

BORROWDALE PARISH COUNCIL

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GDF Siting Process Consultation
Department of Energy & Climate Change
Room M07
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28th November 2013

To Whom it May Concern

Re: Borrowdale Parish Council Adopted Position in response to the 'Review of Siting Process for a Geological Disposal Facility'-September 2013

Please find below the position of the Borrowdale Parish Council in response to the above-mentioned consultation. This position was adopted during the meeting of the Borrowdale Parish Council that was held on Wednesday 27th November 2013. Borrowdale Parish Council have chosen to respond to only two of the questions raised by the consultation, as fundamentally until the issues of selection based on geological suitability and who will be decision making bodies in the process are addressed the answers to the other questions are immaterial.

Beyond the ongoing belief that the site selection process for an underground repository should be based on geological suitability first and then trying to convince the appropriate community to host such a facility. The overarching Borrowdale Parish Council response to this consultation is that selectively restricting the decision-making responsibilities to the only tier (in Cumbria) that has shown any support for the siting of a repository in Cumbria so far is manipulative, undemocratic and fosters serious mistrust in the process.

The two questions that Borrowdale Parish Council are responding to are:

3. Do you agree with this approach to revising roles in the siting process set out in the White Paper?

We accept that the government should play a much more active role in many aspects of the process. However we STRONGLY disagree with the arguments set out for the role of local government, in particular the suggestion that in two tier authority areas the district authority alone should be the Responsible/Decision making authority. To restrict the decision making to the district authority- the only tier in Cumbria that showed support for the West Cumbria Managing Radioactive Waste Safely process to continue is viewed by the Borrowdale Parish Council as manipulative, undemocratic and will place any future siting process in Cumbria under a cloud of significant mistrust. Any proposed repository will affect a

significant area, and the views and opinions of those likely to be affected are best represented by a combination of District, County and Parish councils. Any future siting process should enable views from all levels to be expressed with a solid and transparent weighting process in place between the levels of views (similar to the previous West Cumbria Managing Radioactive Waste Safely Process). Trust in the process will never arise if the first tier (parish) of local government closest to the proposed GDF site is dismissed as being of little consequence and incapable of playing a decision-making role. Borrowdale Parish Council would therefore request that the government look again at the roles of local government, and ensure that all levels of government are included in the decision-making arrangements.

The current consultation document also doesn't address the question of how the representative authority/ies would reach decisions. To ensure confidence in the decision making process is vital, and scrutiny in the recent decision-making process in Cumbria was considerable. The 2008 White Paper expected that a decision to participate should be taken by the full council. However this was not how things ultimately occurred in Cumbria (this was based on legal advice given to the councils), however this undermined trust in the MRWS process, with many people (including the Borrowdale Parish Council) finding it hard to accept that a decision about a nationally important project with such far reaching and significant implications for the local area for thousands of years had (according to legal advice) to be taken by a small number of the relevant councils elected representatives. Given the consultations papers position that any proposal for a nuclear repository should have widespread local support, this should surely include the majority of the decision making authorities elected representatives. Borrowdale Parish Council would therefore also ask that the relevant documents & legislations be amended so that decision-making body/ies can take any decision before the FULL council or cabinet rather than just an executive.

4. Do you agree with this proposed approach to assessing geological suitability as part of the MRWS siting process?

In short the Borrowdale Parish Council's position on this question is NO. The Parish Council still believe that the appropriate way to approach this question is based on detailed geological information to identify the geologically suitable way and then approach the relevant community/ies. We accept that there has been some movement in the right direction on this matter with the suggestion that more geological information would be made available earlier in the 'learning' phase, however we as a parish council still do not feel that these changes go far enough. To not address the issues of geological suitability in much greater (and accessible detail) at the earliest opportunity in the process is in our opinion a fundamental flaw of the process.

In addition the Borrowdale Parish Council support the a statement developed by CALC about National Parks. " A reasonable prospect must not rest on geology alone. On the list of the six high-level site selection criteria is 'potential impact on the natural environment and landscape'. This brings into play the National Parks and Area's of Outstanding Natural Beauty. The LNDPA in its response to the call for evidence says 'the question of identify areas of National Parks for consideration is very contentious and is likely to be contrary to National Park purposes as outlines in legislation. It may be beneficial to future processes to exclude areas, which are subject to National Park Designation. In our view the position

should be put BEYOND DOUBT by excluding National Parks & Areas of Outstanding Natural Beauty from the area of search from the outset”

I will also send through this response via email.

Should you have any queries please don't hesitate to contact me on the above details. I would appreciate it if you could keep Borrowdale Parish Council up to date with any future developments with regard to the Review of the Siting Process for a Geological Disposal Facility.

Kind regards

Becx Carter
Parish Clerk to Borrowdale Parish Council