

## Informal Partnership Workshop meeting notes – 16<sup>th</sup> and 26<sup>th</sup> April 2012

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### **1 – Introduction**

At the 23<sup>rd</sup> February 2012 Partnership meeting (see meeting report – Document 256, Section 3) it was agreed that the Partnership would hold two informal workshops to discuss the issues raised in its formal consultation (PSE3), consider how the Partnership will respond, and develop collective thinking on the main content of the Final Report. The workshops were held on 16<sup>th</sup> and 26<sup>th</sup> April 2012 and a summary of the aims, content and outputs of both workshops is provided below.

For a full list of those who were in attendance at each workshop see Appendix 1.

### **2 – Overview of Workshops**

#### **2.1 – Workshop 1**

The first workshop was held on 16<sup>th</sup> April 2012 at Egremont Market Hall. The objectives of the workshop were to:

1. Agree the PSE3 draft Summary of Views report is an accurate reflection of consultation submissions.
2. Agree the type of response required by the Partnership to each issue raised in PSE3.
3. Discuss and agree responses to the more challenging issues.
4. Agree the way forward and the focus of activity in Workshop 2.

As preparation Partnership members were asked to:

- Re-read the consultation document, to remind themselves of the initial opinions.

- Read the raw consultation submissions and the draft PSE3 early Summary of Views report (circulated in advance).
- Make a note of any issues that they think are missing in the early Summary of Views, and of issues they believe need incorporating into the Partnership's opinions.

## **2.2 – Workshop 2**

The second workshop was held on 26<sup>th</sup> April 2012 at The Oval Centre Salterbeck.

The main focus of this workshop was to continue working through the issues emerging from the analysis of consultation submissions, and focus in particular on the more challenging issues.

As preparation Partnership members were asked to continue reading through the consultation responses and highlight issues that they believe should be added to the early Summary of Views.

## **3 – Consultation analysis process**

Prior to Workshop 1, Partnership members were sent copies of all of the responses/submissions made to the consultation, together with a draft PSE3 early Summary of Views, which provided an early analysis of the majority of the responses and listed the key issues raised under each criterion. Partnership members were asked to read the consultation responses alongside the summary, in order to confirm the issues raised and identify any new issues they felt had not been picked up in the summary.

In parallel to this, the analysis of consultation responses that had not yet been taken into account in the early Summary of Views continued, and any further issues identified were considered during Workshop 2. Full details of the analysis process will be included in the final version of the Summary of Views which is due to be signed off at the 22<sup>nd</sup> May Partnership meeting.

Once the Partnership has agreed its responses to the consultation, a full PSE3 Report will be produced incorporating the final Summary of Views and the Partnership's agreed responses. This report will be signed off alongside the Partnership's Final Report to the three Councils.

#### **4 – Outputs of workshop discussions**

At Workshop 1 Partnership members were asked to individually consider the issues identified under each criterion and make a note of how they feel the Partnership should respond to each issue as follows:

- A** – This issue has been considered previously by the Partnership and no change is necessary to either our initial opinion(s) or supporting information.
- B** – This issue has been considered previously by the Partnership and clarifications are necessary in order to better explain our initial opinion(s) and/or supporting information.
- C** – This issue has been considered previously by the Partnership and we should take another look at the issue with a view to potentially amending our initial opinion(s).
- D** – This issue has not previously been considered by the Partnership. We need to decide whether or not to develop a new opinion in response to the issue.

Partnership members added any new issues that they had identified on the pre-prepared flipcharts around the room, and recorded their individual view on how the Partnership should respond to each issue. They then broke into sub-groups to work through the issues under specific criteria and suggest how to take the work forward for each issue.

Workshop 2 continued this process, looking at the further issues identified during the analysis process and commenting on/agreeing the proposed way forward for each additional issue (these had been put forward by 3KQ based on the responses that Partnership members had agreed during Workshop 1).

A number of the more challenging issues were also discussed in plenary, such as ‘trust’ at all levels in the process.

The outputs that were recorded on the flipcharts, including the individual views and outcomes of subsequent sub-group discussions, are provided below together with a summary of the outputs of the plenary discussions. The numbers in the table below represent the number of people ticking the relevant box per issue.

#### 4.1 Criterion 1 – Geology

1. Geology – Workshop 1	A	B	C	D	Response from Partnership sub-group
	No change	Clarification	Revisit opinion	Consider new opinion	
	This issue has been considered previously by the Partnership and...			This issue has not previously been considered by the Partnership. We need to decide whether or not to develop a new opinion in response to the issue.	
	...no change is necessary to either our initial opinion(s) or supporting information.	...clarifications are necessary in order to better explain our initial opinion(s) and/or supporting information.	...we should take another look at the issue with a view to potentially amending our initial opinion(s).		
1a. West Cumbria is not suitable / previous investigations ruled it out.	9	5	6	0	* see below
1b. Professor Smythe's input has been disregarded.	5	9	5	0	* see below
1c. The hydrology, topography, rock type, potential for seismic activity and complexity of West Cumbria's geology should rule it out.	7	5	7	0	* see below
1d. International guidelines on suitable geology for a GDF have been ignored.	4	11	5	0	* see below
1e. It is a waste of time/money to proceed to the next stage of the process.	15	1	5	0	* see below
1f. Long-term safety, in particular release of radioactive material back into the environment, has not	13	5	1	0	<b>B?</b>

been properly considered.					
<b>1g.</b> Other places in the UK are more suitable. The process should start with geology, and then voluntarism.	5	4	0	11	* see below
<b>1h.</b> There is not enough area of possibly suitable rock left.	10	5	4	0	* see below
<b>1i.</b> The National Park should not contain a GDF.	10	6	2	1	<b>A</b>
<b>1j.</b> The impact on water quality and future natural resources has not been properly considered.	11	5	1	0	<b>B</b>
<b>1k.</b> The BGS report was too narrow in scope and disregarded previous investigations.	7	11	1	0	<b>B</b>
<b>1l.</b> The level of uncertainty is too great to continue.	10	0	8	1	* see below
<b>1m.</b> Further investigations on suitability are needed prior to a decision about participation.	10	0	8	1	* see below
<b>1n.</b> The level of uncertainty is acceptable at this stage.	9	0	9	0	* see below

<b>1o.</b> West Cumbria is suitable for a GDF.	2	15	0	0	<b>B</b>
<b>1p.</b> West Cumbria may or may not be suitable, but we need to go to the next stage to find out.	14	2	0	0	<b>B</b>
<b>1q.</b> Safety is of paramount importance even if the geology is suitable.	18	0	0	0	<b>A</b>
<b>1r.</b> The BGS report and peer review process is satisfactory.	17	0	0	0	<b>A</b>
<b>1s.</b> The NDA should publish detailed criteria of what constitutes suitable geology	2	12	4	2	* see below
<b>1t.</b> The geometric network of sacred sites has been paid insufficient attention.	14	2	0	2	See below – Planning and/or Impacts?
<b>1u.</b> The current process doesn't allow for comparative assessments of different sites around the country with different geology.	7	2	1	8	* see below
<b>1v.</b> Information from Nirex should be put in the public domain.	6	13	0	0	<b>B</b>
<b>1w.</b> The principle of a GDF should be re-considered.	5	8	5	1	* see below

*\* These issues were identified by the sub-group in Workshop 1 as needing inputs from the NDA and others before meaningful discussion could be had. Most of the issues concern uncertainties/doubt about whether there is sufficient*

*geology remaining in West Cumbria, and challenges to the Government's MRWS policy and how it is being delivered in West Cumbria with reference to geology.*

<b>1. Geology – Workshop 2</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>Possible response</b>
	<b>No change</b>	<b>Clarification</b>	<b>Revisit opinion</b>	<b>Consider new opinion</b>	
	This issue has been considered previously by the Partnership and...			This issue has not previously been considered by the Partnership. We need to decide whether or not to develop a new opinion in response to the issue.	
	...no change is necessary to either our initial opinion(s) or supporting information.	...clarifications are necessary in order to better explain our initial opinion(s) and/or supporting information.	...we should take another look at the issue with a view to potentially amending our initial opinion(s).		
<b>1.</b> If you started by assessing UK wide geology what would the financial implications be?					<b>B</b> We will seek advice from DECC and CoRWM
<b>2.</b> Possible impact of nearby 'fracking' on a repository?					<b>B</b> Add to possible impacts list

