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Introduction

This report has been prepared by the Technical Review Group (TRG) to inform the Partnership's assessment of progress against Criterion 1 in the work programme.

1 Criterion 1

This criterion concerns the issues of Safety, Security, Environment and Planning.

2 What we are looking for (as stated in the Work Programme)

Criterion 1a - This criterion seeks to determine whether the Partnership is "*satisfied that suitable regulatory and planning processes are in place or being developed to protect residents, workforce and the environment*". Specifically the Partnership stated that it was looking for:

- Confidence that necessary regulatory bodies and processes exist or are being developed
- Adequate communication links between regulators and community are present and working
- Acceptability of the planning aspects of the early stages in the siting process – (*TRG advises that in view of the uncertainties associated with developments in the planning system it is more appropriate to make a judgement against the wording of Task 1a (iii) Understand the context and role of the planning system in the process and any uncertainties associated*)

Criterion 1b - This criterion seeks to determine whether the Partnership is "*satisfied that the Radioactive Waste Management Directorate (RWMD) of the Nuclear Decommissioning Authority (NDA) has suitable capability and processes in place to protect residents, workforce and the environment*". Specifically the Partnership stated that it was looking for:

- Acceptability of the NDA's process for making a safety case
- Acceptability of the NDA's research programme

3 Work completed

The following work has been undertaken in consideration of this criterion:

Criterion 1a

Regulatory Bodies and Processes

- Presentation and subsequent note by the NDA (Doc 27) in Oct 2009 on the potential impacts of implementing geological disposal. This makes reference to the use of

Strategic Environmental Assessments and Environmental Impact Assessments to identify potential effects which are listed along with potential mitigations

- The Environment Agency (EA)/Nuclear Installations Inspectorate (NII)/Department for Transport (DfT) informed the Partnership in October 2009 (Doc 28 para 2.7) that they are supporting the development of NDA RWMD into an 'implementing organisation' for geological disposal. The first step involves RWMD demonstrating to regulators that as a prospective Site Licence Company (SLC) it will be capable of applying for necessary permits to allow it to develop a Geological Disposal Facility (GDF), with the robust organizational arrangements necessary to deliver the programme of work. RWMD is aiming to be ready by March 2012 to become a wholly owned subsidiary capable of becoming a SLC. Although full SLC status will not need to be achieved until the beginning of Stage 6 when the site licence itself would be required, RWMD will need to hold an Environmental Permit in Stage 5 (to undertake surface-based characterisation).
- Presentation and paper (Doc 36 Jan 2010) produced by EA, Health and Safety Executive (HSE), (which includes within its Nuclear Directorate the NII), and DfT on the roles and responsibilities of the regulators. Paper and subsequent discussion also covered;
 - o Regulatory frameworks in place and/or being developed including early engagement and formal permissioning and a proposed staged regulation process introduced as part of the Environmental Permitting Regulations in April 2010. This involves interaction between the land use planning regime, nuclear site licensing and staged regulation
 - o which regulator is responsible for which activity within the overall process with a description of the individual elements of the process
 - o expectations of the regulators
 - o when regulators get involved and how they can exert influence
 - o how community and stakeholders can influence the regulatory process
 - o independence of regulators
 - o resources available to regulators – now and in the future – capacity AND capability
 - o differences in regulators roles now at Sellafield and at a potential GDF
 - o the regulation of the transport of radioactive materials
- Issues highlighted through PSE 1 (see Annex 2) around safety, security, environment and planning and responses of the Partnership, including requesting a paper from Office for Civil Nuclear Security (OCNS) on security processes that would apply to a GDF.
- Presentation by members of CORWM on their original recommendations and options for geological disposal including the EA's views on geological disposal and subsequent Q and A discussion (Doc 120).
- Discussions between the EA and CALC (Doc 126) of the resources available to the EA in terms of structure and expertise including availability of technical skills, filling of potential skill gaps and planning for the future.
- EA's on-going scrutiny of the NDA RWMD's work on geological disposal and mechanisms for on-going engagement with RWMD. EA publishes an annual report (latest for 2009-10 published in Oct 2010) which summarises the Agency's work in scrutinising the NDA's work in relation to geological disposal. It is noted that such a report in future will cover the scrutiny activities of **all** regulators.

