



Response to DECC's Consultation:

REVIEW OF THE SITING PROCESS FOR A GEOLOGICAL DISPOSAL FACILITY

Question 1: Do you agree that the 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 testing public support and when should it take place? If you do not agree with the need for such a test please explain why.

SPAND believes that a test of public support should be taken before the Right of Withdrawal is lost. We consider that such support should be determined by every locally administrative level, specifically parish, district and county, agreeing to a proposal to express interest by at least a majority of 66% of the administrative body. This includes the fundamental idea of an initial expression of interest to host a GDF. SPAND feels voluntarism should be a concept which requires every level of local government to concur before proceeding to the focusing phase.

These necessary pre-conditions ought to be required:

- ***before any authority may express an interest in going forward***
- ***before site-specific discussions take place***
- ***before the Right of Withdrawal is removed***

Question 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.

SPAND does not agree with the proposed changes. The first phase should be a national geological survey to produce a list of very suitable sites. This survey should automatically exclude any areas that have environmentally protected status. The second phase would be to invite those communities on that list to express an interest. The third phase would be to establish the existence of local support at the levels mentioned in question 1 before any economic and environmental studies take place.

Question 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?

SPAND does not agree with this approach. By excluding two levels of local representation it has made the proposals extremely undemocratic and therefore local opinion will not be fully represented. Too much authority is vested in a single tier of local authority. Our alternative approach is to reinstate both County and parish councils into the decision making process because it gives the widest possible representation of the previously identified suitable areas.

Question 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?

SPAND does not agree to this geological approach to determining suitability. We consider that the selection of the suitable geology for geological disposal of nuclear waste must be the number one priority. For such a survey to be deliberately disregarded would reinforce the impression that the region or even the site had been predetermined. It would then appear that lip service was being applied to the whole process.

Question 5: Do you agree with this proposed approach to planning for the geological disposal facility? If not, what alternative approach would you propose and why?

SPAND does not agree with this proposed approach. We do not believe it is right that the County Council, the strategic waste authority, should be excluded from the process.

We agree that it is logical to apply the NSIP planning regime to the GDF because it is a project of national significance. However, the difference between the GDF and other NSIP projects, for example, a new runway at Heathrow or HS2, is the timescale during which it will impact the local community. For this reason we believe it is wrong for representatives of the local community to be denied a part in the planning process for the GDF.

Question 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?

Following the DECC workshop there seems to be confusion over what is exactly the 'proposed' inventory. A GDF dealing solely with legacy waste i.e. a dig, dispose, cover and leave facility would have a very different impact on any host community than one designed with on-going newly produced waste from a new build. The inventory needs urgent clarification prior to any discussion with any volunteer host community.

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

SPAND does not endorse the proposed approach to community benefits because it is too vague, uncertain and lacks clarity. Before proceeding to the next phase consideration needs to be applied to the proposals. These have to be specific in the nature of the benefits, the amounts of the benefits, the timescales of payment and who are going to be the beneficiaries. SPAND proposes that DECC makes clear the amount and nature of benefits at every stage. Each stage would be mutually exclusive therefore there would be no claw back or unnecessary payment on DECC's part should the Right of Withdrawal be exercised.

Question 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?

SPAND does not agree with the proposed approach. Any assessment of the economic and environmental effects must be conducted by recognised independent bodies and not by the proposed RWMD. The first MRWS process engendered a great

deal of mistrust and suspicion from the communities due to the lack of transparency and its perceived covert processes. To avoid a repetition of this SPAND considers that it is essential that a geological screening of the whole of the UK takes place BEFORE any specific siting process. Information about the socio economic effects must be delivered separately and by a different independent body to that which conducts the EIA.

Question 9: Do you have any other comments?

SPAND believes if the way forward for the disposal of high level waste is the siting of a GDF then this is an issue of national importance. The nation has benefited from the products of nuclear power therefore identification of the best and safest method of GDF disposal ought to lie at a national level. As the title of this proposed project states geology is the foremost aspect therefore nationally the appropriate geology is the first consideration in any process in any form. Voluntarism is the next step when a list or table of acceptable sites have been identified by appropriate geological authorities.

It should not be within the writ of a single local district council to express an interest in having a GDF within its district. The impact of a GDF would be far wider than the area represented by a district council. The current proposals disenfranchise other representatives of community interests. All levels of local government must be involved in the decision making process and be in agreement. Furthermore, representatives of adjacent communities must be allowed some input into the process.

The whole process of the new consultation, as it stands, is undemocratic in the extreme.

The views submitted herein by SPAND (Solway Plain Against Nuclear Dump) were arrived at through several consultation meetings with members.