

## Response of Bootle Parish Council to the GDF Siting Process Consultation

### Question 1 – Public Support

1.1 We agree that there must be a robust demonstration of public support within any potential host community so that it can be established beyond doubt that the community is asking to be considered as host for a GDF rather than having one forced upon them. The concept of Voluntarism, properly applied, will be important in achieving this, but this will only occur if the '*relevant authority*' comprises the individual parishes where a GDF is likely to be situated, and not, as proposed, the District Council acting alone.

A District Council will not adequately represent those who would be the most intimately affected. Headworks and caverns would not be situated in the more urban parts of the District, but this is where the bulk of the population and hence the most Council wards are located. Voting would, understandably, be dominated by Councillors whose voters would in due course to benefit from the improved employment and infrastructure which a GDF would bring, and this without significant impact on the nature of their immediate neighbourhoods. Residents of the more rural areas, where the facility would be situated, would too easily be outvoted.

In Copeland, for example, 40 Councillors come from the more urban wards which might expect a net benefit from a GDF, a mere 11 from the rural wards where the disruption would take place. Thus the very evil which Voluntarism seeks to avoid, having a hosting decision forced on an unwilling community by government, would be replaced by the likelihood of having it forced on it by the District Council.

1.2 Developing this theme the logic of asking parishes to be 'involved' (paragraph 2.35) yet excluding them from the real decisions is contradictory. Despite what paragraph 2.28 says, Parish Councillors *are* elected in the same way as District Councillors, but they are more frequently elected unopposed; this is not evidence of a lack of accountability, but the opposite. A Parish Councillor who has the confidence of his/her community is unlikely to be challenged, but a District Councillor, however well respected, is very likely to be opposed by a candidate with no realistic hope of success, who only stands in order to demonstrate a 'presence' for his or her political party.

1.3 Where a GDF is proposed in a National Park the exclusion of the National Park Authority from initial, indeed any, decisions is difficult to justify. The NPA has, and presumably would retain, the duty to preserve the essential nature of the Park even with the presence of a GDF. And, since a GDF would be a nationally significant facility, the NPA would lose its traditional Planning role. To reduce the NPA to little more than a bit player in the decision process, but leaving it with the responsibility to mitigate the consequences, would seem both unfair and illogical.

1.4 Similarly, to expect a County Council to play a 'prominent role' (paragraph 2.34), and function as the local waste management authority, without executive power, is unfair and unrealistic.

### Question 7 – Community Benefits

7.1 Persuading a community that they would benefit by hosting a GDF will be key to securing enthusiastic volunteers, as opposed to unwilling victims, and the failure to do this has, rightly, been recognised as a major factor in the collapse of the earlier GDF siting attempt. And as well as the 'community at large' which might be attracted by improved community facilities, it must be recognised that the community comprises individuals who will be affected personally and substantially by matters such as difficult house sales. The benefits package must adequately compensate these people, who will be unimpressed by a new skate park or refurbished village hall if they find their house will not sell. This principle, of compensating homeowners whose sale prospects are blighted, should raise no novel challenge; the principle has already been conceded with regard to the HS2 project.

7.2 Compensation must be both generous ('proportionate', as in paragraph 4.10 sounds too coldly calculating, even niggardly), and timely. Delaying payments until the 'Focusing' phase might be acceptable for community projects, but compensation to individuals would be needed earlier; the moment that the first hint that an area is being considered appears is the moment at which house sale prospects deteriorate.

It would also be prudent to take on board the fact that the timescales involved in a GDF project will extend across several stages of an individual's life, so payments must relate to the 'here and now', and not be a matter of 'jam tomorrow'. Enhanced employment prospects would be unappealing to someone, working now, who would be retired by the time they materialised. And for the retired, improvements not due to be seen until after they are dead would be unlikely to excite them.

7.3 The suggested 'claw back' provisions (paragraph 4.15) smack of parsimony. A community would have the choice of drawing but not spending its benefits, or spending them and facing problems should they be recalled later. Benefits with such strings attached are no benefits at all and, in the view of this Council, could utterly destroy any prospect of a community putting itself forward.

7.4 Compensation payments would have to be geographically targeted, in addition to being provided in a timely manner. A rural community offering to host a GDF would feel cheated if the lion's share of the benefits were siphoned off to the more populous parts of the District.

7.5 In summary, the scale and nature of the proposed benefits package, and the assurance that it really would be delivered, come what may by way of national emergency or banking crisis, would all have to be far better defined than during the last GDF siting exercise.

## Question 9 – Other Comments

9.1 In our opinion the Consultation devotes too much effort to deciding how and where to build a GDF and what to put in it (questions 2 to 6), and disappointingly little on how to obtain the true consent of a host community (question 1) and how to properly compensate it (question 7). We have a suspicion that the author has been carried away by technical niceties, and has not really grasped what is necessary to ensure whole-hearted community buy-in.

9.2 Community buy-in is of course unnecessary if the views of the most significantly affected communities can be sidelined, and there is every indication that this is precisely what these latest proposals are intended to do. At the 2012 round of calls for GDF sites :

- Cumbrian parishes overwhelmingly rejected the idea of hosting a GDF
- Cumbria County Council, respecting this, and for other reasons, also rejected the idea
- But of the five Cumbrian Districts two, Allerdale and Copeland, said 'yes'.

So if there is to be any hope of a GDF either the clarity, scope, and security of the compensation package must be significantly improved, or the powers of Allerdale and Copeland have to be reinforced whilst those of the parishes and County are to be eliminated. We see nothing in this current Consultation to allay our fears that the second of these routes is the one the government intends to follow.

9.3 It is disappointing that question 1 concentrates on options regarding how the Representative Authority might conduct itself, omitting to ask the more fundamental question, whether the choice of Representative Authority is, in itself, sound. It harks back, in style, to last year's Consultation on the redefinition of marriage, asking *how* marriage might be redefined, but allowing respondents no means of questioning *whether* it should be.

In conclusion, this Council has no great opposition to the principle of GDF storage, but it has grave misgivings that it may be implemented with only an artificially contrived veneer of community acceptance, and an inadequate compensation package to soften the blow.

C A James, Vice Chairman  
on behalf of the Parish Council of Bootle, Cumbria  
24<sup>th</sup> November 2013