1 - **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.**

Yes, I agree that a test of public support should be taken before the Right of Withdrawal is lost.

I am very much in support of the proposed test of public support. I have tested support informally during conversation with family, friends and colleagues and have been amazed at how very little knowledge local people have about this monumental proposal. On providing information, the response has mainly been one of disbelief, that the District Councils are in favour of Proceeding with the MRWS in its bid to engage the county in a process that would impact the National Park, should the geology be found suitable.Therefore the government need to invest money and time into ensuring that the community are provided with the education and information required make an informed decision.

In order to maximise the effectiveness of testing public support we advocate a range of methods including public consultations, surveys, focus groups, and referenda. Many of these methods also act as engagement opportunities to inform the public. Details such as the criteria for voting rights in a referendum need to be settled at the earliest opportunity.

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.**

No, I do not agree that the District Council, should be accountable for local decision making and hold the Right of Withdrawal. The district council is just one tier within the body of Government tiers in the county and the only tier which supported moving the MRWS to the next phase. The proposed amendments are therefore biased to proceeding to the next phase which is totally against the spirit of what was intended and negates a democratic decision within the county.

Ideally the initial decision by the County Council should stand as it was made within the framework set out by the Government. I do not believe a case to amend and modify the previous process has been justified and the rationale has not been adequately explained.

If a revision is made, then County Councils have a broader accountable role for the County's interests as a whole. They should remain accountable for local decision making alongside District Councils and in the Right of Withdrawal. Parish and Town Councils have an important role to play in supporting and representing communities from the grassroots level and their input into the decision making process is also required.

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?**

No, the case for revising the roles in the siting process has not been made in this consultation document. All other tiers of Local Government need to be involved, and our Authority would expect to have a role to protect the interest of the Lake District National Park if any communities within or in close proximity volunteered for investigation.

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?**

No, the credibility of this overall approach has and will continue to be questioned and criticised. There is no strong rationale or evidence that this is the right way to proceed. In areas of the country such as West Cumbria there is a significant body of geological information, so this proposed approach does not appear to take the assessment of geological suitability forward.
The consultation document states that "*there is no 'best' or 'most suitable' generic type of geology*". This contradicts international approaches where national geological investigations were undertaken to determine where the most suitable geology existed, before proceeding to the next phase of engaging communities within these areas to volunteer to explore the potential for a Geological Disposal Facility.
I support that learning from international experience should be adopted. Therefore the alternative approach should reflect countries such as Finland, where national geological and hydrogeological investigations are undertaken prior to seeking volunteers. Finding the most favourable geological and hydrogeological settings, before moving to engagement of communities, will support the Governments requirement to ensure the best, safest option. Identifying those settings which would potentially offer easier to develop safety, would instil trust and confidence.
5 - **Do you agree with this proposed approach to planning for a GDF? If not, what alternative approach would you propose and why?**
Yes, to a degree, I agree with this proposed approach; I agree that finding the most suitable geological sites in the country and then agreement from those communities is key to the process.
I welcome the Government's proposals to produce a National Policy Statement. I would assume for instance that the National Policy Statement would outline that nationally designated areas such as National Parks and AONBs are not appropriate locations for geological disposal facilities (surface and subsurface) given existing Government policy and legislation. I also assume that a right of withdrawal would be written into the statement. The National Policy Statement needs to be produced within a timeframe that enables clarity from the outset.
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?**
No, whilst the types of waste and material for disposal have been described, lack of clarity regarding the volume of waste and the impact in real terms of issues such as transportation have not been addressed, which is a significant concern. During the previous Managing Radioactive Waste Safely process volume of waste was a cause of significant public concern.
7 - **Do you endorse the proposed approach on community benefits associated with a GDF? If not, what alternative approach would you propose and why?**
YES , I endorse an approach that supports community benefits associated with a GDF, within a framework of the most appropriate sites and community willingness to host as detailed above, have first been established. If not established, then any benefits will be viewed as poor compensation and sweeteners.
The suggestion that Government could retrieve funds in the event of withdrawal is unacceptable and impractical; this proposal would severely undermine trust and confidence in the process.
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?**

Yes, I agree with the proposed approach to addressing socio-economic and environmental effects at an early in the process and for this to be communicated to any host communities, prior to proceeding, so that informed consent can be established . It is important to establish the socio-economic effects on those areas both immediately affected by the Geological Disposal Facility development and also the wider impact on other areas of the county and the country as a Strategic Environmental Assessments need to be carried out early in the process and Environmental Impact Assessments would need to be produced in a timely manner so its findings can influence the site selection process.

9 - **Do you have any other comments?**

Any amendments or revision to current policy and process should continue to provide the National Parks with the highest level of protection. I do not support any Geological Disposal Facility that would impact the National Park or its setting, including any intrusive investigation above or below ground within the National Park. Major development of this kind, will adversely impact on the unique special qualities of the National Park and seriously impact the visitor economy of Cumbria.