- Requests for specific specialist input from respondents to PSE 2 (Feb 2011)
- Doc 36 was updated by regulators as Doc 36.1 in March 2011 to include;
 - o A new section on the role and broad processes of OCNS to support the Partnership response to PSE 1 which requested more information on the security processes that would relate to a GDF.
 - o A new section covering regulatory resources and planning for future needs
 - o More information about the regulation of transport – provided as a formal response to discussions in Partnership meetings
 - o Other updates such as the announcement on the formation of the ONR and the granting of powers for staged regulation to the EA.
- Consideration at the 14th April Partnership (Meeting Report is Doc 165) of the NWAA Issues Register and Rock Solid report, and the regulators' joint regulatory issues resolution process (Doc 154), alongside the NDA's issues resolution process.
- Following a Government announcement the Office for Nuclear Regulation (ONR) was created on 1st April 2011 as an independent statutory body outside of the HSE to regulate the nuclear power industry. ONR takes on the functions currently carried out by both HSE and (from July 2011) DfT, thus bringing civil nuclear and radioactive transport safety and security regulation into one place.

Communications

- Doc 130 on regulator (EA specifically) interfaces with the community (Jan 2011) including mechanisms to interact with community and how they might change if a DtP is taken, along with the process for engaging with a potential CSP. As noted above, Doc 36 (later updated to 36.1) also describes how community and stakeholders can influence the regulatory process.

Planning System

- Presentation and paper (Doc 134) on the planning process both current and what might be in place in the future, and the potential role of national and local bodies.

Criterion 1b

Process to make a Safety Case.

- Publication by NDA of 'An introduction to the generic Disposal System Safety Case in Dec 2010 and discussion at Partnership meeting in April 2011 (Doc 160). Presentation by the regulators at same meeting of their proposed scope for review of the generic Disposal System Safety Case.
- NDA's presentation at 14th April 2011 Partnership meeting on their emerging Issues Process (Doc 159), as well as coverage of how they are responding to the NWAA's Issues Register, including a presentation and response from NWAA. This was also the subject of a later meeting on 28th June between the NDA, DECC, stakeholders and representatives of the Partnership
- Discussion by the 14th April 2011 Partnership meeting of the independent Peer Review Panel report which commented on the NDA's safety case, chaired by David Bennett (Doc 161). Whilst the review panel commented that the DSSC itself was largely satisfactory, they criticized the peer review process itself and highlighted lessons for the NDA for the future.

Research and Development.

- Paper (Doc 147) and presentation by the regulators on their role and expectations of the NDA RWMD's Research and Development programme for geological disposal including the role of research in the regulation process.

- Publication by NDA of Geological Disposal – R and D Programme overview in Feb 2011 followed by critique by Professor Stuart Haszeldine (Paper 146), NDA's subsequent response and Prof Haszeldine reply to that response on 22nd May 2011.
- Receipt of the NDA's draft response (15 June 2011) to Professor Haszeldine's criticisms and a request for clarification from the TRG

4 Commentary

Criterion 1a - satisfied that suitable regulatory and planning processes are in place or being developed to protect residents, workforce and the environment.

- Confidence that necessary regulatory bodies and processes exist or are being developed
- Adequate communication links between regulators and community are present and working
- Acceptability of the planning aspects of the early stages in the siting process

With respect to Criterion 1a and the 3 points regarding 'what we are looking for' the Partnership has received reports and presentations regarding the work of the regulatory bodies relating to the issues of Safety, Security, Environment and Planning.

Regulatory Bodies and Processes. There is an acceptable level of understanding of the roles and responsibilities of the various bodies and their joint working arrangements. There is a general recognition that a number of the key processes are 'work in progress' but that they are being developed. There is evidence that positive changes are being made to the range/scope and structure of the bodies responsible for such issues¹.

The Health and Safety Executive and Environment Agency have a memorandum of understanding which sets out an overarching framework which recognises the need for effective co-ordination and another which is more specific to radioactive waste management. In line with these memoranda, the Environment Agency, Health and Safety Executive and Department for Transport are working together jointly on the regulation of geological disposal.

The joint working approach for geological disposal builds on the model that was successfully established between the Health and Safety Executive and Environment Agency for the Generic Design Assessment of new reactor designs. The regulators have established a programme board which meets periodically to review and coordinate the regulatory activities relating to geological disposal and have also established a joint website to provide an information portal. The regulators also coordinate their work around scrutiny of the NDA's activities.

