

This report will be made public on 11 September 2012

**Folkestone**

Hythe & Romney Marsh  
Shepway District Council



Report Number **A/12/22**

**To:** Council  
**Date:** 19 September 2012  
**Status:** Non-executive decision  
**Chief Executive:** Alistair Stewart  
**Leader of the Council:** Councillor Robert Bliss  
**Project Lead Member:** Councillor David Godfrey

**SUBJECT: ROMNEY MARSH NUCLEAR RESEARCH AND DISPOSAL FACILITY (NRDF) – EXPRESSION OF INTEREST**

**SUMMARY:** This report sets out the arguments for and against making an Expression of Interest to Government on behalf of the Romney Marsh community about potential involvement in the search for a site for a Geological Disposal Facility for the permanent disposal of the UK's nuclear waste. It outlines the process of involvement and summarises views received from local and other communities.

**REASON FOR RECOMMENDATIONS:**

Council is asked to recommend to the Leader of the Council how to proceed as set out in the recommendations below in order to determine if and how this project should proceed.

**Recommendations:**

1. To receive and note report A/12/22.
2. To decide to recommend to the leader of the council either:
  - a. Not submit an Expression of Interest, or
  - b. Submit a without commitment Expression of Interest, or
  - c. Submit a qualified and without commitment Expression of Interest recommending the nature of the qualifications and any time limits, or
  - d. Defer a decision to a later date and instruct officers on the following issues so that sufficient information to enable a decision can be provided to a later meeting:
    - i. Whether Romney Marsh should continue to be considered as a whole or on a parish basis in any possible future Expression of Interest
    - ii. The minimum level of community support required in each parish individually or Romney Marsh as a whole for them to be included in any possible future Expression of Interest
3. To recommend the minimum level of community support required for any possible future Decision to Participate, if appropriate to the decision on Recommendation 2.

## 1. BACKGROUND

- 1.1 Dungeness A nuclear power station ceased generation and entered its decommissioning phase in 2006. Decommissioning is expected to continue in five stages until about 2098 with the current first stage lasting until about 2019. The 'Romney Marsh Socio-Economic Impact Assessment' report produced for the council et al in 2011 estimated that:
- 226 Magnox employees (64% of the total) who work at the site live in the district, of which 75% live on Romney Marsh. The majority of other employees live in neighbouring areas such as Ashford, Hastings and Rother
  - Onsite employment at the site accounts for around 21% of all jobs in Lydd ward and around 8% of all jobs on Romney Marsh
  - The site currently supports around 458 jobs in the district. This will fall to around 166, averaged over the second and third stages of decommissioning between about 2019 and 2027
  - The site currently contributes around £18.6 million a year to the district's economy. This will reduce by an average of about £13.6 million a year to £5.0 million, averaged over the second and third stages of decommissioning between about 2019 and 2027, and by about £16.3 million a year to £2.3 million during the fourth stage which will last until about 2088.
- 1.2 Dungeness B nuclear power station is currently scheduled to cease generation and enter decommissioning in 2018, although an extension of up to 10 years may be applied for by EDF. A detailed assessment of the socio-economic implications, as has been done for Dungeness A, was not included within the report. However it does suggest that decommissioning will follow a similar pattern to that at Dungeness A with job losses anticipated throughout the 2020s and 2030s (ignoring the effect of any extension). It states that Dungeness B currently employs around 554 people and contributes an estimated £29 million a year to the local economy (both figures are higher than the contribution from Dungeness A).
- 1.3 Dungeness A and B together currently employ about 780 people, excluding sub-contractors. They support over 1,000 jobs, which represents 20% of all jobs on Romney Marsh and around 45% of all jobs in Lydd ward. Their annual combined contribution to the local economy is estimated at £48 million.
- 1.4 Dungeness C - Report C/10/49 submitted to Cabinet at its 12 January 2011 meeting considered a Government consultation on revised draft Energy National Policy Statements (NPS). As in previous consultations, the proposals excluded Dungeness as a site suitable for development of a new nuclear power station (Dungeness C), principally on the grounds of possible harm to the Special Area of Conservation (SAC). However the Government said that should evidence be presented to show that development could take place without adversely affecting the integrity of the SAC it would consider including Dungeness as a site in its NPS. Community Overview Committee and Cabinet considered this and resolved

(see Minute 64 of Cabinet meeting on 12 January 2011) that in its response to the consultation the council:

- a. “Renews its support for a new power station at Dungeness and for its inclusion within the NPS as a preferred site for deployment in the period to 2025;
- b. Welcomes the Government’s view that there is still scope for a developer to demonstrate that the integrity of the international wildlife sites would not be adversely affected and that coastal erosion issues can be dealt with;
- c. Continues to encourage all parties to maintain an active dialogue with the objective of identifying suitable mitigation and compensatory measures and enhancement opportunities to deal with the concerns raised in the Strategic Siting Assessment;
- d. Asks the Government to consider including in the final Nuclear NPS a statement welcoming an application from a developer for consent to build a new nuclear power station at Dungeness providing it could satisfy the IPS and the Secretary of State that any such application has satisfactorily addressed the ecological and coastal defence issues”.

1.5 In its response to the consultation, published in June 2011, the Government’s view was unchanged and it concluded that “Dungeness is not potentially suitable for the deployment of a new nuclear power station by 2025” but allowed for reconsideration “should evidence come forward that satisfies the Government that there is potential for development to take place at Dungeness without adversely affecting the SAC ...”.

1.6 Senior officers met with officials from the Department of Energy and Climate Change (DECC) in February 2012 to promote consideration of Dungeness C. At this meeting it was made clear that the likelihood of Dungeness C going ahead in the foreseeable future is very low. The two main reasons for this are the SAC issue outlined above and EDF’s view, as site owner and potential developer, that the commercial case for development is much stronger at other UK sites. DECC consider it unlikely that any developer would choose Dungeness when there are eight other sites that have been identified for new nuclear power stations. These views were reinforced by DECC at a meeting with members and officers from Kent County Council, Ashford Borough Council, Canterbury City Council, Dover District Council and Thanet District Council in Ashford on 11 May 2012.

1.7 Following the meeting in February, the Leader and Chief Executive decided to consider the possibility of a major infrastructure project within the nuclear industry which has the potential to provide employment and contribute to the local economy, particularly of Romney Marsh, as decommissioning progresses at Dungeness A & B. The project currently under consideration is the construction and operation of a Geological Disposal Facility (GDF). This generic Government title for the project was substituted by Nuclear Research and Disposal Facility (NRDF) for the reasons set out in paragraph 6.4. The Government’s project title of GDF and the council’s project title of NRDF are therefore interchangeable in this report.

- 1.8 In recent months, following announcement of the potential GDF project, there has been increased lobbying for Dungeness C. The Government has agreed to review the issues but has also advised Damian Collins MP, KCC and the Leader at a meeting on 25 July 2012 that the likelihood of Dungeness C going ahead in the foreseeable future remains low.
- 1.9 The Local Development Framework Core Strategy recognises Romney Marsh as one of the district's priority areas for investment and the need for a long term development strategy to encourage a wide range of employment opportunities to provide suitable training and environmental improvements. It recognises the uncertainties around Dungeness as well as Lydd Airport and the possible necessity for a review of the Strategy to address these issues. Any such review could be extended to include a GDF if the project were to have substantially progressed by then.
- 1.10 The decisions on whether or not to submit an expression of interest and associated matters are executive decisions and must be made by the executive. The leader has indicated that he will make an individual decision on this matter once he has heard the debate of the council and considered its decisions.

