

# Statement of Community Involvement

**Demolition of the above ground ponds complex structures; the permanent retention of below-ground radioactively contaminated structures and of demolition arisings (including radioactively contaminated demolition waste) emplaced in below ground voids; and related capping and drainage works**

Trawsfynydd Nuclear Power Station, Blaenau Ffestiniog, LL41 4DT

Avison Young Reference: AY/17C1000085/SCI/02

NRS (Client) Reference: TRAWS-23-044 Issue 02

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**For and on behalf of Avison Young (UK) Limited**

# 1. Introduction

- 1.1 This Statement of Community Involvement has been prepared to accompany and support a full planning application for:
- i the demolition of the Trawsfynydd ponds complex buildings;
  - ii the infill of below-ground voids of the ponds complex, mainly with radioactively contaminated demolition arisings, and the permanent retention of the infill (which, in environmental permitting terms, is the disposal of radioactive waste);
  - iii the permanent retention of the radioactively contaminated residual below-ground structures of and around the ponds complex (which, in environmental permitting terms, also involves the disposal of radioactive waste);
  - iv the capping of the footprint of the former ponds complex with a concrete cap; and
  - v modifications to the local drainage on and around the concrete cap.
- 1.2 The applicant is Nuclear Restoration Services (NRS) Limited<sup>1</sup>. On 02 March 2024, Magnox Limited was rebranded to NRS. Hereafter the company is referred to as ‘the Applicant’.
- 1.3 Although it is not a mandatory requirement to submit a Statement of Community Involvement in support of planning applications, the Applicant has taken a proactive approach to engaging with the local community over these proposals for a number of years and recognises the importance of pre-application consultation and engagement. This statement provides a summary of the public engagement undertaken.
- 1.4 The remainder of this document outlines the pre-application consultation / engagement process and the Applicant’s responses to comments received. The statement is therefore structured as follows:
- Section 2 provides an explanation of the background to the site, its location, a description of the proposals and the context to the engagement / consultation;
  - Section 3 outlines the stakeholder and community engagement undertaken; and
  - Section 4 provides a summary and conclusion.

## 2. Consultation / Engagement Context

### Background to the Proposals

- 2.1 Trawsfynydd started generating electricity in 1965 and ceased generation in 1991, being permanently shut down in 1993. The site is currently undergoing decommissioning and waste management operations. Decommissioning involves the systematic removal and management of plant, buildings and waste previously associated with electricity generation and subsequent operations.

### Application Site

- 2.2 The application site mainly relates to the ponds complex, which comprises a complex of mainly contiguous buildings (some of which extend below-ground) located adjacent to the two reactor buildings. However, due to the proposed disposals including some redundant features outside of the ponds complex footprint, the application site encompasses a slightly broader “Disposal Area”. The site location plan is included at Appendix I.

### Description of the Proposed Development

- 2.3 The proposals involve the demolition of the ponds complex to ground slab level, infilling of its below-ground voids, capping of most of its footprint, and modifications to the surface water drainage. The

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<sup>1</sup> Nuclear Restoration Services Limited, the Site Licence Company (SLC) for the Trawsfynydd Site, is a wholly owned subsidiary of the Nuclear Decommissioning Authority (NDA) and is responsible for the general management of, and all operations at, a fleet of reactor sites including Trawsfynydd.

proposals also include the on-site disposal of some structures of the ponds complex that are contaminated with residual low-level radioactivity, including using suitable radioactively contaminated arisings (concrete and masonry) from demolition of the above ground structures to infill unwanted voids (known as “disposal for a purpose”). Some voids will be partially infilled with clean concrete for structural reasons, and others may be partially infilled with clean concrete for groundwater impact mitigation reasons. Some additional near-by, but relatively minor, radioactively contaminated below-ground infrastructure will also become in-situ disposals, although these do not require any significant engineering operations.

### **Pre-Application Enquiry to Eryri National Park Authority (ENPA)**

- 2.4 A planning pre-application enquiry (LPA Reference NP5/73/287L) was submitted to ENPA on 2<sup>nd</sup> September 2022 (letter dated 31<sup>st</sup> August 2022), to provide details of the proposals for the demolition of the ponds complex and on-site disposal of suitable structures/demolition arisings. Although a formal written response has not been received, informally ENPA provided information on the following:
- the scope of technical documents required in support of the planning application;
  - the key planning policies relevant to the proposals; and
  - the likely key material / environmental considerations applicable to the proposals.
- 2.5 A virtual pre-application meeting was also held on 11<sup>th</sup> November 2022, with Robin Wynne Williams (Senior Minerals and Waste Planning Officer).
- 2.6 The matters raised in response to the pre-application enquiry have been addressed in the Planning Statement, Environmental Statement or in supplementary documents accompanying the submission of the full planning application.

### **Environmental Impact Assessment Screening and Scoping Opinion**

- 2.7 The Applicant submitted a formal request for a screening opinion to ENPA on 26<sup>th</sup> January 2022. On 13<sup>th</sup> May 2022, ENPA issued a positive screening determination confirming the likely impact of the proposed development on the environment will require the submission of an Environmental Statement. The screening determination was on the basis of the proposed development being Schedule 2 development – threshold exceeded / criterion met or Sensitive Area and likely to have significant effects.
- 2.8 A scoping request was made by the Applicant on 15<sup>th</sup> September 2022, and a final scoping opinion received on 23<sup>rd</sup> March 2023. The scoping opinion included commentary provided by Natural Resources Wales (NRW).

## **3. Summary of Engagement / Consultation Undertaken**

### **Site Stakeholder Group (SSG)**

- 3.1 The Site Stakeholder Group (SSG) is an independent, local community-based body that is an interface between the Nuclear Decommissioning Authority (NDA), the local community and the nuclear site operator at Trawsfynydd (the Applicant). It operates under the principles of openness and transparency, with the aim of being accessible to its communities. It is primarily site-focussed but takes account of wider policy issues and developments.
- 3.2 The overarching purpose of the SSG is to be the prime interface between the local community and the site operators of Trawsfynydd. SSG membership reflects the representational structure of the local community and its interests as well as the operational status of the site and the needs of the NDA. On this basis, the SSG consists of:
- Representatives of the local community and local environmental groups.
  - Independent advisors to support members as appropriate.
  - Appointed (non-voting) representatives of relevant organisations such as regulators, local authorities, unions, emergency and health services.
  - Representatives of the site operators (non-voting).

- A representative of the NDA (non-voting).
- Additional co-opted members as required (non-voting).

3.3 The specific role and purpose of the SSG is:

- To provide an active channel of communication between the site operators, the NDA and local stakeholders.
- To provide an opportunity for questioning the operators, the NDA and regulators on behalf of the community.
- To allow stakeholders the opportunity to comment on and influence strategies and plans.
- To represent local views and input timely advice to the operators, the NDA and the regulators.
- To comment on the performance of the operators and the NDA.
- To commission and receive reports about site activities and their impact on, for example, safety, the environment and health.
- To review arrangements for such matters as emergency response.
- To provide views and comments to the NDA on the future of the decommissioning site.
- To set up sub-groups to address specific issues (including waste management).
- To set up wider local consultation via the operators as required.