## 4.2 Criterion 2 – Safety, security, environment and planning

2. Safety, security, environment and planning – Workshop 1	A	B	C	D	Response from Partnership sub-group
	No change	Clarification	Revisit opinion	Consider new opinion	
	This issue has been considered previously by the Partnership and...			This issue has not previously been considered by the Partnership. We need to decide whether or not to develop a new opinion in response to the issue.	
	...no change is necessary to either our initial opinion(s) or supporting information.	...clarifications are necessary in order to better explain our initial opinion(s) and/or supporting information.	...we should take another look at the issue with a view to potentially amending our initial opinion(s).		
2a. Safety cannot be 100% guaranteed – the level of uncertainty is not acceptable. <b>IN ADDITION</b> some say simply “it will not be safe”. Others argue unforeseeable risks cannot be taken account of in safety cases and there is too much uncertainty.	15	0	0	0	<b>A</b>
2b. The planning process may change and it is not clear how that would affect an application for a GDF. <b>IN ADDITION</b> how can the Partnership therefore have confidence in an unknown planning process?	7	10	0	0	<b>B</b> (add LDNPA note – see 2t)
2c. The decision-making structures for the planning process are unclear, particularly who would influence the outcome. <b>FOR EXAMPLE</b> will national interests override local views, could local minorities sway planning	4	11	1	0	<b>C.</b> Link to 2q regarding MIPU. <b>B:</b> try to put in diagrammatic format showing alternative processes to aid clarity/understanding (Steve S to try). Acknowledge fears at both ends (i.e. national/local views/priorities dominating) and

decisions?					the tensions between the two. C: expand/strengthen opinion to say that whatever the process is, DMBs should be able to influence it. Also (see Keith H) statutory consultees, neighbourhood planning, Local Development Frameworks – potential new way of involving Host Communities.
<b>2d.</b> The security risk of a GDF is a concern. <b>SPECIFICALLY</b> concentration of wastes from all over the UK, co-location of a GDF and new nuclear power stations, longevity of security needs. There also needs to be further consideration of generic security features, underground vs surface security, nature of physical security measures and understanding the level of security needed.	14	0	0	3	(and 2e transport security) <b>B/potentially D.</b> Acknowledge the strength of opinion expressed in the consultation. Agree the need to add more information/evidence about this. <b>Action:</b> ask CoRWM and regulators for more specifics on security considerations/plans highlighting issues raised in the consultation. Revisit opinions – probably add a new one (security not mentioned in opinion at all currently).
<b>2e.</b> Transportation of waste to a GDF is a concern due to the security risk it presents. <b>IN ADDITION</b> there needs to be a better explanation of how transport would be regulated <b>AND</b> there is inadequate coverage of transport safety	9	1	3	2	<b>B/potential C.</b> See what comes out of 2d. Transport to be included in questions to regulators.
<b>2f.</b> The overall impact on the environment of a GDF has not been sufficiently considered. <b>NB –</b>	16	0	0	0	<b>A</b>

this could be considered under IMPACTS instead.					
<b>2g.</b> Unsuitable geology in West Cumbria means a GDF would not be safe.	10	5	2	0	<b>B.</b> Reiterate the point that if geology is unsuitable a GDF would not be built. Agree with view and look at strengthening this.
<b>2h.</b> The nuclear industry has a poor safety record.	16	1	0	0	<b>B</b>
<b>2i.</b> The regulators may not have the capacity to deal with the safety case and to retain knowledge over the time period required. <b>IN ADDITION</b> concern that regulators may not be able to deliver in the future due to underestimation of the scale of the challenge or the impact of Government cuts.	7	10	0	0	<b>B</b>
<b>2j.</b> The NDA's R&D programme is progressing too slowly and is not wide enough in scope. <b>IN ADDITION</b> the requirements of the R&D programme needs to be more clearly defined and the Partnership needs to pay more attention to the importance of R&D to the success of the programme.	4	13	3	0	<b>C.</b> Strengthen the concerns that we have. Tell the NDA that we have this concern – i.e. the concern has been flagged by consultation responses, we agree in part and are considering rewriting our opinion.
<b>2k.</b> The shorter timescales desired by Government may impact upon safety. <b>IN ADDITION</b> other pressures could cause short cuts	6	12	1	0	<b>B – upfront.</b> Move upfront. Say something more strongly about the impacts of a shorter timescale etc would have, not just on safety

to be taken, e.g. lack of alternatives to West Cumbria, cutbacks in funding and predisposition to succeed.					but also on the whole process. I.e. reinforce that if the Government pushes for shorter timescales the whole process could fall apart (for example by reinforcing views of predetermination). The document being produced for DMBs is based on timescales in the White Paper. If timescales change, everything changes and any decision to participate (if made) is effectively revoked (so would need to know before July).
<b>2i.</b> Risk needs to be more clearly defined and laid out, <b>INCLUDING</b> the scale of potential risks and consequences. <b>SPECIFICS</b> include human error, climate change impacts, land movement, critical events, etc.	5	<b>13</b>	1	0	<b>B – upfront.</b> Move upfront to a new section – pull up to a cross-cutting issue.  <b>Action:</b> Ask NDA what they're doing on risk, at a high level but also specifically on operational risks around Safety, Security, Environment and Planning.  NB links to R&D.
<b>2m.</b> Details of Safety, Security, Environment and Planning are enough for this stage.	14	1	6	0	<b>A.</b> Assume A unless those Partnership members selecting C have additional comments.
<b>2n.</b> The nuclear industry and regulators in the UK have a good safety record.	15	1	1	0	<b>A.</b> Assume A unless those Partnership members selecting C have additional comments.
<b>2o.</b> There is a lack of confidence and trust in the regulators. Also the Partnership appears to have an	9	4	7	0	<b>B/C.</b> In PSE3 Report acknowledge that public have this concern (possibly also part of

incomplete understanding of the regulatory set-up. What is the basis for the Partnership's confidence in regulation?					cross-cutting issue of lack of trust generally). Say that Partnership does not share these concerns (although acknowledge wording "at this stage"). Reflect an opinion to strengthen that any future Partnership needs to keep an eye on this. Check references (see Above Derwent response). Ensure all supporting documents are there and add to boxes 5 and 6 in Consultation Document. Review comments for personal experiences.
<b>2p.</b> What is the process for agreeing the repository can 'go live' and how would operation be regulated?	9	8	0	0	<b>B</b>
<b>2q.</b> How would a MIPU process impact on voluntarism?	0	14	4	0	<b>B/ possible C.</b> Link to 2c. Want response from Government to clarify this issue. Might change opinion depending on response. Also how might a process be developed that involves host communities – see 2c.
<b>2r.</b> There is a potential conflict of interest for local DMBs because of their role in Partnership arrangements <i>and</i> planning decisions.	2	12	6	0	<b>B.</b> Difficult to change people's opinions on this one. Is about perceptions/residents' views of politicians who are going to make decisions. Clearer reference to legal views on website, and add more detail. Possible link to 2c.

<b>2s.</b> There is a lack of trust in the planning system's integrity and ability to resist the development of a GDF. A GDF application would also be outside the normal remit of local planners.	10	5	6	0	<b>A/B.</b> Note the concern but refer to clarifications under 2b/2c regarding future planning process and local influence.
<b>2t.</b> Various points about National Park: lack of clarity/marginalisation of LDNPA; surface facilities should not be within LDNP, concern LDNPA would adopt a NIMBY approach.	9	3	7	2	<b>Hold - possible C.</b> Discussion is needed at a higher level to determine what the Partnership wishes to say about the National Park.
<b>2u.</b> Concerns about planning enforcement, e.g. risks to adequate local enforcement, lack of consideration of planning issues after completion of a GDF.	10	9	0	0	<b>B</b>
<b>2v.</b> There needs to be a more effective response to critics (e.g. NWAA issues register, Prof Haszeldine)	10	8	0	0	<b>B</b>
<b>2w.</b> A site should be chosen that minimises transport for safety reasons.	15	0	2	0	<b>A.</b> This is a siting criteria area. Add clarification unless those selecting C have further comment.
<b>2x.</b> There is a lack of confidence and trust in the NDA. <b>NB</b> There are also some suggestions for addressing these concerns.	10	5	3	0	<b>B/C.</b> Pull out the concerns and suggestions about the NDA and its work to pass onto the NDA – state we have done this in PSE3 response. Opinion is being revisited anyway (see 2j) so review as part of that. Enhance/strengthen the point

					about independent review in safety case opinion (similar to 2o)
<b>2y.</b> There is no basis for the Partnership's confidence that it would be possible to devise a safety case that meets ALARP principles and protects people.	11	5	2	0	<b>B/possible C.</b> Clarify what ALARP means and how it fits with safety case development. Update contextual information around opinion (as regulator review received during consultation). Opinion being revisited anyway so bear this in mind during that review. Unlikely to change opinion in relation to this point.
<b>2z.</b> Concerns over the reduction in public funding and if the regulators/NDA are funded enough to do the work needed.	2	8	0	0	<b>B.</b> Cover in 2i.
<b>2aa.</b> The ONR role needs explaining	0	5	0	0	<b>B</b>
<b>2bb.</b> Explain the Partnership's acceptance of CoRWM's position.	0	6	0	0	<b>B</b>
<b>2cc.</b> Consideration of NP statutory purpose and tests for major development.	0	1	2	0	<b>Hold and B.</b> Hold: include in discussions around 2t, wider National Park issues/decisions. B: expand existing paragraph on page 42 for further clarification on National Park issues and legislation – e.g. “in coming to an opinion we are mindful of the National Park's statutory purpose”. Potential to mention

					Local Plans and other designated areas for DMBs to consider.
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2. Safety, security, environment and planning – Workshop 2	A	B	C	D	Possible response
	No change	Clarification	Revisit opinion	Consider new opinion	
	This issue has been considered previously by the Partnership and...			This issue has not previously been considered by the Partnership. We need to decide whether or not to develop a new opinion in response to the issue.	
	...no change is necessary to either our initial opinion(s) or supporting information.	...clarifications are necessary in order to better explain our initial opinion(s) and/or supporting information.	...we should take another look at the issue with a view to potentially amending our initial opinion(s).		
1. Close independent assessment and scrutiny is required for safety case process / R&D / NDA activities.					<b>B</b> Agree. See response to 2j and 2x
2. Concerns over co-locating a GDF with other nuclear sites, e.g. new build – implication of a major incident/catastrophe at another site?					<b>B</b> (reference safety case process)
3. No amount of planning can prevent a human error causing a disaster					<b>B</b> See response to 2a
4. Eventually an incident will happen / What happens if there is a criticality event / earthquake / incident?					<b>B</b> See response to 2a