## **2 GEOLOGICAL DISPOSAL & THE GDF**

- 2.1 The UK has been producing nuclear waste of varying types for many decades and has built up a large stockpile, much of which is currently stored at Sellafield in Cumbria with the remainder at various sites around the country including Dungeness. Nuclear waste will continue to be produced for decades to come as a by-product of existing and new nuclear power stations and from other sources. The Government has an obligation under international law to arrange for the safe and permanent disposal of all higher activity radioactive waste within the UK. Radioactive waste cannot be disposed of in another country, nor can radioactive waste from other countries be disposed of in the UK. The Government's programme for dealing with radioactive waste is the Managing Radioactive Waste Safely (MRWS) programme. Responsibility for the programme rests with the Department of Energy and Climate Change (DECC) which has a dedicated website on this aspect of its work - <http://mrws.decc.gov.uk/>.
- 2.2 In common with other countries with a similar problem, the Government's preferred approach is 'geological disposal', which essentially means permanently disposing of nuclear waste deep underground in stable strata where the radioactivity can decay safely over many thousands of years. Of the 39 countries that have nuclear waste to deal with, 25 are progressing with geological disposal. These countries include France, Switzerland, Belgium, Finland, Sweden, China and the USA. The other 14 countries have still to decide, although so far none have chosen any other method.
- 2.3 The case for geological disposal is not universally accepted. Greenpeace, for example, has many technical and other concerns about geological disposal, as detailed on their website - [greenpeace.org.uk](http://greenpeace.org.uk). Nuclear Waste Advisory Associates have been involved in the debate in Cumbria and also have concerns – see [nuclearwasteadvisory.co.uk](http://nuclearwasteadvisory.co.uk). However the countries

progressing with geological disposal are confident that the approach is technically viable and will be demonstrably safe to the satisfaction of national and international regulators. Research and development throughout the design stages is therefore an integral part of implementing geological disposal in the UK and elsewhere.

- 2.4 The facility which the Government intends to build somewhere in the UK to facilitate geological disposal is generically called a GDF. Details of the facility, including the amount and type of nuclear waste to be disposed of, are included within the Government's 2008 white paper titled 'Managing Radioactive Waste Safely: A Framework for Implementing Geological Disposal' (subsequently referred to as the white paper) which can be downloaded from DECC's website. The white paper contains a great deal of information on geological disposal and the GDF. Outline details are provided below.
- 2.5 The GDF would probably consist of surface facilities covering an area of approximately one square kilometre and underground facilities covering a much larger area, the extent of which is not known at this time. The underground facilities are expected to be at a depth of between 200m and 1,000m and may be located directly beneath or at some distance from the surface facilities, probably up to 10 km away but possibly even further. Surface and underground facilities would probably be connected by means of sloping tunnels and/or vertical shafts. Details of the design will not be known until a site has been chosen and further design work has been carried out to suit the characteristics of the site and the underlying geology. Preliminary details about the likely physical arrangement of the GDF are contained in the white paper.
- 2.6 The GDF will allow permanent disposal of the UK's nuclear waste. The waste may include high, intermediate and low level waste, spent nuclear fuel, plutonium and uranium. Indicative amounts, radioactivity levels and other details for each type of waste are given in the white paper.
- 2.7 The GDF will cost approximately £12 billion to build and will have an operational life of about 140 years. The Government's programme is for construction to start by 2025 and for the first emplacement of waste in 2040, although they are currently looking at ways of accelerating the later stages of their programme by up to 11 years. The Nuclear Decommissioning Authority (NDA) will be responsible for construction and operation of the facility.

### **3 POTENTIAL BENEFITS**

- 3.1 The potential benefits to an area from having a GDF are considerable. A brief overview of the main potential benefits follows. An explanation of the process of involvement is in section 5.
- 3.2 Employment - construction and operation of a GDF would provide hundreds of long term well paid jobs and secondary employment in the area around the facility. The 'manpower and skills requirement' study by the NDA assessed the skill levels and numbers of jobs likely to be

necessary to build and operate a GDF. It concluded that the average manpower requirement (excluding secondary employment) would be:

- 437 prior to construction (approx 15 years)
- 838 during construction before first waste placement (approx 15 years)
- 565 during operation and on-going construction (approx 100 years)
- 188 during closure (approx 10 years)

This amounts to manpower of 555 averaged over the whole study period (140 years).

More details are given in the study report which can be downloaded from the project website - [romneymarshnrdf.org.uk/downloads.htm](http://romneymarshnrdf.org.uk/downloads.htm).

3.3 Infrastructure – construction and operation of a GDF is likely to involve major investment in local transport facilities, such as road and rail. It is also likely to include improvements to other infrastructure such as defences against inland and possibly also coastal flooding. Improvements could benefit local residents, businesses and tourists and would remain after the facility closed. The nature and extent of any infrastructure improvements would be dictated largely by the location of the surface facility.

3.4 Economy - the local economy would benefit from expenditure on construction and operation and through taxation of various forms. There could be spin-off industry benefits and positive impacts on local service industries that support the facility and its workforce. Socio-economic studies into the potential effects would be carried out as part of the design and approval process so would be taken into account before any final decision by the community on whether or not to agree to a GDF.

3.5 Community Benefits Package – in addition to the benefits outlined above, the white paper states that “there may be other benefits which may be commensurate with developing the social and economic wellbeing of a community that has decided to fulfil such an essential service to the nation”. The following are suggested areas that a community might benefit from as result of hosting a GDF:

- Investment in local education, training and skills development, including for the specific skills required by the GDF investment
- Improved public services, transportation, housing and recreational facilities
- Enhanced local healthcare
- Local environmental improvements

It would be for the local community to agree priorities for investment through a Community Siting Partnership, as summarised in Appendix A and defined in the white paper. The scale of the Community Benefits Package would be negotiated between the Government and the Community Siting Partnership prior to any final decision about hosting a GDF so that a fully informed decision can be taken by the community at that time. While it is not possible at this stage to give any indicative figures,

it is likely that the Community Benefits Package would be worth many millions of pounds a year to the local community, in addition to the other benefits outlined above.

- 3.6 Other benefits – there may be other benefits of being involved in the siting process. It is impossible to quantify or guarantee these but West Cumbria (see paragraph 5.5) are understood to have benefited from additional Government funding in other areas as a direct result of them considering hosting the GDF. There may also be benefits of being involved in the process of finding a site even if the Government eventually decide to locate the GDF elsewhere i.e. by being involved in the process but without actually hosting the GDF. This occurred in Sweden where two ‘competing’ communities agreed which of them should host the GDF and shared a benefits package. Any such benefits, if they applied, would not be agreed with Government until a later stage in the process.

#### **4 POTENTIAL RISKS**

- 4.1 The potential risks to an area from having a GDF are also not to be underestimated. A brief overview of the main potential risks follows. An explanation of the process of involvement follows in section 5.
- 4.2 Public health and environmental damage – the hazards presented by radioactive materials, some of which have half lives measured in thousands of years, are well known and would be a major concern to most people. It would therefore be essential for the hazards to be investigated and risks controlled to the satisfaction of the local community as well as national and international regulators. The principal UK regulators would be the Health and Safety Executive, the Environment Agency, the Office for Civil Nuclear Security and the Department for Transport. Environmental impact and sustainability issues would be dealt with through the Strategic Environmental Assessment, Sustainability Appraisal and Environmental Impact Assessment processes. Further details are given in the white paper.
- 4.3 Disruption during construction – in common with any major infrastructure project, construction would cause disruption to local people. The extent of this disruption would depend on the site chosen and the extent of works to improve infrastructure, particularly road and rail. The NDA would work with the local community, including through the Community Siting Partnership, to mitigate the disruption. The likely extent of disruption would be established through studies carried out before the local community was asked to decide whether or not to host a GDF.
- 4.4 Long term use of land – the surface facilities will require the use of about one square kilometre of land throughout the operational life of the project. This is similar to the area taken up by the two power stations at Dungeness, including the transformer building and the land between them. It is also an area similar in size, although of a different shape, to the Eurotunnel Terminal at Cheriton. On closure, after about 140 years of use, the facility would be dismantled and the land returned to its former or some other use, as agreed at the time. The current land use, which may

comprise agriculture, industry, housing, infrastructure etc., would be displaced and issues of relocation and compensation would therefore need to be addressed. Clearly there can be no assessment of these issues at such an early stage when the area in which the surface facilities could potentially be located is so large.

