a detailed approach to Stage 4 in its entirety, it does need to be able to reach a judgement about whether it is confident that the siting process will be sufficiently robust and flexible. Central to this is whether the Partnership will be able to feel confident that Stage 4 of the siting process would set off on the right footing, which is the focus of this section of the paper.

If it is assumed that a DtP is taken and that the DMBs establish organisational arrangements (the 'local body/bodies'⁶) to take the process forward in West Cumbria (see next section for further suggestions about these arrangements), then proposals for early steps are set out below. These early steps are based on the second perspective on voluntarism set out in Section 4.

The proposed early steps are that:

- a) the 'local body/ies' would review how the Government Stage 4 framework should be applied in West Cumbria, taking into account the principles for community involvement recommended by the current Partnership, including the need for an approach that is based on the consent/willingness to participate of potential host communities and that is integrated with spatial planning requirements;
- b) in order to engender wider ownership of the process, the development of the process for identifying potential site areas would involve local community representatives (that involvement should come from membership of the body/bodies and through wider engagement⁷);
- c) development of the process would need to take account of the Government's framework, including using a combination of national and local criteria to identify potential surface sites and potentially suitable host rocks in parallel⁸;
- d) application of the process would inevitably require specialist input, including from NDA (on geology, engineering and safety issues), local authority officers (on the application of local planning policies), the regulators and independent experts;
- e) working together, the NDA, the local body/ies and specialists would apply the process to develop a preliminary picture of potentially suitable surface areas and host rock volumes;
- f) the local body/bodies would then engage directly with potential host communities (which could involve quite a large number) to: explain the process that has been

⁶ If decisions to participate are taken for the areas of Copeland and Allerdale, it would in principle be possible to set up a body for each of the administrative areas.

⁷ Although initially no specific potential host communities will have been identified, representatives of potentially interested Parish Councils could be invited to participate in the body/bodies or in these specific discussions on a 'without commitment' basis. At this step, it is anticipated that the body/ies would need to give preliminary consideration to how potential host communities and wider local interests will be identified – see Doc 75, section 6, for preliminary suggestions.

⁸ The national criteria are set out in the MRWS White Paper (geological setting, impact on people, potential impact on the natural environment and landscape, effect on local socio-economic conditions, transport and infrastructure and cost, timing and ease of implementation). It is anticipated that local criteria will include those derived from local planning policies and from PSE 2 feedback. It may be appropriate to adopt a tiered assessment process, for example, a pass/fail screening based on key local criteria to rule out areas at a high level, followed by more detailed use of the national and other local criteria.

undertaken up to that point; explain the proposed principles for community involvement; and identify how the process might be taken forward to more detailed desk-based studies, including the who, when and how of seeking potential host community consent to participation in the process.

Within the Government's framework, subsequent steps would depend on the outcome of discussion with potential host communities. Initially, potential host communities could participate in the siting process on a 'without commitment' basis. This would be with a view to using an appropriate method to establish whether there is consent for participation in later steps, for example, if their site area is proposed for detailed desk-based study, or for surface based investigations in Stage 5. Prior to applying an appropriate method, it would be important that there had been full opportunity to develop good understanding of the principles of involvement and how they could be applied, and of the pros and cons of participation in the siting process. Ultimately, it is recognised that consent for participation may not be given by some potential host communities.

Assuming initial participation from a range of potential host communities, it is envisaged that the next steps would involve high level review of the preliminary picture of potentially suitable surface areas and host rock volumes, using national and local criteria. Taking into account the output of this review, it is envisaged that the local body/ies would make appropriate recommendations to the DMBs about the potential site areas to carry forward to more detailed desk-based studies and assessment⁹.

In accordance with Principle 2, it would be necessary for there to be sufficient time and resources (through appropriate engagement packages) for the steps above to be undertaken.

7 The Organisational Arrangements for Taking the Siting Process Forward

The point has been made that a post-DtP body should not be called a 'Community Siting Partnership' (CSP) until representatives of potential host communities are members, alongside the DMBs and wider local interests. This view reflects the White Paper's three pronged definition of community. In recognition of this point, the TRG proposes that the organisational arrangements established immediately after a DtP should be of a form appropriate to the steps involved in identifying potential site areas for detailed desk-based studies and should not initially be called a CSP. Once potential host communities have become involved and participants agree that it would be appropriate, the organisational arrangements could evolve into a CSP (or CSPs), as envisaged in the White Paper.