¹ This includes the establishment of the Office for Nuclear Regulation (ONR) in March 2011. Pending the relevant legislation to create ONR as a statutory corporation, and in the interim, the Health and Safety Executive has taken steps to establish ONR as a non-statutory body from 1 April 2011, signalling the commitment to securing an appropriately resourced and responsive regulator for the future challenges of the nuclear sector. The ONR brings together the Nuclear Installations Inspectorate (NII), the Office for Civil Nuclear Security (OCNS) and the UK Safeguards Office (UKSO). From 1st July 2011, it will also include the Department for Transport's (DfT) Radioactive Materials Transport Team, which is the part of the DfT's Dangerous Goods Division that deals with regulating the transportation of radioactive material.

It is further recognised that the regulators are periodically reviewing the NDA/RWMD's progress towards becoming an organisation capable of holding an environmental permit in the future and in the longer term, developing into a 'site licence company'.

It is also worth noting that the NDA's Regulatory Interface Management Group, which includes regulators, NuLeAF and others, meets periodically and provides a further forum for coordination of activities in relation to GDF. (See weblink; <http://www.nda.gov.uk/documents/upload/Regulatory-Interface-Management-RIM-Meeting-30-January-2009.pdf>)

We welcome the fact that the EA, ONR and DfT are working together and engaging with the NDA on the implementation of geological disposal. It is notable that the regulators are already providing the NDA with advice and scrutiny on matters of regulatory interest about GDF development, and have developed a joint issues resolution process to manage issues of regulatory concern arising from their scrutiny work. These steps will lay the ground for the EA's formal regulatory permissioning role, which would start if the process proceeds to intrusive investigations in Stage 5 of the MRWS process.

The Partnership notes that the role of the ONR will be focussed on the Operational Safety Case whilst the EA focuses on the Environmental Safety Case. (It is also worth noting that from 1st July ONR's scope will widen to the Operational Safety Case and Transport Safety Case. The Environmental Safety Case will remain the focus of the EA).

It is recognised that the staged development of any future geological disposal facility results in statutory regulation beginning at different points for each regulator. In particular, based on the current timeline the EA could start statutory regulation around 2017, whereas for the ONR this may not be until around 2025. The lengthy timeline and the voluntarism/partnership aspects of the siting process make it challenging for the regulators to plan for. The regulators are aware that they may need some additional skills/resource to support the regulation of a geological disposal facility.

Communication with communities.

In terms of regulators communications with the wider community the Environment Agency set out its own approach to engagement (see Doc Ref 130) in a presentation to the Partnership in Jan 2011. The presentation highlights the importance of engagement and consultation with the public on any decisions on whether to grant the necessary permits throughout the staged regulation process. The EA is able to tailor its approach to consultation in response to local circumstances and is able to link such activities with those of the other regulators involved in the site licensing process and those of the local planning authorities.

We welcome the fact that the EA and HSE/ONR have been observing members of the Partnership since May 2009, and have provided information and support as requested.

Planning System. It is anticipated that the planning system would have a role to play at a number of key steps within the siting process, including:

- During the initial identification of potential site areas in Stage 4. This could involve the use of criteria derived from local planning policies (see the Preliminary Assessment Report on Siting (Document 186));
- Planning decisions about the locations of surface investigations in Stage 5, including borehole drilling. DECC's indicative timeline for implementing geological disposal

suggests that such decisions could take place as early as 2015 (available on the DECC website at [DECC timeline](#));

- Planning decisions about GDF construction and underground investigations in Stage 6. DECC's indicative timeline indicates that this could take place in the period 2026-2027.

It is recognised that preliminary developments such as borehole applications are likely to be considered under current locally determined processes, ie as planning applications considered under the Town and Country Planning Acts, and therefore would be considered by the relevant waste planning authority (ie Cumbria County Council or Lake District National Park Authority, depending on location). If such preliminary developments are not waste related then they could be considered by the relevant local planning authorities depending on location (ie Allerdale or Copeland Borough Councils or the National Park Authority).

If the siting process was to proceed, the statutory planning process to consider the actual construction of a GDF would probably still be some 15 years away and therefore the nature of the planning process may well change. It is recognised that there is therefore uncertainty around what planning process might be in place at that time and consequently what opportunities for community engagement might prevail: much can change in 15 years. Partners would however be able to comment on new planning proposals as they are developed, and the right of withdrawal will also exist.