- 4.5 Other effects – a GDF may have a wide range of other effects on the local community, including aspects such as the environment, property values and tourism. These effects may be positive or negative, major or minor and short or long term. At this early stage it is too soon to be certain about what these effects might be or even if some of them would occur. There would need to be extensive studies, carried out for the Community Siting Partnership and funded by Government, to establish what the effects might be. These studies would probably be carried out over a period of years and would certainly need to be completed before any final decision by the local community on whether or not to host a GDF. They would probably address the same general issues as those which also apply to West Cumbria as well as studies into specific local issues.

## **5 PROCESS OF INVOLVEMENT**

- 5.1 The Government's approach to finding a site for a GDF is based on 'voluntarism'. This essentially means that communities which live on and around the site where a facility may be located must be willing to host it. The Government's approach includes a 'Right of Withdrawal' from the process which can be exercised up until the point when underground operations and construction are due to begin. The inclusion of a Right of Withdrawal is intended to contribute to the development and maintenance of community confidence, although there are likely to be issues around how it would be safeguarded and exercised. Further details of the voluntarism approach and the Right of Withdrawal are contained in the white paper.
- 5.2 The process of involvement leading to site selection is staged. This is to enable local communities and others to gather information and make informed decisions at each stage before deciding whether or not to proceed further. A Community Siting Partnership would represent the local community from Stage 4 onwards. The Right of Withdrawal applies until the end of Stage 5. An outline of the process is set out below and further details can be found in the white paper:
- Stage 1 – Invitation issued and Expressions of Interest
  - Stage 2 – Sub-surface unsuitability test (desk study of geology)
  - Stage 3 – Community consideration leading to Decisions to Participate
  - Stage 4 – Desk-based studies in participating areas
  - Stage 5 – Surface investigations on remaining candidates
  - Stage 6 – Underground operations (construction and operation)
- 5.3 The Government "does not wish to be over-prescriptive" about the way in which community involvement and decision-making should work, as this will depend on local circumstances. However the white paper does provide



an indication of the potential steps to be taken by communities at all stages of the process. The steps suggested for Stage 1 include:

- “Preliminary discussion between potential local partners”
  - “Opportunity for initial discussions between potential local partners and government/NDA”
  - “Further soundings from potential local partners”
  - “Decision about Expression of Interest”
- 5.4 The invitation from Government to “communities to express an interest in opening up without commitment discussions on the possibility of hosting a geological disposal facility at some point in the future” is contained in the white paper. It requires local authorities, as the ‘Decision Making Body’, to submit a formal Expression of Interest (EoI) to Government on behalf of a community that wishes to accept the invitation.
- 5.5 It is useful to see how the process has progressed elsewhere. In 2008/09 three councils (Cumbria County Council, Allerdale Borough Council and Copeland Borough Council) each submitted an EoI. Their intention was to work together regarding one possible site somewhere in the Allerdale or Copeland areas of West Cumbria, so this could be considered as being a collective EoI rather than three unrelated EoIs. Since then these councils have worked with a range of other organisations as part of the West Cumbria Managing Radioactive Waste Safely Partnership (West Cumbria). This work was paid for by DECC so there was no cost to any of the three councils. Details of their work can be found on their website - [westcumbriamrws.org.uk](http://westcumbriamrws.org.uk).
- 5.6 To date only the West Cumbria councils have submitted EoIs, although it is understood from Government that at least one other community, apart from Romney Marsh, is actively considering whether or not to do so.
- 5.7 Since submitting EoIs, West Cumbria has received a total of £2.8 million from the Government through an engagement package grant. This funding covered all of the costs of running the partnership, direct costs incurred by the local authorities as result of their involvement, the cost of public engagement activities and the provision of independent expert and legal advice, including on issues of geology.
- 5.8 West Cumbria recently conducted an extensive public consultation which sought people’s views on a range of issues related to GDF. This generated responses from 1,400 people in West Cumbria, other parts of the county and further afield. The responses were used to inform West Cumbria’s final report to the three councils to inform their decisions on whether or not to submit a Decision to Participate (DtP). The report (document 306) can be viewed on their website - [westcumbriamrws.org.uk](http://westcumbriamrws.org.uk)
- 5.9 In addition to the consultation, Ipsos MORI was commissioned to conduct a representative and random opinion poll telephone survey of more than 3,000 people, asking if they supported taking part in the search for a site for a GDF. A poll was used rather than a referendum because West

Cumbria decided that not enough information was known about where a GDF may be sited and therefore also about key issues such as safety, geology and community benefits.

- 5.10 The results of the combined total of over 4,400 responses are tabulated below. In all areas more people supported a DtP than opposed it.

**Table A**

<b>West Cumbria - public consultation</b>	<b>For</b>	<b>Opposed</b>	<b>Neutral</b>	<b>Do not know</b>
Allerdale BC	51%	37%	4%	8%
Copeland BC	68%	23%	4%	5%
Other parts of Cumbria	50%	35%	5%	10%

- 5.11 The results of the opinion poll showed that support for taking part seemed to be linked to awareness as those who were more aware of the search for a site for a GDF were more likely to support it, as shown in the table below:

**Table B**

<b>West Cumbria – level of knowledge of the search</b>	<b>Should take part in the search</b>	<b>Should not take part in the search</b>	<b>Neutral</b>	<b>Don't know</b>
A lot	70%	27%	2%	2%
Not heard of	35%	38%	8%	19%

- 5.12 The three councils are expected to make decisions on whether or not to submit a DtP in October this year. If a DtP is submitted then West Cumbria will begin Stage 4 which includes the formation of a Community Siting Partnership.
- 5.13 Members should note that a DtP is a far more significant step than an EoI. It shows to Government that a community has seriously considered the possibility of hosting a GDF over a period of years, including investigation of a range of issues, and that it is in overall support of proceeding to the next stage (Stage 4). A DtP is therefore the trigger for far more detailed work by Government than is warranted by an EoI. This would include addressing issues which the community had raised but that were not addressed fully at previous stages. The community's Right of Withdrawal is unaffected by a DtP.

## **6 PROJECT INCEPTION**

- 6.1 In February 2012 a project team of members and officers was set up, led by Councillor David Godfrey. Their remit was to carry out the work necessary at Stage 1 to facilitate a decision by members on whether or not to submit an EoI on behalf of a community within the district.
- 6.2 It was decided that the focus of the search should be on the areas of Romney, Walland and Denge Marshes colloquially and collectively known as Romney Marsh which fall within the district. This was the part of the district likely to be affected most by the decommissioning and closure of Dungeness A and B. As parish/town councils would be a key part of the decision-making process it was decided to define the search area by parish boundaries. Parishes would therefore be either fully in or fully out of the defined search area in order to facilitate decisions by their councils.
- 6.3 The potential Host Community, as defined in the white paper, was therefore defined as all parishes within the district including and to the south and west of Dymchurch and Burmarsh. By definition, the potential Wider Local Interests are “other communities that have an interest in whether or not a facility should be built in the Host Community”.
- 6.4 The project team agreed that the title Geological Disposal Facility would not be clear to the general public, nor did it give any indication of one of the benefits of this potential project i.e. the highly skilled and other well paid jobs associated with a research centre which would be an international centre of excellence. The project was therefore titled the Romney Marsh Nuclear Research and Disposal Facility (Romney Marsh NRDF).

## **7 SOUNDINGS**

- 7.1 The white paper states that “before making an EoI, Government suggests that the local authority should have canvassed opinion ...” with “parish/town councils, local community, business and environmental stakeholder groups, and neighbouring local authorities”. It does not suggest that individual residents or businesses should be canvassed but the project team agreed that it would be desirable to do so within the potential Host Community to obtain a better indication of local opinion.
- 7.2 The white paper refers to “preliminary soundings”. It does not suggest or require ‘consultation’ as might be carried out for, as an example, a major Planning Application. The project team therefore agreed that formal ‘consultation’ was not necessary or warranted at this very early stage. As in West Cumbria, detailed consultation would be carried out at later stages of the process (Stage 3 onwards) if an EoI is submitted, and would be funded by Government as part of an engagement package.
- 7.3 Although the soundings were not a consultation, the Government’s ‘Code of Practice on Consultation’ dated July 2008 (the consultation code of practice) was used to guide the soundings process. All of the criteria in the consultation code of practice were considered and adapted to the soundings process and available resources.

