

**DECC Consultation: Review of the Siting Process for a Geological Disposal Facility  
– Response by Low Gillerthwaite Field Centre, Ennerdale**

Q1 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.

A Yes. A full referendum for voters in the representative authority, before the detailed siting stage.

Q2 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?

Q3 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?

Q5 Do you agree with this proposed approach to planning for a GDF? If not, what alternative approach would you propose and why?

A No. This infrastructure project is too important to be left to DECC, the RWMD (NDA) and Borough/District local authorities who will be in complete control of the process. This significantly reduces the voluntarism element and concentrates power into a too limited group. International best practice is for the process is to be overseen at the *national* level by a Commission independently chaired, accountable to Parliament, and including external stakeholders and peer review expertise. This allows a greater role for other views. For example, if the representative authority is within a National Park, which is a national asset, there should be *national* stakeholder(a) as part of the decision-making process. The DECC Secretary of State should not be the final arbiter because this person will also be the proposer, with a vested interest in the planning application succeeding.

Q4 Do you agree with this proposed approach to assessing geological suitability as part of the MRWS siting process? If not, what alternative approach would you propose and why?

A No. International best practice for site selection for GDFs is to screen out areas with unsuitable geology. Sufficient geological information should be available, or can be researched, to identify suitable geology.

. This should come before the search for volunteer communities. To put volunteerism before geology is unsafe because it may lead to the temptation of 'engineering a solution' to compensate for non-ideal geology where there is a volunteer community. Man-made structures will very probably have a shorter lifespan than geological structures.

There are concerns with the *statement "Allow for a balanced and open appraisal of local geoscientific factors, in relation to local socio-economic and environmental factors"*. The safety of the geology, the socio-economic and the environmental factors are all distinct and separate issues and should not be conflated.

Q7 Do you endorse the proposed approach on community benefits associated with a GDF? If not, what alternative approach would you propose and why?

No. Community benefits should play no part in the process until geological suitability has been verified.

Q8 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?

- A No. Environmental assessments should be considered as soon as an area expresses an interest, not late in the process.  
More fundamentally, mitigating the environmental impacts is not possible for a project on the scale of a GDF.

Do you have any other comments?

Copeland Borough Council and/or Allerdale Borough Council should not be able to re-enter a revised MRWS process because MRWS is a continuing process and these areas have already been democratically excluded within this process.

If they do re-enter, a further issue is that many residents are employed by the nuclear industry with relatives and friends living nearby.