

Bassenthwaite Parish Council

Question	Response
Letter	<p>The Parish Council is unanimous in its rejection of the proposal to bury radioactive waste in West Cumbria.</p> <p>The Parish Council remains unconvinced that the safety of local residents, the workforce and the environment can be adequately protected.</p> <p>The repository would be in place for hundreds of years to come. The Parish Council has grave concerns about whether a geological disposal facility could be made safe for this and future generations.</p> <p>The Parish Council therefore finds the above proposal completely unacceptable.</p>

Beckermet Parish Council

Question	Agree	Response
1 – Geology	Partly	<p>The work that has been undertaken to date is satisfactory, but the information offered is incredibly limited. Even at this early stage of the process, more could have been revealed. We agree that it does not rule out the remaining 75% of the Copeland/Allerdale area.</p> <p>The NDA documentation does not indicate how likely it is that progress can be made. It boils down to an assurance that they think it could yield something; without any real supporting facts (e.g. the results of the Longlands Farm investigations, or existing knowledge that is readily available)</p> <p>It is disappointing that no attempt has been made to indicate what type of geology would be preferred: or what would be the “show stoppers”.</p>
2 – Safety, security, environment and planning	Partly	<p>Safety Cases are routinely produced in the nuclear industry, and we agree that the organisations involved are capable of constructing such a case. The safety case references do not seem to show a response to potential criticality events. i.e. Will the design cater for such an event occurring, or will it depend upon it never taking place?</p> <p>The main concern is over the R&D programme, which has made little progress in the 10 years following the NIREX enquiry. The outstanding list of work is huge, there is no valid programme, and no indication of alternative solutions if the answers emerging are not beneficial. Whilst RWMD claims that much would be site specific and hence premature, this does not preclude the need for much to be done now.</p>
3 – Impacts	Yes	<p>The chapter gives a comprehensive list of impacts, and acknowledges the areas requiring more attention.</p> <p>It would be useful to see the word “blight” in the text, and to stress that this could apply to both a community in general; and to specific individuals- so there needs to be a simple process to deal with individuals, without them having to incur substantial legal costs.</p> <p>The chapter is weak on spelling out the huge environmental impacts of the rock removal process; the creation of spoil heaps, the traffic involved, the land needed and the scale of the operation.</p>
4 – Community benefits	Partly	<p>It would be useful to set out the kind of infrastructure benefits that are envisaged, as there is such a wide divergence of view about what would truly benefit West Cumbria.</p> <p>The principles are good and appropriate. However, the document says little in 4 areas of concern</p> <ul style="list-style-type: none"> • Does the right of withdrawal get progressively more difficult, so that Government could refuse to accept it? • Does negotiation of the detailed benefits package only occur after agreement to proceed? This would be a ludicrous situation. • The “host community” is defined elsewhere as being a local village or small town. Whilst a wider area may be impacted to a small degree, there is the potential for such marginal areas to get a disproportionate share of benefits, and for the areas that are really impacted to lose out.

		<p>• Other developments are also being considered for the area, particularly a new nuclear station at Moorside. To what extent does the Localism Act limit the benefits that might be received?</p> <p>Satisfactory responses in these 4 areas would be needed before a vote to proceed should be given.</p>
5 – Design and engineering	Partly	<p>This section is at such an early stage that there is really nothing of substance in it. It could, at least, have discussed the anticipated arrangements for dealing with water flows, gases, explosion hazard, criticality, etc.</p> <p>The ‘ideal’ design could have been spelled out more, particularly the flow of water and radionuclides that would be tolerable. Then, the arrangements for responding to unexpected events. E.g. what if a future ground movement opened up new pathways back to the surface? There is no indication of the extent of monitoring that is foreseen, nor of the period during which the waste could be retrieved.</p>
6 – Inventory	No	<p>The 6 principles represent a reasonable way forward.</p> <p>You also recognise the various potential types of waste, including uranium and plutonium.</p> <p>The quantity range is as good as you could expect at the moment, although you do not give much explanation of the spoil that would have to be extracted, together with the methods, space and location for handling it.</p> <p>The surface buildings may need to incorporate some treatment facilities to ensure that the waste is fit for the repository. This aspect has not been explored.</p> <p>In view of discussions on Independence, there is no acknowledgement of the Scottish origin of a significant part of the inventory, and the resulting consequences.</p> <p>However, the main difficulty comes from the fact that the inventory is much less-well defined than you imply. Some of it is stated as little better than (say) “20 m3 of radioactive sludge”. You need to know the actual radionuclides, the associated chemicals (and hence their binding properties, acidity, solubility, fire or explosion characteristics), future intended chemical treatments, encapsulation or packaging, etc. This is connected with the poor state of R&D generally. It may well be that some of the inventory can never go into a repository, and will always need above-ground storage.</p>
7 – Siting process	Partly	<p>The document recognises the need to change the representation on the Partnership to reflect the evolving situation.</p> <p>However, it is hard to see how the Decision Making Body represents the host community, when it comes from such a large area; and many members will be from areas that have already been excluded!! It would allow some areas to jump on to a ‘gravy train’, regardless of the area really impacted. It is difficult to see how such a body has a democratic mandate in these circumstances, and much more ‘say’ should be given to residents, perhaps via a referendum or more substantial Parish Council input.</p> <p>The 7 principles set out are reasonable, but they are very vague, and their interpretation could be questioned</p> <p>1. How are you going to show that there is “confidence and ownership on the part of the host community”? (Principle 1))</p>