5. How does current surface storage situation compare to a potential GDF/s in terms of risks, impacts, safety/security and costs?					<b>B</b> Point towards CoRWM outputs
6. Who would operate the facility?					<b>A</b>
7. All the issues in the NWAA Issues Lists and Rock Solid report are not sufficiently dealt with.					<b>B</b> See response to 2j and 2x

#### 4.3. Criterion 3 – Impacts

<b>3. Impacts – Workshop 1</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>Response from Partnership sub-group</b>
	<b>No change</b>	<b>Clarification</b>	<b>Revisit opinion</b>	<b>Consider new opinion</b>	
	This issue has been considered previously by the Partnership and...			This issue has not previously been considered by the Partnership. We need to decide whether or not to develop a new opinion in response to the issue.	
	...no change is necessary to either our initial opinion(s) or supporting information.	...clarifications are necessary in order to better explain our initial opinion(s) and/or supporting information.	...we should take another look at the issue with a view to potentially amending our initial opinion(s).		
<b>3a.</b> Tourism would suffer, as would the National Park and overall perceptions of the area.	12	2	4		* <b>LINKED:</b> Come back to later when we have the Brand Protection report and can consider economic sustainability in the widest sense.
<b>3b.</b> Employment gains would be small and short tem, and outweighed by negative impacts	12		6		* <b>LINKED:</b> Come back to later. Could gather more info on different employment sectors and revisit opinion? Add clarification

over the longer term.					p63 that jobs <i>may</i> be lost in tourism and farming, but these are uncertain for now.
<b>3c.</b> Concern that jobs would not go to local people, and that an influx of workers would disrupt the locality.	16	1	1		<b>B.</b> Recommend that if the process goes ahead, the NDA should put in place a training programme to ensure local people well equipped to win jobs. And base R&D and RWMD in Cumbria.
<b>3d.</b> Negative impacts would outweigh the positive / positive impacts do not exist.	15	2			<b>B</b>
<b>3e.</b> Transport infrastructure is inadequate and would be stressed by the presence of a GDF.	13	2	3		<b>A.</b> Add transport to the list of impacts covered by the schedule on p57 and check covered by schedule. Cover the assessment done by CCC and NDA transport planners.
<b>3f.</b> House prices will suffer, with concern over delivery of compensation / PVP.	17				<b>A</b>
<b>3g.</b> The farming and food industries would suffer, as would small businesses in general.	17	1			<b>B</b>
<b>3h.</b> Construction impacts, particularly the issue of spoil, have not been considered properly.	6	12	1		<b>B.</b> Add comparison of annual rock extraction in Cumbria, to show context. List the questions to answer later regarding spoil (but don't answer them now).
<b>3i.</b> Environmental impacts, including on landscape biodiversity and water quality, have not been	10	5	3		<b>B</b>

considered properly.					
<b>3j.</b> The short and long-term impacts on health and wellbeing have not been properly considered.	9	7	2		<b>B</b>
<b>3k.</b> A GDF could disrupt the geology and cause an increased likelihood of seismic activity.	11	3	2		<b>B</b>
<b>3l.</b> A GDF could affect areas much wider than the immediate location.	12	3	1		<b>B</b>
<b>3m.</b> The impact of a GDF on a potential World Heritage site has not been considered.	8	5	2		* <b>LINKED:</b> Come back to later when we have the Brand Protection report and can consider economic sustainability in the widest sense.
<b>3n.</b> A GDF would not contribute to economic sustainability in West Cumbria.	16		2		* <b>LINKED:</b> Come back to later when we have the Brand Protection report and can consider economic sustainability in the widest sense.
<b>3o.</b> West Cumbria is over-reliant on nuclear and needs to diversify and move away from the nuclear industry.	15	1	1		<b>A.</b> This dependence is acknowledged across West Cumbria, and is being addressed via the economic blueprint. Opinion does not need reviewing.
<b>3p.</b> What are the outcomes of the Brand Protection study and why were they not available during the consultation?		6		11	* <b>LINKED</b> to reviewing the Brand Protection study.

<b>3q.</b> The scale of impacts is unclear.	7	8	2		<b>B.</b> We agree they are unclear, but necessarily so at this stage.
<b>3r.</b> Longer-term impacts and potentially unknown impacts that have not been taken into account.	2	14			<b>B</b>
<b>3s.</b> Positive impacts will outweigh negative impacts / these can be mitigated.	9	5	3		<b>B</b>
<b>3t.</b> A GDF would impact positively on employment, economic sustainability and long-term direction – West Cumbria is used to the nuclear industry and has the necessary skills and experience.	14		3		* <b>LINKED:</b> Come back to later when we have the Brand Protection report and can consider economic sustainability in the widest sense.
<b>3u.</b> A GDF could link up with other local infrastructure projects – for example to use the spoil.	14	1	2		<b>A</b>

<b>3. Impacts – Workshop 2</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>Possible response</b>
	<b>No change</b>	<b>Clarification</b>	<b>Revisit opinion</b>	<b>Consider new opinion</b>	
	This issue has been considered previously by the Partnership and...			This issue has not previously been considered by the Partnership. We need to decide whether or not to develop a new opinion in response to the issue.	
	...no change is necessary to either our initial opinion(s) or supporting information.	...clarifications are necessary in order to better explain our initial opinion(s) and/or supporting information.	...we should take another look at the issue with a view to potentially amending our initial opinion(s).		
<b>1.</b> Transport of waste is a separate issue as it will affect Cumbria wherever a GDF is located					<b>A</b> We agree. Although we are focusing on a GDF in this process.

2. What is the impact (e.g. in terms of perceptions) of currently being in the process? And of continuing with Stage 4?					<b>B</b> Hard to assess. See Brand Protection study.
3. There is no comparative analysis of the different impacts and benefits – how do they compare against each other in terms of scale and across time?					<b>A</b> Too early for this analysis.
4. What are the impacts over and above existing nuclear activities in the area?					<b>A</b> This is the aim of the Brand Protection study – outline results.
5. Will there be compulsory purchase?					<b>A</b> Far too early to tell.
6. The jobs provided would not help the long-term unemployed. AND The jobs provided would be largely unskilled (e.g. security guards).					<b>B</b> Add more detail on skill level of jobs from NDA.
7. The Partnership is more concerned about 'brand' / perceptions than actual impacts					<b>B</b> All impacts are important. Brand was focused on because no information was available.
8. What are the impacts of not having a GDF (i.e. staying with current situation)? What are the benefits?					<b>B</b> See CoRWM's work on reasons for GDF preference. Explain status quo.
9. Impacts on wider areas have not been sufficiently covered.					<b>B</b> No impacts have been covered in details – this would come later.

<p><b>10.</b> Principles for spoil disposal, PVP, protection of local jobs etc should be drawn up in advance of a DaP.</p>					<p><b>D</b> View on a PVP plan?</p>
<p><b>11.</b> Impacts on public rights of way have not been considered.</p>					<p><b>A</b> Consider only if/when sites are identified.</p>
<p><b>12.</b> The distribution of infrastructure improvements (roads etc) for a facility is a concern.</p>					<p><b>A</b> <u>All</u> benefits would need to be carefully considered at Stage 4/5 if relevant.</p>
<p><b>13.</b> How long would construction impacts last/how long would it take to build?</p>					<p><b>B</b> Add information from NDA on timescales.</p>

#### 4.4 Criterion 4 – Community benefits

4. Community benefits – Workshop 1	A	B	C	D	Response from Partnership sub-group
	No change	Clarification	Revisit opinion	Consider new opinion	
	This issue has been considered previously by the Partnership and...		This issue has not previously been considered by the Partnership. We need to decide whether or not to develop a new opinion in response to the issue.		
	...no change is necessary to either our initial opinion(s) or supporting information.	...clarifications are necessary in order to better explain our initial opinion(s) and/or supporting information.	...we should take another look at the issue with a view to potentially amending our initial opinion(s).		
4a. Community benefits are a bribe.	17	2			B
4b. Community benefits would never be enough to justify having a GDF.	17	1			B
4c. A community benefits package would be of negligible benefit.	18	2			B
4d. Community benefits should not be necessary if a GDF is such a good thing.	19				A
4e. Community benefits will always be perceived as a bribe.	17	1			B
4f. Benefits are irrelevant if the geology is wrong.	20				A