- 7.4 A council budget of £44,000 was set up to commission work required at Stage 1. This included the costs of engaging a consultancy to produce information, run public exhibitions and set up and maintain a dedicated website. The final cost is estimated to be about £38,000.
- 7.5 The soundings process began with a series of meetings with potential key stakeholders starting on 10 May 2012. Confidential briefings were given to:
- MPs for Ashford, Dover, Hastings & Rye and Folkestone & Hythe
  - East Sussex and Kent county councils
  - Ashford, Canterbury, Dover, Rother and Thanet district councils
  - Shepway District Councillors

7.6 The soundings process continued with a media launch on 16 May 2012. Articles were published in the Kentish Express, Folkestone Herald and the Romney Marsh edition of The Looker. The dedicated project website ([romneymarshnrdf.org.uk](http://romneymarshnrdf.org.uk)) was activated and a link from the council's own website was provided.

- 7.7 The following letters were sent, timed to arrive before the media launch:
- 10,223 to all registered homes in the potential Host Community
  - 652 to all registered businesses within the potential Host Community
  - All parish/town councils in the district and immediately adjacent to the potential Host Community
  - Potential key stakeholder and interest groups, as listed in Appendix B

Leaflets and reply forms were included with the letters to homes and businesses. The offer of a meeting to explain the proposals was included within all letters to parish/town councils on Romney Marsh and potential key stakeholders and interest groups.

- 7.8 The question asked was "Do you think that Shepway District Council should submit an Expression of Interest on the community's behalf, in order to find out more information about a possible Nuclear Research and Disposal facility on Romney Marsh"? The available responses were:
- "Yes. We should find out more"
  - "No. We should not find out more"
  - "I am undecided"

Space was provided on the printed and on-line forms for any comments or questions. A deadline of 20 July was given for views to be expressed, just over nine weeks after the letters were expected to be delivered. However all views received by 26 July were considered, in order to allow sufficient time for any postal delays. The period allowed for the expression of views was therefore just over ten weeks.

- 7.9 Presentations were made to bodies and groups that requested them, at which members of the project team were questioned. Officials from DECC

and the NDA attended some of the presentations and were also questioned. Presentations were given to the following bodies and groups:

- Dungeness Site Stakeholder Group
- Folkestone Town Council
- Kent Channel Chamber of Commerce
- Lydd Town Council
- New Romney Town Council
- Marsh Forum
- Shepway District and Parish Councils Joint Committee

7.10 A series of seven all-day public exhibitions was held so that the public and interested parties had the opportunity to speak directly to members of the project team and officials from DECC and the NDA about the proposal. Seven public exhibitions were held across Romney Marsh and one at Dungeness A for workers at both nuclear power stations. This last exhibition was not open to the public for security reasons. The public exhibitions were attended by over 400 people.

7.11 The project website was updated during the soundings period in response to queries and views expressed by providing additional information and clarification. A series of 'Q&As' was also added to provide answers to questions asked in reply forms, letters, emails and at the public exhibitions. The website was visited 1,489 times during the soundings period, of which 1,254 were first time visits and 235 were return visits. The total number of pages loaded was 1,972, giving an average of only 1.3 pages seen per visit. The website has over 20 pages indicating that most people did not see most of the information provided.

7.12 There was significant media interest during the soundings period, as summarised in the media report at Appendix E.

7.13 It is worth noting that the soundings were far more extensive, both in terms of the amount of information provided and the number of people and organisations from whom views were sought, than were carried out in West Cumbria at this stage of the process.

## **8 VIEWS EXPRESSED**

8.1 The table below shows the number of responses received and the variation between parishes. The percentage in the final column is the response rate based on the number of properties. The response rate per person would be lower as most properties house more than one person, although there were many instances of more than one view being received for a particular property. The response rate measured in this way varied between 21% and 42% with an overall average of 29%. This is considered to be good and higher than normally expected in 'consultation' type exercises. However, it also means that no responses were submitted from 71% of properties which represents more than 71% of residents and businesses.

**Table C**

Parish	Forms Sent	Views Received from Romney Marsh		
		Residents	Businesses	Total
Brenzett	179	47	1	48 (27%)
Brookland	222	54	0	54 (24%)
Burmarsh	157	38	3	41 (26%)
Dymchurch	1,813	509	12	521 (29%)
Ivychurch	119	25	0	25 (21%)
Lydd	3,184	840	16	856 (27%)
Newchurch	152	59	3	62 (41%)
New Romney	3,426	1,038	25	1,063 (31%)
Old Romney	109	26	3	29 (27%)
Snargate	57	24	0	24 (42%)
St. Mary in the Marsh	1,457	378	6	384 (26%)
<b>Totals</b>	<b>10,875</b>	<b>3,038</b>	<b>69</b>	<b>3,107 (29%)</b>

It should be noted that the total number of residents and businesses expressing a view varies considerably between parishes, ranging from 24 in Snargate to 1,063 in New Romney. All summary percentages in the remainder of this report should therefore be considered with an understanding of the number of views they represent and the relative size of different parts of the community.

- 8.2 Views were expressed by a variety of means. The majority of responses, 89%, were submitted on printed reply forms posted to the council, 9% via the on-line reply form on the website with the remainder by email or letter. All views were collated into a single spreadsheet and checked for multiple and other invalid returns, as detailed in Appendix B. Only one response per person was considered. A total of 32 submissions were excluded for this reason. All responses will be published on the project website after the council's decision.
- 8.3 A total of 3,328 valid views expressed to the council were included in the analysis, of which 94% were from Romney Marsh. Views sent to other bodies such as the media were not included in the analysis as they did not always address the same question and may have duplicated views that were officially submitted. Views expressed in the media are however summarised in the report at Appendix E for members' information. Views expressed by political bodies and representatives are summarised below.
- 8.4 The project team decided that members would want to understand the views of people in the potential Host Community in more detail than those in potential Wider Local Interests areas. Views from the potential Host Community were therefore grouped by parish and views from outside this area were grouped as follows:
- The remainder of the district and neighbouring districts within an arbitrary distance of 30 km
  - Remaining areas of Kent and East Sussex further than 30 km

- All other areas

8.5 Members should note that the responses to the question asked do not necessarily correlate directly to support for a GDF on Romney Marsh. While this may be true for some respondents, some comments indicate otherwise. Some people who have indicated “Yes. We should find out more” have provided comments to show that they want more information before they can form an opinion, which is consistent with the purpose of the soundings exercise. However other people have indicated “Yes ...” but their comments suggest that they would not be in favour of a GDF. Members should assess the analysis of views expressed against this background.

8.6 The views expressed to the council during the soundings process are summarised in Tables D to L below. Of the 3,328 views expressed, 2,065 (62%) were accompanied by comments, the full text of which is contained in Appendix D. For the purposes of these tables the potential Host Community is called Romney Marsh and the potential Wider Local Interests are described in the title of each table. In all tables ‘Yes’, ‘No’ etc. are abbreviations of the available responses listed in paragraph 7.8 above, together with a ‘No View’ category for those who submitted comments but did not express a view. Members should also note the following:

- All areas are defined by local or national administrative areas i.e. using parish, district, county and national boundaries
- All percentages are rounded to the nearest whole number - rounding errors therefore mean that not all figures total 100%

8.7 The views expressed have also been summarised in graphical format (maps) in Appendix C. Arbitrary categories have been used to assist interpretation of the maps.