3.4 The works to decommission and demolish the ponds complex at Trawsfynydd and dispose of suitable infill in the below-ground voids before capping of its footprint have been discussed with the Trawsfynydd SSG several times over the last seven or eight years during the development of the scheme. A list of the SSG meetings at which the proposals have been discussed is set out below:

Meeting Date	Extent of discussion about the proposals
6 <sup>th</sup> June 2016	A presentation was given by the Applicant's End State Project Manager regarding new draft regulatory guidance on optimising site end states and associated waste management. It was explained that, where appropriate and optimised, some low-level decommissioning wastes could remain on site rather than being transported for off-site disposal. Also, that three 'lead and learn' sites had been chosen to trial the draft regulatory guidance – Trawsfynydd was (is) one of those sites.
5 <sup>th</sup> December 2016	Further to the optimised end state update and the site director's site closure report, a question was raised about the potential for on-site disposal of suitable radioactive waste at Trawsfynydd and whether this would open the door for other sites to import waste to the site. It was confirmed that this was not being proposed.
4 <sup>th</sup> December 2017	A progress update was provided by the Applicant' End State Project Manager in respect of optimising site end states in which it was explained that the feasibility of the partial demolition of the ponds complex and on-site disposal of suitable radioactive waste was being considered.
6 <sup>th</sup> June 2019	A presentation was given by the Applicant's End State Project Manager regarding optimising site end states. Members' attention was drawn to a strategy change involving the demolition of all the above ground portions of the ponds complex and leaving some below ground features in-situ. Calls were made for a robust public consultation process.
3 <sup>rd</sup> December 2020	The Applicant's End State Project Manager provided an update report on the development work undertaken to support the ponds complex demolition and associated on-site disposal.
10 <sup>th</sup> June 2021	The Applicant's End State Project Manager provided an update report on the development work undertaken to support the ponds complex

Meeting Date	Extent of discussion about the proposals
	demolition and associated on-site disposal. It was highlighted that 'GRR' guidance was published in 2018 for operators and stakeholders to consider the best option for disposing of remaining lightly contaminated radioactive wastes generated during the remaining decommissioning programme. It was confirmed the strategy for Trawsfynydd ponds complex had been revised accordingly.
18 <sup>th</sup> November 2021	The Applicant's End State Project Manager and Plant & Structures Manager provided an update report on the ponds complex demolition proposals and tabled a timeline for progress.
9 <sup>th</sup> June 2022	The Applicant's End State Project Manager provided an update report on the development work undertaken to support the ponds complex demolition and associated on-site disposal. Particular attention was drawn to the configuration of the complex and the current work programme (including the communications plan).
8 <sup>th</sup> June 2023	The Applicant's End State Project Manager provided an update report on the ponds complex demolition proposals and tabled a timeline for progress.

3.5 The SSG makes information publicly available by publishing meeting dates and minutes on its specific website. The website address for the Trawsfynydd SSG is:

<https://magnoxstakeholdergroups.com/site/trawsfynydd/>

3.6 Extracts (edited for clarity) from the relevant SSG meeting minutes are included at Appendix II.

**Trawsfynydd End-State Group (TESG)**

3.7 The Trawsfynydd End-State Group (TESG) has been meeting regularly in some form since May 2016, its primary purposes being to: identify and seek resolution to issues which are potential impediments to defining the end state for the site and/or effective delivery of work towards it; and ensure “no surprises” prior to and during wider public engagement.

3.8 The TESG has the following members:

- Site Integration Manager (delegate of Site Closure Director) – Chair
- Site EHSSQ Manager (or delegate)
- End State Manager
- End State Technical Lead
- The corporate Head of Profession Environment & Waste (or delegate)
- Natural Resources Wales (NRW) site inspector (or delegate)
- Environment Agency representative in support of NRW
- Office for Nuclear Regulation (ONR) site inspector (or delegate)
- NDA representative
- Representative(s) of Planning Authority

3.9 The TESG is not a forum that includes direct representation of the local community, and much of the discussion that takes place concerns either progress towards making the planning and permit<sup>2</sup>

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<sup>2</sup> Meaning an application to vary the site's environmental permit under Environmental Permitting Regulations, as required to enable the on-site disposal of solid radioactive wastes.

applications for the ponds demolition and disposal applications, or concerns detailed technical matters. As such, no further information is provided in this Statement of Community Involvement.

### **Stakeholder Workshop**

- 3.10 A workshop organised by the applicant was held at the Prysor Centre (neighbouring the Trawsfynydd Site) on 29<sup>th</sup> November 2016. The workshop involved representatives of the Applicant, the NDA, regulatory organisations covering England, Wales and Scotland, and representatives of local stakeholder groups. The local Welsh Senedd member attended, as did a representative of NuLeAF. The workshop included dialogue on the advantages and disadvantages of possible decommissioning strategies for the Trawsfynydd ponds complex.

### **Community Council Presentations**

- 3.11 Presentations were made to the Trawsfynydd and Maentwrog Community Councils in 2017.

### **Councillor Feedback Request Letter**

- 3.12 On 21<sup>st</sup> December 2022, the Applicant sent a letter (copy enclosed at Appendix III) to local councillors describing the proposals and requesting feedback be provided before 31<sup>st</sup> January 2023. The purpose of this letter was to gain an understanding of what local people think of the proposals.
- 3.13 On 24<sup>th</sup> March 2023, the Applicant arranged a visit to the Trawsfynydd site for Members of ENPA's Planning Committee. A presentation was given at the site explaining the proposals and Members were shown the ponds complex and wider application site.

### **Public Engagement / Consultation Events**

- 3.14 Three staffed public consultation events have been held in respect of the proposals. These took the form of drop-in sessions. In addition, to support the public events, four unstaffed exhibitions were organised at local libraries and a virtual, online, exhibition ran in parallel to the public events. The public engagement and consultation period was from 10 July 2023 through to 31 August 2023, a total of 53 days inclusive. A total of 32 people attended the across the three drop-in events with 54 feedback forms completed. 76% of people attended an exhibition (either at a public event or an unstaffed exhibition). The remainder (24%) attended online.
- 3.15 Appendix IV includes details of these events the promotion and publicity campaign in advance of and during the events, local press involvement, the key points raised and the Applicant's responses.

### **Health Impact Assessment (HIA) Workshop**

- 3.16 Following discussion with the National Park Authority and the Wales Health Impact Assessment Support Unit, the Applicant took the decision to prepare a HIA for the proposed development and, as part of this assessment, undertook a workshop to engage with stakeholders and members of the public.
- 3.17 The purpose of the workshop was for the Applicant to understand any concerns people/groups may have regarding any perceived health effects of the proposed development. A Health Impacts Assessment (Document Reference: TRAWS-24-001) that provides the details of this workshop, the key points raised and the Applicant's response has been produced and has been submitted as part of this application.

### **Mandatory Pre-Planning Application Publicity and Consultation**

- 3.18 In accordance with article 2F of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (as amended), which requires particulars of how the Applicant has complied with section 61Z of the Town and Country Planning Act 1990 (inserted into the 1990 Act by section 18 of the Planning (Wales) Act 2015), statutory pre-application publicity and consultation has been undertaken. This is reported in a separate pre-application consultation report.
- 3.19 The pre-application publicity required by article 2C of the order included:
- Erection of a site notice in accordance with article 2C(1)(a)(i) of the order;

- Notice given in writing to adjoining landowners in accordance with article 2C(1)(a)(ii) of the order;
- Draft planning application documents including Environmental Statement made available online (<https://www.avisonyoung.co.uk/statutory-public-consultations>) for the consultees and wider community to inspect in accordance with article 2C(1)(b) of the order;
- Provision of an online form through the above website which could be completed online, or downloaded, completed and posted or emailed directly to Avison Young or the Applicant.

3.20 The pre-application consultation required by article 2D of the order included:

- Notice in line with Schedule 1B of the order given to community consultees: the ward Councillor for Trawsfynydd ward and Cyngor Cymuned Maentwrog in accordance with article 2D(1)(a). In addition, Cyngor Tref Blaenau Ffestiniog and Cyngor Cymuned Ganllwyd have also been notified and a link to the website on which the draft planning application documents can be found provided;
- Notice in line with Schedule 1C of the order given in writing to specialist consultees in accordance with article 2D(1)(b): The Health and Safety Executive (in English only), the Office for Nuclear Regulation (in English only), Dwr Cymru Welsh Water, Cadw, Natural Resources Wales, North Wales Fire and Rescue Authority, the Council's Highways Department, and the Council's Development Management Department and a link to the website on which the draft planning application documents can be found provided; and
- Provision of an online form through the above website which could be downloaded, completed and posted or emailed directly to Avison Young or the Applicant.

## 4. Summary & Conclusion

4.1 This Statement of Community Involvement has been prepared to accompany and support a planning application for:

- i. the demolition of the Trawsfynydd ponds complex buildings;
- ii. the infill of below-ground voids of the ponds complex, mainly with radioactively contaminated demolition arisings, and the permanent retention of the infill (which, in environmental permitting terms, is the disposal of radioactive waste);
- iii. the permanent retention of the radioactively contaminated residual below-ground structures of and around the ponds complex (which, in environmental permitting terms, also involves the disposal of radioactive waste);
- iv. the capping of the footprint of the former ponds complex with a concrete cap; and
- v. modifications to the local drainage on and around the concrete cap.