	<p>2. How will the host community be “empowered”? (P2) 3. You have not spelled out how the “representatives of the host communities will be effectively involved” (P3) 4. How will the outcome be shown to be “consensual”? (P4) 5. There is no indication of what is meant by “equitable outcome” in Principle 6. 6. What is the test of “credible local support” required in principle 7?</p> <p>The areas where most of the population of West Cumbria lives have already been ruled out.</p> <p>It would seem to be problematic to access the repository via the National Park, so only a fairly small part of Copeland/Allerdale is of prime interest for access:-</p> <ul style="list-style-type: none"> • The Sellafield area • An area around Millom • An area to the north of Cockermouth, extending to the Silloth area. <p>If it turns out that Silloth has the best geology, how will the decision to locate be made, as there is then a trade-off against the convenience of access at Sellafield?</p>
<p>8 – Overall views on participation</p>	<p>No, based on the information presented.</p> <p>The reasons are:</p> <ul style="list-style-type: none"> • Much of the language is truly ambiguous, so that it could be interpreted as suggesting a good way ahead; it could also be interpreted otherwise. It should be more specific before any progress can be made. • The local host community should primarily be within (say) 4 miles of the site(s). There is no acknowledgement of this: indeed, the process seems to be trying to undermine it. Just how this real host community is to be involved, and give its approval in a consensual manner needs to be spelled out. • The process is at a very early stage, so a lot of information is not available. Whilst this is understandable for some aspects (detail repository design, actual location, production of safety case, etc), other information could and should have been declared by now. In particular: <ol style="list-style-type: none"> 1. How the DMB is going to be constituted in the future to prevent the repository being forced on the local host community by other areas that are hardly involved 2. How the host community will have a proper democratic ‘say’ in the affair. Local support needs to be demonstrated. . 3. How the R&D is going to be programmed, and the processes envisaged for waste treatment. There will be pressure to make some progress with this project, and the temptation to move ahead with insufficient information. Remember the Inspector’s comments re Longlands Farm!! 4. What kind of geology would rule out progress, and what would be the response to future ground movements? 5. The principles to ensure safety- regarding gases, explosion, criticality, water flows, etc. • There is no mention of UK devolution issues. Perhaps 30% of the waste arose originally from Scottish operations, so how will this be equitably resolved? At some point, the Scottish administration will need to be reconciled. • There is no acknowledgement that compensation should also be targeted at individuals who may be impacted, as well as to communities in a more general sense: or what this process might be.

		<ul style="list-style-type: none">• Satisfactory answers to question 4.2 need to be obtained.
9 – Additional comments		<p>The need for a National Repository is recognised.</p> <p>However, the process described is unfair, particularly towards the eventual host community. It seems to seek to draw that community into the process, with minimal 'say' in the matter; and a benefits package to be 'negotiated' only after agreement to host! The local population would not have a direct vote on the matter. Whilst the document talks of 'equity', the process does not seem to be consistent with achieving it.</p>

Organisation / Group	Question	Agree	Response
<p>Blackwater Against New Nuclear Group (BANNG)</p>	<p>Letter</p>		<p>GEOLOGICAL DISPOSAL OF RADIOACTIVE WASTE IN WEST CUMBRIA?</p> <p>RESPONSE OF THE BLACKWATER AGAINST NEW NUCLEAR GROUP (BANNG)</p> <p>Introduction</p> <p>The Blackwater Against New Nuclear Group (BANNG) is a Citizens Based Organisation primarily concerned about the potential development of new nuclear reactors and associated waste stores at eight sites identified as potentially suitable in the National Policy Statement for Nuclear Energy. BANNG is interested in the long- term management of nuclear wastes and especially of the spent fuel from new nuclear reactors; hence it has a particular concern with the MRWS process under development in West Cumbria. BANNG is interested both in the proposed method of long-term management and in the process of site identification and assessment. BANNG has sought to raise public awareness and knowledge about the implications of new reactors and waste stores should there be future development of the Bradwell site in Essex. The group has held public meetings, demonstrations and gathered 10,000 signatures for a petition presented in person to the Minister for Energy.</p> <p>During its four years of existence BANNG has built up a portfolio of 14 detailed papers responding to consultations on various aspects of nuclear policy. These documents are based on knowledge, experience and research and draw on BANNG’s expertise in the area of radioactive waste management policy. A number of these papers are concerned with waste management issues, particularly the problems of long-term storage of spent fuel at coastal locations vulnerable to sea level change and coastal processes in the absence of firm or credible plans for its management.</p> <p>Two of our documents have a particular bearing on the current MRWS process in West Cumbria. One is the response to the consultation on Managing Radioactive Waste Safely: Desk-based Identification and Assessment of Potential Candidate Sites for Geological Disposal (BANNG, 2011a). We have drawn extensively on this in this present response on West Cumbria. The other is our response to Essex County Council’s Waste Disposal Document: preferred approach (BANNG, 2011b). We pointed out that Essex CC appeared to assume that West Cumbria had already been designated as the location of the national geological disposal facility for the long-term management of radioactive wastes (Essex County Council, 2012). We shall comment further on this below.</p> <p>BANNG commends the consultation document for its clarity, level of detail and setting out of the key issues. There is useful reference to other documents and an effort to reveal different perspectives on the issues as well as identifying uncertainties. In particular, we feel the document does not seek to lead an argument to a specific conclusion; rather the question whether to proceed is left open.</p>

