

Our Ref: DD/zb
Your Ref: 4/06/2318/0*1

6 June 2006

Dear Mr Pomfret

TWO STOREY PREFABRICATED OFFICE BUILDING – SELLAFIELD

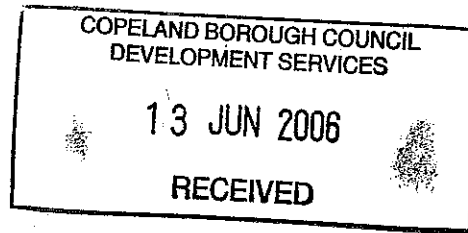
We would like to enquire as to whether the occupants of this office building need to be on site or could they be accommodated off site?

It has long been the Council's policy to encourage the practice of "off site" accommodation for offices. The construction of offices within the local towns in Copeland would have significant indirect benefits for the local community, furthermore it would reduce the amount of traffic travelling to Sellafield, which would improve both road safety and the environment.

Yours sincerely

David Davies
Head of Sustainability & Nuclear Policy

Development Services Manager
 Copeland Borough Council
 Copeland Centre
 Catherine Street
 Whitehaven
 Cumbria
 CA28 7SJ



Direct tel: 019467 71220
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12 June 2006

Your ref: 4/2006/2318

Dear Mr Pomfret

PLANNING APPLICATION FOR THE RELOCATION OF A TWO STOREY OFFICE BUILDING, SELLAFIELD. REF: 4/2006/2318

The planning application was submitted on 10 May 2006.

Temporary Planning Permission was renewed on 5 January 2006 and expires on 31 January 2011 (Ref: 4/05/2855/0), for the two storey office building known as B481.3. The building is located on the East side of the Sellafield Site close to the areas of cleanup.


As part of the enabling works for the B215 Evaporator D project, it will be necessary to dismantle B481.3 two storey office building. The building remains in good condition and the company would like to dismantle and re-erect the building in a new location on the Sellafield Site.

The building accommodates 80 people from the cleanup lead team and these are all existing personnel on site, in this role they have frequent meetings with other areas of the Sellafield Site (Production, Operations and Infrastructure). To minimise disruption and to facilitate such discussions it is highly beneficial for the individuals to be based on the Sellafield Site.

When relocated the building would take up a small part of the area previously occupied by B591. Indications are that the building will be required at least for the next five years. Please could you grant planning permission for at least five years.

If you require further information please do not hesitate to contact me or alternatively I Massey on Ex 71220 or mobile 07803 887 164 or J Parke on Ex 71221.

Yours sincerely



B Snelson
 Managing Director

David

On the basis of the above I trust you will agree that there is good reason for this particular team to be based within the Sellafield site.

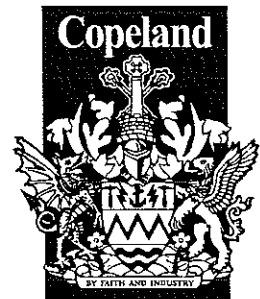
Regards

Tony

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HEAD OF SERVICE
SUSTAINABILITY AND NUCLEAR POLICY

David Davies

Our Ref: DD/zb
Your Ref: 4/06/2318/0*1

19 June 2006

Dear Mr Pomfret

TWO STOREY PREFABRICATED OFFICE BUILDING – SELLAFIELD

Thank you for forwarding the reply from British Nuclear Group dated 12 June 2006.

Based on this information, I agree that temporary planning permission should be granted in this instance.

However in future, I request that where permission is sought for accommodation by this operator, it is made clear to them that they need to provide justification why they cannot be based off-site.

Yours sincerely

Zena Bergmann

pp David Davies
Head of Sustainability & Nuclear Policy

VALDOR

Values in Decisions On Risk Stockholm, 14th to 18th May 06

Introduction

The Valdor symposia are arranged to support the further development of transparent risk management and assessment. It takes a holistic and democratic approach to societal decision making in the complex issues including the nuclear agenda. The symposia believe that in order to resolve complex issues there is a need to have a clear framework of collaboration between scientists, technologists, NGOs and the local community, with transparency as a fundamental requirement.

The conference concentrated on four main areas of risk management and assessment, these were:

- Radioactive Waste Management.
- Biotechnology.
- Contaminated Land.
- Electromagnetic Fields (EMF).

Representation

Alongside representation from Sweden and the UK, a wide range of countries were represented at the conference; including France, Germany, Finland, USA, Canada, Iran, Korea and Australia. There was a good balance of academics, scientists, technologists, social scientists, regulators, NGOs and community groups.

Key Content

- Aarhus convention.
- Precautionary Principle.
- Stakeholder Involvement.
- Ethics / Sustainable Development & Social Responsibility.
- Community environmental justice (Polluter Pays Principle).
- SEA (compulsory 2003, UK – Plans Programmes only i.e. strategic) and EIA (projects). Sustainable Appraisal (SA will be Plans Programmes and Policy) and will take over SEA in the near future.
- Contaminated land remediation.
- COWAM 2. (Serge Gadbois).
- CARL. (Anne Bergmans).