4.2 The pre-application engagement and consultation has included:

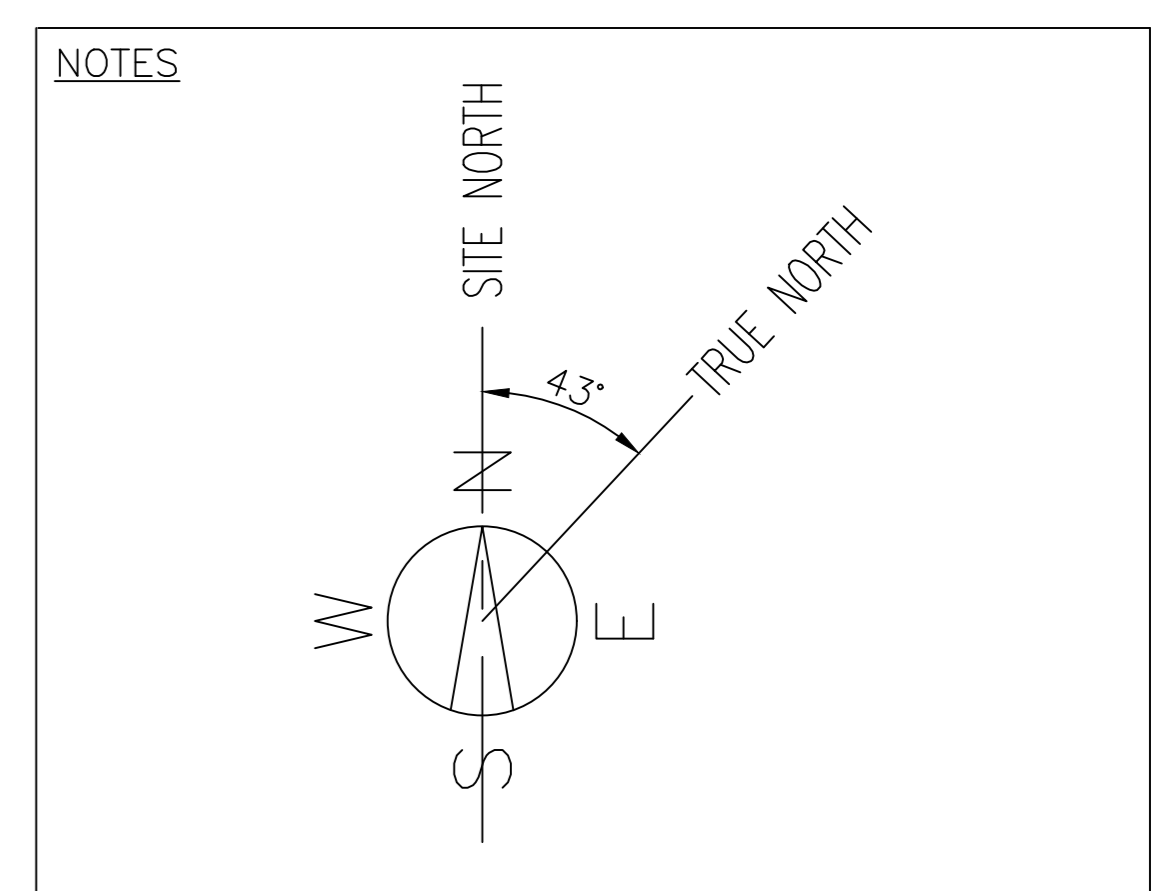
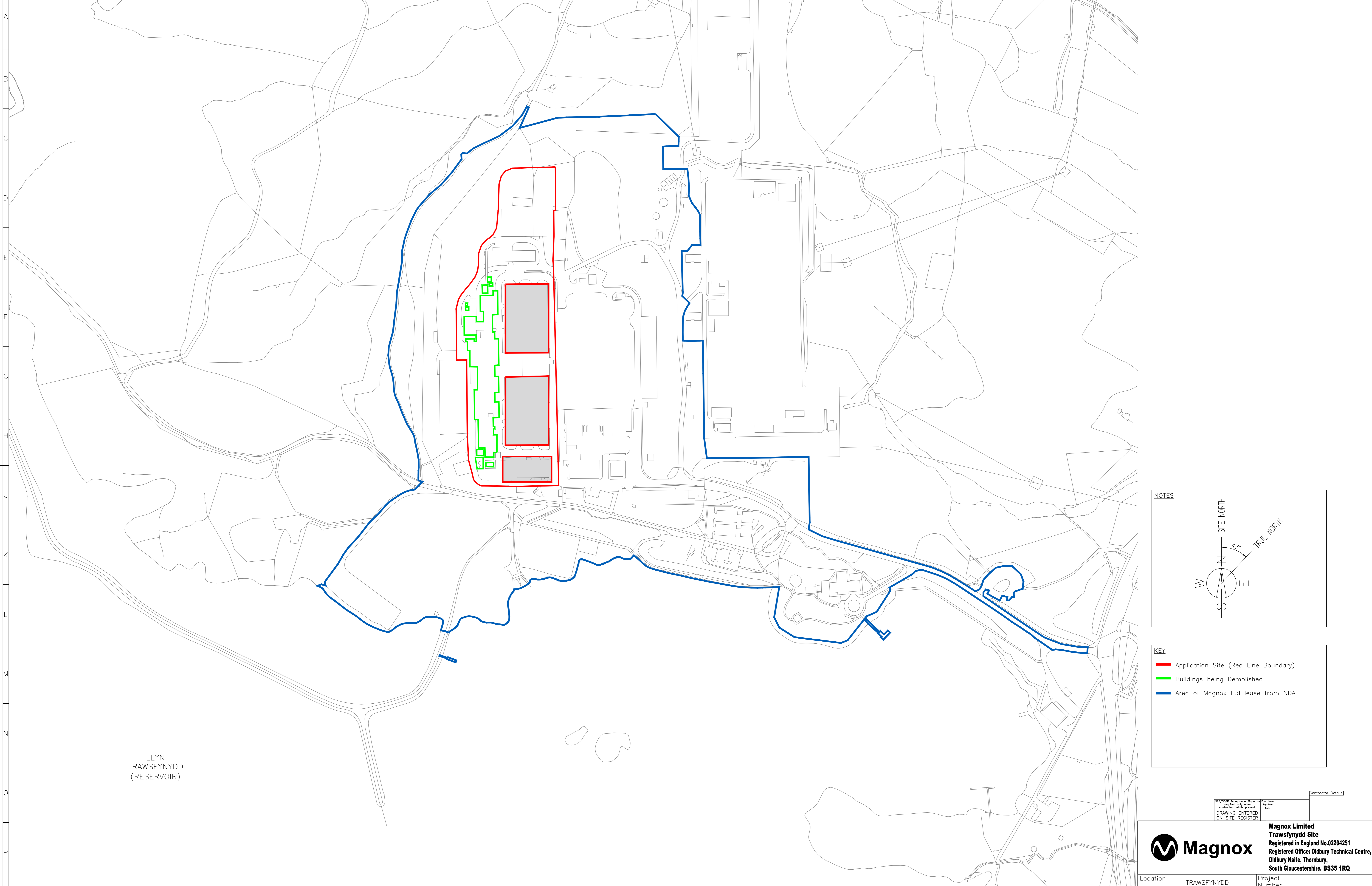
- Pre-application discussions with the Local Planning Authority
- Request for a screening and scoping opinion from the Local Planning Authority
- Presentations and discussions as part of the Site Stakeholder Group (SSG) meetings
- Presentations and discussions as part of the Trawsfynydd End State Group (TESG) meetings
- Discussion in a stakeholder workshop in November 2016 involving representatives of the Applicant, the NDA, regulatory organisations covering England, Wales and Scotland, and representatives of local stakeholder groups
- Request for feedback from elected Councillors
- Three staffed public engagement events and four further unstaffed exhibitions
- Health Impact Assessment workshop
- Mandatory pre-application consultation



- 4.3 The written feedback that was received during the public engagement events have been logged and taken into consideration by the Applicant. Responses to specific comments / queries have been provided.
- 4.4 Notwithstanding the limited negative feedback, there have been some issues and concerns raised. Generally, the Applicant has explained the benefits of the proposals and tried to allay any specific concerns by explaining the scale of the proposals, regulatory controls and so on. Where appropriate, additional information has been provided as part of the planning application documentation.