		<p>Our response is in two parts. The first part considers some general and generic issues, especially on process, that we feel should be considered by the West Cumbria MRWS Partnership in reaching its conclusions on whether or not to recommend decision-making bodies to enter the siting process. The second part focuses on specific issues raised in the consultation related, where relevant, to the questions in the document. We hope that this approach will be acceptable.</p> <p>Part 1 Some Overarching Considerations</p> <p>A premature proposition</p> <p>The purpose of this consultation is to invite comments on whether West Cumbria should enter the siting process for a national repository for radioactive wastes. BANNG is concerned that the process should be measured and take adequate time to consider relevant issues before proceeding. We are concerned that the process may be too hurried and too presumptive about the outcome. This is not intended as a criticism of the work of the Partnership which, within its own terms, we consider to have been reasonably careful, comprehensive and cautious. The consultation document is clear and accessible though, understandably for an area of such uncertainty, lacking in detail at times. Nevertheless, we believe the purpose of the process might be misunderstood and lead to a perception of premature legitimisation both of deep disposal as a method and West Cumbria as a location.</p> <p>In our view the kind of misunderstanding we find in the Essex CC Waste Disposal Document is all too common and reinforces a public perception that West Cumbria will inevitably host the nation's repository. This perception is lent greater credibility by the Government's repeated affirmation in its National Policy Statements that effective arrangements will exist to manage and dispose of the wastes from a notional new build programme. The Government claims in EN-6 that geological disposal is technically achievable, a suitable site can be identified and safe, secure and environmentally acceptable interim storage arrangements will be available (DECC, 2010, p.14). It is clear the Government considers the goal of a deep repository is in sight and that it will be sited in West Cumbria. This confidence has recently been underlined by the Minister stating an aspiration for the opening of the repository to be brought forward from 2040 to 2029. Yet, it must be pointed out that there is, as yet, no repository design, only a concept and no acceptable site, only a process. Both concept and process are at an early stage with no certainty that a scientifically credible design or a publicly acceptable site will be delivered in the near future. In view of this BANNG considers a decision to proceed to enter the siting process now would be premature in the absence of sufficient consideration of alternative methods of management.</p> <p>Disposal not the only alternative</p> <p>This MRWS consultation is about 'whether to take part in the search for a site for a repository in West Cumbria' (p.4, our emphasis). There is nothing here about considering alternatives to a repository. It is important to recollect that, in the original policy recommendations put forward by CoRWM1, geological</p>
--	--	--

		<p>disposal was part of an approach, not the sole solution. Geological disposal is, as CoRWM 1 suggested, 'the best available approach' for the long-term management of wastes 'within the present state of knowledge' (CoRWM, 2006, p.12). It is important to remember that geological disposal is potentially the final stage. It cannot be available for many decades and must be preceded by a robust programme of interim storage as well as a commitment to an intensified programme of research and development. Moreover, there is no certainty that geological disposal will ever be developed. It may prove impossible to find a site that is both scientifically and socially satisfactory or there may become available other preferable approaches for the long-term management of wastes, boreholes for instance, as recognised in the consultation. Nonetheless, as this West Cumbria MRWS consultation states unequivocally, Government policy is for geological disposal. 'Therefore, the Partnership is only discussing geological disposal and not other potential approaches to managing higher activity wastes in the long term' (p.19).</p> <p>Given the integral requirement for interim storage and the possibility of alternative methods of management we believe that geological disposal has been taken out of its context presenting it as an end state rather than as an integral part of a more complex set of possibilities and uncertainties for the long-term management of solid radioactive wastes. This decontextualisation may lead, intentionally or not, to a perception of geological disposal, as soon as practicable, as the only and inevitable way forward.</p> <p>Alternative methods of managing wastes, notably long-term storage, can be both in competition with and complementary to deep disposal. It is conceivable that the problems of proving a concept and finding a site for deep disposal make long-term, indefinite storage a safer and more acceptable option. In any event it is quite possible that there will be long delays in the process so that storage becomes the de facto method. One of the contingent factors that might be considered in siting assessments for a repository is the viability of potential sites for long-term storage.</p> <p>Geological disposal should be recognised as one component in an integrated process of long-term management of radioactive wastes. BANNG is concerned that the consultation elevates disposal to the position of a singular strategy and thereby diminishes the importance of other components in the process, notably long-term interim storage. BANNG believes the public should be presented with a more considered assessment of the alternative methods of managing wastes in the long-term before entering further into the siting process.</p> <p>West Cumbria the only site</p> <p>So far only West Cumbria through its local authorities has got as far as setting up a siting partnership but has yet to take the decision to participate. No other area in any other part of the country has expressed any interest and it seems unlikely any will do so. Consequently, comparative assessment will be confined to sites within the West Cumbria area. Should the process in West Cumbria fail, for whatever reason, there appears to be no alternative siting area in prospect at present.</p> <p>Given that West Cumbria is the only area expressing any interest in the process, BANNG believes it is of</p>
--	--	--

