

This is a personal response to the consultation document. I am a member of BRARE (Bradwell for Renewable Energy) in NE Essex. I have read the document carefully and attended a DECC consultation briefing in London on November 22nd, 2013.

Qu 1. It is of course important that a test of public support be taken before the representative authority loses the Right of Withdrawal. (It is also important that public support continues to be assessed throughout the process - how difficult would it be to continue with the project against a background of rising public disquiet for instance?). However the authority and the government should have the most diverse and extensive assessment of public support available to them before committing to a project of such duration and scale. This should not be a simple yes/no referendum, but would need to use a variety of ways to elicit concerns from many community level interest groups including those who are often left out - especially those concerned with health, family and childhood issues, and the long-term prospects for communities.

Qu 2. Learning, Focussing, forming supportive partnerships and representative steering groups are all good strategies, but it does seem that once the District Council has agreed to host a GDF and lost the Right of Withdrawal, then it also loses any significant influence over the very long-term future development of the project. Its hard to know how this could be done differently or better, but once a decision has been made to go ahead with such a huge project then it would essentially be imposed on a host community, unless partnerships/steering groups and eventually the regulators found reasons to reverse the decision.

Qu 3. Given the very long time-scale (minimum 30 years from inception to opening, and then another hundred or so) and the technical complexity of the issues of geology and radioactive inventory, District Councils lack the competence to take the necessary decisions in an informed way (even given the period of Learning and Focussing described). Add to this the uncertainties in the process (unanticipated geological complexities, emergence of new storage techniques, arisings of new waste forms from new technologies....etc) and it is hard to see how local authorities can be prepared to shoulder these decisions.

Qu 4. The approach to assessing geological suitability sounds good. But every site will have its own engineering complexities, and these in turn will have impacts on local populations in terms of the times scales, the kinds of equipment used, and their intrusiveness; the need to transport in materials, and transport away spoil. It will not be enough to explain the geology - though that in itself will be of great interest. It is also necessary to identify the possible and likely causes of geological structures which might cause future delays and other problems which may not be known at the outset. Again, I believe the sheer complexity of these problems makes any meaningful decision making process virtually impossible for most District Councils.

Qu 6 - The legacy waste inventory for geological disposal is still not entirely clear, and much work remains to be done. How much less certain is the inventory of new build wastes. RWMD are reported on p49 of the Review as saying that the wastes expected to arise from the existing PWR at Sizewell B, are similar to those expected to arise from the EPR - both of these 'expectations' referring to things which are not yet known because they haven't happened. Again the technical complexities of the specifications of wastes, the long time-scales involved and the probability of emergent issues - new types of wastes, new dilemmas about short-term storage and transportation, and new kinds of requirements for underground storage, all militate against any informed decision by District Councils.

Qu 9. I think we have to think of Sellafield today, and some other community, much like the Sellafield of 50 years ago. The lure of community benefits, and the excitement of joining a

technological adventure may blind people enough to the uncertainties of outcome a long way in the future, for them to 'volunteer' to host a GDF. Beyond those very early stages, voluntarism will disappear. As great investments are made it will be unthinkable to turn back, and carrots and sticks of different sizes will be used to carry the project through. Compulsion will extend to accepting even very different kinds of wastes arising from new nuclear adventures, as the time and effort involved in planning and building new repositories becomes clear.

I do think that some communities might sign up to a commitment to host all the legacy waste - the unavoidable leftovers from a past experiment which didn't work quite as expected. But the addition of new unknowns in the form of wastes from newbuild ventures - wastes which are entirely avoidable - is likely to make the venture much less acceptable.

I believe, along with others here, and at the regional consultation I attended, that the cloak of 'voluntarism' is only a thin veil which does not really disguise the intention of government to press ahead with this policy come what may, and it will eventually be imposed.

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