

Department of Energy and Climate Change (DECC) Consultation Response

1. Do you agree that a test of public support should be taken before the representative authority loses the Right of Withdrawal?

Yes. This has already been done once and Cumbria exercised its right to withdraw. A referendum is being claimed to be “undemocratic” by Copeland councillors. Insulting! The right of withdrawal, in a continuing process should be exercised at each point in the process and public opinion should be tested at each stage right up to construction. Everyone must have complete confidence in the process. There must be a high level of engagement, openness and complete transparency.

There must be enshrined the legitimate and democratic **Right of Withdrawal** by potential host communities, parish councils, district councils and the county council (or unitary authority).

2. 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?

In a multi-tiered area, all levels must be in agreement. District Councils should not be allowed to act as the Representative Authority. The County Council should be involved as they are ultimately responsible for all major matters within their area and it appears that the move to stop them being able to influence the decision making is a ploy to prevent Cumbria County Council vetoing the process in Cumbria and allow the Government to get the response it desires.

The views of Parish and Town Councils should also be taken into account as they have a clear understanding of local views.

We also disagree with the suggestion that the Leader of the Representative Authority should chair the Steering Group.

3. 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?

No. All tiers of Local Government need to be involved and all must be in agreement. This consultation appears to be already flawed as little publicity has been given outside Cumbria. Baroness Varsey wrote in our local paper that the consultation was not aimed at Cumbria but our friends and family widely dispersed across the country have heard nothing of this until we brought it to their attention. It has been given a very low priority and this leaves a lack of confidence in the whole exercise.

4. 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?

No. There is significant information regarding the geology in West Cumbria. Indeed hundreds of millions were spent investigating the area but the government seems to be choosing to ignore the result which indicated an unsuitable geology.

Suitable geology should be identified within the whole of the country before volunteers are sought. The long term safety of a GDF depends almost entirely on the geology in which it is placed and the best site should be identified. The data already exists that could be examined and compiled into a national report within a matter of months.

We have no confidence in an engineered solution in a less than ideal site. The track record of “engineered solutions” is not good as the comments in the recent report into the storage of legacy waste at Sellafield amply demonstrates. Urgent remedial work needed.

5. Do you agree with this proposed approach to planning for the geological disposal facility?

The 'representative authority' role should not be delegated to a district council. A County Council must have a participative role rather than merely a consultative one. The County Council are responsible for highways, minerals, planning, waste disposal and safety. A District Council as representative authority cuts across all these and many other responsibilities.

It is not acceptable that the Secretary of State for ENERGY should have the final decision about a GDF application i.e. whether or not to grant itself planning permission!

6. 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?

The types of waste have been clarified but the volumes and origins of the waste have not. It appears that waste from “new build” and even that originating outside the country may be placed in the GDF - possibly without the need for further consultation. This is not acceptable. CoRWM disagrees with these additional waste streams being added to the inventory.

The inventory should be open and transparent and linked to community benefits. The “host community” should have a right of veto to the placement of unknown future waste and to the possible future expansion. The right of veto should be in perpetuity.

The definition of “Host Community” is still unclear and needs to be clearly identified which it certainly has not been in the process this far.

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

Community benefits should be significant but should not be part of the “selling pitch”. Hard pressed councils should be given help to diversify so that they are in a position make choices.

There should be guidance as to the adverse effect of hosting a GDF, tailored to any area which volunteers. There should be no retrieval of funds if Councils exercise their right of withdrawal. Benefits should be given at each stage of the process – starting with some benefit for an expression of interest and continuing as the process proceeds.

What benefit does the community in West Cumbria derive from the current storage of the country's nuclear waste? Look at our current infrastructure. Sub-standard road and rail links and crumbling towns. High unemployment and poor health standards.

8. 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?

No community should feel under the pressure to accept a GDF as West Cumbria currently is. Comment has already been made in the previous answer relating to the current socio-economic situation here in West Cumbria. A GDF should not be seen or presented as a way out of economic hardship. We should not be being pushed towards a GDF by the continuing cuts being made to councils by the government.

There should be clear separation of the environmental issues from the economic issues. With regard to environmental issues, it would appear to be illogical and entirely counter-productive to attempt to put a GDF where it could adversely affect any nationally and internationally protected areas (National Parks, Areas of

Outstanding Natural Beauty, World Heritage Sites, Special Areas of Conservation, Ramsar Sites, Special Protection Areas).

Other Comments:

The current storage of nuclear waste at Sellafield has been criticised by the Nuclear Inspectorate and by Rt Hon Margaret Hodge, Chair of the Public Accounts Committee. Engineered solutions currently in place are deemed inappropriate and we are about to embark on another project where we will not even seek the best site for the storage of our nuclear waste.