8.8 The views expressed directly to the council by residents of Romney Marsh are summarised below:

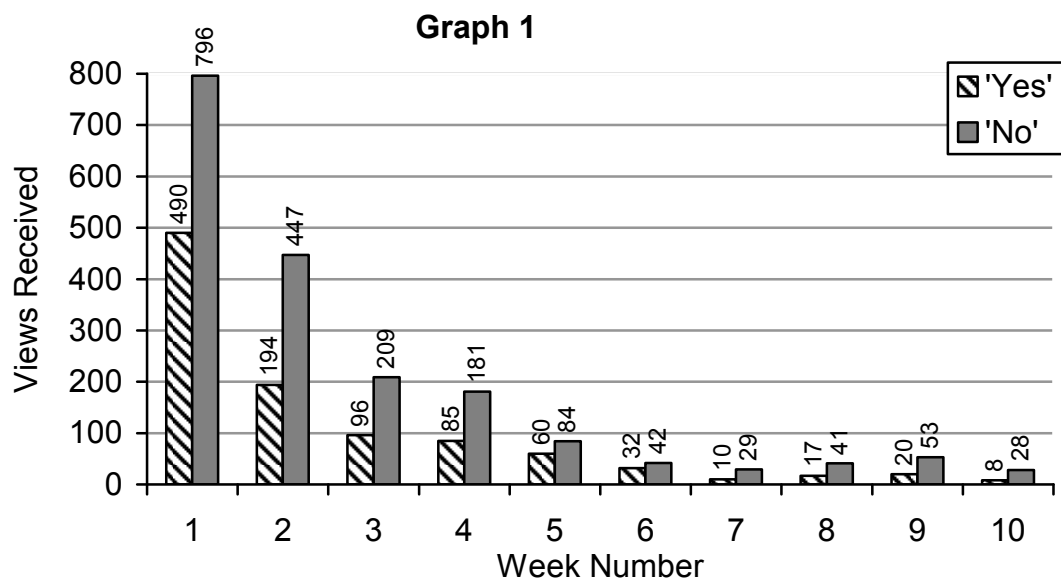
**Table D**

Parish	Residents of Romney Marsh			
	‘Yes’	‘No’	‘Undecided’	‘No View’
Brenzett	12 (26%)	34 (72%)	1 (2%)	0
Brookland	18 (33%)	35 (65%)	0	1 (2%)
Burmarsh	15 (39%)	23 (61%)	0	0
Dymchurch	126 (25%)	357 (70%)	18 (4%)	8 (2%)
Ivychurch	5 (20%)	19 (76%)	0	1 (4%)
Lydd	301 (36%)	513 (61%)	23 (3%)	3 (0%)
Newchurch	19 (32%)	39 (66%)	1 (2%)	0
New Romney	367 (35%)	632 (61%)	28 (3%)	11 (1%)
Old Romney	11 (42%)	14 (54%)	1 (4%)	0
Snargate	3 (13%)	21 (88%)	0	0
St. Mary in the Marsh	135 (36%)	223 (59%)	18 (5%)	2 (1%)
<b>Totals</b>	<b>1,012 (33%)</b>	<b>1,910 (63%)</b>	<b>90 (3%)</b>	<b>26 (1%)</b>

A total of 3,038 views were expressed by residents of Romney Marsh representing 91% of the total 3,328 valid views expressed.

'Yes' views varied between 13% and 42% of the total in each parish with an average of 33% across Romney Marsh. 'No' views varied between 54% and 88% with an average of 63%.

The pattern of responses varied during the soundings period, as indicated on the graph below. During the first week of the ten week soundings period 44% of the total responses were received. This was before the first public exhibition. The public exhibitions were held in weeks 2, 3, 4 and 9.



The views expressed by people who attended one of the public exhibitions showed a different pattern to the overall figure with 54% indicating 'Yes' and 41% indicating 'No'. This seems to reflect experience in West Cumbria (see Table B) where people who knew more about the search for a site for a GDF seemed more likely to support involvement in the process.



- 8.9 The views expressed directly to the council by businesses on Romney Marsh are summarised below:

**Table E**

Parish	Businesses on Romney Marsh			
	'Yes'	'No'	'Undecided'	'No View'
Brenzett	0	1 (100%)	0	0
Brookland	0	0	0	0
Burmarsh	1 (33%)	2 (67%)	0	0
Dymchurch	6 (50%)	6 (50%)	0	0
Ivychurch	0	0	0	0
Lydd	8 (50%)	7 (44%)	1 (6%)	0
Newchurch	3 (100%)	0	0	0
New Romney	11 (44%)	12 (48%)	2 (8%)	0
Old Romney	2 (67%)	1 (33%)	0	0
Snargate	0	0	0	0
St. Mary in the Marsh	0	5 (83%)	1 (17%)	0
<b>Totals</b>	<b>31 (45%)</b>	<b>34 (50%)</b>	<b>4 (6%)</b>	<b>0</b>

A total of 69 views were expressed by businesses on Romney Marsh which represents 2% of the total 3,328 valid views expressed.

The average level of 'Yes' views across Romney Marsh was 45%. 'No' views represented 50% of the total.

- 8.10 The views expressed directly to the council by residents and businesses in neighbouring areas, all of which are outside but within 30km of Romney Marsh, are summarised below:

**Table F**

District	Residents & Businesses outside but within 30 km of Romney Marsh			
	'Yes'	'No'	'Undecided'	'No View'
Ashford	18 (50%)	18 (50%)	0	0
Canterbury	0	2 (100%)	0	0
Dover	2 (100%)	0	0	0
Hastings	5 (50%)	5 (50%)	0	0
Rother	5 (15%)	29 (85%)	0	0
Northern Shepway	20 (29%)	48 (69%)	2 (3%)	0
Swale	0	0	0	0
Tunbridge Wells	0	0	0	0
<b>Totals</b>	<b>50 (32%)</b>	<b>102 (66%)</b>	<b>2 (1%)</b>	<b>0</b>

A total of 154 views were expressed from these neighbouring areas, representing 5% of the total 3,328 valid views expressed.

- 8.11 The views expressed directly to the council by residents and businesses further than 30km from Romney Marsh are summarised below. Views from people who did not give an address are included within this category and shown as unknown.

**Table G**

Location	Residents & Businesses more than 30 km from Romney Marsh			
	'Yes'	'No'	'Undecided'	'No View'
East Sussex	0	2 (100%)	0	0
Kent	3 (25%)	9 (75%)	0	0
UK	3 (23%)	9 (69%)	1 (8%)	0
Mainland Europe	0	1 (100%)	0	0
Rest of the world	1 (100%)	0	0	0
Unknown	2 (25%)	4 (50%)	0	2 (25%)
<b>Totals</b>	<b>9 (24%)</b>	<b>25 (68%)</b>	<b>1 (3%)</b>	<b>2 (5%)</b>

A total of 37 views were expressed from all areas more than 30km from Romney Marsh, or whose location was unknown, representing 1% of the total 3,328 valid views expressed.

- 8.12 The following table summarises Tables D to G by showing the total views expressed directly to the council by residents and businesses, categorised by location:

**Table H**

Summary	All Residents & Businesses			
	'Yes'	'No'	'Undecided'	'No View'
Romney Marsh Residents (Table D)	1,012 (33%)	1,910 (63%)	90 (3%)	26 (1%)
Romney Marsh Businesses (Table E)	31 (45%)	34 (50%)	4 (6%)	0
Kent & Sussex < 30 km (Table F)	50 (32%)	102 (66%)	2 (1%)	0
Elsewhere > 30 km (Table G)	9 (24%)	25 (68%)	1 (3%)	2 (5%)
<b>Totals</b>	<b>1,102 (33%)</b>	<b>2,071 (63%)</b>	<b>97 (3%)</b>	<b>28 (1%)</b>

A total of 3,298 valid views were expressed by all residents and businesses, representing 99% of the total 3,328 valid views expressed. The remaining 30 views (1%) were from political bodies and representatives, interest groups and key stakeholders, as detailed below.

The proportion of 'Yes' and 'No' views are the same for all residents and businesses as they are for residents of Romney Marsh i.e. 33% 'Yes' and 63% 'No'.

