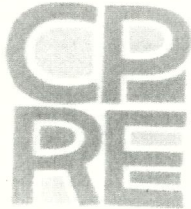


Received 05/12/13



Protecting Dorset
Campaign to Protect Rural England

Dorset CPRE
Patron: Her Majesty the Queen

Please address your reply to : Dr John Larkin

30 November 2013

GDF Siting process consultation
Department of Energy and Climate Change
Room M07
55 Whitehall
London SW1A 2EY

Dear Sirs

Review of the Siting Process for a Geological Disposal Facility

I am the Minerals and Waste Adviser to the Dorset Branch of CPRE. I have discussed these matters with my colleagues and I am writing on behalf of the Branch.

We wonder how much can be learned from Sweden, Canada, and Finland who are all ahead of the game. These countries are mentioned in the text but, nowhere does it say that anyone has looked carefully what others have already done, and how some of their work might be applicable in this Country.

We understand that Thorium nuclear reactors can absorb and actually make use of some types of nuclear waste. This technology is presently underdeveloped but we wonder it might be worth pursuing this as an alternative or additional treatment of nuclear waste.

QUESTION 1 We agree, but a BINDING REFERENDUM of the electorate in the District Council or other representative authority area would be essential to ensure that the consent, or otherwise, of the local populace was valid. The District Council might not always constitute an appropriate area especially if the GDF were near the boundary.

The preferred timing would be after the borehole drilling to give clarity on what is proposed, even if this involves spending some public money at that stage.

It is not easy to give the public at large a clear understanding of the need for a GDF and, especially, to emphasise that this is a National Priority.

Dorset CPRE | Charity no. 211974
The Little Keep | Bridport Road | Dorchester | Dorset | DT1 1SQ
www.dorset-cpre.org.uk Tel: 01305 265808

The Campaign to protect Rural England exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

The raising of national awareness before seeking volunteers (2.13 -2.15) is essential. There will be few volunteers unless the urgent national need for a GDF is made apparent together with a clear outline of what would be involved.

Nothing is said in the report about the half-life of the radioactive isotopes or how long it would take for all the radioactive material to decay and become completely safe.

QUESTION 2 We agree, but care should be taken to keep the Consultative Partnership to a reasonable size. If it were too big, see 2.54, it would become unwieldy.

QUESTION 3 We agree, but the independent verification must be truly independent and seen to be truly independent. Probably option 3 in 2.85 is the way forward here.

QUESTION 4 We agree, but again with independent technical peer review of all processes.

QUESTION 5 We agree. Non-intrusive geophysical investigations will give timely provision of new geological information to local communities (3.41).

QUESTION 6 We agree, BUT clarification of the nuclear waste inventory is needed. There is still no indication at all in the report of the expected volumes of nuclear waste, nor of the types (alpha, beta, and gamma) of radioactivity, nor of the half-lives of these highly radioactive nuclear waste materials. We do not expect any exact answers at this stage, but we do not see how you can begin to design the facility and investigate a site for a GDF without having a general idea of what you are going to put in it.

Nothing whatever is said about possible costs. An estimated cost should be publicised but, again, we do not expect to see detailed estimates at this time.

QUESTION 7 We agree. A GDF will have to be established somewhere in the Country. Probably, the only way forward is for the Government to come up with a sufficiently generous socio-economic package to attract at least one, or possibly more than one, contender for this Community Benefits Package. They must also explain clearly how the Package will work over the very long timescale envisaged for the planning, construction and actual use of the proposed GDF.

QUESTION 8 We agree. National Parks, AONBs, SSSIs and other designated areas should be excluded.

QUESTION 9 The planning of the GDF will, inevitably, take some while. The excavation and the construction of the GDF will create a great deal of rock and other waste materials to be disposed of in an environmentally friendly manner. And there will be a lot of heavy traffic in the local area throughout this time.

When the building is complete the underground works will be very large indeed as shown on page 12. The above-ground facilities will be highly visible but,

presumably, not really very extensive and they could be located where they are unobtrusive.

The location for the GDF will need to be where there is a good local supply of the necessary professional people, qualified engineers and other staff.

The report says nothing about the present and future storage above ground of all this highly radioactive material, nor about its transport from place to place. We accept that this is not really what is under discussion here but it is very important that the public should have firm reassurance that this is being properly and safely looked after all the time between now and the final implementation of the GDF.

Yours sincerely

A handwritten signature in cursive script, appearing to read 'John Larkin', written in dark ink.

Dr John Larkin

Minerals and Waste Adviser to CPRE Dorset