# Appendix I

## Site Location Plan



KEY

- Application Site (Red Line Boundary)
- Buildings being Demolished
- Area of Magnox Ltd lease from NDA

Contractor Details
<small>         NRE/5267 Acceptance Signature: [Signature] Date: [Date]          Contractor Details: [Name] Date: [Date]       </small>
DRAWING ENTERED ON SITE REGISTER

**Magnox** Limited  
 Trawsfynydd Site  
 Registered in England No.02264251  
 Registered Office: Oldbury Technical Centre,  
 Oldbury Nait, Thornbury,  
 South Gloucestershire. BS35 1RQ

Modifications	01	HMW
	FIRST ISSUE.	

Current Issue	Signature	Name	Date	Scope of Verification
Drawn by:		H M WILLIAMS	11/08/21	SITE CHECK
Verified by:				
Approved by:				
Issue: 01	Drawing Status	Q.A. Grade	Classification	
Date:	ISSUED	3	COMMERCIAL	

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ORIGINAL DRAWING SIZE A0	CREATED IN AUTOCAD	Scale NTS
DRAWING TO BS8888 MIN. TEXT HEIGHT 3,5mm		
ALL DIMENSIONS ARE mm UNLESS OTHERWISE STATED		

Location	TRAWSFYNYDD	Project Number	
Title	POND'S COMPLEX DEMOLITION AND DISPOSAL PROJECT RED-LINE BOUNDARY MASTER MAP		
Drawing Number	TRA/3210/LA/47775	Issue	01

# Appendix II

## Site Stakeholder Group (SSG) Minutes

The following is taken from the minutes of the various SSG meetings referred to, edited for clarity.

### 06 June 2016

IW, End State Project Manager, Magnox Ltd, gave a presentation regarding optimising site end states and associated waste management.

IW explained the current approach relating to Nuclear Licensed sites, and the various licences and permits involved, i.e. the contribution of the ONR (Nuclear Safety), Natural Resources Wales/The Environment Agency (Environmental/Public protection), and the Local Authority through the planning and development framework. The question being considered by Government is whether there is a more balanced way to regulate sites in the latter years of the lifecycle such as whether there is a need for a specialist nuclear safety regulator after all significant nuclear hazards have been dealt with and the remaining type of work involved is generally of a conventional nature e.g. demolition activities.

IW referred to the draft Guidance on Requirements for Release of Nuclear Sites from Radioactive Substances Regulation (GRR), recently issued by the Environment Agencies'. The aim is to think about what the right thing is to do with wastes. It is based on managing risks and developing more sustainable solutions. Ian Warner explained that the purpose of the presentation was to give an update on new draft GRR and provided an overview of the associated work programme and the potential impact of this for the final end state of the site.

Where appropriate and optimised, some low level decommissioning wastes could remain on site rather than being transported for off-site disposal, the benefits being:

- Less waste shipped off for disposal
- Less material imported to fill voids
- Safe for future generation
- Environment protected
- Uses less resources
- Better value for money
- The types of wastes include: Low Level Waste; relatively high volume/low hazard waste; wastes associated with demolition/redundant below ground structures, including concrete tanks/voids, concrete/brick rubble, soil and buried pipes/drains

The options of what to do with the waste could include transporting it off-site by road for off-site disposal through to building a dedicated waste disposal facility on site (this latter option isn't being considered for Trawsfynydd though), amongst other things. It really is a balancing act which aims to establish the most sustainable option considering a range of factors.

Three 'lead and learn' sites have been chosen to trial the guidance over the next year or so (with regulator involvement) – Winfrith, Dounreay and Trawsfynydd. The aim is to develop optimised solutions for these sites and assess the timings for planning considerations etc. The GRR would be revised as appropriate and learning would be applied to other sites.

To summarise, this is about trialling new Regulatory Guidance as part of a wider review of the regulation of nuclear sites. Magnox is required to develop an optimised end state which may involve leaving in place some low activity wastes. However, it is important to note that nothing has been decided yet and stakeholder engagement will form part of the development of an optimised end state.

## **Question and Answer session**

**RT:** With regards to Ponds for example, how does this affect the decommissioning timing?

**IW:** This shouldn't be affected.

**IWi:** Thinking about these three sites, you wouldn't be able to do this with other sites because of their close proximity to the sea. You have to come to an understanding with local areas. There is potential to make a lot of savings here. Something should come back to the community. Regarding being near the sea, with rise in levels, you may not be able to get away with it.

**Cllr JR:** This is probably a money saving exercise.

**IW:** This goes back to the options. Does it make sense to take things from one part of the country to another? There could be savings in other fields as well, such as conventional safety, avoiding dose to workers and minimising the environmental impact from the transport off-site of large volumes of waste. All of these factors need to be considered as part of the optimisation exercise.

**Cllr JR:** We were told about three packages. There is still no clear mandate. Why is this process taking so long?

**MM:** We have had to go through detailed planning etc. with regards to Ponds. Until we decontaminated Ponds it was difficult to do work as we didn't want people to be exposed to radiation. From a site perspective, we need to know who we need to engage with in regard revised options, and this is an opportunity to look again at things. These three sites have played a critical role. We have had talks with the National Park and have anticipated the guidance appropriately. Until we know what is in the ground, we can't do anything. We have a clearer picture now though.

**RC:** There are various reasons why this has taken so long. We have to recognise the need to know what is happening and when. We have tiers of regulations and we need to know who is doing what, and this has been the incentive for all this. ONR will potentially drop out at a certain point and the UK has to show it can deal with nuclear legacy.

**Cllr GT:** There is a lot of work to be done to sell this to the community. When it comes to Ponds, for example, people may be looking at doing the right thing in 20 years' time, but by then it's quite possible that the sea levels will have risen and things will have to be brought into Traws. That's the concern.

**IW:** There isn't any intention to take waste from other sites for disposal at Trawsfynydd.

**Cllr GT:** In 20 years' time, someone in a similar position may say 'we'll take it to Traws'. It is a local worry.

**RC:** It must be remembered that this is a trial. The level of detail is exceptional, so if you fill in voids and leave contaminated concrete, the safety case must be for hundreds of years into the future, with ongoing monitoring. In terms of Regulations, we would utilize everyone possible while looking at the work to ensure the best input possible.

**Cllr TE:** Ponds is the main concern. Who is going to look at their condition in 60, 70 or 100 years' time? They're definitely going to deteriorate, but who is going to check them and take care of them?

**MM:** Work has been put in and we have looked at the structure. We have to demonstrate the basis for assumptions and have teams of local experts. If anything is incomplete it will not be approved. If the solution would be to leave Ponds in the ground, the assessment would address the question of "for how long would this be considered safe"? At this stage we could make a case which covers approximately 150 years, after which the hazard would be significantly reduced.

## **05 December 2016**

IW presented his report as a PowerPoint presentation on screen. This was the latest update following a stakeholder workshop the previous week.

A recap and overview of the proposed GRR (Guidance on Requirements for Release) document by NRW/ Environment Agency was given, i.e. when NRW was satisfied on site condition, it would then be handed over to next organisations such as local authority.

A timetable of the work from November 2016 through to Royal Assent in the summer of 2019 was presented on the screen. Should there be issues during this timetable, it could cause delay.

An explanation of GRR was given, this included five fundamental principles:

- 1) Protection against Radiological Hazards
- 2) Optimisation: "as low as reasonably achievable" (ALARA), taking into account economic & societal factors
- 3) Equivalent protection against non-radiological hazards
- 4) Reliance on human action (passive safety)
- 5) Openness and Inclusivity (consult, explain, audit trail)

The above principles were implemented by 14 detailed requirements. This would require two new key types of documentation, i.e. a waste management plan and site wide environmental safety case (SWESC).

New boreholes had been drilled to provide additional information as to how the site is performing now and in the future.

The Trawsfynydd site had been offered by the NDA as one of 3 lead and learn sites. The purposes of trials at Trawsfynydd were listed, i.e. to test how easy the Draft GRR was to apply; to flush out issues to be addressed by regulators before GRR was formally issued and its requirements became mandatory; to start a process of defining an optimised site end state for Trawsfynydd and to clarify whether and when Magnox Ltd may have to make formal applications to NRW for any proposed on-site disposals.

Details of what involved optimisation (principle 2) were presented. A summary was given comparing the benefits and detriments of options against a range of factors in order to establish the optimum solutions. The key point noted was that it may not necessarily result in all radioactivity being removed from the site. The site was required to demonstrate to GRR that everything possible was being done and that doses to public had to be as low as reasonably achievable.