		<p>paramount importance that public confidence and acceptability are achieved through the voluntarist principle.</p> <p>A repository for legacy, not new build</p> <p>BANNG is very concerned at the potential implications of any new build programme for the repository siting process. In various consultations relating to new build the Government has made it clear that it believes 'that effective arrangements will exist for the management and disposal of wastes produced by new nuclear power stations' (DECC, 2011, p.15). The West Cumbria consultation document is quite ambiguous about the role of new build wastes. It notes that the Government considers it 'technically possible and desirable' that a repository would take new build wastes but that the implications for design and operation would have to be discussed with any potential host community. This is altogether too vague and deviates considerably from the original intentions of the CoRWM1 recommendations. That committee made it perfectly clear that its recommendations applied only to legacy wastes. Moreover, new build wastes should be subject to their own public assessment process which would 'need to consider a range of issues including the social, political and ethical issues of a deliberate decision to create new nuclear wastes.' (CoRWM, 2006a, p.14). There is no evidence whatsoever that the Government intends to initiate such a process and certainly not before any decision by West Cumbria to participate further. Rather, it appears the Government's pell mell pursuit of a repository for West Cumbria is a means of removing radioactive waste as an impediment to new build. On this point CoRWM1 was also clear,</p> <p style="padding-left: 40px;">'It must be emphasised that CoRWM's recommendations are directed to existing and committed waste arisings. CoRWM believes that its recommendations should not be seen as either a red or green light for nuclear new build. The main concern in the present context is that the proposals might be seized upon as providing a green light for new build. That is far from the case. New build wastes would extend the timescales for implementation, possibly for very long but essentially unknowable, future periods. Further, the political and ethical issues raised by the creation of more wastes are quite different from those relating to committed – and therefore unavoidable – wastes. Should a new build programme be introduced, in CoRWM's view it would require a quite separate process to test and validate proposals for the management of the wastes arising' (2006a, p.15).</p> <p>BANNG considers the statements in the consultation document regarding potential wastes from new build to be vague and inconclusive. We strongly support the view of CoRWM1 that the present MRWS process should apply only to legacy wastes. New build wastes raise a series of issues, not the least of which is the uncertainty over timescales and the volumes and radioactivity of the inventory. This has significant implications for the size, configuration and timescales of a repository. Accordingly, BANNG believes an entirely new scientific and siting process using the voluntarist approach would be necessary before there is any commitment to including new build wastes in the putative repository in West Cumbria or, for that matter, anywhere else.</p> <p>Need for an ethical context to decision making</p>
--	--	---

		<p>The consultation notes that ethics was a part of the work programme (p.22). At points the consultation sets out principles, for example on community benefits packages, which contain ethical considerations. The Partnership also recognises that ethics will remain an important and cross-cutting issue for the future. Although ethical concerns are inherent in much of the Partnership's work, BANNG considers the ethical choices need to be more explicitly debated (CoRWM, 2006b). In particular, questions of fairness are fundamental to a publicly acceptable siting process. Three areas in particular should be prominently considered. One is procedural equity – is the process fair, sufficiently representative, inclusive, deliberative and democratic? Should the principle of voluntarism be more widely applied to radioactive waste management? Two is intragenerational equity, fairness between places. Is it fair that West Cumbria is the sole focus of attention for the possibility of a new repository? Within West Cumbria how should principles of fairness be developed and applied to choosing between specific candidate sites? Three is intergenerational equity, the fairness of distributing burdens of cost, effort and risk between present and future. Should a repository be developed sooner rather than later? Is retrievability a fair proposition? Is long-term storage a fairer option than disposal? These, and many more, ethical questions are difficult, complex and not easy to resolve. But, they need to be exposed to ensure that decisions are based upon adequate discussion of ethical considerations. We are confident the Partnership acknowledges the relevance of ethical considerations but are concerned that they should be more explicitly identified and debated to achieve informed and acceptable decisions.</p> <p>The need for ethical issues fully to be taken into account should be more explicitly recognised. The decision-making process should routinely identify the principles and criteria that are considered in reaching a decision. The decision on whether to enter the siting process is fundamentally an ethical question.</p> <p>Part 2 Specific Issues and Questions</p> <p>Geology and locational considerations</p> <p>BANNG is concentrating its response on issues of public acceptability and the siting process though we do have comments on the geological and environmental issues raised in questions 1 and 2. Clearly the suitability of West Cumbria depends fundamentally on whether there are sites where the geology and hydrogeology provides a safe environment for long-term containment such that a robust safety case can be made. In our view the evidence does not look promising. The Cumbrian area has complex geology with much faulting. The desk based BGS geological screening has ruled out a quarter of the area surveyed. If the whole of the Lake District National Park is also excluded, as we suggest below, then only a relatively small area outside the Lake District would be available. This may not necessarily be suitable for a repository. Even if an underground site in the Lake District were considered, the surface facilities would need to be outside the National Park for environmental reasons. Displacement between surface and underground facilities could prove difficult to engineer and costly to construct. As the document points out</p>
--	--	---