Key issues

- How do ethics fit with democracy and how ethics be used in a pragmatic community decision-making process?
- Can stakeholders understand the complexity of the decision making process?
- What level of input is expected from a community, rubber stamp or an equal partnership in technical / value participation during whole process including the design and implementation stages?
- How can we ensure a transparent partnership between government, the implementing body and the community?
- How can we change a current 'expert-driven' process into a 'values-driven' process?
- How can we validate a new process of local empowered decision-making rather than a central government lead one and ensure a mandated process?

NuLEAF key statements

- Reinforced our policies of volunteerism and willingness for a community to withdraw from the process during the staged design and implementation process.

- Asked for debate and clarity on what is the ‘affected community’, i.e. wider community v local community and the question of weighting?
- Commented positively on the CoRWM process of stakeholder involvement, however stressed some concern over the short time stakeholders have to respond to the draft recommendations and question their ethics behind this, i.e. is it rail-roading the process or enthusiasm to stick to the programme; on-target budget?
- As a communities burden, whether perceived or not, hosting a radioactive waste site is long-term, community benefits need to take account of future generations and thus needs to be intergenerational in their implementation.
- In relation to contaminated land clean-up/remediation there should be a close comparison between community benefits to the savings made by a site licence holder/NDA in not fully returning the site to a Greenfield status.

Recommendations

- Further research the potential for using the precautionary principle.
- Look into the emerging SEA process during social environmental planning for waste sites.
- Learn more about the Aarhus convention 2005 and consider its relevance to our remit.
- Consider the potential for using the provision of a ‘Special Development Order’ in relation to linking the ‘veto/willingness to proceed’ principle with the ‘local planning’ process.
- Conduct more research into considering a similar role for the future of CoRWM with that of the Swedish group KASAM, i.e. an independent scientific council to promote, support, advise and oversee the process of an implementing body and community partnership.

Conclusion

The symposia reinforced the principles of volunteerism, veto and community benefit for the complex issue of radioactive waste management. It emphasised the importance of developing a transparent and democratic approach between government, scientific bodies and community values.

It highlighted the need to change the current expert-driven approach to developing an equal partnership between ‘values’ and ‘fact’. Furthermore the precautionary principle and the principles behind sustainable development are fundamental to the solution.

The question of ethical pragmatism still remains. Everyone agrees that ethics are fundamental to the process however, it is how it is integrated practically into the democratic process. It is impossible to have consensus on ethics and it is not ethical to ignore the individual. Shouldn’t democracy by elected bodies be ethical enough as a recognised process.

I attach a short explanatory note in Appendix 1.

David Davies

Head of Sustainability and Nuclear Policy,
Copeland Borough Council

APPENDIX 1

Aarhus Convention

Following on from the Rio Declaration in 1992, which advocated a 'bottom-up' approach to decision-making, the Aarhus Convention in 2005 further reinforced this approach and asked for access to information, public participation and access to justice (a right to appeal) with regard to environmental issues.

Precautionary Principle

Defined during the Rio Declaration in 1992. The key areas of this principle are:

- Even when lacking full scientific certainty, action must be taken to avert harm to the environment and humans.
- Sustainable methods of production and consumption.
- Access to participation of the general public.

Polluter Pays Principle

A cornerstone of environmental policy since the 1970s, it passes the responsibility/liability of clean-up to the polluter. Practical constraints include assessing an agreed monetary value for remediation.

Sustainable Development

Development that meets the requirements of our current society without compromising the needs of future generations.

COWAM 2

Serge Gadbois from MUTADIS, France, presented an introduction to the COWAM (Community Waste Management) action project. The four key work packages cover the main aspects of decision-making governance, these are:

WP1- Implementing local democracy and participatory assessment methods.

WP2- Influence of local stakeholders on the national decision-making process.

WP3- Quality of decision-making processes

WP4- Long-term governance.

The project, established within the European 6th Framework Research Programme in January 2004, will be completed at the end of 2006. COWAM 3 will then follow.

CARL

Anne Bergmans from the University of Antwerp and project coordinator, introduced the CARL research programme. The cross-national social science programme researches into the effect of stakeholder involvement on the decision-making in radioactive waste management. There are four types of partners Citizens, Agencies, Researchers and Licensing regulators. The countries involved are: Slovenia, Belgium, Sweden, UK, Canada and Finland. The main aims of the project are to provide a platform for interaction, collaboration and sharing best practice. And to feed the benefit of social-science research in stakeholder involvement within the radioactive waste agenda.

The 2nd phase of the project (already reported) focussed on the countries reports on how they approach the issue and the current situation in their own national setting, the 3rd will compare the individual country reports in order to further identify the

relationships between each country. Although from a UK perspective it is not possible to directly translate a process or system from another country, however we can cherry-pick the aspects that would work for our particular political structure.

END.