IW reported on the Stakeholder workshop that had been held in the lake café the previous week; a summary was given and all those present had had an input into the GRR. An extensive briefing pack had been provided before the workshop. The purpose and objectives of the workshop were listed, the first step being the Strategic Options Assessment. Consultants had been employed to help with this process. Option 1 was to remove all radioactive materials from the site for disposal elsewhere. Option 2 involved leaving some radioactive materials on site in various measures. The purpose of workshop to test out the optimized solution. Factors considered were presented, which included H&S to the Public, H&S to workers Hazard Reduction and Safety. Environmental factors, socio economic impact, burden on future generations, NDA strategic requirements, viability and value for money were also considered. Each option was tested against these factors. The outcome of the day was that there wasn't much difference between both options, however Option 2 was the most favourable. The next steps would be to publish a report in January 2017 and further work to optimize Option 2. It was stressed that this did not give the green light on waste disposal, only on planning. Submission of initial Waste Management Plan and Site Wide Environmental Safety Case to NRW for comment would be done in May 2017, with further development of these as necessary in 2017/18, with stakeholder engagement ongoing.

The timeline for Trawsfynydd to address the GRR requirements was shown on the screen, starting in 2016 through to release from GRR post 2083. Any work carried out during the timeline would be reversible.

### **Question and Answer session**

**SM, Blaenau Ffestiniog stakeholder**, asked for details of the viability of an Option 3, i.e. would there ever be a possibility of tunnelling deep underground and making onsite disposal as they do in Finland.

**IW** stated that the safest method of disposing waste would be investigated. Disposal at Trawsfynydd in terms of GRR was low level waste and not in the same league as deep geological disposal.

**IWi, Trawsnewid** - the Daily Post had reported on the intention to continued decommissioning, which mentioned the ponds structure remaining. Iwi's understanding was different.

**IW** confirmed that the plan being considered was to demolish both ends of the ponds complex, with the middle portion being put into safe store configuration.

**MM** added that this was not yet a decision, it was a part of the current proposals only, that have to be consulted on, with no decision made as yet. Discussions were ongoing with the planners as to what the ponds complex might look like and whatever we do now leading up to 2029 would be reversible. The earlier part of Daily Post article related to continued decommissioning and not the recent workshop.

**JJ**, NDA commented that the NDA Strategy states that we'd prefer continuous decommissioning as potentially there were more benefits, including cost benefits. However, affordability is a key consideration.

**MW, Maentwrog Community Council** referred to a document published in 2006 and stated that this had been debated years ago, and expressed concern with the timetable, i.e. that the site would be put back as soon as possible and as safely as possible with no cutbacks. He expressed his concern about the many uncertainties and asked why these issues weren't addressed when the reactor building safe stores planning went in.

**IW** acknowledged that dates had changed and that expectations had been built up with the regulators.

**MM** added that the overall plan for care and maintenance that had been submitted to the NDA was deliverable. There remained however some unknowns and uncertainties. Boreholes had been drilled to gain a better understanding of the characterisation of the pond construction joints. The low level waste identified is now stored in the Interim Storage Facility which 18 months ago was still in the ground.

**MW** added that the decisions being made would affect future generations and that it was not fair for future generations to have to do the work.

**IW** re-iterated that the site has had to respond to the draft GRR issued by the Environment Agency.

**RC, Environment Agency** commented that there was no easy answer to the dates and he couldn't promise that the dates were fixed and confirm but there is more detail and more clarity and it is therefore an improvement.

**Councillor GT, Gwynedd Council (Penrhynedeudraeth)** asked whether leaving any waste on site would open the doors to other sites storing waste at Trawsfynydd. He believed that consideration of local people's perception was very important, for example clarifying the difference between low and high level waste.

**IW** confirmed that there was no intention to import waste from other sites and re-iterated that only wastes from Trawsfynydd are currently being considered and agreed that the public's perception was paramount.

**Councillor TE - Gwynedd Council (Trawsfynydd)** stated that height reduction was also important.

**IW** confirmed that the plan still included height reduction and said demolition waste would be reused on site in accordance with NRW regulations.

**MM** referred to asbestos on site. Trawsfynydd had recently undergone an ONR inspection and Trawsfynydd arrangements were reported as robust, which was pleasing. The site was always mindful of the regulator's requirements and the public's perception. He added that the site was delighted to have been selected for the draft GRR and that the complex information within it was communicated as clearly as possibly externally. He was concerned that people who read the Daily Post might get a different view of what the site was doing.

## 04 December 2017

**IW** gave a progress update on the work being done in relation to the 'Guidance on Requirements for Release' (GRR) trial:

Trawsfynydd Lifetime Plan 2017 sets out what the site is contractually required to do. This saw the site move from a three-box model (ie two reactor safe stores and one ILW store) to a five box model which includes the partial demolition of the middle of the ponds complex to create two additional safe stores from the sections that are left. The intention being to deal with the remaining structures at Final Site Clearance. This Lifetime Plan will of course still require underpinning and this work is ongoing.

The Lead and Learn trial for the draft GRR looked at the feasibility of an optimised end state that may incorporate on site disposal of lightly contaminated radioactive waste. It also sought to clarify, as far as possible, the likely planning requirements, timescales and impact delivering the site's end state would have on the existing work programme.

The trial is now formally completed and based on what the Regulators have seen so far, they have indicated Magnox may be able to make a technical case for on-site disposal of radioactive waste at Trawsfynydd site. However, the trial is just the beginning of the journey as further evidence and clarification is needed before Magnox could be in a position to formally submit an application to Natural Resources Wales for on-site disposal. Such an application would be unlikely until at least 2020-21.

Two strategy papers are being developed for the NDA Senior Strategy Committee which look at the outputs of the optimisation process together with a recommendation for what the site end state at Trawsfynydd could look like and the potential for any on-site disposals.

An update of work since the last SSG was given, including several briefings to local groups, strategic group meetings, EA/NRW workshop and further optioneering studies (fleet wide).

The final version of the GRR is anticipated to be published in January 2018.

A Proportionate Regulatory Control public consultation is planned for February 2018 to consider the future regulation of sites in the latter states of decommissioning. This work will have a direct bearing on the potential for on-site disposals on Nuclear Licensed Sites.

Stakeholder engagement for Trawsfynydd site end state was on-going and on the 20th February, Trawsfynydd would be hosting a visit of Senior NRW and Welsh Government staff.

### **Question and Answer session**

**IW** confirmed that the schedule for the papers to be submitted to the NDA, i.e. the ponds paper was fleet wide and will consider all remaining ponds facilities and the end state paper, which is specific to Trawsfynydd would be submitted by December 2018.

**MW** asked how long the PRC consultation would last; this was confirmed as 12 weeks.

**IW** stressed that the consultation would only be considering the proposed legislative changes to the Nuclear Installations Act 1965 and not on-site disposal, which would be separate consultation.

**JR** commented that it would make more financial sense disposing on site, however questioned the samples taken to date, and that it was unclear what level of disposal was being considered on-site.

**IW** responded that samples and data for contamination levels beneath the ponds complex were now available following drilling beneath the floor slab. Contamination levels from under the ponds complex were much lower than originally anticipated and this information has added to the overall knowledge of the site characteristics to date.

**RC** added that additional work is needed to characterise certain areas in more detail to support the formal application for on-site disposal and this will be the subject of normal Regulatory engagement with the site.

**MW** requested further information on the ground contaminated area associated with the historic leakage (1980's) from the pond. IW confirmed this to be approx. 5,000 cubic metres, although the levels of contamination are relatively low.