		<p>there is a dispute as to whether Cumbria is unsuitable on geological grounds with the Partnership concluding that there is a sufficient area worthy of further investigation if it is decided to enter the siting process. However, there are major uncertainties which can only be resolved by more detailed and sub-surface investigations. The previous attempt to demonstrate through drilling that suitable geology exists for an underground facility failed when the Sellafield RCF was ruled out partly on the grounds of a lack of sufficient scientific consensus. There is no reason to assume that another attempt to find a suitable rock within a circumscribed area of West Cumbria will be any more successful. BANNG urges the Partnership to proceed cautiously and consider whether there are any issues or uncertainties that are likely to rule out a site within the area.</p> <p>As the Government's recent consultation on siting assessment points out there is a requirement under SEA legislation to develop and apply the siting process 'in a manner which identifies and assesses reasonable alternatives' (DECC, 2011b, p.15). This is interpreted as applying to 'reasonable alternative sites within the decision to participate area' (pp. 15-16). It is unclear what this requirement refers to and how it will be applied. It may presumably apply both to sites for surface facilities as well as the area of the host rock for the underground facility. While it is conceivable that alternative locations for surface facilities might be assessed it is not so readily applicable to the underground location which may be confined to a single (possibly large) rock formation. Comparative assessment is clearly possible, at least for surface facilities, in the scenario where one or more large areas have been chosen in which alternative potential sites may be identified. But, it is conceded that under another scenario a Decision-Making Body may decide 'to participate with a smaller area which could already be equivalent to a Potential Candidate Site' (p.14). In such a case there may be only one viable location for both the surface and the underground facility. In this situation it is unclear how the requirement for alternative assessment can be undertaken.</p> <p>On the subject of geological safety BANNG observes that if both the area screened out by the BGS and the whole of the Lake District National Park are ruled out as potential locations (at least for surface facilities) only a relatively small area of West Cumbria remains potentially available. BANNG urges the Partnership to consider whether it is practicable or feasible to find both a site for surface facilities and a suitable rock formation within such a confined area or whether it is feasible or practicable to entertain considerable displacement of surface from underground facilities. The Partnership should also consider whether it is practicable or feasible to undertake a comparative assessment of sites within the area.</p> <p>Scale and impact</p> <p>This comment relates to question 3. One of the features of the geological disposal project is its sheer scale. CoRWM1 estimated the volume of the eventual inventory at 478,000 cubic metres with an activity of 78M. terabequerels. This volume, once conditioned and packaged, would fill the equivalent of five Albert Halls – and that is just for legacy wastes. There are factors that could affect the volume and space required including any wastes from a new build programme or space required by high burn-up fuels. The consultation document estimates a baseline inventory of 631,000 cubic metres with an upper inventory of 1,160,000 cu. metres based on a substantial new nuclear programme. The volume of the underground</p>
--	--	--

facilities to accommodate these wastes could be between six and eleven Albert Halls with an underground footprint that could vary from 6km² to 25km². This would require an engineering project the size of the Channel Tunnel creating vast amounts of spoil to be accommodated at the surface. The project will also require transport infrastructure for the movement of wastes and materials. In view of the scale and impact of the project no site should be considered that lies within the Lake District National Park.

Inventory and the role of storage

Here we consider some issues arising from question 6. The need for a separate voluntary process is necessary both for West Cumbria and for those places which may accommodate wastes from any new build stations. For West Cumbria the implications for the future inventory of wastes and the consequent size, design and timescales need to be openly and explicitly considered. As things stand there is considerable uncertainty over the size of the new build programme and the wastes it may produce. The possibility of the need for more than one repository is also an issue. For the new build sites there needs to be a discussion of the management of wastes, especially spent fuel. Great uncertainty surrounds the future of waste management at these sites. If a repository is developed it will not be available for new build wastes until well into the next century, if at all. The methods of storage, the need for encapsulation, the movement of wastes are all unknowns but they will have to be undertaken at sites where deteriorating coastal conditions are inevitable. At the very least new build sites will be responsible for the management of wastes in store for well over a century. Yet, there has been no debate about the principle of long-term storage let alone the option of volunteering.