Under current planning arrangements the Partnership is clear as to how such an application would be considered by Cumbria County Council, as the planning authority for minerals and waste developments outside of the National Park or by the Lake District National Park Authority if an application were to be made inside the Park boundary. Options for the future include the potential for a GDF proposal to be included as a Nationally Significant Infrastructure Project (NSIP) and thus considered under the development consent process administered by the Major Infrastructure Projects Unit of the Planning Inspectorate.

Whilst there is considerable uncertainty involved in this area, it is difficult to see what further clarification the Partnership can reasonably seek at this point. Ultimately a right of withdrawal exists for many years in the process and can be exercised as appropriate.

Criterion 1b - satisfied that the Radioactive Waste Management Directorate (RWMD) of the Nuclear Decommissioning Authority (NDA) has suitable capability and processes in place to protect residents, workforce and the environment.

- Acceptability of the NDA's process for making a safety case
- Acceptability of the NDA's research programme

The work within this criterion has focussed on the robustness of processes of review and scrutiny, as this is the appropriate level of assessment for the Partnership, rather than on the technical detail itself.

Process to make a Safety Case. The NDA's process for developing the Generic Disposal System Safety Case (GDSSC) is subject to a range of review and scrutiny processes.

- The approach has been internally reviewed and externally peer reviewed. The Partnership did not employ its own technical adviser because we are not assessing the generic safety case itself, simply the process by which it is put together. A detailed review of any safety case would have to follow if the process proceeds. The

Partnership has received the summary report of the peer review process and understand the NDA is taking learning on board.

- The GDSSC is also subject to regulator review with the EA (working with DfT and ONR) indicating that this review will not be complete until Autumn 2011. The EA will be reporting its preliminary views of the GDSSC at the Partnership meeting on 29th July.
- CoRWM plans to carry out a major piece of work on the GDSSC in 2011-12 and are also developing a programme with the NDA to prepare comments on the approach but this is unlikely to be available before the Partnership completes its work.

In addition the Partnership has received a presentation from Nuclear Waste Advisory Associates (NWAA) regarding the suggested establishment of an issues register to catalogue the management of key safety issues that need resolving before construction could happen. NDA have responded to the comments of the NWAA and have accepted that some form of issues register is appropriate. The register will also consider issues highlighted in the 'Rock Solid?' report published by Greenpeace. At a meeting held with stakeholders on 28th June the NDA presented a briefing note on the proposed issues management process. It highlighted the means for the identification of potential issues, their assessment and evaluation, and the potential for the process of issues resolution to impact on the R&D programme. Feedback from those present will be used to help shape the final process. An initial issues register is to be published in October.

Research and Development.

The NDA's proposed R&D programme has been and is subject to a range of review and scrutiny processes via peer review, independent specialists, regulators and CoRWM.

In 2009 CoRWM issued a report on R&D (ref CoRWM Document 2543) which made a number of recommendations to Government including and concerning;

- the need for strategic coordination of UK R&D
- adequate resources for the regulators, and
- the requirement that an underground research facility be constructed at any site where it is proposed to construct a GDF.

CoRWM has been monitoring the implementation of these recommendations but they still have concerns around; the lack of strategic coordination of waste and decommissioning R&D including disposal; the lack of acceptance that an underground research facility will be needed (DECC and NDA say it is too early to decide) and the need for greater openness and transparency around the establishment of R&D requirements and more accessible information being made publicly available.

At the Partnership meeting in March 2011 (see Doc 150) the NDA outlined key aspects of the proposed research programme. The presentation covered how the research needs have been identified and prioritised and how the programme was developed, including input from across the Radioactive Waste Management Directorate of the NDA, comments from an R&D advisory panel and discussion with regulators and CoRWM. An independent critique was provided to the meeting by Professor Stuart Haszeldine of the School of GeoSciences, Edinburgh University (Doc 146). In addition the meeting heard from the EA who provided comments on the R&D programme from the regulators perspective on behalf of the EA, the HSE and the DfT and noted the role of R&D to both inform the development

of the safety case and support the scrutiny work of the regulators. Finally the meeting heard the views of CoRWM from Prof Rebecca Lunn who specifically identified the need to involve an appropriate level of independent challenge from the outset.

