Loweswater Parish Council
c/o David Smith, Clerk,
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The GDF Siting Process Consultation,
Department of Energy and Climate Change,
Room M07,
55 Whitehall,
London SW1A 2EY

30.11.13

Dear Sirs,

The response of Loweswater Parish Council to the Consultation on the Review of the siting process for a Geological Disposal Facility

Before responding to the specific questions in the consultation document, Loweswater Parish Council would first like to express the disappointment it feels that this issue is being revisited again after a clear decision was made by Cumbria County Council, on behalf of the people of Cumbria, not to proceed to Stage 4 of the original MRWS process. The reason for this decision was that there was already enough geological information available that made it clear that Cumbria was not a suitable location for a GDF. Nothing has changed that fact and we profoundly regret that Cumbria is being involved again in a futile search for a suitable site for a GDF in the county.

We recognise that the government remains firmly committed to geological disposal as the correct policy for the long-term, safe and secure management of high level radioactive waste. We also understand that the government continues to follow a site selection process based on partnership and volunteerism. Loweswater Parish Council believes that geology should be the first consideration prior to seeking volunteer communities and the setting up of any partnerships.

To address the specific questions highlighted in the consultation:

Do you agree that a test of public support should be taken before the representative authority loses the Right of Withdrawal? If so, what do you think would be the most appropriate means of testing public support, and when should it take place? If you do not agree with the need for such a test, please explain why.

Yes, a test of public support is required and the only safe way of polling the community is by independent referendum. This should be taken before any intrusive work is carried out. It is the belief of Lorton Parish Council that only the parishes directly affected, i.e. the actual 'host' communities, should be polled and not the whole borough.

Not only must there be clear, **independent** and unambiguous evidence of public support, there must also be enshrined within the process, the legitimate and democratic **Right of Withdrawal** by potential host communities, Parish Councils, Borough Councils and the County Council. This Right of Withdrawal should continue, all the way, until a planning application is made, prior to construction.

Do you agree with the proposed amendments to decision making within the MRWS siting process? If not, how would you modify the proposed phased approach, or, alternatively, what different approach would you propose? Please explain your reasoning.

No. We do **not agree** with the amended decision making process. It is contradictory and flawed. These new proposals allow for a body, which is most likely to be a Borough Council, to express an interest. This body will then be responsible for steering the project and finally deciding upon a right of withdrawal. No one body should have all of these roles. The representative authority needs to consult local people and stakeholders before giving its consent. This goes to the heart of volunteerism and CALC would wish to see an explicit requirement for prior consultation. The proposals for a steering group and for a consultative partnership have merit, but are mistaken and will not engender community support. Both bodies should be **independently led**. The suggestion that the leader of

the representative authority should chair the steering group is simply wrong and will undermine any confidence local communities might have in the process.

Do you agree with this approach to revising roles in the siting process set out in the White Paper? If not, what alternative approach would you propose and why?

We do not agree with the approach to revising roles.
We do not agree with the District Council being the "Representative Authority" (see above). We disagree with any revisions to create a process which clearly attempts to deny the body that is closest to community, the Parish or Town Councils, any say in the decision making process, other than that of being consulted.
We also disagree with this approach which seeks to marginalise a County Council, which acts as the legally constituted Strategic Waste Authority for a county, to that of a merely consultative nature.
We are also concerned to note that DECC paper does not propose to require the Environment Agency to have a role in coming to a decision on the suitability or otherwise of a siting.

Do you agree with the proposed approach to assessing geological suitability as part of the MRWS siting process? If not, what alternative approach would you propose and why?

We do not agree. Selection of the suitable geology for ***geological*** disposal of nuclear waste must be the number one priority. Geology must lead this process not geography. The geological data for West Cumbria already exists and could be examined and compiled into a national report within a matter of months.

It is stated within the consultation document that '*there is no best or most suitable generic type of geology*', This is not true. It is generally agreed that the long term safety of a GDF depends almost entirely on the geology in which it is placed. By continuing to downplay the importance of geology, DECC demonstrates either a fundamental misunderstanding of science, an over-reliance on untested and un-testable engineering, or a blatant disregard for the safety of future generations.

Do you agree with this proposed approach to planning for a GDF? If not, what alternative approach would you propose and why?

We do not agree with this proposed approach to planning for a GDF. We do not believe that the DECC Secretary of State should be the final arbiter of any planning application associated with the GDF as this person has a vested interest in such an application succeeding.

Do you agree with this clarification of the inventory for geological disposal – and how this will be communicated with the volunteer host community? If not, what alternative approach would you propose and why?

We agree that it will be helpful if the potential volunteer host community is made aware, at the outset, of what type of waste and materials may be disposed of within the prospective GDF;

Do you endorse the proposed approach on community benefits associated with a GDF? If not, what alternative approach would you propose and why?

We do not endorse the proposed approach on community benefits. There is a lack of clarity regarding the term 'host community' and this may lead to an inequitable distribution of the benefits. We believe that separate funds should be established to meet the aspirations of the affected communities at parish level, borough level and county level, i.e. three different funds, local, social and strategic.

Do you agree with the proposed approach to addressing potential socio-economic and environmental effects that might come from hosting a GDF? If not, what alternative approach would you propose and why?

We do not agree with the proposed approach to addressing potential socio-economic and environmental effects. Proposing to group and deal with such effects under a broad umbrella is crude and unrealistic. It is not acceptable to this parish that where a development causes environmental damage, such damage may be offset by the developer offering employment in the area, or other economic benefits. We believe that there should be a clear separation of Environmental and Economic issues.

Do you have any other comments?

Whilst the proposed revision goes some way to meeting the government's wishes to encourage communities to participate in its MRWS programme, local communities are more likely to be attracted to it if they are confident that safety rather than technical or political expediency will be the prime considerations and if they can believe that the benefits for the area outweigh the disadvantages. The project to build a GDF will only succeed if it is clear to potentially interested communities that there is an unequivocally safe geological environment in which to locate it.

Yours faithfully,

David Smith: Clerk to Loweswater Parish Council.