Taking into account discussion at the 6 June seminar, TRG proposes that appropriate organisational arrangements should be based on the following factors:

- they should facilitate the achievement of the principles for community involvement (particularly Principle 1, ensuring that the siting process is developed in a way that

⁹ Document 75 suggests a series of criteria for reaching judgements about whether to recommend proceeding with detailed desk-based studies and multi-criteria assessment. These include that: the assessment process for identifying site areas for desk-based studies is robust; there are no grounds for screening out any of the site areas recommended for desk-based studies; potentially affected communities have been properly engaged in the process; there will be an adequate process for developing benefit packages, alongside the desk-based studies; future steps in the siting process provide sufficient opportunity for any other outstanding issues and concerns to be addressed; and that any recommendation is credible in the light of the views of potential host communities. Note also that the Government consultation document on Stage 4 will contain proposals for the way in which the desk-based assessment of potential site areas should be undertaken.

inspires confidence and engenders a sense of ownership of the process on the part of potential host communities and wider local interests);

- they should take into account the main findings of the Wood Holmes evaluation, including the strength of having an independent body, the appointment of independent facilitators, the need to address the role of a Chair, and the need to address barriers to participation (WH Interim Evaluation Report, April 2011); and
- they would need to fulfil a number of key functions, including (a) political accountability and strategic decision making, (b) coordination and integration of technical work and community engagement (including operational decisions), and (c) engagement of potential host communities and wider local interests.

The 6 June seminar discussed a number of organisational options that might meet these factors, including developing the current Partnership structure, or creating new arrangements involving a siting board, a coordination group and a siting advisory forum.

Differences of view were expressed about:

- whether to combine the functions of political accountability/strategic decision making on the one hand, and coordination and operational decision-making on the other, in one coordinating body, or in a separate board and coordination group; and
- the pros and cons of having an 'independent chair' or a chair appointed from within the organisation.

Further discussion is required to develop thinking on organisational arrangements, taking into account the factors identified above.

In accordance with the White Paper, it is assumed that, whatever organisational arrangements would be put in place, the DMBs will take the major local decisions at key decision points within the siting process. It is also assumed that these decisions would be based on the advice and recommendations from the local body/ies established after any DtP and that they would respect any potential host community decisions about participation.

8 Summary

Proposals are made in this annex for:

- the meaning of voluntarism in Stage 4 of the siting process (section 4);
- principles for community involvement (section 5);
- steps in the initial identification of potential site areas and potential host communities (section 6); and
- organisational arrangements for taking the siting process forward (section 7).

Based on discussion at the 6 June seminar, the TRG considers that these proposals offer potential to:

- provide the basis for a clear and understandable way forward, including local decision-making
- appropriately address the concerns raised in PSE2
- provide the basis for a fair approach
- provide the basis for building a consensual approach between DMBs and potential host communities (including Parish Councils)
- be sufficiently integrated with spatial planning requirements
- provide the basis for a robust, flexible and workable way forward.

ANNEX B: DECC CLARIFICATION OF RIGHT OF WITHDRAWAL

(Initially published as Appendix 3, Partnership Meeting Report, 19 January 2011, Doc 139)

In response to our action to 'Provide clarification on the exact stage at which the final opportunity to exercise a Right of Withdrawal exists' over and above the verbal response provided on the day that this is at the end of stage 5 (Surface Investigation) please find below a fuller description of the position.

'The 2008 White Paper Managing Radioactive Waste Safely: A Framework for implementing geological disposal describes the right of Withdrawal as follows:

Right of Withdrawal – The Right of Withdrawal (RoW) is an important part of the voluntarism approach intended to contribute to the development and maintenance of community confidence. Up until a late stage, when underground operations and construction are due to begin if a community wished to withdraw then its involvement in the process would stop. As with other key local decisions in the siting process, the Decision Making Body will be responsible for exercising the RoW, based on advice and recommendations from the local Community Siting Partnership. All parties in a Partnership would be expected to work positively to seek to avoid the need to exercise the RoW.

Paragraphs 7.19 and 7.20 of the White Paper then describe in more detail the final opportunity for the community to exercise this right of withdrawal at the end of Surface Investigations (MRWS Stage 5). In these sections Government proposes that once the detailed assessments have been completed following surface investigation that they be reviewed, as at the previous stage, and that then:

- The Community Siting Partnership would make recommendations to its local Decision Making Bodies about whether to proceed to the next stage of the site selection process.
- The Decision Making Bodies would decide whether they wish to proceed to the next stage of the site selection process.
- Government would make an informed decision on a preferred site.

Because subsequent stages of the process are specific to one site and involve very significant expenditure, the decision to proceed at this stage would be **the final opportunity** for a community to withdraw. This would also be the point at which any final agreement should be reached on the scope of any Benefits Package. Although the community would have given its final consent for development to proceed, the continuing process of disposal facility development would still be subject to regulatory approval with appropriate hold-points, as described earlier, and would be discontinued if the necessary regulatory approvals could not be obtained. Provision is contained within the relevant regulatory processes for public body notification and opportunity for Community Siting Partnerships to influence development proposals.'