Prof Haszeldine's focus of concern was not primarily the scope of the R&D programme, but more about how the programme had been put together and presented. For example, he criticised the audit trail for the evidence base, overly simplistic reporting of what constituted priority issues for research, and lack of clarity over the timescales for delivery. NDA have responded to Prof Haszeldine's 26 key areas of comment and Prof Haszeldine has recently replied to the NDA's response. As the NDA's initial response to the critique was not entirely satisfactory, the NDA have subsequently been requested by the TRG to confirm how and when Prof Haszeldine's comments will be considered in the next draft of the research programme and how this relates to the establishment of the issues register. In a response (15 June 2011 see Doc ???) the NDA responds specifically to the points raised by Prof Haszeldine and makes a number of recommendations including;

- Making arrangements for discussing areas of concern around needs and priorities with stakeholders through workshops or other mechanisms
- Recording changes to the R&D programme document and improving access to technical information directly downloadable from the Bibliography
- Involving the Learned Societies to develop the R&D programme for Stage 5 to ensure that the approach is based on sound scientific processes
- Addressing specific technical issues through the issues management process to assess whether if there is an R&D need and if such a need should be added to the programme.

Subject to providing details of timescales for some of the actions listed, the TRG is content that the NDA response provides sufficient clarity to the points raised around prioritisation and how they will be addressed in the programme going forward.

Clearly there is more work to do in the R&D area if the process moves forward, but the view of TRG is that, given where we are in the MRWS process, that is hardly surprising. It is recognised that such R&D would have to be subject to significant independent scrutiny, in addition to the regulators and CoRWM.

5 Emerging Conclusions

In the light of the work undertaken, when reflecting on the criterion and the notion of 'what we are looking for' the TRG suggest that;

Criterion 1a

- **Regulatory Bodies and Processes.** The Partnership can be as confident as is possible at this stage that the necessary nuclear regulatory bodies have regulatory processes in place or being developed/modified and they have provided adequate clarity of roles and responsibilities. The Partnership should note the regulators recognise that the staged development of any future geological disposal facility results in statutory regulation beginning at different points for each regulator and are coordinating their activities accordingly. The lengthy timeline and the voluntarism/partnership aspects of the siting process make it challenging for the regulators to plan for. The regulators are aware that they may need some additional skills/resource to support the regulation of a geological disposal facility.
- **Communications and Engagement.** The Partnership can be confident that the EA has adequately described its intentions regarding its approaches to community engagement now and going forward to a potential siting partnership and that through existing joint-working arrangements between regulators there are adequate

opportunities for integrating future community engagement approaches. Further detail and close liaison would be needed if the process proceeds.

- **Planning System.** The Partnership understands the context and role of the current planning system in the consideration of an application for planning permission for a GDF as far as is possible at this stage. Specifically, the Partnership should recognise the uncertainties associated with potential changes to the process that may be introduced by the time that such an application might need to be made in around 15 years time. However in the short term it is recognised that applications for preliminary development associated with a GDF (eg borehole drilling) would be considered by the relevant waste planning authority (ie Cumbria County Council or Lake District National Park Authority, depending on location). Again, further updates and scrutiny of the planning process would be required if the process proceeds.

Criterion 1b

- **Process to Make a Safety Case.** The Partnership should recognise that the development of the GDSSC is a fundamental component of the approach to the siting of a GDF. The Partnership can be confident that through the processes of;
 - internal NDA review and external peer review,
 - external review by the regulators and CoRWM and
 - the establishment of the issues register,the NDA will have an acceptable process in place to develop site specific safety cases. The Partnership recognises that the NDA will continue to develop its safety case methodology and delivery in the future and that this is closely linked to the R&D Programme.
- **Research and Development.** Based on the responses from the peer reviewers and the scrutiny process undertaken, the Partnership can be confident that the NDA's R&D Programme contains the necessary areas of research in terms of content. It is recognised that through the further development of the programme, through stakeholder engagement and via input from the issues register, the scope and coverage of the programme could change. The response from the NDA to the TRG's request for additional clarity around priority and timescale shows that concerns are being properly addressed and the Partnership should therefore be confident - to the degree required at this stage – that the R&D Programme is acceptable. Further independent scrutiny work would be required should the process move forward, and it would be necessary for example to see a clearer indication of which uncertainties might potentially represent 'showstoppers' for the MRWS programme at some point in the future, as well as the indicative size of each research task to enable a greater degree of transparency for community representatives.

Annex 1 – List of tasks under this criterion

Task 1a(i) seeks to ‘understand what regulatory bodies are involved, what their roles are and what regulatory processes they have in place or are developing’.

Task 1a(ii) seeks to ‘assess the recent and current arrangements for regulatory interfaces with the community’.

Task 1a(iii) is to ‘Understand the context and role of the planning system in the process and any uncertainties associated’.

