

## **REVIEW OF THE SITING PROCESS FOR A GEOLOGICAL DISPOSAL FACILITY**

### **RESPONSE TO THE CONSULTATION BY BARRY TURNER**

The policy of DECC is to portray the selection of a site for a GDF as being relatively straightforward. It is proposed that any community can apply to provide a GDF site regardless of the local geography, geology, environmental sensitivity, socio-economics or national park status. This is unrealistic and will cause time and money wasting since many parts of the country can be ruled out due to their unsuitability.

1. Establish the minimum specifications for a suitable GDF location in terms of geology, hydrogeology, geography, mining history, future mining potential, socio-economics, environmentally sensitive areas and national parks.
2. Conduct relevant surveys to screen out unsuitable areas.
3. Conduct a national awareness and engagement programme open to suitable areas.
4. Interested councils should have to canvass local opinion before expressing interest and must inform the public if they participate in the process. Neighbouring councils must be included in the decision making body when locations are close to the boundary. The county council should be included in the decision making process for such a large project. The proposal to change solely to district councils as decision makers appears designed to allow Cumbrian borough councils to reapply.
5. DECC to provide interested councils with geological, socio-economic and environmental reports and the resulting effects of the GDF on the location, the population and the economy of the area. Compensating benefits packages to be explained, projecting these effects into the distant future. The volumes and requirements of wastes from an open ended new nuclear programme are unknowable and must therefore be outside the scope of the present GDF waste programme, contrary to the proposed programme. There must also be clarity on the possible inclusion of legacy spent fuel and plutonium in the inventory for the same reason.
6. There must be encouragement for positive public involvement in the process, not the usual low key minimalist DECC public involvement. Staged decision making must be retained, rather than the proposed five to ten year period of involvement before a single make or break test of public support, leading to irrevocable continuation or withdrawal. Referenda should be used to test acceptance at key stages in the process. This means the public will need to be given sufficient information to make decisions.
7. The right of withdrawal must be protected until the commencement of construction or even longer if critical new evidence undermines continuation.
8. The management body responsible must be transparent, open, objective and have

public trust. A partnership. Government, DECC and RWMD involvement must be advisory or observer status.

9. The proposal to introduce a generic NPS for siting a GDF must be rejected as each site is likely to be unique. The use of an NPS is also alien to the voluntarism principle. The possibility of IROPI is totally contradictory to voluntarism.

10. Community benefits packages must not be a bribe offered to plug local financial shortfalls. There must be a long term programme offering genuine benefits to community wellbeing. The benefits packages provided in west Cumbria over the last 60 years have not prevented high levels of child poverty. A far better system is required.

This will have to be provided from taxation if the GDF only deals with legacy waste as in 5. above. If however the decision is made to include new build waste in the GDF then benefits packages for accommodating this waste must come from the developers.

11. There must be a moratorium on new build since the waste cannot be included in the proposed GDF.

12. There must be a fully integrated waste programme which includes storage of so called interim waste, which by any other standard is long term, being up to 160 years or more. This means communities must be offered the choice of whether to host ILW and therefore any new build project.

Barry Turner  
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