

Copeland & Workington Liberal Democrats Response to the GDF Consultation Process

Given our previous opposition to the siting of a GDF in Cumbria based on sound geological, scientific and engineering advice we are pleased that the Government are entering into a National Consultation Process and are willing to learn from the experience of attempting to site a GDF on the West Coast of Cumbria.

We are concerned that the Review of the Siting Process for the GDF asks for a response to a number of leading open and closed questions however as a framework for gathering information and reflecting on past experience we are pleased to submit the following responses to the questions.

1 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 making this test, and when should it take place? If you do not agree with the need for such a test, please explain why.

- We agree that a test of public support should be taken before the representative Authority loses its right to withdraw.
- We would advise against the GDF Process placing the decision making at a District Council level or in the gift of a relatively small easily influenced group within a community for example an Executive Body of a Council.
- We would encourage a much broader representative Steering Group to be developed that would include County District and Parish Councils plus community stakeholders.
- The body responsible for the disposal of all waste including Nuclear Waste (County Council or Unitary Authority) should retain this responsibility.
- The impact of a GDF would extend far beyond the boundaries of a single district council area. We are concerned that a district authority may not give due weight to important considerations relevant to a wider area.

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? Please explain your reasoning.

- We do not agree with the proposed amendments to the decision making within the GDF siting process.
- It is evident within the Consultation Document that the process is being manipulated to exclude and marginalise any Authority Community or Stakeholder that would provide challenge to the siting of a GDF in their area.
- The Right to Withdraw should be supported by legislation in order to provide confidence in the GDF Siting process.

- We would therefore suggest that to develop a partnership based on trust, with all the communities and stakeholders affected by the siting of a GDF, a public referendum should be undertaken following the collection and dissemination of all the geological scientific and engineering information available.
- The steering group defined in paragraph 2.53 needs to have a wider membership for it to be seen to be democratic and representative in areas where multi-tiered governance exists. County and borough council representatives should be included.

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?

- We do not agree with the approach to revising roles within the GDF siting process set out in the White Paper.
- It is essential that the process should be seen to be a truly National Process from the start and that all levels of Local Government should have an option to participate in the process Parish District and County/Unitary Authorities.
- The model of Voluntarism should be superseded by a presumption of Safety First at all times.
- We are of the opinion that a safety first evidence based model leading to voluntary engagement in the siting process would prove to be a national GDF Policy that communities and stakeholders could have confidence in.

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?

- We would suggest that the initial reports provided by the RWMD during the Learning Phase should be restricted to the geological suitability of an area supported by sound scientific and engineering reports. An evidential process not undermined by socio-economic factors.
- It would support the GDF Siting process if more than one Local Authority or Community were engaged in the Learning Phase of the process so that Communities could see that all options were being considered within the process.
- The Cumbrian experience was that trust in the process broke down when it became apparent that the DECC/MRWS would not acknowledge the geological and scientific evidence that the Cumbrian geology would not be suitable for a GDF and that an engineering solution would not address these issues.
- A new independent body should be set up to advise all parties on the geological suitability of areas and the scientific and engineering requirements of siting a GDF.

- All evidence should be peer reviewed to establish a safety first evidence based model that a community or stakeholder can have confidence in.
- West Cumbria Liberal Democrats support the view that a nationwide geological survey should be carried out.

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

- We would agree that the final Planning Decision for the siting of a GDF should ultimately be held at a National Level.
- We also agree that a specific National Policy Statement should be made setting out the Assessment Principles that would need to be met prior to the siting of a GDF.
- We support the proposal for the Appraisal of Sustainability and would also suggest that the proposal goes further and include all models and alternative suggestions for assessment.

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?

- When considering the inventory for geological disposal we would suggest that the National Nuclear waste repository should be limited to safe storage of UK Nuclear waste and UK Nuclear Waste material processed.
- We welcome the UK Government DECC proposed changes to Baseline Inventory for Nuclear Waste.

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

- We would advise against complicating and ultimately undermining the evidence gathering process for the siting of a GDF by focusing too early in the process on the socio-economic support available to a host community. Communities should not be bribed to host a GDF.
- We would encourage the UK Government to establish funding for communities to participate in the Learning Phase (Engagement Funding).
- We would support funding for community benefit during the focusing Phase and the establishment of a Community Benefit Fund.
- The impact on the wider community geographically would be significant and this should be reflected in the disbursement of the Engagement Funding and Community Fund.

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?

- We would suggest that any interested community would benefit from detailed environmental and socio-economic assessments.
- However this should commence during the Focusing Stage.

9 Do you have any other comments?

- We are pleased to note that the issue of retrievability has not been excluded from the process however we are of the opinion that a much clearer stronger statement regarding a positive commitment to retrievability should be made within the process.
- The formation of Steering Groups should have a clear membership and Terms of reference that have been shared with all communities and stakeholders.
- The Steering Group should therefore represent all levels within a community both elected and those who are not elected members of a proposed host community.
- West Cumbria Liberal Democrats welcome this government's commitment to continuing with a fully democratic process and the substantial attempts which have been made to address lessons learned from previous failures. We particularly welcome the stated commitments to retrievability and to the process of independent peer review.
- The process of independent peer review recommended in this report should be transparent and it should be extended into the public domain, with resource being provided to properly answer question in real time through mass online discussion.
- However in addition to points already raised, a significant failing of this report is that it fails to present the scientific case for a GDF and is based on the assumption that this case is made. The UK Government must understand that it is unlikely to win any public test of support when it fails to properly engage with the concerns of members of the public who agree with Scottish policy and do not believe that the case for geological disposal is made.
- In Cumbria opposition to the GDF was successful because it was perceived by open minded members that by 2013 the case being made for a GDF was not convincing. It was perceived that if the UK government was not concerned to scrutinise or properly present this case it would be unlikely to take the appropriate level of care with its consideration of where to site a GDF. These concerns were compounded by our members' experiences of previous decisions made regarding investment at Sellafield which took place despite locally known issues which should have been addressed and which led to vast waste.

- Enhancing the process of independent peer review in the ways described above would be likely to play an important part in the process of convincing key leading analysts and communities should the evidence justify proceeding.

Yours sincerely

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