<b>4g.</b> Doubt that the current Government will follow through on any commitments.	10	6	3		B/C. Need to recognize the deep mistrust in Gov't following through. Point to principle 11 regarding legislation and longevity. Add <u>opinion</u> that legislation may be required to make benefits binding.
<b>4h.</b> Concern that a future government could remove any existing agreement on benefits.	7	7	4		Ditto 4g, plus recommend DMBs ask Gov't for a ringfenced fund, without prejudice to RoW, where Gov't puts a bond on account, from which the community can spend interest while siting process continues, but gives bond back if withdraws e.g. Canadian experience. To build trust.
<b>4i.</b> What would a package consist of; what would be agreed (and when) with Government?	2	14	1		<b>B</b>
<b>4j.</b> Benefits should be over and above any usual benefits we would normally expect.	16	1			
<b>4k.</b> A community benefits package could not last long enough.	11	6			<b>B</b>
<b>4l.</b> Who will get the benefits? There is a potential tension between communities closest to a facility and those impacted in some way but further afield.	5	12	2		<b>B.</b> Acknowledge 'distribution' of benefits is very difficult and needs agreeing as part of future engagement, if the process goes ahead.
<b>4m.</b> What will you do with all the specific suggestions we have made?	14	1			<b>B</b>

<b>4n.</b> The community benefit principles look sound.	12	5			<b>B</b>
<b>4o.</b> Who would influence decisions about benefits?	8	8	1		<b>B.</b> Clarify that DMBs would start negotiations as the area of search would be so wide. Specific Host Communities would join discussions as they are identified.
<b>4p.</b> Community benefits are a necessary or expected part of this kind of development.	16				<b>A</b>
<b>4q.</b> If community benefits came as a fixed package they might not be seen as a bribe.	17		1		<b>A</b>
<b>4r.</b> The principles are not sufficiently binding or detailed. They lack definition, unclear what they mean in practice.	14	1	1		<b>B.</b> We agree, but believe it is appropriate at this stage!
<b>4s.</b> Lack of trust in DMBs to do a decent job in negotiating benefits.	12	4	2		<b>B.</b> See clarification under 4o.
<b>4t.</b> Benefits need to be agreed up front and be legally binding before moving forward – principles are not enough.	15	1	1		<b>B.</b> We agree, need to be binding at a later stage. Gov't cannot agree legally binding principles in generic terms.
<b>4u.</b> The Partnership has not actually expressed an opinion about its own criterion	15	1			<b>B</b>
<b>4v.</b> Consideration should be given to 'disruption benefits packages' where site investigations occur	10	5	1		<b>B.</b> Clarify that Principles 5 does cover this, although calls it mitigation. Consider a timeline of different benefits and mitigations.

<b>4w.</b> To what extent does the Localism Act limit the benefits that might be received?		15			<b>B.</b> Acknowledge Act exists but don't know what affect it will have until it is tested in courts. Recommend DMBs monitor progress.
<b>4x.</b> Principle 6 says that benefits must be transformative, but none of the examples from overseas are transformative.	5	11			<b>B</b>
<b>4y.</b> There are comments on specific principles, how will these be handled?	6	7	1		
<b>4z.</b> When do benefits begin? (ref brand protection)		6	4		
<b>(added on the day)</b> R&D and RWMD jobs should be based in W Cumbria if the DtP taken					Clarify that these jobs are a central part of exploring a repository and must not be defined by Gov't as a community benefit

<b>4. Community benefits – Workshop 2</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>Possible response</b>
	<b>No change</b>	<b>Clarification</b>	<b>Revisit opinion</b>	<b>Consider new opinion</b>	
	This issue has been considered previously by the Partnership and...	This issue has not previously been considered by the Partnership. We need to decide whether or not to develop a new opinion in response to the issue.	...no change is necessary to either our initial opinion(s) or supporting information.	...clarifications are necessary in order to better explain our initial opinion(s) and/or supporting information.	
<b>1.</b> Need a process for dealing with specific comments on principles/the areas they cover					<b>C</b> 3KQ collate comments on principles and draft options for discussion.

2. Provision of community benefits distorts the perception of negative impacts and the importance of geology and safety					<b>A</b> Assessments need to be done openly and transparently to avoid this.
3. Previous nuclear developments have not delivered on any proposed benefits					<b>B</b> See 4g and H. Agree
4. Community benefits package may be a bribe but it is a reasonable and necessary one					<b>A</b> Agree in principle. Too early to tell whether benefits would be enough
5. Could a community benefits package relate to/be done in parallel with a new build package so they complement each other?					<b>B</b> CBP could integrate with all sorts of initiatives. Too early to form a view.
6. Community benefits are short term compared to impacts/could never be long enough					<b>B</b> See 4b and 4k
7. What if the host community disagrees with the community benefits package agreed by the community siting partnership?					<b>A</b> Host communities would be involved in developing and agreeing the community benefits package. The question must be addressed by the wider siting process, and how disagreements are handled.

#### 4.5 Criterion 5 – Design and Engineering

<b>5. Design and engineering – Workshop 1</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>Response from Partnership sub-group</b>
	<b>No change</b>	<b>Clarification</b>	<b>Revisit opinion</b>	<b>Consider new opinion</b>	
	This issue has been considered previously by the Partnership and...			This issue has not previously been considered by the Partnership. We need to decide whether or not to develop a new opinion in response to the issue.	
	...no change is necessary to either our initial opinion(s) or supporting information.	...clarifications are necessary in order to better explain our initial opinion(s) and/or supporting information.	...we should take another look at the issue with a view to potentially amending our initial opinion(s).		
<b>5a.</b> The level of uncertainty over design at this stage is not acceptable. The generic design concept is not detailed enough particularly in relation to safety considerations.	19	2	0	0	<b>B</b>
<b>5b.</b> It is too soon to consider more detailed design – further clarity on siting would help to reduce uncertainties.	18	1	0	0	<b>B</b>
<b>5c.</b> Retrievability should be built in to enable access if something goes wrong.	2	15	3	0	<b>C.</b> Provide more information and clarity about retrievability. Strengthen the opinion to say that retrievability is a bigger issue that currently reflected in the Consultation Document with some strong views either way from respondents – will need addressing by DMBs at an early stage. Also 5d and 5e below.

<b>5d.</b> Retrieval should be built in, in case future technology enables the waste to become useful.	1	16	2	0	See response to 5c above.
<b>5e.</b> Retrieval over a longer time has safety and security implications.	4	16	1	0	See response to 5c above.
<b>5f.</b> How will specific design considerations be identified and dealt with? <b>IN ADDITION</b> how is the scope of a repository defined?	12	4	0	0	<b>B</b>
<b>5g.</b> What is the regulatory position on retrieval?	3	18	0	0	<b>B</b>
<b>5h.</b> The generic design concept is acceptable and understandably lacking in site-specific detail.	21	0	0	0	<b>A</b>
<b>5i.</b> How would we communicate with future inhabitants about what a GDF is?	11	9	0	0	<b>B</b>
<b>5j.</b> What difference does geology make to costs?	6	13	0	0	<b>B</b>
<b>5k.</b> Design surface facilities to maximize use of Sellafield.	1	5	0	7	View from the group that this is unworkable and a big query as to where this is worth considering as it is such a big issue. Potential for legal challenge if the Partnership forms an opinion on it. This is for consideration later if the process moves to Stage 4 and beyond.

	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	
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5. Design & engineering – Workshop 2	No change	Clarification	Revisit opinion	Consider new opinion	Possible response
	This issue has been considered previously by the Partnership and...			This issue has not previously been considered by the Partnership. We need to decide whether or not to develop a new opinion in response to the issue.	
	...no change is necessary to either our initial opinion(s) or supporting information.	...clarifications are necessary in order to better explain our initial opinion(s) and/or supporting information.	...we should take another look at the issue with a view to potentially amending our initial opinion(s).		
1. Design is for the engineers and regulators to decide in close consultation with the community.					<b>B</b> Design will depend on geology, inventory and safety considerations.
2. Retrievability presents the issue of whether this is actually a storage facility, not a disposal facility.					<b>B</b> See also the response to 5c, 5d and 5e
3. The ability to monitor is essential from a safety point of view.					<b>B</b> Seek more clarification from NDA
4. How would the design take into account release of radioactive gases, water flow, heating explosion or criticality event / what are the constraints on design					<b>B</b> Discuss with NDA whether they can provide a summary of what informed the gDSSC
5. Less that ideal geology would mean that safety would be largely reliant upon engineered barriers.					<b>A</b> Referencing multi-barrier approach and the fact that unsuitable geology = no GDF
6. There is a difference between retrievability and reversibility.					<b>B</b> Three Rs will be defined in more detail in final report

7. There is not enough detail to comment on D&E.					<b>A</b>
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#### 4.6 Criterion 6 – Inventory

