



11th August 2017
Ref: DSG(2017)C030

MOD Ministerial Correspondence Unit
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Please respond to:

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Dear Sir/Madam

REQUIREMENTS FOR MOD TO ENGAGE/CONSULT WITH COMMUNITY

The Dounreay Stakeholder Group is an independent body of over 20 community organisations overseeing the operations of the Dounreay site and the Nuclear Decommissioning Authority. As part of this group MOD Vulcan is also included in this stakeholder activity.

We wrote to you on the 19th April (Reference DSG(2017)C016) regarding your requirements to engage/consult with the community and you responded on 30th May (Your reference TOC2017/0057 (DSG(2017)C019)).

At our last sub group meeting we discussed this in full and were extremely disappointed with your response. While we asked that MOD provide assurances that they would consult with the community on the future options for the Vulcan site the response provided did not give us any comfort that you will undertake such an activity.

While your response says that you recognise the concerns and that MOD is committed to choosing the option that best balances all the relevant factors (including community views) it appears that you will continue to 'inform' DSG and not consult. Informing and consultation are two completely different things and we have been quite deliberate in asking MOD to consult with the community, ie consulting on the four options you are considering, taking on board views from the community BEFORE formal consultation is afforded by the Environmental Impact Assessment Report and planning applications.

While we have been told time and time again that MOD does not have a statutory remit to consult nor a socio economic remit, we believe that MOD has a moral obligation to consult more widely and not wait until the statutory process is being undertaken.

The Vulcan site has lived side by side with Dounreay for decades and has been supported by the community in many different ways, not least supporting the local MOD and Rolls Royce workforce at

Vulcan when the 2012 leak was eventually announced two years later. While DSG was disappointed it was supportive of the workforce and spoke positively about this.

With the closure of the Dounreay site and of Vulcan it is even more important that MOD consider options in a truly open and transparent way. Understanding you are already in discussion with the NDA, knowing that you have identified the options for analysis we believe it is now time to speak to the community about the way forward.

By suggesting that consultation will only be afforded through the statutory process of the Environmental Impact Assessment Decommissioning report and subsequent planning application is a complete disregard to the community who have been supportive for many years.

Given we have raised this topic time and time again and the fact that even at our last meeting MOD could not say what the options being analysed were is extremely disappointing. Given the Vulcan site depends on radioactive waste management and disposal by Dounreay there is a strong link for the need to be transparent.

We noted in our previous correspondence that MOD can, when it wants to get support for their operations, carry out a comprehensive stakeholder consultation (as noted by the consultation undertaken to agree the sites for the decommissioning of submarines). As a community who has lived, worked and supported your operations in Caithness for decades we are asking for nothing more than what you have undertaken for submarine dismantling. There are times when early views from the community can help and support a preferred option going forward but if you decide to wait until the statutory process begins then DSG will have no other avenue but to write outlining our disappointment that early consultation with the community was not afforded to us despite many requests to the contrary.

We look forward to receiving your response to this letter and hope that you see the sense in early consultation which will allow you to inform your environmental impact assessment and subsequent planning application.

Yours sincerely

Roger Saxon
DSG Chairman

cc. The Rt Hon Sir Michael Fallon, MP (Secretary of State for Defence)
Roseanna Cunningham, Cabinet Secretary for Environment, Climate Change and Land Reform (Scottish Government).
Charles Stewart-Roper, Scottish Government Radwaste team
Jamie Stone, MP
Gail Ross, MSP
Highland Council, Planning Director
Leader of the Highland Council
Caithness Councillors