
From:
Sent: 19 May 2013 22:52
To: radioactive waste (DECC)
Subject: MRWS programme

I am aware you are seeking views as to the site selection aspects of this programme.

In responding to your request I have been shown a copy of a lengthy e-mail letter

sent to you today

This letter summarises succinctly the views I wish to express, and the approach I would wish to see adopted, and I would wish to be associated with it.

It is absolutely fundamental to any resumption of this process that a national survey of suitable geological sites is undertaken as the first step in the process. Such a survey should necessarily concentrate on areas within which, applying only the appropriate geological criteria, the possibility of locating a suitable site is at its greatest.

The initial survey should exclude any areas comprising a National Park, SSSIs and any other environmentally sensitive registered sites. I am not qualified to state whether a desk-top survey would be adequate or reasonable to establish whether any site could be regarded as potentially suitable. But on the basis of previous surveys I understand that several sites have already been identified in areas where the geology is simple and stable with mild gradients and low permeability, so it may well be that no large scale intrusion within any given area would be necessary to formally establish suitability.

No attempt should be made to engage with the public on a voluntary basis until all suitable sites have been identified and feasibility studies carried out and costed..

Proper public consultation should be the keystone of whatever means are adopted to acquaint the public with the salient aspects of the consultation process.

With regard to the perceived failings of the MRWS process in Cumbria I was struck in particular by:-

1 the growing realisation of the public at large that the volunteering process was being manipulated/abused towards a pre-determined outcome in which a GDF in LDNP would become a reality in any event and so-called "volunteerism" was the means by which this was on course to being achieved.

2 the impact of the Partnership's final report in August 2012 which, by reference to the reaction of the wider public on becoming aware of its contents, revealed it to be

(a) (Partnership) self-serving and wholly inadequate in its assessment of public opinion

(b) the first indication (after 3 years) of the enormity of the engineering works to site a GDF.

(c) inadequate as to the scale of operations likely to be needed to investigate the suitability of the geology after completion of a desk top survey

At this point the whole process smacked of a smoke and mirrors exercise in which some of the most august bodies in Cumbria had allowed themselves to become participants without a full appreciation of the implications of a process in which there were no adequate safeguards including a legal framework for withdrawal. There was a widespread feeling that many of these bodies had chosen to "sit on the fence" and had failed to think the process through. The Government seemed to be taking full advantage of weaknesses within the process to speed it up and to conflate stages 4 and 5. The actions of the some proponents of the process and the lack of willingness by anyone other than objectors to debate the issues served only to increase mistrust of it.

Any future consultation process must be frameworked to reach grass-roots public from the outset. Public meetings should be held routinely at every stage where conflicting arguments can be properly aired. Panel representation from interested organisations is inadequate and insufficient. It was quite astonishing how little the proponents of a GDF and the process in Cumbria were prepared to take the public platform, and how equally astonishing was the lack of referral back to its members on the part of interested organisations within the Partnership.

I knew little about the issues until I became aware of the Partnership final report. The public meetings I attended thereafter were organised only by those who like me were concerned at the lack of proper public consultation and the implications for Cumbria both commercially and environmentally. Panel members included representatives from NDA and one geologist who did not support the argument that the geology was unsuitable. However none was prepared to engage in open debate. The one meeting that I was aware of which had been organised by a trade union in favour of a GDF was not open to the public.

I hope you find these observations helpful

Sincerely