BANNG is opposed to new build. However, if a policy of new build is pursued, we consider the scope of the process of identifying and assessing potential candidate sites for geological disposal should be broadened explicitly to cover the long-term storage of wastes from new build. For these wastes a separate process is needed that takes account of the uncertainties involved including the different timescales, inventory and social and ethical considerations involved. BANNG believes that the voluntarist principle should apply to those communities near new nuclear power stations where wastes, including spent fuel, will be stored for the indefinite future. These communities should be offered a willingness to participate in the process and the right of withdrawal supported by the development of siting partnerships and community benefits packages. The implications for West Cumbria of decisions on waste management at new build sites will need to be considered as part of the continuing MRWS process.

Options for storage should be an integral part of the siting process. As things stand, the greatest volume and radioactivity of wastes in store is at Sellafield, with significant stores of long-lived wastes at Dounreay and spent fuel in store at Sizewell, with wastes also scattered around the country at various sites. Proposals for new build envisage spent fuel and radioactive waste stores located at each of the eight potential sites. As we have pointed out in several submissions most of these sites are vulnerable to inundation and coastal change especially in the far future when stores may still be present on site. There have also been suggestions, but no proposals, for regional or central stores. In effect, there is no long-term strategy for the development, maintenance or siting of stores. West Cumbria has a strategic interest

		<p>in policy and proposals for storage of new build wastes. If a repository is developed in West Cumbria the volume of new build wastes that might need to be accommodated would greatly increase the volume of wastes needing to be managed in the area, possibly in storage prior to disposal. The risks to health, safety and security from interim stores suggest the need to address the siting strategy for stores is rather more urgent than the need to find a suitable location for final disposal.</p> <p>With the potential emergence of new build the need for a comprehensive process and strategy for safe and secure storage in the long-term is of paramount importance and should be developed alongside the process and strategy for deep disposal. Such a strategy should adopt the principle of voluntarism in the search for suitable sites for storage of new wastes.</p> <p>Community benefits for whom?</p> <p>Here we consider some aspects arising from question 4. The chapter on community benefits in the consultation document is thoughtful and comprehensive. The set of principles is especially helpful as guides to what benefits achieve and how they should be distributed. The principles emphasise that benefits should make a positive contribution to community well-being, both short and long-term, and should leave a community better off. They should help to transform the community and be based on fairness, equity and flexibility. We fully commend these and the other principles. In practice community benefits packages will include a whole range of resources such as research, community facilities, provision of infrastructures, investment, employment and training. But, fundamentally they must contribute to enhancing the well-being of communities that are willing to host a disposal facility. 'Well-being' is a vague but important concept embracing more than simply material benefits. In CoRWM's words, 'By well-being we mean those aspects of living which contribute to the community's sense of identity, development and positive self-image'(CoRWM, 2007a, p.12). There are interesting discussions on how this might be achieved both in CoRWM's implementation report (2007a) and in the AkEnd Report produced by the expert group considering site selection for a repository in Germany (AkEnd, 2002). We believe it would be worth revisiting these reports in order to consider the nature and deployment of community benefits packages.</p> <p>BANNG is dismayed by the Government's apparent reluctance to give wholehearted support to the principles set out in the consultation document preferring instead to regard them 'as a basis for negotiation in the next stage of the process' (p.69). This is a classic formula for procrastination. The document notes 'a perceived lack of trust in central government' on the part of the public in developing the principles. If the Government is as committed to finding a site for a repository in West Cumbria as it appears to be, it is astounding that it is not fully behind the principles set out in the document.</p> <p>There is also the question of the size and distribution of benefits packages. We agree with the Partnership that the size of benefits must be additional to existing and planned investments, not replacements for them. We also agree that benefits must be fairly distributed both over space and time. The distribution between host, neighbouring, wider communities and affected areas will be a problematic issue and will</p>
--	--	--