6. Inventory – Workshop 1	A	B	C	D	Response from Partnership sub-group
	No change	Clarification	Revisit opinion	Consider new opinion	
	This issue has been considered previously by the Partnership and...				
	...no change is necessary to either our initial opinion(s) or supporting information.	...clarifications are necessary in order to better explain our initial opinion(s) and/or supporting information.	...we should take another look at the issue with a view to potentially amending our initial opinion(s).	This issue has not previously been considered by the Partnership. We need to decide whether or not to develop a new opinion in response to the issue.	
6a. There is still too much uncertainty about what would go into a GDF.	10	6	2	0	C. Strengthen the opinion to give more recognition to the uncertainty, based particularly on the outcome of 6b, c, d, o, (p), q, t.
6b. How can we be sure that overseas waste won't be accepted in the future?	8	7	2	3	<b>B/possible C.</b> Write further clarification about Government position on overseas waste and how substitution works. Bring this clarification back to the Partnership to decide whether the Partnership should revisit its opinion (including the caveat about substitution).
6c. The position on new build waste is unclear.	6	9	4	0	Also applies to 6d below. <b>B/possible C.</b> Write further clarification on current position (what is the waste, current Government assumption, implications for GDF) then bring back to Partnership to discuss whether opinion should be revisited. Recognition that this area has lots of uncertainty. (NB some feel the Partnership should make a

					clear statement that a GDF should take new build waste but this would have an impact on how long a GDF would stay open.)
<b>6d.</b> New build waste should not be accepted.	10	5	4	0	See response to 6d above.
<b>6e.</b> Spent fuel, plutonium and uranium have safety implications or could be useful in the future so should not be included.	9	9	1	0	<b>B.</b> These are Government policy issues that we can clarify but at the moment not minded to change the opinion.
<b>6f.</b> The change process is unclear. The inventory could change without the knowledge or agreement of the local community.	5	11	1	0	<b>B.</b> Clarify but not minded to change opinion.
<b>6g.</b> There is not certainty that current or future governments will stick to any agreements about inventory.	11	7	0	0	<b>B</b>
<b>6h.</b> Placing such a concentrated amount of higher activity waste together is not safe or secure.	11	7	0	0	<b>B</b>
<b>6i.</b> Transportation of waste from across the UK to one location has security implications.	13	5	0	0	<b>B</b>
<b>6j.</b> How would different inventories or changes to the inventory affect the design and safety requirements of a GDF?	0	15	0	0	<b>B</b>

<b>6k.</b> The inventory principles are acceptable.	12	0	3	0	<b>A</b> (unless suggestions from other Partnership members otherwise)
<b>6l.</b> Uncertainty is recognized and is acceptable at this stage.	10	3	2	0	<b>A</b> (unless suggestions from other Partnership members otherwise)
<b>6m.</b> Clear rules and transparent community involvement would be required for any agreement and changes to inventory.	3	11	3	0	<b>B.</b> Review Principle 2 to look at how we can work in public concerns more clearly. Possibly review whether there is a need to work into Partnership opinion more clearly.
<b>6n.</b> The upper inventory should be assumed.	6	9	0	0	<b>B</b>
<b>6o.</b> A GDF should accept all and any waste types, including potentially all new build waste and overseas waste, for a financial gain.	4	5	8	0	<b>B/possible C.</b> Revisit depending on outcomes of 6b,c,d etc. Depending on outcome revisit issue of financial gain.
<b>6p.</b> What effect would changes in reprocessing capability have on the inventory and therefore on a GDF?	3	11	1	0	<b>B</b>
<b>6q.</b> Would military waste be included and if so from where (e.g. from Scotland too?)	1	11	3	0	<b>B/possible C.</b> Clarification needed. Clarify what the policy is and what the expectation is (currently mentioned p83 – need to expand on this). Then treat in the same way as 6b-d: Partnership may want to revisit opinion depending on above.

<b>6r.</b> The upper inventory is significantly bigger than the lower – this heightens feelings of uncertainty.	6	9	0	0	<b>B</b>
<b>6s.</b> Higher burn up fuel of new nuclear stations is not adequately addressed	3	13	0	0	<b>B</b>
<b>6t.</b> Clarify Scottish waste is for storage not disposal.	2	4	3	0	<b>B/possible C.</b> Clarify current position. Revisit opinion if needed.

<b>6. Inventory – Workshop 2</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>Possible response</b>
	<b>No change</b>	<b>Clarification</b>	<b>Revisit opinion</b>	<b>Consider new opinion</b>	
	This issue has been considered previously by the Partnership and...	...clarifications are necessary in order to better explain our initial opinion(s) and/or supporting information.	...we should take another look at the issue with a view to potentially amending our initial opinion(s).	This issue has not previously been considered by the Partnership. We need to decide whether or not to develop a new opinion in response to the issue.	
<b>1.</b> Co-locating the different waste types currently in the inventory would not be safe.					<b>B</b> Similar response to 6h
<b>2.</b> There should be no local influence over the inventory as a GDF would be fulfilling a nationally important function.					<b>A</b> Disagree
<b>3.</b> Need a process for dealing with specific comments on the principles / the areas the principles cover.					<b>C</b> 3KQ to collate inputs on principles and draft options for discussion

4. More research into reprocessing and recycling waste should happen before a GDF / reprocess as much as possible so only true waste is disposed of.					<b>B</b> The principle for the industry is only to dispose of what it has to.
5. What happens if the inventory expands after construction has happened / after RoW.					<b>B/C</b> See response to 3 above
6. There is no trust in the Government sticking to any commitments on inventory.					<b>C</b> Await outcome of over-arching discussion on trust.
7. There is insufficient detail and the information is not clear and understandable.					<b>A</b> 3KQ compiling list of comments about consultation materials/responses
8. The Partnership should take a stronger position than simply accepting DECC's presumption that it will just be UK waste.					<b>C</b> See response to 6a and 6b
9. There should be clarification on the substitution issue.					<b>B</b> Agreed, will be included in final report
10. DECC's Waste Transfer Price document supports the argument that new build waste will be put in the Repository					<b>B/C</b> See response to 6a, 6c and 6d
11. The Partnership should have sought more information on encapsulation and fuel mixing					<b>B</b> Check con doc for detail and possibly expand

<p><b>12.</b> CoRWM considered a GDF for legacy waste only and noted the ethical/technical distinction between legacy/new build wastes.</p>					<p><b>D</b></p>
<p><b>13.</b> CoRWM supported geological disposal as part of a mixed programme</p>					<p><b>D</b></p>

#### 4.7 Criterion 7 – The siting process

<b>7. The siting process – Workshop 1</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>Response from Partnership sub-group</b>
	<b>No change</b>	<b>Clarification</b>	<b>Revisit opinion</b>	<b>Consider new opinion</b>	
	This issue has been considered previously by the Partnership and...			This issue has not previously been considered by the Partnership. We need to decide whether or not to develop a new opinion in response to the issue.	
	...no change is necessary to either our initial opinion(s) or supporting information.	...clarifications are necessary in order to better explain our initial opinion(s) and/or supporting information.	...we should take another look at the issue with a view to potentially amending our initial opinion(s).		
<b>7a.</b> There is a lack of clarity around decision-making structures for a siting process. Who would influence and how?	3	7	11	0	** see below
<b>7b.</b> At which level does voluntarism really occur? (County, borough or parish?)	0	9	13	0	** see below
<b>7c.</b> Local resourcing need to be considered in relation to participation in a siting process.	3	13	2	0	** see below
<b>7d.</b> Very local right of withdrawal does not really exist.	11	1	8	0	** see below
<b>7e.</b> The overall right of withdrawal would be hard to exercise in stage 4, and increasingly more difficult should the process progress further.	11	3	8	0	** see below

<b>7f.</b> What happens if West Cumbria says no?	6	12	0	0	<b>B</b>
<b>7g.</b> The process is predetermined in favour of having a GDF in West Cumbria.	14	5	0	0	<b>B</b>
<b>7h.</b> The Government is taking the wrong approach with the overall MRWS process – geology, not voluntarism, should come first.	8	1	0	13	<b>B or D</b> * see also Geology above
<b>7i.</b> The proposed siting process makes sense and is satisfactory at this stage in the process.	16	1	2	0	<b>A</b>
<b>7j.</b> Clear ongoing communications are needed should West Cumbria participate in the siting process.	16	3	0	0	<b>B</b>
<b>7k.</b> Right of withdrawal exists as an option if West Cumbria does enter the siting process.	9	8	3	0	<b>B</b>
<b>7l.</b> No other areas have expressed an interest in participating in the siting process.	19	0	0	0	<b>A</b>
<b>7m.</b> Voluntarism is a difficult concept, and challenging to play out in practice.	16	1	1	0	<b>A</b>
<b>7n.</b> How would suggestions for specific siting criteria or considerations be taken into account if the process continues?	1	15	1	0	<b>B</b>

<b>7o.</b> How do you define community?	4	13	4	0	** see below
<b>7p.</b> How to balance views of for e.g. urban/rural and county/borough/parish levels	0	14	4	0	** see below
<b>(added on the day)</b> Will Government really allow a Right of Withdrawal if ££££ have been spent?	0	1	1	0	<b>See 7e</b>

*\*\* These issues all concern trust – both in the current system and in the system that may come to exist in any Stage 4 of the MRWS process. The sub-group recommended that this should be considered as an over-arching issue by the full Partnership as a plenary discussion.*

<b>7. The siting process – Workshop 2</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>Possible response</b>
	<b>No change</b>	<b>Clarification</b>	<b>Revisit opinion</b>	<b>Consider new opinion</b>	
	This issue has been considered previously by the Partnership and...			This issue has not been considered by the Partnership. We need to decide whether or not to develop a new opinion in response to the issue.	
	...no change is necessary to either our initial opinion(s) or supporting information.	...clarifications are necessary in order to better explain our initial opinion(s) and/or supporting information.	...we should take another look at the issue with a view to potentially amending our initial opinion(s).		
<b>1.</b> Specific comments/ suggestions on principles etc.					<b>C</b> 3KQ to collate inputs on principles and draft options for discussion
<b>2.</b> Residents should have been consulted before EO1					<b>A</b> Noted and refer to DMBs to respond

<b>3.</b> What impact would changes in Borough/County Councils have on volunteerism					<b>C</b> To be discussed
<b>4.</b> Resourcing for communities to access independent expertise					<b>B</b> To be built into engagement package in Stage 4
<b>5.</b> There are no criteria for failure at any stage					<b>B</b> To be considered in Stage 4
<b>6.</b> Partnership definition of volunteerism is poor... departure from White Paper					<b>D</b> Seek view from DECC on possible departure from White Paper
<b>7.</b> No clarity over reasoned justification for withdrawal					<b>B</b> Define the term
<b>8.</b> Can Right of Withdrawal be statutorily backed?					<b>C</b> Seek view from DECC

## **4.8 Other issues and cross-cutting issues**

Italicised text illustrates the suggestion made by the sub-group on a post-it.

