

GDF Siting Process Consultation  
Department of Energy and Climate Change  
Room M07  
55 Whitehall  
LONDON  
SW1A 2EY

Phone:

Email:

Your ref:

Our ref: SP3/13 SAB/GM/SB

Date: 3 December 2013

Dear Sir/Madam

**CONSULTATION ON THE REVIEW OF THE SITING PROCESS FOR A  
GEOLOGICAL DISPOSAL FACILITY**

Thank you for your correspondence inviting our response to the consultation paper regarding the siting process for a Geological Disposal Facility (GDF).

In common with colleagues from Cumbria County Council, I am very concerned that County Councils are being excluded from the decision making process by removing their right to withdraw their support for the hosting of a Geological Disposal Facility within their administrative area (Consultation Question 3).

The consultation paper proposes that in two-tier areas, the district authority rather than the county authority will have the decision making power to adopt a GDF and to withdraw from the process altogether. I am concerned that this proposal will diminish democratic responsibility within two-tier areas. It is a matter for *both* tiers of local authority to have the right of withdrawal. County authorities have a strategic role; are responsible for the strategic transport network and economic development, as well as having expertise in handling complex strategic infrastructure projects, including minerals planning and emergency planning. Any community hosting a GDF will require these areas of expertise, and therefore County Councils should be involved in the process as a decision-making body. Furthermore, both tiers of local government have a democratic mandate from their communities. County Councils are democratically responsible to every person within the county rather than those contained within a narrow district footprint, and are therefore in the position to represent the views of the wider community and not to exclude communities affected by the GDF process that live outside of a specific district area.

However, in relation to the remaining Consultation Questions (1-2, 4-9) I am content to rely on the attached response made by the Nuclear Legacy Advisory Forum (NuLeaf), of which the County Council is a corresponding member.

I look forward to continued involvement in this.

Yours faithfully

A handwritten signature in black ink, appearing to read 'A. Browne', with a stylized, cursive flourish extending to the right.

Steve Browne  
Interim Executive Director for the Environment