Task 1a(iv) seeks ‘written assurance from regulators on the nature of their engagement with a potential CSP’.

Task 1a(v) – is to ‘Ask NDA and regulators for commentary on NWAA submission to Energy and Climate Change Committee, Issues Register, and Rock Solid report’.

Task 1b(i) – is to ‘Review NDA’s Generic Disposal System Safety Case once it has been peer reviewed’.

Task 1b(ii) is to review and comment on NDA’s R & D plans.

Annex 2 Partnership Response to Round 1 of Public and Stakeholder Engagement

3.4	Criteria and Associated Work Programme		
3.4.1	Safety, Security, Environment and Planning		
i	Monitor the NDA's work to assess the likely impacts of a facility, and seek reassurance on where particular impacts would be identified and assessed in the process moving forward (Tasks 3b(ii) and 3b(iii) in the Work Programme). We will ensure that, when delivered, this task will cover: transport safety and impact; community safety and cohesion of worker influx during construction; public health; and impact on inland and offshore water environments. (See also section 3.4.3 on Negative Impacts and Mitigation.)	Impacts Sub-Group	Complete, included as far as possible within Doc 163 and further clarifications from NDA about transport movements.
ii	Ask the NDA, the Environment Agency and the Health and Safety Executive (HSE) for a commentary on critical views on the safety of geological disposal, in relation to the potential impacts of natural disaster and human error, and the points raised by the Nuclear Waste Advisory Associates in their submission to the Energy and Climate Change select committee.	Programme Manager	Regulators covered how they handle these uncertainties in their Joint Issue resolution process, at 10 th Dec 2010 meeting.
iii	Continue to receive updates from the NDA in order to understand the developing generic design concepts (Task 4a(iii)). We will ensure that when delivered, the concept covers transport implications.	Programme Manager	Covered on 24 th May 2011 by NDA in their supplementary briefing on transport implications, and their presentation about manpower estimates.
iv	Request a paper from the Office of Civil Nuclear Security to outline the broad security processes that would relate to a GDF, under Task 1a(i) in the Work Programme. This should provide us with a broad understanding of the system and reassurance that processes are in place. Further discussion could take place if a Decision to Participate (DtP) is taken and once potential specific sites have been identified. This would however be a prime concern for a Community Siting Partnership if one proceeds, so will be added to the list of possible tasks for such a body.	Programme Manager	Complete. Doc 36.1 now contains a briefing on security.
v	Consider how to best communicate the results of these technical analyses in an accessible way.	Communications Advisor	Ongoing 3 briefing notes complete. More potentially under consideration for PSE3.

Annex 3 Partnership Response to Round 2 of Public and Stakeholder Engagemen

Impacts and Community Benefits				
4.1	<p>Most of the issues that people raised about possible impacts in PSE1 are raised again in this round of public and stakeholder engagement. In particular, the issues of health and safety, and uncertainties around potential economic impacts, need to continue to be reflected strongly in the Partnership's considerations.</p>	Impacts Group	Sub-	<p>(For sign-off by Impacts Sub Group – current proposed text as follows:) The Partnership has received presentations and information from the Environment Agency, HSE and NDA about general health and safety impacts of any GDF development on workers, the public and environment and about how these impacts will be assessed if a specific site for development is identified. This information will be summarized in the PSE3 Consultation Document. Indicative research on the perception of GDF development was commissioned by the Partnership which included perceptions of health impacts. In this survey most people perceived no health impacts providing quality public services and physical infrastructure (roads, rail, housing) can be maintained. No further Partnership work will be undertaken at this stage but it is very clear from PSE1, PSE2 and the 'perceptions' research that issues of health, safety and the economic wellbeing of the community must be protected if the process to site and develop a GDF continues in West Cumbria.</p>
9.3	<p>Some people continue to express concern that: geological disposal is not the only option, that a wider debate is needed and that West Cumbria is currently the only area in discussions with the Government about this. Whilst these issues are not within the remit of the Partnership, they do provide context for its work.</p>	Steering Group		<p>The Partnership will continue to provide information about why the Partnership is looking at possible involvement in a GDF siting process, including providing details about why geological disposal was the approach recommended by CoRWM over other options. The context for our work is that CoRWM led a wide ranging national debate about geological disposal in 2003-2006 that led to the current policy. We also note that Government has taken a range of steps to invite other communities to express an interest in participation.</p>