8.13 The views of political bodies and representatives, including MEPs, MPs and councils at county, district and parish level, are summarised below. The views are tabulated separately for Romney Marsh and elsewhere. To avoid duplication, the former is given precedence where both are represented. Members should note the following:

- These views have not been included in the preceding summaries for residents and businesses
- Although not all have directly advised the council whether they have a view on the proposal, the following is believed to be an accurate representation of their views
- Where individual representatives have expressed views they are not shown separately where the political body of which they are part has collectively expressed a view

**Table J**

<b>Romney Marsh</b>	<b>Political Bodies &amp; Representatives</b>			
	<b>'Yes'</b>	<b>'No'</b>	<b>'Undecided'</b>	<b>'No View'</b>
Catherine Bearder MEP		Keith Taylor MEP		Dymchurch Parish Council
Lydd Town Council		Damian Collins MP		Ivychurch Parish Council
Shepway District Councillors for Romney Marsh		Kent County Council		Newchurch Parish Council
		Kent County Councillor for Romney Marsh		Old Romney Parish Council
		Brenzett Parish Council		Snargate Parish Council
		Brookland Parish Council		St. Mary in the Marsh Parish Council
		Burmarsh Parish Council		
		New Romney Town Council		
		Shepway Liberal Democrats (also petition with 142 signatures)		

**Table K**

<b>Outside Romney Marsh</b>	<b>Political Bodies &amp; Representatives</b>			
	<b>'Yes'</b>	<b>'No'</b>	<b>'Undecided'</b>	<b>'No View'</b>
Aldington & Bonnington Parish Council		Julian Brazier MP		Damian Green MP
Appledore Parish Council		East Sussex County Council		
Lead Member for Romney Marsh at Ashford Borough Council		Camber Parish Council		
Bilsington Parish Council		Kent Green Party		
Hawkinge Town Council		Newington Parish Council		
Hythe Town Council		Saltwood Parish Council		
Iden Parish Council				
Kenardington Parish Council				
Lyminge Parish Council				
Stanford Parish Council				
Stowting Parish Council				

8.14 The views of interest groups and other potential key stakeholders are summarised below. Members should note the following:

- These views have not been included in the preceding summaries for residents and businesses
- Views are not shown separately for Romney Marsh and elsewhere as the geographical area of interest of these groups does not generally coincide with these areas

**Table L**

<b>Interest Groups &amp; other Key Stakeholders</b>			
<b>'Yes'</b>	<b>'No'</b>	<b>'Undecided'</b>	<b>'No View'</b>
Discover Folkestone, Hythe & Romney Marsh	Hythe Civic Society		Community Action South East (CASE) Kent
Greatstone Primary School	Kent Downs AONB		EDF Energy
Keep the Marsh Special Alliance	Kent Wildlife Trust		Farming members of Romney Marsh NFU
	Royal Society for the Protection of Birds (RSPB)		Natural England
	Visit Kent		Veolia Water

8.15 Members should note the limitations of the soundings process. These are discussed in Appendix B, together with further details of the process.

## **9 KEY ISSUES**

9.1 The most frequent issues raised during the soundings period are listed below, followed by brief comments on each and suggestions for further actions if an EoI were submitted. The issues were:

- Public health
- Environmental damage
- Geology
- Flooding
- Waste from other countries
- Blight & house prices
- Tourism
- Employment
- Location
- Preference for something else
- Benefits
- Delay in implementation
- Inadequate information
- Planning process
- Democratic accountability
- Right of Withdrawal

9.2 Public health – several reasons for concern were raised, including the hazards of radiation from the facility or during transportation, the location of the facility and rail links within the most populated corner of the UK and long term changes such as sea level rise and climate change. Both DECC and the NDA have sought to address some of these issues by providing

generic information which has already been publicised in West Cumbria. Further assessments, including of site-specific (local) aspects, would be carried out if an EoI were submitted. All such issues would need to be resolved in order to satisfy the Community Siting Partnership and regulators as well as local people, for all of whom safety would be the overriding issue.

- 9.3 Environmental damage – many of the concerns here were the same as for public health. Other issues were the scale of the surface facility, the type and scale of any associated new infrastructure, traffic impact and visual impact on the landscape of Romney Marsh. These issues would need to be addressed if an EoI were submitted in order to inform decisions by the local community and Community Siting Partnership on whether or not to proceed further.
- 9.4 Geology – many reasons for concern were raised about the local geology, with many respondents quoting its unsuitability as a reason that an EoI should not be submitted. Concerns included tunnelling, shingle, aquifers, groundwater, earthquakes, faults and the Nirex investigations in the 1980s. While many opinions were expressed, Government has advised that they do not have any detailed knowledge of the geology below Romney Marsh at the depths which would be necessary for the underground facilities. At this stage all they know is that there may be clay of a type similar to that found in the GDF facilities being developed in France and Switzerland. As outlined in the white paper, detailed investigations over many years would be necessary to establish what the geology is at depth and whether it would be suitable. These investigations would begin with a desk study by the British Geological Survey at Stage 2 if an EoI were submitted. A GDF could not be built on Romney Marsh if at any point during the process the geology were found to be unsuitable. If a GDF was built the suitability of the geology would first need to be proved to the satisfaction of the regulators.
- 9.5 Flooding – many concerns were expressed about the safety of a facility built on the low-lying ground of Romney Marsh which is at risk from both inland and coastal flooding. These concerns included future risks associated with sea level rise, long term tilting of the UK and climate change. There is no information at this stage to suggest that it would not be possible to mitigate these risks. However they would need to be addressed if an EoI were submitted in order to inform decisions by the local community and Community Siting Partnership on whether or not to proceed further. An assessment should also be made of the potential benefits to the community of any coastal defence or other flood protection works carried out as part of the project.
- 9.6 Waste from other countries – some people expressed concern that nuclear waste from other countries would be disposed of in a GDF. This would not happen as it is illegal under international law. All 39 countries that have produced nuclear waste are required to dispose of it in their own country. This also means that the UK's nuclear waste cannot be disposed of elsewhere. Clarification on this point was added to the project website during the soundings period.

- 9.7 Blight and house prices – various issues were raised, including possible effects on business in the area, possible implications (both positive and negative) for attracting new business, and possible effects on house prices (also both positive and negative). There is very little information at this stage to justify either the positive or the negative opinions, although there is some evidence that in Cumbria house prices have tracked those in Kent over the last four years. This suggests that the possibility of their hosting a GDF has had no net effect on house prices there, although this cannot be relied on as firm evidence about possible effects on the housing market here. All such issues would need to be investigated if an EoI were submitted in order to inform decisions by the local community and Community Siting Partnership on whether or not to proceed further.
- 9.8 Tourism – many concerns were raised about possible effects on tourism, with many respondents being concerned that the construction and then operation of a “nuclear dump” would discourage people from visiting or staying in the area. Some of the respondents said that this was incompatible with the promoted image of an unspoilt natural environment, although there was no detailed justification of why a GDF would be worse in this regard than the existing or any new nuclear power stations. In the absence of any detailed indication about the scale of community benefits that a GDF would bring, nor any detail on what they could be spent, there was little appreciation during the soundings period of the positive potential impacts, such as improved rail links and other measures to promote tourism in the area. If an EoI were submitted studies could be carried out into the potential positive and negative effects on tourism of hosting a GDF, including during involvement in the siting process.
- 9.9 Employment – doubts were expressed about the number and type of jobs that a GDF would bring to the area and whether workers would be local or would commute from elsewhere. The ‘manpower and skills requirement’ study by the NDA, referred to in paragraph 3.2 was published on the project website to provide answers to many of the questions and concerns raised. Unfortunately incorrect information was also published (by others) which may have led to confusion or doubts in the minds of local people about this major benefit of a GDF. If an EoI were submitted employment issues would need to be clarified before any decisions by the local community and Community Siting Partnership on whether or not to proceed further.
- 9.10 Location – a further cause of confusion in the minds of some local people became apparent during the soundings period. Some people assumed that a GDF on Romney Marsh would necessarily be sited at Dungeness, on or near the site of the existing power stations. No information was provided stating this although one of the schematic images of a GDF provided by the NDA unfortunately and unintentionally resembled the Dungeness peninsular. Clarification was added to the project website to address this issue as soon as it became apparent, including an explanation that Dungeness is an unlikely site due to its SAC, SPA and other environmental designations which protect the Dungeness peninsula.

