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e-mail response sent to: EQR@gov.wales

Dear Sir/Madam,

Response to: Geological Disposal of Radioactive Waste

The Royal Town Planning Institute (RTPI) is the largest professional institute for planners in Europe, representing some 25,000 spatial planners. RTPI Cymru represents the RTPI in Wales, with 1,100 members. The Institute seeks to advance the science and art of spatial planning for the benefit of the public. As well as promoting spatial planning, the RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, training and development. The response has been formed drawing on the expertise of the RTPI Cymru Policy and Research Forum which includes a cross section of planning practitioners from the private and public sectors and academia from across Wales.

Thank you for the opportunity to contribute our views to the above consultation.

RTPI Cymru considers that the planning system has a central role to play in the consideration and development of Geological Disposal Facilities (GDF) in Wales. The planning issues raised would be potentially significant and require careful assessment in the light of current national and local planning policies and development plans.

A considerable increase in awareness of the issue is needed across the planning sector in Wales. A GDF will have implications for all areas of land use planning, and affect the land use plans for any area for multiple generations. Are sufficient resources available at a national level to bring forward greater awareness of the issue?

The Well Being of Future Generations Act 2015 gives a potential framework for communication to be brought forward. Are there potential lessons to be learned from the nature of national engagement in low carbon policy development, and the current planning issues in relation to renewable energy implementation? Could the lessons be applied to communication and engagement in GDF planning?

Question 1

There is a need to ensure communities are armed with sufficient information, knowledge and awareness of the issue. It is unclear what would happen in the absence of any emerging

community. How would engagement would move forward with no community expressing any interest in dialogue?

We suggest that the National Development Framework (NDF) play a role in facilitating discussion on regional and sub regional planning, given the fundamental input (during formative engagement) of minerals, aggregates and waste planners to the discussion. Local planning authorities (LPAs) and specialist minerals planners should also form part of the formative engagement team.

There would be a need for considerable cross border dialogue and communication. Is there an engagement issue in relation to the differentiation between legacy waste and new generation waste, or the need for multiple GDF? We note that a single GDF is not a requirement of the consultation. Prior to moving forward greater clarity is needed on defining the disposal inventory and confirmation of the safety case for a single and/or need for several GDF.

Question 2

The economic, transport, environmental, minerals, waste and health implications of a potential GDF will cover large geographical areas, encompassing multiple local authorities. The area of search would therefore need policy consideration within the Wales NDF and any relevant Strategic Development Plan. The project would have considerable implications for any Local Development Plans in Wales.

Question 3

The role of specialist planning knowledge should be brought forward within the community partnership.

Question 4

The proactive engagement of an LPA via a service level agreement could be signposted within the consultation documentation.

The core role of local authorities in paragraph 102 is confirmed with the statement “a test of public support cannot be designed or enacted without their support”. It appears that this phrase gives the local authority the key and overriding decision making role in the community partnership. Local authorities have developed considerable experience in community decision making via community strategies, originating from Local Agenda 21 frameworks, but not at the scale and significance required for a GDF. It is therefore essential that resources for involvement by LPAs are identified, for example through Planning Performance Agreements (PPAs).

Question 5

The impacts of a GDF (including, but not only, waste, transport and minerals) are likely to cover a large area and thus potentially very large numbers of Community Councils would be brought into consideration. The views of One Voice Wales should be sought to input to this key question of defining a host community.

Question 6 & 7

No comments

Question 8

We support the need for access to expert advice, we would wish to reemphasise the need for input of a diverse range of professional planning expertise to any GDF proposal.

Question 9

No comments

If you require further assistance, please contact RTPI Cymru on 029 2047 3923 or e-mail
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Yours sincerely,



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