## **03 December 2018**

ES tendered IW's apology for an unavoidable absence and presented an update received by email as follows:

*The Environment Agencies' guidance on the release of nuclear sites from radioactive substances regulation (The 'GRR') has now been published and Magnox continues to work on developing an optimised end state for the Trawsfynydd site in accordance with the new guidance.*

*At the same time BEIS has now published its consultation response to the proposals to streamline the regulation of nuclear sites in the final stages of decommissioning and is supportive of these proposals. Adoption of the proposals will require an amendment to the Nuclear Installations Act 1965 and a bid for a parliamentary slot has been made, and once enacted will effectively allow an operator to surrender the nuclear site licence once all significant nuclear safety hazards have been dealt with.*



*Taken together the above changes will allow an end state option for the site which may involve leaving behind some radioactive decommissioning wastes to be considered. Such wastes would largely involve leaving behind some lightly contaminated sub-surface structures, either with or without the emplacement of similar wastes within any sub-surface voids.*

*Magnox will be presenting a preferred options paper to the NDA Senior Strategy Committee in March 19 setting out the case for what it considers to be an optimised end state for the site. Current thinking is for an end state that does involve leaving behind some in-situ radioactive wastes including the early disposal of the former cooling ponds complex.'*

## **06 June 2019**

IW provided a presentation on Site End States. He outlined steps taken to date and next steps as follows:

- Feb 2016: Draft new guidance from the EAs' (NRW) on their requirements for release of sites from regulation (the 'GRR').
- 2016-17: Trial use of Draft 'GRR' at Winfrith (Dorset) & Trawsfynydd (North Wales)
- July 2018: Formal 'GRR' published by EAs', clarifies regulators' approach to 'optimisation' relevant to end-states and on-site disposal of radioactive waste.
- Oct 2018: UK Government (BEIS) response to consultation on amending nuclear legislation relevant to final stages of decommissioning. Minister 'minded to' accept proposed changes therefore deemed to be Government policy. Still awaiting 'bill slot' to amend legislation.
- April 2019: New draft NRW permit conditions: Magnox must demonstrate optimised disposition of all decommissioning wastes arising up to the end state; Magnox must demonstrate optimisation of any proposed on site disposals of radioactive waste.
- Ongoing: Negotiation as to when Magnox needs to meet the above permit requirements.

Proposed Strategy change:

- Lead and Learn trial - On site disposition is technically feasible.
- Permit application or remove prior to Care & Maintenance for certain features.
- Based on the work to date.
- It is not believed that the current strategy represents the optimised position for the End State.
- An End State with some degree of on-site disposition represents a more optimised approach.
- Strategy change paper to NDA in March 19.
- Approval to develop alternative option(s).

Possible disposition of radioactivity from a decommissioning site:

- New strategy is to pursue a 'ponds down' and early on-site disposal prior to C&M.
- Complete demolition of the above ground ponds structure.
- Leaving in-situ some features already in the ground.
- Physical demolition works on the ponds complex likely to commence in 2023/4.
- Reactor height reduction would still go ahead.
- ILW store would remain unchanged.
- Five box model would return to a three box model.

He summarised by stating that a Strategy change simply gives approval to develop up the option(s) and does not necessarily confirm what will eventually take place. It will require:

- Detailed business case supported by detailed design.
- Further technical development work - how much and in what configuration.
- Extensive stakeholder engagement.
- Development of applications for both permit and planning permission.
- Execution of work - main demolition likely 23-25.

**Cllr MW** wished to stress the importance of a robust public consultation process.

IW confirmed that there are statutory requirements for extensive engagement but this is yet to be agreed.

## 03 December 2020

IW provided an update report on the above summarised as follows:

- The Draft GRR “Lead and Learn” trial was in 2016/17.
- An alternate draft site end state strategy was developed.
- The new strategic approach was accepted by NDA in 2018.
- The development work to support ponds complex demolition and associated on-site disposal is ongoing.
- It is anticipated that all necessary permissions will be sought in 2021/2022 – COVID permitting.
- Ponds complex demolition scheduled for 2024.

Attaining the ponds complex end state:

- Deplanting and demolition readiness.
- Buildings demolished and voids infilled, capped in accordance with engineering design.
- Final landscaping completed at final site clearance.

In conclusion, the GRR sets out regulatory aims for nuclear site clean-up:

- Optimised waste management plans.
- Optimised waste disposal.
- Environmental safety standards for surrender of permits.

This enables sustainable management of radioactive waste from nuclear decommissioning and is part of the wider picture of UK Government and the Devolved Administration’s plans for the final stages of nuclear decommissioning.

### **Question and Answer session**

JJJ thanked IW for his detailed presentation noting that the content described the steps to be taken to deal with waste in a sustainable way, proportionate to concerns. He enquired whether Ian Warner would be able to present to the Snowdonia Enterprise Zone and also asked if there will be any consultations on the site’s future developments.

IW stated that he was happy to present to the Snowdonia Enterprise Zone Board and confirmed that consultation processes will be an integral part of developments.

## 10 June 2021

IW provided a presentation update on the above summarised as follows:

- ‘GRR’ guidance published in 2018: operators and stakeholders to consider best option for disposing of remaining lightly contaminated radioactive wastes generated during the remaining decommissioning programme.
- Strategy for Trawsfynydd ponds complex revised accordingly.
- Project established to deliver Phase 1 work: looking at characterisation of buildings; environmental impacts; necessary planning permission and permits and ongoing engagement activity.

Scope of the proposed development:

- Demolition and backfilling of the ponds complex to implement the ‘Disposal Area Interim State’.
- In-situ disposal of buried radioactive features (no physical works required).

Magnox plan to deliver non-statutory engagement activities, including animated fly-around video for use in regulator/planning/stakeholder briefings; Online updates/information provision; Informal briefings with stakeholders; attendance at local community events prior to application and face to face community engagement sessions.

Avison Young will represent Magnox for all statutory activities, including co-ordinating and managing the pre-application public consultation exercise. They will also write the pre-application consultation report setting out the consultation methodology and analysis of responses.

In summary:

- This is a standalone planning application.
- Delivering the ponds complex to its interim state frees up space that could be used for future decommissioning activities.
- A Planning Performance Agreement (PPA) is being sought to facilitate engagement with Snowdonia National Park Authority and submissions will be made to Sustainable Drainage Systems approving body.

**Question and Answer session**

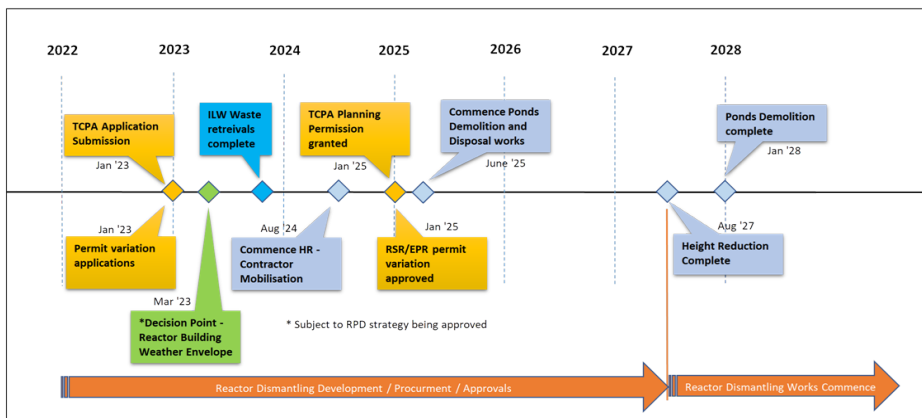
None presented.

**18 November 2021**

IW provided an update report as follows: -

- A Stakeholder consultation video was ‘road tested’ with members, the final version of which will form part of the Stakeholder Outreach Programme.
- Discussions are ongoing between Snowdonia National Park; NRW and ONR regarding planning permissions and any other relevant issues.
- The intentions are to progress height reduction first and retain any demolition material that is not radioactive, working with the regulator to re-use all suitable materials.

NW Senior Project Manager was also welcomed to the meeting and outlined the timeline for progress with the following table: -



He noted that the project was in the ‘In-Concept’ phase currently. He also noted that there may be potential for a prolonged interim phase.

**Question and Answer session**

PR enquired as to why there will be screening mounds. ID stated that this formed part of the original plan in order to reduce offsite impact, however it may also be used for final landscaping and concrete slabbing. RT noted that the Rail Head should also form part of discussions regarding future interest and uses of the site.

**9 June 2022**

IW provided an update report on the above drawing particular attention to the configuration of the complex. He outlined the current work programme as follows:

- Systematic de-planting.
- Characterisation.

- Disposal configuration.
- Groundwater compliance.
- Planning application development.
- Stakeholder engagement.
- Permit variation application development.

He referred to the importance of robust Stakeholder Engagement supported by an agreed Communication Plan. Engagement activity will include:

- a bi-lingual local communities letter for early circulation.
- creation of a virtual Town Hall which will serve as a platform for sharing information and receiving comment.
- establish drop in centres in Libraries; Lakeside café and Village/Town halls.