<b>Other issues – Workshop 1</b>	<b>Response from Partnership sub-group</b>
<p><b>8a.</b> How does the Partnership want to respond to this question overall? There will be a number of people expressing overall support or opposition to participating in the siting process (overall/for a particular council). Whilst this is not statistically significant due to the self-selecting nature of responses, will the Partnership want to say anything about this?</p>	<p>For Ipsos Mori poll No, numbers not relevant here (x 3)</p> <p><i>List of statistics of numbers of responses and where from?</i></p>
<p><b>10a.</b> Whether or not to return to the issue of a referendum.</p>	<p>Yes (x 4), No (x 3), Not yet consider later, No – already agreed its too early as demonstrated by the feedback!</p> <p><i>Needs discussing in plenary to explore why we took this view</i></p>
<p><b>10b.</b> Addressing concerns about balancing different views in the Partnership's work (e.g. rural / urban).</p>	<p>Next stage if there is one (x 5)</p> <p><i>Disaggregate opinion survey results by rural/urban respondents</i></p>
<p><b>10c.</b> Addressing concerns about balancing local interests with borough, county or national interests in any future process.</p>	<p>Next stage CSP, Next stage (x3), Consider Now, Consider this and define now</p> <p><i>Not sure what can be done on this (nothing can be done!). CSP must address this if siting becomes clearer. Acknowledge potential conflict of levels of community interest. Consider when deciding membership of a CSP.</i></p>
<p><b>10d.</b> How to take forward suggestions or requests for specific engagement in any future process.</p>	<p>Pass to CSP, Pass to DMBs, Produce report/rec paper for next stage</p> <p><i>Compile list and pass to DMBs separately.</i></p>

<b>10e.</b> Whether/how to respond to comments on the consultation process itself.	Include in PSE3 response (x 2), clarify and explain, consider now in detail  <i>Compile list and respond</i>
<b>10f.</b> How to deal with comments about the Government's MRWS Process, the idea of geological disposal itself and overall energy policy.	Clarify P'ship role (x 2), not in our hands, not our decision (x 2)  <i>Respond and clarify.</i>
<b>10g.</b> Whether to summarise and/or pass on comments about specific organisations.	Yes (x 5), fyi  <i>If possible, collate them and pass on to relevant orgs for info</i>
<b>10h.</b> What to do with the suggestions for potential future MRWS stages.	Pass to DMBs, Pass to DMBs/CSP (x 2), Produce recommendation paper for next stage <u>not</u> DMBs  <i>Collate and pass to DMBs</i>
<b>10i.</b> How to respond to the cross-cutting issues (both in response to PSE3 and whether/how to deal with them in the Final Report).	See sheet to right (expansion of list)  Ignore!
<b>10j.</b> Whether to take an overall view on the siting of a GDF within the National Park.	No (x 4), yes, For CSP, Discussion on Major Development tests
<b>11a.</b> Does the Partnership need to revisit or visit for the first time any of the references listed in 11.1 of the early Summary of Views?	No (x 5), Yes
<b>11b.</b> Should any of the suggestions in 11.2 of the early Summary of Views either be considered for action now or passed on to the DMBs as potential future considerations?	Pass to DMBs (x 3), consider now, No pass to CSP
<b>Lack of trust</b>	Report it (x 2), not just to DMBs, DMBs to consider, to CSP not DMBs, No trust that host communities will be involved early enough in the process, Lack of trust in partnership should be addressed

	whilst lack of trust in constituent bodies including DMBs should be passed to them for response
<b>Concern about uncertainties</b>	Report it (x 2), DMBs to consider, CSP not DMBs
<b>Ethics: future generations, radwaste, pressure on WC</b>	For next stage
<b>Uncertainty about geology</b>	Big question mark, needs revisiting. Country-wide... (sp??)
<b>Drawing on past experience</b>	Yes
<b>West Cumbria's history</b>	?
<b>Managing risk</b>	Yes
<b>You will never satisfy everyone</b>	True (x 2)
<b>Implication from the responses that current waste arrangements are fine</b>	Was there? Not intended, as wasn't part of our remit.

<p style="text-align: center;"><b>Other issues/overall – Workshop 2</b></p>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<p style="text-align: center;"><b>Possible response</b></p>
	<b>No change</b>	<b>Clarification</b>	<b>Revisit opinion</b>	<b>Consider new opinion</b>	
	This issue has been considered previously by the Partnership and...				
	...no change is necessary to either our initial opinion(s) or supporting information.	...clarifications are necessary in order to better explain our initial opinion(s) and/or supporting information.	...we should take another look at the issue with a view to potentially amending our initial opinion(s).	This issue has not previously been considered by the Partnership. We need to decide whether or not to develop a new opinion in response to the issue.	
1. What if UK says no – what is Plan B?					<b>B</b> Add clarification from DECC on this.
2. Too much sense that “this could / would all be sorted at the next stage”.					<b>A</b> We acknowledge this but it cannot be avoided.

3. Overall concern about balancing views (rural / urban and pro / anti)					<b>A</b> Acknowledge. Process must be open and transparent on methods.
4. There is a sense of a Government preying on a vulnerable region which is in need of regeneration.					<b>A</b> Safety comes first. Benefits etc. come second. (see 'bribe' responses)
5. Has the option of a "world repository" been considered?					<b>A</b> Yes, see details of Pangea (add ref)

#### 4.9 – CALC position statement

CALC were asked to comment on the release of their new position statement and accompanying press release (see Appendix 2), and the reasons for the timing of the release given that the Partnership's consultation analysis has not yet been completed.

In response CALC advised that, whilst they started from a position of neutral on the Partnership, as a result of the Partnership's consultation, CALC has moved from a position of neutrality to a position of saying that the MRWS process within West Cumbria is not credible or viable unless the five issues listed in the statement are addressed. CALC are not leaving the Partnership and are happy to work with the Partnership to address the issues raised. They emphasised that they were looking at responses from Parish and Town Councils, and it was as a result of that information that CALC felt they had to revisit their position. With regard to timing, CALC advised that the timing fitted with their existing planned meetings with the Allerdale and Copeland Executives, and the next Executive meeting in July. They also reiterated that they are a member organisation, and they were under a lot of pressure from their members for a response and for this response to be very public. They were also considering whether it was better to wait to air these issues until the end of the current process, or raise them now to see if they can be resolved.

Clarity was sought about the percentage of parishes responding to the consultation and CALC confirmed that 56% of West Cumbrian members had responded to the consultation and 70% of those who responded had expressed opposition to the process.

Several Partnership members expressed their disappointment with the actions taken by CALC and the impact on the Partnership. Whilst several members acknowledged that the issues raised are very valid, and are indeed shared by other members, it was also

felt that it would have been more helpful if CALC had raised the issues during the Partnership workshops to be debated and responded to alongside all other issues, before a decision was taken to make a public statement.

It was also reiterated that the Ipsos MORI poll would address one of the issues raised by CALC with regard to quantitative analysis.

A discussion was held about where it leaves the Partnership and whether the work of the Partnership has been put at any risk. It was agreed that the position adopted by CALC should be fed into the process alongside the rest of the Partnership's work, and that, on that basis, the process should continue and no further response or public statement is needed.

The nature of partnership working and the agreed working arrangements of this Partnership were discussed. There was a reminder that all Partnership members had signed up to the working arrangements that set out how Partnership members should relate to each other including with regard to public communication. CALC noted that they have some concerns about the model of partnership working and the potential for that kind of model potentially leading to 'group-think'.

A discussion was held regarding the right of member organisations to make decisions or take actions on behalf of their organisation/constituency, and whilst it was agreed that every organisation has the right to take such actions, it was also broadly agreed that it would be useful and appropriate to give a 'heads up' to the Partnership. This was generally accepted, with the proviso that, *if* a heads up is given, no pressure should be put on that organisation to modify or 'soften' the action.

CALC noted that DECC had contacted them about their press release and requested that they see future press releases before they are issued. It was agreed that DECC need to hear that this is not acceptable and the Programme Manager agreed to talk to John Dalton at DECC about the Partnership's collective concerns.

It was agreed that the ground rules would be re-circulated, and it was further suggested that the following should be agreed by Partnership members for any future plans for press releases/public statements:

1. If an organisation feels it needs to make a press release for whatever reason, that is entirely 'within their gift' and cannot be constrained by the Partnership.
2. Partnership members should be able to expect a 'heads up' from the organisation that it is thinking of or planning to make a press release, so that they are aware of what is coming. Members should not seek to change the organisation's position but

may choose to share their thoughts on the plans. It is the organisation's choice whether or not to share their plans with Observing members.

