



Nuclear Industry Association

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GDF Consultation: National Policy Statement for Geological Disposal Infrastructure

1. The Nuclear Industry Association (NIA) welcomes the chance to respond to the Government's consultation on a Draft National Policy Statement for Geological Disposal Infrastructure.
2. The NIA is the trade association and representative body for the civil nuclear industry in the UK. It represents around 260 companies operating across all aspects of the nuclear fuel cycle, including the current and prospective operators of nuclear power stations, the international designers and vendors of nuclear power stations, and those engaged in decommissioning, waste management and nuclear liabilities management. Members also include nuclear equipment suppliers, engineering and construction firms, nuclear research organisations, and legal, financial and consultancy companies.
3. Several of our members will be making their own responses to this consultation.

Overview

4. The NIA agrees that geological disposal is the appropriate policy for the long term safe and secure management of higher activity waste. The Government's independent advisers the Committee on Radioactive Waste Management (CoRWM) were clear it was the right mechanism, and it is the solution being adopted internationally.
5. We therefore support the policy set out in the 2014 White Paper 'Implementing Geological Disposal', including the decision to classify geological disposal infrastructure as a nationally significant infrastructure project (NSIP). Similarly we support the production of a National Policy Statement to create a clear route for planning decisions on such projects, on the basis that need has been demonstrated.
6. We agree that the setting out of high level assessment principles against which development consent applications for such infrastructure can be considered will help the Planning Inspectorate and Secretary of State to take decisions on these vitally important national projects.
7. Some of the NIA's member companies have significant experience in planning matters and will be providing detailed responses to the consultations specific questions. Our higher level responses are set out below.

Question 1: Does the draft NPS provide suitable direction to the Planning Inspectorate and Secretary of State on the need for geological disposal infrastructure?

8. Yes. We believe that the draft NPS clearly sets out the technical, ethical and legal case for a geological disposal facility to manage and dispose of the UK's higher activity radioactive waste.
9. As the draft NPS recognises geological disposal is the solution being adopted internationally, and is needed both to deal with the UK's legacy waste that has been built up over the past 60 years, and for waste that will arise in future from the UK's planned and proposed new nuclear stations as well as those currently operating or under construction, and from other sources including the defence sector, hospitals and scientific research.
10. We believe the NPS should say more about the potential timing of the need for a repository. The draft recognises that indefinite storage would represent a burden for future generations and that there is a responsibility to address this. It also notes CoRWM's statement in its 2006 report, reiterated in 2013, that 'the aim should be to progress to disposal as soon as practicable, consistent with developing and maintaining public and stakeholder confidence'.
11. However Government could usefully state that there is a need to progress this urgently, recognising that there will be a long lead-time before the facility is operational. Clearly there could be a temptation to defer important decisions if the need was not seen as urgent.

Question 2. Do the assessment criteria adequately address the principles that the developer, the Planning Inspectorate and the Secretary of State should take into account in an application for development consent? If not, what further information on the assessment criteria is required?

12. Yes. The general principles of assessment set out in the NPS, together with the requirement to consider the potential benefits and potential adverse impacts, are the right criteria to be taken into account in an application for development consent.

Question 3. Does the draft NPS appropriately cover the impacts of geological disposal infrastructure and potential options to mitigate those impacts? Please provide reasons to support your answer.

13. We believe that the generic impacts and guidance set out in the draft NPS will enable the national need to be properly balanced against the impacts of a development.

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