



GDF Siting Process Consultation
Department of Energy & Climate Change
Room M07
55 Whitehall
London SW1A 2EY

25-Nov-13

Dear Sir/Madam

Herewith attached Egremont Town Council's response to the Consultation on the Review of the Siting Process for a Geological Disposal Facility.

Yours faithfully

Mrs M Woodburn
Town Clerk



Egremont Town Council's reply to the summary of question 1 – 8 on the Review of the Siting Process for a Geological Disposal Facility.

Question 1 – A test of community support is essential before the right of withdrawal is taken. It is difficult to define NOW what form that test of community support should take, as what might seem appropriate now, might not be at the time the test is needed, which could be 10/15 years into the future. It is important that flexibility is introduced into the process to ensure that options are not closed off too early in the process. As one of the Town Councils representing over 10,000 residents who supported a “Yes” vote in the MRWS process, part of the difficulty having a process with little flexibility resulted in a premature halt to the whole process.

Question 2 – The decision making process as proposed would seem the most sensible recommendation. Ensuring Parish and Town councils have a role is essential as we are armed with both local knowledge and communication links within our communities. The only query we would have over the proposed phased approach is when the right of withdrawal would apply. There is some concern that if the right of withdrawal expires before the borehole work starts, then how can the community know for definite that the geology is right for a GDF. There might be a risk of successfully getting through the learning phase and the majority of the focusing phase, then losing community confidence at the end simply because the right of withdrawal has not been retained through to the end of the borehole work. Therefore we would suggest that there is flexibility within the right of withdrawal to ensure all the information that is needed for the community, is available before a final test of community support is taken. Care should be taken about having both the NDA and the RWMD on the steering group as this could be seen as the interested developer having a dominant role on the steering group.

Question 3 – More definition of the roles of the NDA and the RWMD is needed. If NDA are openly to become advocates for a GDF then it raises the question of whether they should have a active role on the steering group. As stated in Question 2 this on paper implies that NDA / RWMD would have the controlling voice on a steering group. To ensure community confidence the process has to be in the control of the right of withdrawal holder i.e. the District Authority.

Some clarification is sought on the thought that District Councillors could become more less neutral has to be legally checked, if they are ultimately the Authority who will enforce the right of withdrawal then by default it implies that they are the decision making authority, therefore does not the previous pre-determination advice still apply? There is more work needed on clearly defining the roles and responsibilities of all who will be involved in the process.

Question 4 – The proposed approach seems reasonable but does emphasise the concern about the right of withdrawal and the timing of it. If by only carrying out deep geological investigations can an area be deemed suitable or not then surely until a site is geologically proven the right of withdrawal should remain.

Question 5 – We agree with the proposed approach with regards to the planning permission needed for a GDF itself but remain to be convinced whether the intrusive investigations need to follow the same process. There are two different requirements, one is carrying out investigations, the other is giving the go ahead for the start of a GDF construction, should they both be in the same hands of Government who have a vested interest? The local community has to be able to retain some control over such a development and retention of the planning permission over intrusive works would seem to lie solely with the Local Authority planning department. If Government is serious about Local Control then this would be a good example of words been put into action.

There is also the concern that by taking the intrusive work through the National Process it is placing an unnecessary time delay and potential additional cost on a Local Authority as reports would have to be made by them that are costly and time consuming, especially as local authorities budgets are getting cut.

Question 6 – In principle the clarification and communication of the inventory is welcomed BUT there would still have to be process in place explaining what and when the waste would be emplaced and a change control mechanism if the inventory changes.

Question 7 – The recognition that benefits should come earlier in the process is to be welcomed, but more recognition within the proposed process that benefits must be used to offset the detriments and improve the area, especially within the most affected District. Any reference to other local authorities working with the most affected area should be removed from the process advice as this should be controlled by the District who have volunteered, and emphasises the need for the paper to be not too prescriptive.

The need for a long term fund is essential and this must go through legislation to ensure the fund is secure.

Question 8 – We remained to be convinced about the merit of spending both time and effort on generic socio-economic / environmental studies and we feel the more detailed work needed within the focusing stage is more important.