- 9.11 Preference for something else – many people expressed a preference for something other than a GDF to provide jobs and investment. Dungeness C, Lydd Airport, green tourism, more wind turbines, solar panels and new energy generating technologies were all mentioned. The scope of this report is limited to the possibility of involvement in the siting process for a GDF and does not extend to these issues which could occur alongside a GDF.
- 9.12 Benefits – views expressed about the potential benefits focussed on employment with very few people mentioning any of the other potential benefits outlined in section 3. Preliminary information about the scale and extent of the potential benefits was provided in the leaflet and on the website but was, unfortunately, not as detailed or specific as some people would have liked. This was unavoidable because the Government cannot give details of the level or type of benefits at this very early stage, nor has there been much discussion about what the community's priorities might be. Although these issues would be resolved during later stages of the process, the lack of detailed information about potential benefits did not help respondents to properly consider and weigh the arguments for and against an EoI.
- 9.13 Delay in implementation – the process of finding a suitable site for a GDF necessarily takes many years. The Government's current programme is for construction to start in 2025 and a site is not likely to be chosen until near this time, unless the programme is accelerated. There could therefore be a period of many years between an EoI (if submitted) and Government's decision on where to site the GDF. Some people were concerned about this long period of uncertainty, particularly if at the end of it a GDF is built elsewhere. This is an issue which cannot be resolved at this stage and would be a key consideration for the community in deciding whether or not to remain in the process as it goes forward, having balanced the risks against the potential benefits. The only means of mitigation, apart from withdrawal from the siting process, is to press Government to carry out their investigations as quickly as possible so that the suitability or otherwise of a site on Romney Marsh can be established in the shortest possible time. This would be in line with the Government's wish to accelerate the programme.
- 9.14 Inadequate information - some people felt that there were too many uncertainties and unknowns regarding the possibility of a GDF on Romney Marsh, including the issues mentioned above, and therefore said 'No' to an EoI. This apparent misunderstanding of the process and the question being asked is not surprising as it is unusual for Local Government to take soundings in this way. Many people seem to have understood the soundings to be a 'consultation' on a definite proposal, of the type typically carried out for a major planning application. They do not seem to have understood it to be a far more informal and less rigorous process which is simply about expressing an interest in finding out about a possible scheme and in which the answers to many questions raised would not be known until later in the process.



- 9.15 Planning process – queries were raised about the planning process associated with development of a GDF. Planning permission for a GDF would not be applied for until a preferred site has been identified, which would probably not be until 2025 unless the programme is accelerated. Under current legislation this would be submitted to KCC for determination in consultation with the council (KCC determine all applications relating to minerals and waste development). Prior to any application for a GDF planning applications would be needed to be submitted for any boreholes. Under current legislation such proposals would also be determined by KCC, in consultation with the council. The 2008 Planning Act provided means by which large scale infrastructure projects, known as Nationally Significant Infrastructure Projects can be determined in a more streamlined manner. The National Infrastructure Directorate (NID), previously known as the Major Infrastructure Planning Unit, within the Planning Inspectorate is responsible for making recommendations for such projects to the relevant Secretary of State who would then make the decision. A GDF does not currently fall within the remit of NID and further legislation would be required to be passed for it to do so. Were such legislation to be passed then any planning application for a GDF would be submitted to NID. The council's planning department, alongside that of KCC would be involved in pre-application discussions, would consider the application against local policies and would prepare a response in terms of a Local Impact Report. It would also consider the applicant's Statement of Community Consultation and negotiate planning obligations and community benefits in conjunction with the Community Siting Partnership.
- 9.16 Democratic accountability – some people were concerned about aspects of the process including how the council would decide whether or not to submit an EoI, who would decide whether or not to submit a DtP at Stage 3 and how the Community Siting Partnership would work from Stage 4 onwards. While the white paper provides some guidance, these aspects generally need to be resolved locally at the appropriate times, which would not be until after submission of an EoI. It was therefore not possible to provide the public with detailed answers during the soundings. However publication of all views received during the soundings, including the full text of all comments, does mean that the public have access to exactly the same information as members at this stage. If an EoI were submitted, work could progress in a similar way to West Cumbria where all documents are publicly available and all meetings are open for the public to attend.
- 9.17 Right of Withdrawal – some doubt about the right of a local community to withdraw from the process once it had begun was raised. These doubts echo those raised in West Cumbria and, as there, would need to be addressed before any DtP could be made. West Cumbria has been given a commitment by the Minister that the Right of Withdrawal will be legally binding, which would presumably also apply to Romney Marsh.
- 9.18 As can be seen from the above discussion, it was possible to provide satisfactory answers to some of the issues raised during the soundings period. However it would not be possible to address all of the issues until studies have been carried out, in a similar way to those in West Cumbria. These studies would be fully funded by Government if an EoI is submitted.

The only key issue raised which it would not be possible to address by means of studies or other work is that of the delay between any Eol and Government's decision on where to build a GDF.

- 9.19 The wide range of comments expressed is of considerable value in highlighting the specific concerns which would need to be addressed if an Eol is submitted. However, in terms of their relevance to a decision on whether or not to submit an Eol, the consultation code of practice states that the "focus should be on the evidence given by consultees to back up their arguments". Understandably, the majority of comments received were not supported by evidence, particularly with regard to issues around geology, flooding, blight, house prices, tourism, employment and potential benefits. This was unavoidable in view of the limited information available during the soundings period. The studies mentioned above, which could be carried out if an Eol were submitted, would provide much better evidence on which local people could base their views before any DtP.
- 9.20 The consultation code of practice states that "analysing consultation responses is a qualitative rather than a quantitative exercise". Although the soundings process carried out was not a consultation, this does suggest that members should base their decisions more on the validity of views expressed (qualitative aspects) than on the numbers and percentages in the report (quantitative analysis). Quantitative analysis would be more appropriate in informing a decision on whether or not to submit a DtP than it is for an Eol since the level of information available and consequent understanding of the issues by the community would be much greater at that stage. This is the approach taken by West Cumbria which did not carry out opinion polls until after Eols had been submitted.

## **10 OPTIONS**

- 10.1 To assist debate and decision by members, this report presents a number of options for consideration. Key issues and risks for each option are given in Appendix F. Members may wish to consider other options which may be a variation of or entirely different from those presented, in which case they are asked to instruct officers to consider and report on the issues and risks associated with such options before deciding further. The options below were considered and relate directly to the report recommendations:
- Option 1 – no Eol
  - Option 2 – submission of an Eol
  - Option 3 – submission of a qualified Eol
  - Option 4 – defer decision
- 10.2 The Eol is that described in the white paper and relates to finding out more about the possibility of hosting a GDF by participating in Stages 2 and 3 of the process. Any Eol would be without any obligation or commitment, as set out in the white paper. None of the options relate to a DtP or any further involvement at Stages 4 or beyond, nor for any agreement or willingness to eventually host a GDF.

10.3 **Option 1, no Eol** – members may decide for a variety of reasons that they recommend that the council does not wish to submit an Eol on behalf of Romney Marsh. One argument for this decision would be that a significant majority of those who expressed views (63% overall) do not want to find out more about the possibility of hosting a GDF. This decision would reflect the views of those people on Romney Marsh and neighbouring areas that submitted views and would avoid the need to address a wide range of concerns which cannot be answered adequately at this stage. The main implication of this decision would be loss of the opportunity to find out more about the significant potential benefits of hosting a GDF and, possibly, the eventual realisation of those benefits.

10.4 **Option 2, submission of an Eol** – members may decide that there is sufficient support (33% overall) to recommend that an Eol is submitted on behalf of the Romney Marsh community. One argument for this decision would be that if an Eol were submitted the risks and issues raised during the soundings period could be thoroughly and independently addressed. The community would then be much better informed before being asked whether or not it supported the submission of a DtP. As shown in West Cumbria, increased knowledge and understanding of the issues may lead to increased support and a majority in favour of the possibility of hosting a GDF. An extensive process of consultation, which would be far more rigorous and quantitative than the soundings process, would be carried out to determine the community's view before any decision on whether or not to submit a DtP. A key issue associated with this decision is that it would be against the wishes of the majority of those who expressed a view at this stage.

