RESPONSE TO DECC CONSULTATION ON PROPOSED SITE SELETION PROCESS

Submitted by Eleanor Williamson, resident of Allerdale Borough, West Cumbria

1. **Do you agree that a 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.**

In summary:

Independent referendum has to be the method used; it has to be county wide; and it has to take place (at the very least) before any kind of intrusive investigation can possibly begin. Should that stage of investigation go ahead, then there need to be further referenda at each later stage, and certainly again before beginning to construct a repository, to ascertain whether public support is still in place. This is important, since the people in, and governing, the geographical area the time of beginning construction will be to a significant degree different to the people (and to the politicians) who originally voted to host. Therefore this new 'generation' of people needs the chance to have its own say, and the chance to object to a decision that is not their own.

Regarding Right Of Withdrawl (ROW):

Your talk of ROW is cosmetic, and meaningless.

Your present consultation document seems to forget that within the County in which you previously attempted to site a repository (Cumbria), ROW was actually exercised (by its County Council).

The fact you have ignored the exercising of that ROW, and seem to be designing a new process specifically tailored to inviting Copeland and Allerdale Boroughs to re-bid, sends two clear messages:

- Your talk of ROW is purely cosmetic;
- Your process holds no credibility;
- DECC cannot be trusted.

Regarding test of public support:

If 'volunteerism' is to hold any water at all as a concept, your process needs to ascertain whether all the people who could potentially be **adversely affected** by a repository are (nonetheless) genuinely 'volunteering' for it. Hence the need for a very widespread public

consultation within the county in question – and at an early stage – i.e. before ROW is forfeited, and before any environmental damage (intrusive investigation) has occurred.

I am extremely concerned that you do not define 'host community', and seem to suggest that it is acceptable only to reveal your definition at the last minute, and only to explore your 'show of public support' with the 'community' as you yourselves choose to define it.

It is not merely those who stand to benefit with whom you need to be consulting. I should not need to point out that adverse affects – radioactive leakages; loss of National Park – will be felt far more widely over a far greater community of people than will the localised financial 'sweeteners'. It is the wider definition of 'public' or 'community' with whom you need to be exploring whether public support exists.

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 with the amended process. It gives power to the level of a borough council to make a bid to host a repository; a level of power quite disproportionate to size of body. Also, there is no facility for a community of any kind to object to host a repository. Borough councils – along with their constituent parish councils and their overarching county council – also need to be able to formally **object** to hosting. There needs to be a mechanism whereby communities can indicate to their representative authority and to Government that they do not wish to volunteer or to 'be volunteered'. Just because a Parish Council clearly does not have the resources "to manage a process or project on the scale of a GDF", is no reason to exclude their objections from the decision process. A borough is composed of its parishes. Your process would in principle enable a borough council to volunteer yet with every since one of its constituent parish councils in objection. This represents a logical and a democratic flaw, in failing to recognise that the borough is the sum of its parishes.

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, because I do not agree with the District Council being the "Representative Authority". See response above.

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?**

I do not agree. I firmly believe that the GDF site-search process must begin with a genuinely nationwide study to identify areas with the most promising geology. Only after this short-list has been reached, should volunteer communities be sought from among it.

To imply, as your document does, that an engineered solution is fit for purpose is profoundly alarming. Your approach betrays a lack of understanding of the long-term significance of "Geology" to the concept of a "Geological" Disposal Facility. It is the central tenet of a GDF that the waste is safely contained by the **geological** barrier. To prioritise the finding of a host community over the finding of safe geology is a case of 'the tail wagging the dog'. Completely wrong headed.

You fail to distinguish social factors from geological factors when you talking of "A*llow[ing] for a balanced and open appraisal of local geoscientific factors, in relation to local socio-economic and environmental factors"*. The safety of the Geology is an entirely distinct and separate issue from the financial state-of-affairs within the surrounding community. You speak as if social depravation is a reason to be more lenient about geological flaws. I can only conclude from this that you believe the safety of people in deprived areas is less important than the safety of people in areas of relative wealth. It is absolutely not acceptable to build a GDF in an area of questionable geology, however much some members of a community might welcome the cash.

5. Do you agree with this proposed approach to planning for a GDF? If not, what alternative approach would you propose and why?

I strongly disagree with your proposal that the DECC Secretary of State would "make the ultimate decision on whether to grant or refuse planning consent". How can DECC (in effect) grant planning permission to itself? This looks like a blatant conflict of interest due to vested interest. DECC should not be the final arbiter.

Screening needs to take place, very early on, of any area that has registered an interest in bidding for a GDF, to ensure that there are no environmentally-sensitive or protected sites that would be affected. This would need to include at the very least: National Parks, Areas of Outstanding National Beauty (AONB), and Sites of Special Scientific Interest (SSSI). Their identification must rule them out, and ruling them out at this precursory stage will avoid further waste of public money.

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?

It is clear that insufficient work has been done of forecasting the requirements for a GDF. With the government's proposals for a dozen or so new nuclear stations – a new development since MRWS1 and a massive case of scope creep – how can a community

rationally volunteer when there is no sense of how big the GDF will be and how much waste is involved?

The correct inventory of Waste needs to be completed prior to any public consultation exercise – and fixed once a community has volunteered. It must not be allowed to increase, post-volunteering, without a mechanism for the Host community to accept of reject such ha "change request".

I also believe that - because Scotland and Wales have differing or unconfirmed views on Deep Geological disposal – any waste must come from England alone.

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

I do not endorse the proposed approach. Insufficient attention has been given to the effect of economic blight on the host community and surrounding (non-host) communities who will be blighted across a much wider area.

It is unclear in your proposal when exactly the 'benefits' would be paid. Under MRWS1, they were to be paid out until after a final decision was made to being construction. Of course this may be a decade or more **after** the onset of intrusive investigations, not to mention the uncertainly that would proceed even that.

By the time the benefits were paid, many businesses may have failed and many jobs in tourism and all of its supporting trades would be lost.

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?

With regard to Cumbria – where MRWS1 tried to site s repository – you cannot simply recreate a section of The Lake District National Park elsewhere in the country. The National Park is a National Asset, of National Value, to the Nation far and wide. Its loss could never be compensated for in any financial terms.

MRWS1 should never have got as far as it did – it should have screened out both its implicated rock volumes - Ennnerdale (on the grounds of National Park and SSSI) and Solway Plains (n grounds of AONB).

Your current proposal makes the same mistake, of potentially allowing other areas to proceed far further into schemes than - legally – they could never be allowed to bring to fruition. MRWS1 has wasted a lot of public money this way. MRWS2 needs to avoid this obvious blunder.

9. Do you have any other comments?

Your proposed new process is entirely premised on an assumption that the GDF will be sited in Cumbria.

Your document is supposed to be a framework for conducting a national search. What you have instead documented is a 'path of least resistance' specifically tailored to invite Copeland and Allerdale Borough Councils to bid again. Your document is specifically designed to eliminate all of the obstacles that you rightly encountered in your previous attempt.

Your proposed process is an affront to democracy, to ethics, to political process, to geology, and to public safety.

You leave me with no option but to deeply mistrust DECC and the MRWS process.