3. This heads up warning should be given by 3KQ where possible rather than direct.

This was not considered to be a change to the current working agreements.

#### **4.10 – Trust**

The issue of trust was raised by many respondents in the consultation and was discussed as an over-arching issue during discussions about the siting process during Workshop 1. It has been recognised by the Partnership as a key issue that needs to be considered both with regard to how the Partnership responds to the consultation, and what can be put in place for engendering trust in the short term as well as the long term if the process continues in West Cumbria.

The Partnership therefore discussed issues and ideas for how to put in place mechanisms for engendering trust etc. at different levels and with different organisations. The emphasis was on generation of ideas that *could* be implemented – the ideas will be discussed and chosen from at a later stage.

The ideas that were generated were recorded on flipcharts and the transcripts of these flipcharts are provided below. 3KQ will take these and work with officers to draft up options for addressing the ideas for consideration at the 22<sup>nd</sup> May Partnership meeting.

#### **Key question:**

What could you build into the process to ensure trust could be strengthened, developed and maintained?

#### **DECC**

- Put MRWS on a statutory basis e.g. benefits, RoW, inventory
- Upfront fund/bond for benefits, either nationally or locally
- Evidence of better understanding and support from Ministers, and that departments are joined up regarding radwaste policies
- Mandated intermediary to liaise and negotiate with Government

- More transparency about Government motivations and drivers e.g. why not screen whole country for geology
  - explanation from DECC on why this choice was made
  - clarification on why SEA not done at the start: a risk?
- Request a stronger commitment from Government on RoW: statement from Minister
- Clarity and update on process of DECC developing thinking on benefits with Treasury
- Clarity on the circumstances that RoW could be used, including agreement on this by DECC
- Clarity/confirmation of how a Dev. Consent would be handled OR when this clarity would emerge
- Strengthen Principles on benefits and inventory... and a stronger agreement from DECC
- Commitment to funding, despite austerity
- Set out what DECC has done to canvas Eols from elsewhere
- Clearer articulation of what happens to waste if Stage 4 doesn't happen. What is Plan C?

## REGULATORS

- Communication of role of regulators, and reveal/demonstrate independence of regulators
  - comms from them, not us
  - examples of enforcement
- Independent audit of their work and specifically their capacity and funding and skills (especially given austerity)
- Transparency to funding regime
- Senior statement of regulator's ability and willingness to say 'No'

## NDA

- Audit of resources and competencies and culture (existing or new?)
- Early commitment to public education/information for locals and visitors: visitor centre?
- International oversight of how UK and NDA are operating
- Better explanation of exactly what Stage 4 looks like: what technical work would happen , and how does it fit with the siting/CSP process and other topics. (work programme?)
- Request for more clarity when they are constrained either by DECC or the process e.g. NDA report on the geology

## **PARTNERSHIP/CSP**

- Ask for independent advice, not NDA etc., more frequently e.g. geology
- Get clarity on what the roles of representative bodies on a CSP are
  - when discussing, when deciding
  - external comms of roles
- Understanding of where all partners, including LDNPA etc., fit into a CSP... and what trust is being put in them (organisationally and individually)
- Measures for a CSP to be seen to be independent:
  - arms length/unfettered
  - active/equal participation of members
- Clear agreed ToRs, and sticking to them
- Strengthen the fact that a CSP will look very different to this Partnership
- Positioning any CSP so that there is a gap between NDA, DECC and CSP and avoiding perception that CSP is 'in the lead' and pushing for a facility
- Understanding of what decisions need to be taken in a Stage 4, so therefore what CSP members can influence
  - continuity would be useful
- Genuinely respond to the issues raised in PSE3 now
  - push back to Government, demand things the Partnership wants

## **COUNTY COUNCIL**

- DaP could be taken by full Council so that processes are consistent and decision taken at the 'highest' level
- Communicate reasons for difference process of CCC to be set out and explained: ask for statement?
- More widespread and regular participation from CCC members in this Partnership:
  - puts a lot of weight on lead members
  - implies a lower priority, even if not true
- Separation of waste planning authority role, and DMB role in the CCC
- Succession planning around elections
- See \* points below

## **BOROUGH COUNCILS**

- \* Ask Borough Councils to put forward suggestions on how everyone can trust how 'host communities' and 'public interest' will be balanced
- Debate and vote in full Council (ABC)
- \* Clarify how and when host communities would be involved in Stage4
- Succession planning around elections
- Define possible CSP structures and decision making roles etc? Scenario planning?
- \* Not handling MRWS/voluntarism just like any other issue

## **PARISH/TOWN COUNCILS**

- Robust mechanisms for how to elect parish representatives
- Discharge responsibilities of representing their constituencies properly and responsibly, on demonstrable action/evidence
- Tie CALC/Parishes to the MoU?
- Make it clear in Final Report that individual Parish representatives would be involved as soon as possible

### **4.12 – Geology and the siting process**

These items were carried forward to be discussed at the next meeting.

## **5 – Future process**

A discussion was held regarding the work that is still outstanding on analysing and responding to the consultation submissions, and how this fits within the current planned timescales for future Partnership meetings and the Final Report being presented to the DMBs.

Concerns were expressed by Copeland BC and Cumbria County Council about the impact of a delay in the process on their current planned timescales for making a decision about participation. There were also concerns about the limitations on how much additional work could usefully be carried out at this stage.

Others felt that it is important to take the time that is needed and to make sure that the end of the process is not rushed. It was also noted that, if the Partnership is to have any credence, it needs to – and be seen to – be analysing and addressing the consultation responses rigorously and making appropriate changes.

A number of options for accelerating the process within the existing timetable of activities were considered, including holding a further Partnership workshop before the next full Partnership meeting, organising further drafting meetings (in addition to the one already planned for 10<sup>th</sup> May), doing more commenting by email, and extending the process to definitely include the provisional July Partnership meeting.

It was acknowledged that some of the extra work that the Partnership might want to have done is unlikely to be possible within the current timescales, and many of the questions and problems raised by the consultation cannot be resolved satisfactorily at this stage of the process. The dilemma that this poses was acknowledged and it was suggested that a definitive deadline could help the Partnership determine how much work can be done, and which work it will need to recommend should be carried out by the DMBs (whether prior to or after a decision about participation).

There was a reminder that the consultation document took a long time to sign off. It was, however, also noted that the Partnership is not looking to make a recommendation in the Final Report. It is not expected that the report will have definitive indications of which way to go on everything that has been consulted on, and it will have many caveats. It was suggested that signing off the Final Report will be a lot easier if the 'rules of the game' are changed from aiming towards consensus in the Partnership to saying that there are different views amongst Partnership members where these exist.

## Agreements on the way forward

It was agreed that the Partnership should still aim towards a July deadline for finalising its Final Report, but it was acknowledged that it will become self-evident if it turns out that this is totally impractical. 'Compression' will be built in by arranging at least one further drafting meeting to work up content for the Partnership's deliberation.

It was also acknowledged that sticking with this timeline would mean that the Partnership may need to accept that some work has to be done later.

Specific agreements and actions for the way forward were:

- 3KQ will draft initial options for addressing all of the issues raised (A, B, C, Ds), and the 'trust options'.
- The planned drafting meeting on 10<sup>th</sup> May will develop this list and form a proposal/s if possible.
- The 22<sup>nd</sup> May full Partnership meeting will consider and decide how to address each issue and when. The issues raised with regard to geology and the siting process will also be considered at this meeting.
- At least one further drafting meeting will be organised between Partnership meetings in May and June. All Partnership members are welcome to take part in these meetings.
- It is likely that the provisional Partnership meeting on 19<sup>th</sup> July 2012 will be needed so all Partnership members should make sure it is noted in their diaries.
- The Decision Making Bodies will consider how the extended timescale will affect their internal processes.

## Appendix 1 – Attendance at Partnership workshops

The table below shows who attended for all or part of both workshops

Organisation	Name	16 April	26 April
<b>Allerdale Borough Council</b>	Richard Griffin	Yes	Yes
	Charles Holmes	Apologies	Apologies
	Alan Smith	Apologies	Apologies
	Tim Heslop	Apologies	Apologies
	Michael Heaslip	Yes	Yes
	Carni McCarron-Holmes	Yes	Yes
<b>Barrow Borough Council</b>	Ken Williams	No	No
<b>CALC</b>	Keith Hitchen	Yes	Yes
	Guy Richardson	Yes	Yes
	Chris Shaw	Apologies	Yes
	Geoff Smith	Yes	Yes
<b>Carlisle City Council</b>	Jane Meek	No	No
<b>Churches Together in Cumbria</b>	Lindsay Gray	Yes	Yes
<b>Copeland Borough Council</b>	Steve Smith	Yes	Yes
	Elaine Woodburn	Yes	Yes
	Ian Curwen	Apologies	Yes
	Paul Walker	Apologies	Apologies
	Yvonne Clarkson	Yes	Apologies
	Allan Holliday	Yes	Yes
	John Kane	Yes	Apologies
<b>Cumbria Chamber of Commerce</b>	Rob Johnston	No	Apologies
<b>Cumbria County Council</b>	Tim Knowles	Yes	Yes
	David Southward	Apologies	No
	Stewart Kemp	Yes	Yes
	Paul Feehily	Yes	Apologies
	Tony Markley	Apologies	No
<b>Cumbria Tourism</b>	Richard Greenwood	Yes	Yes
<b>Eden District Council</b>	Mike Tonkin	Yes	Yes
<b>GMB/Unite</b>	Peter Kane	Yes	Yes
<b>LDNPA</b>	Rob Allison	Yes	Yes
	Stephen Ratcliffe	Apologies	Yes
	Judith Cooke	Yes	Apologies
<b>NFU</b>	Robert Morris-Eyton	Yes	Apologies
<b>NuLeAF</b>	Fred Barker	Yes	Yes
<b>Prospect</b>	Marcus Swift	Yes	Yes
<b>SLDC</b>	Simon Rowley	Yes	Yes
	Ian McPherson	Yes	Apologies
<b>Secretariat</b>	Cath Little	Yes	Yes
<b>3KQ</b>	Richard Harris	Yes	Yes
	Rhuari Bennett	Yes	Yes
	Helen Fisher	Yes	Yes
	Jane Dalton	Yes	Yes
	Jenny Willis	No	Yes
<b>Osprey</b>	Paul Gardner	Yes	Yes
<b>Wood Holmes</b>	Stuart Smith	Yes	Apologies