		<p>have to be faced when and if a site is chosen. It will be especially important to sustain benefits over the longer term to mitigate the burdens on future generations.</p> <p>BANNG supports the principles for community benefits packages set out in the document. We view such benefits as a necessary but not a sufficient condition for proceeding further with the process. Moreover, we consider that benefits packages should be considered for sites where radioactive wastes are stored for the long-term, especially West Cumbria which already hosts over two-thirds of the country's wastes. The Government should support unequivocally the principles for community benefits set out in the document. Benefits must be sustained over the long-term to mitigate burdens that will be borne by future generations.</p> <p>A democratic and participative process?</p> <p>BANNG believes that the Partnership has tried to sustain an open, democratic and participative process. On the face of it the Partnership appears to see voluntarism as the best means of achieving an acceptable solution rather than as a process to achieve a repository. We do not think the Government thinks this way, viewing voluntarism as the means to the desired end of a repository in West Cumbria. BANNG considers it to be imperative that the principles of participative democracy including openness, transparency, inclusiveness, representativeness, equity and deliberation continue to be at the heart of the decision-making process. But, we also believe that key decisions should be ratified through representative democracy in order to achieve legitimation. These issues are fully discussed in two CoRWM documents, one on implementation (CoRWM, 2007a), the other on partnership (CoRWM, 2007b). We commend these as a source for consideration of future decision-making arrangements. For the present we refer to issues arising in the consultation document relating to question 7 concerning the roles of the various bodies involved in the decision to enter the siting process.</p> <p>Partnership. The Partnership is pivotal in that its advice will be crucial to the decision to participate. It will base its recommendations on the information it has received and discussed over the past three years and on its analysis of public and stakeholder views, as revealed through this consultation process. It is important that the Partnership makes its recommendation in as disinterested a way as possible free from predilection, prejudice or partisanship. In particular, members of local authorities composing over half the current Partnership must seek to reflect the interests of the wider partnership before those of their authority. At the Partnership level it is necessary to reach agreement on the basis of consensus rather than voting.</p> <p>Decision Making Body. In the West Cumbria case with a two-tier system, the decision-making bodies comprise two district councils (Allerdale and Copeland) and one county council, Cumbria. Their primary role is to provide representative democratic ratification of key decisions. The first such decision will be whether or not to enter the siting process. Ratification should be endorsement by all three councils of the recommendation of the Partnership, hence it is important that the Partnership is clear and conclusive in what it recommends and has evidence of community support for its recommendations. It is understood that the three councils have agreed a Memorandum of Understanding on how decisions will be</p>
--	--	---

		<p>coordinated including the provision that for an area to enter the siting process both the District and the County Councils will be in agreement. This could mean just two of the three councils in the Partnership. BANNG considers that, at this stage, unanimity of all three councils provides the necessary social and political support for the process to continue. We do not believe that West Cumbria should enter the siting process if there is conflict between the participating decision-making bodies. If the process continues beyond the next stage, then it is conceivable that councils will reach different conclusions. For instance, if a particular candidate site is selected the process might be carried forward by the council in whose territory the site is located. BANNG thinks it is necessary for protocols on decision-making to be agreed for each stage in the process. We also believe that, in the interests of democratic pluralism, key decisions should be taken by the full council of members and not by the Executive or Cabinet.</p> <p>More consideration will need to be given to the role of the Decision-Making Bodies in respect of: which decisions must be referred to them? which authorities take key decisions? what is the role of neighbouring or affected authorities? what proportion of the membership of Partnerships should be drawn from Decision Making Bodies? And so on.</p> <p>Affected communities. Referred to in the document as 'wider local interests' these are communities at a distance from the area hosting a repository which may be affected in some way. This could be negatively through increased transport movements or through association with radioactive waste. It might be positive if well-being is enhanced especially through community benefits. At this stage with no host site identified, affected communities do not exist. At later stages in the process where candidate sites emerge it will be necessary to identify affected areas and consider whether they should have some participation in decision-making or some involvement in community benefits. In the case of West Cumbria, the impact on the Lake District will be of obvious interest and the National Park Authority already has representation on the Partnership.</p> <p>Candidate site communities. Clearly these do not exist at this stage. However, it is worth considering their role in any future stages. Host communities will obviously be relatively small, the size of a small town, a village or group of villages but large enough to contain the surface footprint of a repository. This is estimated to be about 1km² though, if retrievability is built in, a much wider area would be required for surface storage. It will be important that potential sites are willing hosts and effort must be made to canvass local opinion, possibly ultimately through a referendum. However, it is conceivable either that a host community is willing but areas surrounding are not, or the reverse might be true. In either case to proceed would vitiate the principle of voluntarism. Therefore, BANNG questions the Partnership's present view that if omission of a potential host would create insurmountable problems then 'it could recommend the inclusion of the community concerned if this was supported by a full justification and explanation'. In our view there are already sufficient opportunities for participation and provisions for community packages to improve well-being to encourage communities to host a site. If these provisions prove insufficient and communities are unwilling to proceed then it must be accepted that the siting process has failed to find an acceptable host community. This applies not merely to the specific host but to other nearby communities which oppose the candidate site.</p>
--	--	--