10.5 **Option 3, submission of a qualified Eol** – as Option 2 except that members may decide that there are some issues that have not been adequately addressed in West Cumbria or that are specific to Romney Marsh and so recommend that the Eol is subject to qualification. The purpose of these qualifications would be to ensure that adequate information was available to the community to inform the decision on whether or not to submit a DtP, rather than these issues potentially not being addressed until later stages. Members may wish to include qualifications on a range of issues, although the following are suggested based on views expressed during the soundings:

- That the Eol is subject to the Government funding independent studies into the potential effects of Romney Marsh being involved in the GDF siting process, as well as the possibility of eventually hosting a GDF, on local tourism, house prices and the business community. The extent of the studies is to cover Romney Marsh itself as well as the rest of the district and neighbouring districts
- That the Eol is subject to the Government clarifying the risks associated with hosting a GDF on Romney Marsh in relation to inland and coastal flooding, both in the short and long term, and provides an indication of the location and nature of any coast protection works it sees as necessary to ensure the safe construction and operation of a GDF

- That the EoI is subject to the Government clarifying the scale and timing of the benefits, including the Community Benefits Package, that the local community would benefit from if a GDF were built

A time limit of, say, one year could be set on these qualifications to ensure that the Government provides this information within a reasonable timescale and well before a decision on whether or not to submit a DtP.

The other risks and issues discussed above will be addressed during the process, as set out in the white paper, so members may not feel it necessary to specifically include them as qualifications at this early stage. If sufficient concerns remained at the end of Stage 3 then these issues could be reconsidered as qualifications in any DtP (if submitted).

- 10.6 **Option 4, defer decision** – members may decide that they do not yet have enough information to make a recommendation with sufficient confidence. An argument for this decision would be that a GDF could have such significant implications for Romney Marsh that a higher level of certainty is required to ensure that the right decision is taken, including ensuring that the views of the community are more objectively understood than the limited soundings carried out have allowed. If so, it would be possible to carry out a more rigorous process of assessment of the community's views, possibly including a quantitative method such as an opinion poll. Depending on the extent of further work required by members, this approach could cost several tens of thousands of pounds funded by the council and would delay a decision by several months. This approach would not provide members of the community with any more information than was provided during the soundings process, for which the submission of an EoI (options 2 or 3) would be necessary.
- 10.7 As part of Option 4 members may consider that, in view of the difference in views from different parishes on Romney Marsh, the extent of the potential Host Community should be reassessed so that areas where there is insufficient support are removed from the search area. Current views are summarised in the table below which categorises the parishes based on the total numbers of 'No' views expressed by local residents from Table D during the soundings process. There were no parishes where 'Yes' views were expressed by a majority of residents. Of those residents who expressed a view, those in Brenzett, Ivychurch and Snargate were most opposed to an EoI. Those in Old Romney and St. Mary in the Marsh were least opposed to an EoI.

**Table M**

<b>Views expressed as percentage of total</b>		
<b>50% to 60% 'No'</b>	<b>60% to 70% 'No'</b>	<b>&gt; 70% 'No'</b>
Old Romney	Brookland	Brenzett
St. Mary in the Marsh	Burmarsh	Ivychurch
	Dymchurch	Snargate
	Lydd	
	Newchurch	
	New Romney	

Any more quantitative assessment work carried out could be used to inform a decision on which parts (if any) of Romney Marsh should not be included in an EoI. It would be necessary to clarify that the extent of the potential Host Community was being reconsidered and that only those part(s) where there was sufficient support for an EoI would be included if one were submitted. This would not preclude any other part(s) of Romney Marsh from changing their opinions as further information becomes available during Stages 2 & 3 and becoming part of the potential Host Community at a later date. This assumes that the process was still continuing in the original potential Host Community and would probably need to be before any DtP in these areas. Reduction in the extent of the potential Host Community would in any case be part of the process at Stage 2 and beyond, as further information on geology and community views became known, but areas of the community shown to express significant opposition would probably prefer to be removed from the search for a site at the earliest opportunity.

- 10.8 As a further part of Option 4, members may also wish to address community concerns about democratic accountability by specifying the minimum level of support which would be required in any part of Romney Marsh before it could be included in an EoI. The minimum level of support required could be set at 50% of those expressing a firm opinion i.e. excluding 'Undecided' and 'No View's, which would represent a clear majority. Alternatively it could be set at a lower threshold, perhaps 40% or some other figure, in recognition of the fact that opinions may change as more information becomes available after an EoI. The level of support would be demonstrated by opinion poll or other quantitative means of assessment.
- 10.9 For Options 2, 3 & 4, and in recognition of community concerns about democratic accountability, members may wish to decide that clear majority support i.e. by more than 50% of those who express a firm opinion, would be necessary for any decision to submit a DtP, as in West Cumbria. The level of support within the community would be established by quantitative assessment as part of the extensive consultation carried out during Stage 3.

## **11 FUTURE WORK**

- 11.1 The council's decisions will need to be communicated and explained to the local community and key stakeholders. Residents and businesses will be informed through local newspapers, broadcast media and the council and project websites. Key stakeholders will be informed by letter.
- 11.2 If an EoI was submitted the Government would commission the British Geological Survey to carry out geological screening using available information to establish if there were any reasons that the geology may not be suitable. This is Stage 2 of the process. In parallel with this, the council would discuss with Government the work required at Stage 3 i.e. up to a local decision on whether or not to submit a DtP. The white paper lists indicative steps on how this could be done but is not prescriptive. A programme of work and associated resources would be discussed and agreed with Government but it would need to include an extensive programme of engagement with the community, stakeholders and political bodies to provide further information and address the issues raised during the soundings process. This work would be funded by the Government.
- 11.3 If a decision is deferred officers will carry out the further work necessary, as outlined in paragraphs 10.6 to 10.8, to inform a decision at later date.

## **12 RISK MANAGEMENT**

- 12.1 A summary of the perceived risks at this stage of the process (before the end of Stage 1) is provided at Appendix F.
- 12.2 A comprehensive process of risk management would be carried out by officers, DECC and the NDA if an EoI were submitted and would continue through all stages of the process.

## **13 CONCLUSION**

- 13.1 The report has attempted to present both the opportunities and concerns associated with development of a GDF. The options presented attempt to enable members to balance those opportunities and concerns and either stop any involvement now or allow further information to be obtained to answer the questions that have been posed by the community.
- 13.2 An EoI would be without any commitment and allow the issues and concerns raised during the soundings period to be investigated in detail and discussed at length by the potential host and surrounding communities, stakeholders and political bodies before a decision on whether or not to submit a DtP. Actual participation in the process of finding a site for a GDF would not begin unless a DtP is submitted.

## **14 LEGAL/FINANCIAL AND OTHER CONTROLS/POLICY MATTERS**

### **14.1 Legal Officer's Comments (PW)**

There are no legal implications arising directly from this report.

## 14.2 Finance Officer's Comments (TM)

There are no financial implications arising directly from this report if the authority submits an Expression of Interest as the Government will fund all of the costs incurred including staff time. Recommendation 2(d) may incur some additional cost as DECC will not pay for any costs until an EoI is submitted.

## 14.3 Diversities and Equalities Implications (DI)

There are no implications arising directly from this report.

## 15 CONTACT OFFICERS AND BACKGROUND DOCUMENTS

Councillors with any questions arising out of this report should contact the following officer prior to the meeting

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The following background documents have been relied upon in the preparation of this report:

'Managing Radioactive Waste Safely: A Framework for Implementing Geological Disposal', a Government White Paper by Defra, BERR and the devolved administrations for Wales and Northern Ireland, June 2008

'The Government Response to Consultation on the Revised Draft National Policy Statements for Energy Infrastructure' by DECC, June 2011

'Romney Marsh Socio-Economic Impact Assessment' report by Regeneris Consulting for Shepway District Council, Kent County Council, Magnox Ltd and the Nuclear Decommissioning Authority, 2011

'Geological Disposal: Manpower and skills requirements – summary', a study report by the Nuclear Decommissioning Authority (NDA), May 2011

'Code of Practice on Consultation', HM Government, July 2008

### **Appendices:**

- Appendix A: Abbreviations & acronyms
- Appendix B: Soundings report
- Appendix C: Maps summarising views by area
- Appendix D: Comments expressed
- Appendix E: Media report
- Appendix F: Risk management