

This is a formal response to the DECC's Consultation Review of the siting process for a Geological Disposal Facility (GDF) from the Churches Together in Cumbria Environment Group.

Background information

Churches Together in Cumbria is the umbrella organisation of all the Christian denominations represented in Cumbria.

The views of the members of its Environment Group were assembled at their meeting on Wednesday 20th November 2013.

The considered response of the CTiC Environment Group

1. We argue very strongly that the Consultative Document put the cart before the horse. The responsibility of the government is, first and foremost, to secure the safest achievable location for a GDF. The geological selection process, on the basis of a geological survey of the whole country, should therefore come first. This survey should be opened to scientific peer review and public examination. On the basis of such a survey, the government should identify appropriate areas on rigorous safety grounds alone, and only then approach local authorities and invite communities to come forward. The involvement of an independent authoritative body as overseer of the survey and selection process – for example the Royal Society – would be essential in giving communities confidence that the selection of appropriate areas was made solely on geological, rather than on political grounds.
2. Public information is essential once possible areas have been identified: people need to understand the issues before decisions are taken by them or their representatives. The process operated by the West Cumbria Managing Radioactive Waste Safely Partnership (MRWSP) earlier this year is a model of good practice for the future. The MRWSP went to enormous lengths to involve the public through consultations, roadshows, exhibitions and widely distributed and well-produced literature.
3. The Consultative Document misrepresented the structure of Local Government and did not clearly define the term 'responsible community'. Paragraph 2.30 states that District Councils have the right of withdrawal on behalf of their community, implying that they are the 'responsible community'. Many would argue that County Councils, representing a wider area with larger electorates and with wider-ranging responsibilities, are the more appropriate representative bodies. It is also illogical that where there are Unitary Authorities, the higher tier of local government would have the right of withdrawal, whereas where there are both county and district tiers, the lower tier would have that power. The most sensible conclusion is that both County and District Councils should be involved and also that, when decisions are taken, all elected members should participate, not just the cabinets of those Councils.
4. Local Authority boundaries do not necessarily coincide with key geological or environmental features, so a mechanism is needed to ensure that the whole area likely to experience the environmental impact of GDF construction should be considered in a comprehensive strategic environmental assessment. This should of course consider the location and landscaping of the considerable volume of spoil to be excavated since this is likely to have a greater long-term environmental impact than the underground vaults or their associated surface structures.

We hope that the government will give weight to this response,

Yours faithfully,

Pamela K.A.Martin (Administrator to CTiCEG) pp The Reverend Professor Ian James (Chair – CTiCEG)