## Appendix 2 – CALC position statement and press release

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### Cumbria Association of Local Councils UPDATED POSITION ON MRWS (April 2012)

1. CALC has represented town and parish councils on the West Cumbria MRWS Partnership for the past three years. CALC's participation was based on a Position Statement agreed with its member councils in September 2009 that required a neutral position to be adopted on the merits or demerits of a GDF in West Cumbria.
2. CALC has now reviewed its position, particularly in the light of the Partnership's extensive public consultation concluded in March 2012.
3. *In view of the absence of clear support from parish councils and the community generally and the number of serious shortcomings in the prospective MRWS process in West Cumbria, CALC does not consider the programme as currently envisaged to be credible or viable.*
4. The five main reasons for adopting this position are set out below.
5. **Absence of clear public support.** The MRWS process is based on community voluntarism and there is a need for clear evidence of broadly based public support at all stages. Generally the organisations and individuals that responded to the recent consultation are divided on whether they agree with the Partnership's conclusions and whether to proceed into Stage 4. With respect to town and parish councils specifically, 70% of those that responded stated that they do *not* support proceeding into Stage 4 of the MRWS process. In CALC's view there is therefore no evidence from the recent consultation that there is the necessary level and breadth of public support for proceeding. (However, the results of an Ipsos Mori survey to gauge 'net support' for proceeding into Stage 4 are awaited)
6. **Uncertainties and lack of trust.** The Partnership recognised, and the respondents to the consultation emphasised, that at this early stage in the MRWS process there are many uncertainties and many significant issues to be resolved. These uncertainties and the absence of information around so many issues are clearly of widespread concern and strongly influenced the way many people responded to the consultation. However, there is no quick way available to remove all these uncertainties. In CALC's view the only practical way to move forward in the face of these uncertainties is for the community to be willing to place its trust in the key players in the MRWS process, especially the Government, the NDA, the Environment Agency and the Decision Making Bodies and in the processes they would be following.

Many respondents to the recent consultation expressed a lack of confidence in these bodies and in some of the processes. In CALC's view the Government and Decision Making Bodies, in particular, have failed over the last three years to lay the foundations for the level of trust and confidence that would be required. On the contrary, there have been too many examples of confidence being undermined in various ways (for example, the Government's initiative to accelerate the MRWS

process; the Decision Making Bodies' failure to ensure that existing and future partnerships set up to give them advice are perceived to be genuinely independent, etc.). There appears to be considerable evidence of suspicion and doubts amongst the general public and little tangible evidence of the trust and confidence that would be essential to take the process forward.

- 7. Poor prospects of finding suitable geology.** The conclusions of the Partnership about the possible suitability of West Cumbria's geology have been significantly influenced by CoRWM's view that "there is presently no credible scientific case to support the contention that all of West Cumbria is geologically unsuitable". However, CALC finds this reliance on the absence of a negative unsatisfactory because it avoids the key question – how good are the prospects of finding a suitable site? At CALC's instigation the Partnership asked the NDA in early 2011 to undertake some work to explain why the prospects of finding a site for a GDF in West Cumbria are sufficiently good to justify proceeding further. In the event the NDA's ability to fulfil this brief was constrained by a restriction placed on it using West Cumbria specific data and research in advance of a formal Decision to Participate. As a consequence the resulting NDA report is limited in its usefulness.

So the submissions that there is no prospect of finding a site (e.g. Professors Smythe and Haszeldine) or that the probability of finding a site is low (e.g. McDonald and Knipe –Nirex Inquiry inspector and assessor) are the dominant opinions in the public domain. In CALC's view the evidence in the public domain and available for public discussion points to the conclusion that the prospects of finding a suitable site in West Cumbria are too poor to justify proceeding.

- 8. Weaknesses in national policy.** The recent consultation has revealed misgivings about the way the Government is applying the principle of 'voluntarism' and whether, together with the companion principle of the Right of Withdrawal, it is genuinely sustainable through the many years of a MRWS programme. CALC shares these concerns.

Despite the general consensus that safety and finding suitable geology is the most important consideration, Government policy makes voluntarism the leading criterion in starting the search for a site. CALC considers that a more logical approach, bringing voluntarism and geology considerations together at an early stage, would be to identify the more promising areas of geology first and then seek volunteers from within those areas. Such an approach would reduce the risk of working for many years in an area of borderline (or worse) geology, leading ultimately to failure. CALC is currently reviewing CoRWM's and the Government's consideration of this option and so far finds the reasons for its rejection insubstantial and unconvincing.

A further aspect of national policy, very important for securing trust, is whether the Government's MRWS principles of voluntarism and the Right of Withdrawal can be relied on. These principles are only Government policy and have no statutory basis that can be relied on in the future. CALC is concerned that without statutory force they will have a limited 'shelf life' as the process proceeds, expenditure rises and plans take shape.

9. **Failure to recognise the standing of the ‘host community’.** CALC remains most concerned about the views of the Decision Making Bodies on the standing and role of the ‘host community’ as defined in the White Paper. The MRWS process is unique in the UK and gives an explicit major role to the host community requiring decision making to be undertaken in innovative ways that have not been seen before. The Decision Making Bodies appear unwilling to rise to the challenge that voluntarism demands and the part to be played by the host community. CALC does not subscribe to the view that a host community should always have an automatic right of veto over all decisions affecting it, but it would expect to see evidence that Decision Making Bodies are clearly committed to the principle of voluntarism at the community level rather than viewing it as something that applies to them alone.

Adopted by the CALC Executive Committee on 21 April 2012

## NEWS RELEASE

For immediate use

### MRWS PROCESS “NOT CREDIBLE OR VIABLE”

A leading member of the West Cumbria MRWS Partnership is not supporting the process that could lead to searching for a site for burying radioactive waste because it thinks it is ‘not credible or viable’ unless major changes are made.

The Cumbria Association of Local Councils (CALC), which represents town and parish councils on the Partnership and is also a member of its Steering Group, has concluded that the MRWS programme as currently envisaged lacks sufficient local support and has too many shortcomings to be supported in its present form. The Association has reached this conclusion after seeing the results of a major public consultation conducted by the West Cumbria MRWS Partnership.

The Chairman of CALC, Cllr Keith Hitchen, says “The process is meant to be based on voluntarism, but the recent public consultation has not shown clear support from parish councils or other interested bodies and individuals. We see a distinct lack of trust in Government and the local decision-making arrangements and there is no information available to the public to suggest that a suitable geology to host a repository can be found.”

CALC see five main problems with the current MRWS programme:

- Absence of clear support from organizations and individuals who responded to the consultation
- The wide range of uncertainties and lack of confidence in the process and bodies that will address them
- Evidence that West Cumbria’s geology is probably unsuitable and no information available to show that it holds sufficient promise to justify proceeding.
- Weaknesses in national policy. Broad areas of more promising geology nationally should have been identified first. Concern that voluntarism and the Right of Withdrawal have no statutory backing.

- The Decision Making Bodies' unwillingness to properly recognise the standing of a host community (and potential host communities) in decision-making.

CALC believes that the Partnership must now take a lead in pressing for a comprehensive review of the MRWS programme nationally and locally.

ENDS

***[The full CALC position statement can be found below {see above}]***

Further information;

1. CALC is a membership association that supports the interests of town and parish councils throughout Cumbria.
2. CALC has been an active member of the West Cumbria MRWS Partnership since 2009.
3. During the recent public consultation conducted by the Partnership, 53% of all town and parish councils in Allerdale and Copeland Districts responded and 67% said that the MRWS programme should not continue to the next stage. 25% said it should continue and 8% expressed no view on this question.
4. The responses of town and parish councils to the recent consultation will shortly be published on the CALC website [www.calc.org.uk](http://www.calc.org.uk)
5. For further information contact Cllr Keith Hitchen on 07843370085 or [keith.hitchen@btinternet.com](mailto:keith.hitchen@btinternet.com) or Guy Richardson (MRWS Advisor) on 01539531153 or [guy.richardson@calc.org.uk](mailto:guy.richardson@calc.org.uk)