

Cumbria and Lancashire Area Campaign for Nuclear Disarmament  
**Response to the Department of Energy & Climate Change's consultation *Review of the Siting Process for a Geological Disposal Facility* September 2013**

It is clear that the DECC are very ready to listen to criticism and objections but also that the object of this exercise, as in other consultations, is to identify objections, rather than allow them to have any substantive influence on predetermined policy. In short, there is little contact between our wish for DECC to reconsider its apparent determination to site the GDF in West Cumbria and DECC's need to consider a wide range of opinions as part of its political management of policy.

The flow of events indicates to us that West Cumbria has been, from the beginning, the leading (very possibly the only) candidate for the site for one main reason: its proximity to Sellafield, which has advantages not only for transport but in terms of political influence. Thus, DECC seems to have assumed that it could take local support for granted when it decided to begin construction with a rock characterisation facility. Its case that the geology was suitable for this construction failed badly when subjected to independent scrutiny and assessment at the Nirex enquiry. DECC's response was not to accept the evidence but to change the process and, after a long pause, voluntarism, a feature rather undervalued in the first phase, was announced as the basis of future policy. This failed when the arguments against the GDF siting were accepted by Cumbria C.C., reflecting opinion outside the immediate orbit of Sellafield. DECC's reaction, again process-based, was to propose a national conscious-raising exercise in the hope (genuine but tenuous) that a candidate site other than West Cumbria might be proposed by a local authority other than a county council. Since a minister had, after all, made an undertaking that the process in West Cumbria would end, it would be difficult to restart it without drawing a line under the past.

This restart also has the effect of removing all experience gained in Cumbria from consideration. In this version of reality, the decision to make local councils the decision-making bodies is, apparently, nothing to do with the fact that Cumbria County Council rejected the scheme and halted the process; it is merely a more thought-out application of the principles of localism and subsidiarity. Geological evidence cannot be considered at this stage since comprehensive and detailed knowledge of the entire geology of England is lacking; forget Nirex. A local council must show some interest in becoming a candidate before the geology of the area is examined. (It seems to us that if one was trying to find the best site for a GDF, it would be hard to find a worse way of going about it; and it is only slightly mitigated by the very low probability of any council volunteering, not least if it considers the experience of West Cumbria).

It is vital for our county to have a robust safety case for the disposal of highly radioactive waste and for this safety case to be examined and judged and scrutinised by independent experts. This is not a railway nor an airport. It is a safety issue of utmost importance for the Nation today and for generations to come. We want to discuss this. Instead, we find ourselves being invited to contemplate improbable scenarios concerning notional candidate sites while being deflected from making our continuing arguments about the West Cumbria's geological unsuitability and the need to find sites that are geologically more suitable. Voluntarism may well depend on Copeland and Allerdale, and the popular reaction to the removal of Cumbria County Council from the process may well have a greater effect on them than DECC hopes. In light of this, we would hope that our input to this consultation at the workshop we attended in Westminster on 27 November, which was not necessarily according to the agenda, might be taken seriously.

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