

**Barrow Borough Council**

Question	Agree	Response
<b>Introductory remarks from emailed letter answering consultation questions</b>		Barrow Borough Council is concerned that not all the information to give a final response is currently available. The answers given here are therefore preliminary and should not be taken as the final position of the Council on the proposal for geological disposal of radioactive waste in West Cumbria.
<b>1 – Geology</b>	Partly	<p>In the main we support the Partnership's initial opinions on geology, but also believe full examination of counter views on the suitability of the geology is required before a full answer can be made.</p> <p>A desk top study has been completed by BGS which identifies at a very preliminary stage those areas which are unsuitable. The report also notes that even in the areas not ruled out at this stage, subsequent geological investigation is likely identifying further areas which are unsuitable. However, the area of search remaining is large and should not be ruled out at this stage, pending further detailed geological investigation. It is noted that there has been a heated debate about details of geological suitability, but these can only be resolved by further investigations.</p>
<b>2 – Safety, security, environment and planning</b>	Yes	<p>Given the considerable period of planning before a repository comes on stream and at this early stage in the siting process, it is difficult to forecast what system of regulation would be in force at that time. The same is true of planning processes to be followed. Given this uncertainty all we can reasonably be assured about is that safety, security, environment and planning concerns are being given appropriate weight in the decision making process at the time.</p> <p>Further examination is required of the full range of potential facilities which might be sited at the surface works for the GDF. On the GDF itself the current view of the Partnership appears reasonable, but would require further scrutiny in conjunction with the surface facilities.</p>
<b>3 – Impacts</b>	Partly	Note that the Partnership has ongoing concerns about the level of job creation and the brand and reputation consequences of siting a repository in West Cumbria. The latter will affect a wider area than the 'host' communities or decision making bodies and it is right the Partnership undertakes and completes further research on these matters before coming to a conclusion.
<b>4 – Community benefits</b>	Partly	Given the timescale under any repository commences it is reasonable to set the principles which would govern negotiations on a community benefit package. The Borough Council is satisfied that these principles are robust and endorse the principle that distribution of benefits should be equitable to each affected community. This principle recognizes that the impacts of the siting decision will be felt well beyond the host and decision making communities. For this reason the council has concerns over how the benefit package might be controlled and believes a more inclusive system is required to allow for the potential 'wider local' areas which may be impacted to have a say over distribution of any benefit package.
<b>5 – Design and engineering</b>	Yes	There are so many uncertainties about design and engineering, horizontal distance, retrievability and detailed engineering that anything other than a general opinion would not be warranted. The council agrees with the partnership position at present but is of the view that these matters should be subject to continuous monitoring and improvement in an open process which allows for examination from all parties concerned

<p><b>6 – Inventory</b></p>	<p>Partly</p>	<p>The current 2010 baseline inventory for a repository is known and the Partnership have concentrated on the level of community involvement over future inventory and when these decisions would be made. DECC have not given a commitment to this, but have promised to give up to date inventory information to any siting partnership so they can make an informed decision and this seems a reasonable approach.</p> <p>The Partnership has also received assurances that only UK waste would be disposed of in the GDF.</p> <p>The issue of inventory contributions from the nuclear new build programme has also been considered, but there seems to be uncertainty on the level of additional waste which the programme would produce. The inventory principles agreed by the Partnership can not be fully supported at present as they do not account for the separate discussions, such as those between Government and industry, which are relevant to the inventory and GDF.</p> <p>Any move towards full support for the inventory principles by the council would be dependent on full disclosure of the discussions on future agreements now taking place between the government and industry on new build waste management and disposal.</p>
<p><b>7 – Siting process</b></p>	<p>Partly</p>	<p>The consultation document sets out in detail how it is envisaged the different stages of the siting process will operate. The Partnership is currently considering Stage 3 – the decision whether to enter the siting process. Stage 4 is largely desk based assessments to refine the siting area with Stage 5 detailed Geological Investigations likely to take 10 years. DECC are clear that Decision Making Bodies have the right to withdraw at any point up to the end of Stage 5.</p> <p>The Consultation document also makes clear that following a positive decision to participate, a new Partnership including representatives of wider local interests will be created and would be involved in all aspects of Stage 4 work.</p> <p>The Borough Council agrees with the Partnership's initial opinion only partly as it is not clear how the Partnership could influence any decision to withdraw which appears to relate only to the Decision Making Bodies.</p>
<p><b>8 – Overall views on participation</b></p>		<p>The Partnership's consideration of the issues around siting a repository are influenced by the extended timescale until any facility would be available for disposal, and understandable uncertainties about where a repository could be located. At this stage many of the key issues can only be dealt with by establishing principles rather than detailed proposals. Although the Partnership's work does seem to be as thorough as it is possible to be at this stage and has not identified any major concerns about the issues it has considered, the responses to the consultation have yet to be examined. This may bring up issues not discussed in the consultation which the borough considers relevant to any future process.</p> <p>This, together with the agreed right to withdraw at any point up to the end of Stage 5 would suggest it is appropriate to move forward to the next stage of investigations, but only subject to the partnerships being satisfied about reputational and brand impacts.</p>