### **Question and Answer session**

**JR** asked what would happen if Snowdonia National Park was against any planning applications for disposal.

**IW** noted that this would depend on what the issue might be.

## **31 January 2023**

**IW** provided an update summarised as follows:

- Post Demolition Drainage – SAB approval received for proposal. Preliminary design in place. Currently being refined in line with capping design. Capping detailed design progressing.
- Ponds Structural Assessment – Review complete and being verified.
- Demolition approach: radiological constraints assessment; review of possible enclosures during works; characterisation works progressing.
- Outline demolition plan: Initial demolition sequence being developed by specialized groups; radiological constraints; placement of demolition arisings into appropriate voids.
- Site Environmental permit: requires variation, ongoing engagement with NRW/EA.
- Planning permission: environmental impact assessment being undertaken; scoping request submitted (September 22).
- Community engagement: stakeholder letter-December 22; BBC article – December 22; on site tour/explanation provided.
- Engagement plan: aiming to commence proactive engagement in Spring 2023; there are a number of statutory requirements to fulfil; utilising a mixed approach (media/web-based/face to face).
- Timeline for ponds demolition: permit variation application – Sept 2023 with planning application a few months later.
- No physical works will be starting in the near future.

### **Question and Answer session**

**CIlr MW** – enquired as to whether all material from the ponds will remain on site?

**IW** noted that the intention is for all below ground structures to stay on site. As regards the above ground materials, these will be repurposed on the site.

**RT** asked if the railway line be used by contractors.

**JT (Magnox)** noted that no detail is available until all tenders have been received.

**PR** requested a reminder of the completion date for Height Reduction and ponds demolition.

**JT** stated that the timeline for Height Reduction is end of 2027.

**IW** confirmed a timeline of 2029/30 for ponds demolition; however, he reiterated the importance of maintaining community engagement in order to ensure timeliness of information sharing.

**BW** referred to the closure of the Café, acknowledging that this may be due to high running costs. She suggested that this would be a suitable venue for community engagement and thus contributing to the venue's viability. She also referred to the upcoming National Eisteddfod in Llyn this summer and that would also be an

effective avenue to promote developments, in particular the good work undertaken with STEM. AR acknowledged BW's comments and agreed that they would be given further consideration.

## **8 June 2023**

IW was welcomed to the meeting. He stated that the earlier site visit around the ponds complex was a good opportunity to share developments. He described the timetable for future developments as follows: -

- Q3/4 2023 - RSR Permit Variation
- Q4 2023 - 2-year determination period
- Q3 2027 - Beginning of Contractor Award Demolition
- Q3 2030 - Completion of all works to include final landscaping.

IW also referred to Community Engagement events from mid July 2023 which will include face to face and internet platform interaction. Members will be kept updated via the SSG.

### **Question and Answer session**

**Cllr. MW** asked if surplus material would be left on site.

**IW** stated that several options will have to be considered but that, ultimately, there are statutory permissions required for all options. He reiterated that there exists a close working relationship with NRW to ensure statutory requirements are met.

**Cllr JR** asked about the voids in the ponds.

**IW** noted that there is 3,500 cubic meters of voidage and that there was a need to build the voidage up to enable appropriate use of the footprint.

# **Appendix III**

Letter to Local Councillors (Dated 21 December 2022)

21 December 2022

## Safle Trawsfynydd Site

Blaenau Ffestiniog  
Gwynedd LL41 4DT  
**Tel:** +44 (0)1766 543210  
**Fax:** +44 (0)1766 543343  
[www.gov.uk/government/  
organisations/magnox-ltd](http://www.gov.uk/government/organisations/magnox-ltd)

Dear Councillor,

### **Seeking feedback on plans to demolish and dispose of the former cooling ponds complex at Trawsfynydd**

Magnox has an obligation to comply with new guidance from our environmental regulators, released in 2018, on how sites reach their final 'end states', and have been consulting with local stakeholders.

We are now planning to ask for feedback from the community on our plans to safely demolish and dispose of the former cooling ponds complex at the Trawsfynydd Site before we apply for planning consent and a variation to the existing environmental permit.

The ponds were used to cool spent fuel elements from the twin reactors when the site was generating power, and these were safely removed for reprocessing at Sellafield during the mid-1990s. The ponds complex was also used to store intermediate-level waste, which is currently being retrieved and stored safely on-site in a specially designed building until it can be transported to the national geological disposal facility. The final stage of decommissioning this part of the site is to demolish the ponds complex itself and dispose of the associated low-level waste.

The ponds complex is around 200 metres long and 25 metres wide, and the ponds themselves are around 100 metres long and 6 metres deep. Rather than sending the rubble created when we demolish the above-ground structures to off-site landfill sites, we are proposing using it to fill the underground voids left by the ponds. We will then cover and cap it to create a flat area of land we can use for other purposes such as when we begin demolishing the reactor buildings.

Some of the building fabric and the rubble generated during demolition will contain low levels of residual radioactivity - equivalent to levels that are permitted to be disposed of at licensed landfill sites, referred to legally as 'Very Low Level Waste'. We are considering options that include filling the underground voids in the ponds complex with this rubble. These proposals remain subject to further examination and evaluation by Natural Resources Wales and the Snowdonia National Park Authority, as well as wider stakeholder engagement.

*Continued...*

We believe this is a safe and sustainable option because:

- The level of residual radioactivity associated with the proposed disposal is low, and we believe our assessment work will demonstrate there will be no significant impact on people or the environment
- Using the rubble to fill the below-ground voids left by the demolition is more sustainable and will remove the need for large numbers of lorry journeys off-site, which will make local roads safer and cut CO<sub>2</sub> emissions
- We will be left with a flat area of usable land that will support the decommissioning of the two large reactor buildings
- This is a safer option for our workers and the environment because it will avoid the need for extensive and prolonged working at depth to excavate the below-ground portions of the structures

Importantly no decisions have yet been taken - we are committed to cleaning up Trawsfynydd Site in a way that is safe for people and the environment, and we are committed to engaging widely to ensure the optimal end state for the site.

We are keen to understand what local people think of our plans before we apply for permission late next year to demolish the cooling ponds. We plan to host a series of community drop-in sessions and publish information online but, before we do this, would like feedback from you, our stakeholders. Please respond to let us know how you would like us to involve the local community in this discussion, and whether there are particular ways you would like us to engage with you and the community.

Responses marked 'Cooling Ponds Feedback' can be sent to:

[feedback@magnoxsites.com](mailto:feedback@magnoxsites.com)

before 31 January 2023.

We look forward to engaging with you in more detail about this subject in the coming months.

Yours sincerely



**Angharad Rayner**  
Trawsfynydd Site Director



# Appendix IV

## Public Engagement / Consultation Events

Three public consultation events have been held in respect of the proposals. These took the form of drop-in sessions and were held on three consecutive days, July 10-12, 2023 at the following venues:

- Monday 10 July 2023 at Trawsfynydd - Neuadd Gyhoeddus y Pentref / Village Public Hall, Stryd y Capel, Trawsfynydd, Gwynedd, LL41 4RW (1.5 miles from site)
- Tuesday 11 July 2023 at Blaenau Ffestiniog - Y Ganolfan Gymdeithasol / Community Centre Wynne Road, Blaenau Ffestiniog, LL41 3UF (10.8 miles from site)
- Wednesday 12 August 2023 at Penrhyndeudraeth – Neuadd Goffa / Memorial Hall Griffin Terrace, Penrhyndeudraeth, LL48 6LP (9.8 miles from site)

Each public event was open to the public for five hours, between 3pm – 8pm. Each of the venues was chosen on the basis of its location relative to the site and accessibility to occupiers of surrounding smaller villages and hamlets that may have wished to attend the consultation events.

To support the public events, four unstaffed exhibitions were organised at the local libraries in Porthmadog, Dolgellau, Harlech and Bala, which ran from July 10 – August 7, 2023. The four libraries identified were:

- Monday 10 July 2023 – Monday 17 July 2023 at Llyfrgell Porthmadog / Porthmadog Library, Heol y Llan, Porthmadog, LL49 9HX (13.2 miles from site)
- Monday 17 July 2023 – Monday 24 July 2023 at Llyfrgell Dolgellau / Dolgellau Library, Bala Road, Dolgellau, LL40 2YF (12.6 miles from site)
- Monday 24 July 2023 – Monday 31 July 2023 at Hen Lyfrgell ac Institiwt Harlech / Harlech Old Library and Institute Y Stryd Fawr, Harlech, LL46 2YB (15 miles from site)
- Monday 31 July 2023 – Monday August 7 2023 at Llyfrgell Bala / Bala Library Campws Godre'r Berwyn Campus, Ffordd Ffrydan, Bala LL23 7RU (18.4 miles from site)

These libraries were chosen because they were further afield from the nucleus of the 10-mile radius of the site and where the three staffed public events took place.

For the main public engagement events a series of 18 standard 2m x 1m pop-up banners were produced, nine in Welsh, nine in English. The exhibition consisted of 16 pop-up banners produced by the Applicant which provided information about the history of the site, work that has been completed to date and the proposed next steps in terms of decommissioning the ponds complex. The additional two, bilingual pop-up banners were produced by Natural Resources Wales which provided general environmental information.

The unstaffed exhibition for the libraries was smaller, consisting of six, standard pop-up banners, three in Welsh, three in English. The information provided was a summary of the information displayed at the public engagement events, detailing the history of the site and the proposed options for decommissioning the ponds complex.

To support all seven exhibitions an A4 information sheet was produced detailing background information, how the on-site disposals will be monitored and assessed, and what are the risks. The information sheets were produced bilingually and were handed out at the public events as well as at all unstaffed library events.

To complement the exhibition pop-up banners a bilingual, 5-minute video was produced and shown at all staffed exhibitions. The animated video was played on a large screen in a continuous loop and provided a step-by-step explanation of the proposals for the ponds complex. A virtual exhibition was also designed and uploaded to the Applicant's website to provide the same information at the same time as the public engagement events. It went live in time for the first public engagement event on Monday 10 July and, for the purpose of analysing and finalising the feedback data, closed on 31 August. Therefore, the public engagement and consultation period was from 10 July 2023 through to 31 August 2023, a total of 53 days inclusive.

## **Promotion and Publicity Campaign**

A press release detailing the programme of community engagement events was uploaded to the Applicant's website and a bilingual letter of invitation was sent to approximately 40 local stakeholders. The letter detailed a brief outline of the proposed plans and a personal invitation to one of the events.

To promote the events, four main publicity communications channels were used; social media, media relations, the Applicant's website and stakeholder engagement. A collection of digital publicity notices was designed to promote the events; these were edited to promote each event and posted on the various platforms a few days in advance of the event. The promotion and publicity campaign commenced during week commencing Monday 3 July and ran up to 7 August when the last library event (at Bala) finished.

The Applicant has several social media platforms which were used to publicise the events.

- X (formerly known as Twitter) – regular tweets were posted to coincide with each event informing the public where and when the next event was taking place.
- Linked-In – similar to X, posts were uploaded to the Applicant's Linked-In profile account to publicise the forthcoming events, again a few days in advance of the event.
- Facebook – the Applicant does not have an active Facebook page and since this platform is well used by communities to publicise local events it was agreed that the Applicant could use the NDA's Facebook platform to promote the community engagement events. This was done in the same way as on X and Linked-In.

In December 2022 BBC Wales Wales Today, S4C's Newyddion, BBC Wales Online and Cymru Fyw news outlets ran a news item detailing the proposed plans to decommission the ponds complex before it had been made formally public through a planning application. The item was filmed and edited by BBC Wales reporter Gareth Pennant-Jones. It was decided to invite the BBC Wales to follow up these news items with an interview to discuss the next step in the process. An interview was secured with Radio Cymru's (Welsh language) lunchtime programme, Dros ginio (Over lunch), a news and current affairs programme which discusses and debates topics of the day. The programme airs between Monday – Thursday between 1-2pm and site director, Angharad Rayner was interviewed by programme presenter Cennydd Williams; the interview was a 7-minute recorded radio interview in Welsh. The interview was aired at 1.30pm on Monday 10 July.

## **Feedback & Applicant Responses**

To maximise public response and capture opinions and thoughts regarding the proposed plans, a bilingual feedback form was produced which was made available at all events and the public were encouraged to complete them. A total of 54 feedback forms were completed, the comments from which are set out in the following table, together with the Applicant's response or an explanation of how they have been considered in the evolution of the proposals.

***Location codes provided in the table:***

***PM – Porthmadog Library, HL – Harlech Library, TF – Trawsfynydd Public Exhibition, BF – Blaenau Ffestiniog Public Exhibition, PD – Penrhyndeudraeth Public Exhibition, PO – Postal, OL – Online***

<b>Key Matters Raised</b>	<b>The Applicant's Response</b>
"Trawsfynydd is a part of the area's history, it's important continues to offer employment to local people." (PM4)	-
"Future work for local people. Local economy needs to benefit from the site." (TF3)	-
"I received detailed information about the work to be done." (TF6)	-
"Good information about what's happening on site." (PD1)	-
"Excellent information displayed, very well done." (PD5)	-

Key Matters Raised	The Applicant's Response
"Informative." (PD10)	-
"Keep at it, do it as soon as possible – but safely. Work for local people." (PD7)	-
"Online exhibition was intuitive and fun to use." (OL3)	-
"Very interesting, need more contact with the community." (BF1)	-
"Poor communication, badly advertised, no representative from Magnox. This was not a serious attempt at public engagement – why no direct question on what industry could replace it?" (HL1 & HL2)	-
"Not much notice the exhibition was happening." (TF2)	-
"Some of the text on the online exhibition was rather small for comfortable reading. A way of viewing the panels at full screen would have been useful." (OL6)	-
"Exhibition information posters were very user unfriendly to increase size to read on an iPhone as the left margin would disappear. This appeared amateurish." (OL7)	-
"It doesn't seem safe."	The Applicant is a heavily regulated site operator with a very good safety record. The proposed on-site disposals have been subject to detailed and comprehensive safety and environmental assessments. The proposals will not be granted a permit or planning permission if the relevant authorities are not in agreement that all the required standards would be met.
"Disliked the music (referring to the online video)". "More commentary would have been helpful" (OL1)	Noted.
"There are no measurements for someone to get an idea of the size of the work and the proposed cap, although the measurement of the waste that needs to be filled is given. All reports show that the effects of low-level waste are even greater than originally thought. The advantage of fewer lorry movements is emphasised with this design. This argument should be remembered and there should be no loads carrying SMR components to this site either. The result of this would be the destruction of roads, causing trouble for local residents and adding to the pollution of the site. The effect of the old nuclear plant on the health of residents was not investigated. These are the effects that manifest themselves more and more every year. These plans show that empty promises were made that the site would be restored to its original condition and be a green site. Leaving problems to future generations happens every time in this industry and it is completely against the laws to protect our descendants in Wales." (PO1)	The Environmental Statement and planning application documents provide information on the scale of the works and cap. For an assessment of the effects of historical operations, see the series of reports Radioactivity in food and the environment, produced annually by the Environment Agency, Food Standards Agency, Natural Resources Wales, and Centre for Environment, Fisheries and Aquaculture Science: <a href="http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/272227/rife-report-2015.pdf">Radioactivity in food and the environment (RIFE) report - GOV.UK (www.gov.uk)</a> See also: <a href="http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/272227/rife-report-2015.pdf">Radiation: detailed information - GOV.UK (www.gov.uk)</a>
"Very good but need to be better advertised." (BF2)	-
"I have previously worked on the site for a north Wales based civil engineering contractor. I now work for Alun Griffiths Contractors, who have an office in Porthmadog. It is important that local contractors are employed in	The Applicants corporate policy is to use local contractors where it is appropriate to do so. This issue is reflected in the company's contractor selection processes. However, it should be noted that the demolition of radioactive

Key Matters Raised	The Applicant's Response
Trawsfynydd and Wylfa to maximise benefits to the local economy." (PD2)	facilities is a specialist activity, and it may not be possible to only utilise local contractors.
"What's happening to Traws' bridge? It would be such a shame to lose such a resource. Traws people use it a lot – it would be an excellent goodwill gesture if the site was to repair it – it would bring in more tourists to the area." (PD7)	Whilst this is an important topic, it is not relevant to the current proposals for demolition and on-site disposal of the ponds complex and associated redundant infrastructure.
"Seems like a long-term plan." (PD13)	-
"Does the energy required to decommission this plant exceed the amount it generated?" (OL4)	-
"Personal preference is the site is left for reuse for nuclear industries (power generation, medical products etc)." (OL5)	-

The comments received on feedback form PO1 is believed to be from or on behalf of the local anti-nuclear group, Cadno.

# Contact details

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