		<p>Government. Provided the siting process proceeds smoothly on a consensual basis and results in a host site being found relatively swiftly in West Cumbria, the Government appears to be taking a passive and benign role. The NDA has an observing role on the Partnership but is the responsible Government body for implementing and funding the process and project. However, should the process falter or fail it seems pretty clear the Government may feel it should adopt force majeure and step in to take over. Given that only West Cumbria has come forward it seems unlikely that other areas would volunteer in the event of failure to find a site in the current process. However, we believe it would be imprudent for the Government to abandon voluntarism and intervene to impose a solution. This would contradict all the evidence and effort made so far. The Government should make it clear that if for any reason the present process fails, a full review of all the options will be undertaken. Among the issues to be considered will be: alternative methods of management, including long-term storage; restricting the process to legacy wastes as originally intended; abandoning any new build programme on the grounds that a solution to the problem of radioactive waste has not been found. On the basis of the review the Government would be able to consider whether to opt for long-term storage for the time being, or to initiate a new process to find a safe solution and an acceptable site. Under no circumstances should a repository solution be imposed or the principles of voluntarism be abandoned.</p> <p>In terms of process BANNG recommends:</p> <p>The Partnership and any successor Partnership should ensure that recommendations to the Decision Making-Bodies are based on open, deliberative processes and agreement is reached through consensus.</p> <p>For key decisions such as entering the siting process, the Decision-Making Bodies will be expected to ratify the recommendations of the Partnership. All Decision- Making Bodies should be in agreement at this stage. Decisions should be taken by the full council of members of each Decision-Making Body. Consideration should be given to protocols for decision-making for later stages in the process and to the role of Decision-Making Bodies in respect of key decisions.</p> <p>The needs of 'affected areas' should be identified and taken into account in decision-making and in benefits packages.</p> <p>In the spirit of voluntarism, it is expected that candidate host communities will agree to proceed. We consider the provisions for participation and for community packages are sufficient to encourage communities to proceed. We do not agree that communities should be included in the process against their will. In the event where agreement cannot be achieved, the process must be deemed to have failed.</p> <p>In the event of failure of the current process, Government should undertake a thorough review and decide whether to continue with long-term storage for the time being or to inaugurate a new process. Under no circumstances should the voluntarist approach to participation and decision-making be abandoned.</p>
--	--	---

		<p>Conclusions</p> <p>In response to question 8, BANNG concludes that the Partnership should recommend to the councils that they do not proceed to take part in the search for a repository at the present time because such a decision would be premature for the following reasons:</p> <ul style="list-style-type: none">• The focus is on geological disposal as the only approach to long-term management. Alternative approaches have not been adequately considered. Geological disposal is part of an integrated process, not the only way forward. Alternatives need to be explored beyond the idea of geological disposal as soon as practicable;• The process should be explicitly restricted to legacy wastes for which there is a known inventory. New build wastes would raise a series of issues, not the least of which is the uncertainty over timescales and the volumes and radioactivity of the inventory. BANNG believes an entirely new and scientific process, based on voluntarism, would be necessary before any consideration is given to including new build wastes in any future repository;• Ethical issues must be more explicitly considered including the ethical issues inherent in the decision on whether to enter the siting process;• The area available for siting surface facilities may be too small (once areas of unsuitable geology and the Lake District National Park have been screened out) to enable an adequate comparative site assessment;• The possibility of new build introduces a range of issues concerning long- term storage, with implications for West Cumbria. Before proceeding further these implications should be assessed through a thorough consideration of the siting strategy for long-term interim storage. <p>We also recommend that:</p> <ul style="list-style-type: none">• The principles for community benefits packages proposed in the consultation document should be endorsed by the Government;• Decision-Making Bodies should ratify the recommendations of the Partnership; they should all be in agreement; and the decision should be taken by the full council of members;• Potential host communities must agree to proceed;• In the event of failure of the current process, Government should undertake a thorough review and decide whether to continue with long-term storage for the time being or to inaugurate a new process. Under no circumstances should the voluntarist approach to participation and decision making be abandoned.
--	--	--

			<p>References</p> <p>AkEnd (2002) Selection Procedure for Repository Sites, Recommendations of the AkEnd – Committee on a Selection Procedure for Repository Sites, December</p> <p>BANNG (2011a) Managing Radioactive Waste Safely: Desk-Based Identification and Assessment of Potential Candidate Sites for Geological Disposal, Public Consultation, Response of the Blackwater Against New Nuclear Group, BANNG, Paper 13</p> <p>BANNG (2011b) Essex County Council Waste Disposal Document: preferred approach, Response to consultation, BANNG Paper 14</p> <p>CoRWM (2006a) Managing Our Radioactive Waste Safely, CoRWM's Recommendations to Government, London, November</p> <p>CoRWM (2006b) Ethics and Decision Making for Radioactive Waste, Document 1692, March</p> <p>CoRWM (2007a) Moving Forward: CoRWM's Proposals for Implementation, Document 1703, February</p> <p>CoRWM (2007b) Implementing a Partnership Approach to Radioactive Waste Management – Report to Governments, April 2007, Document No. 2146</p> <p>DECC (2010) Revised Draft National Policy Statement for Nuclear Power Generation (EN-6), TSO, October</p> <p>DECC (2011a) National Policy Statement for Nuclear Power Generation (EN-6) Vol. 2, TSO, June</p> <p>DECC (2011b) Managing Radioactive Waste Safely: Desk-Based Identification and Assessment of Potential Candidate Sites for Geological Disposal, A Public Consultation, September</p> <p>Essex County Council (2012) Waste Disposal Document: Preferred Approach</p>
Organisation / Group	Question	Agree	Response
Blawith and Subberthwaite Parish Council	Email		Please note that at its meeting on 12th March, Blawith and Subberthwaite Parish Council, in response to correspondence from Radiation Free Lakeland (Marianne Birkby, 1st March) resolved (Item 2b – full Minutes on www.crake.org) to write to convey general unease about the closeness of the proposed waste deposit sites to this parish, and to urge, because of the unsoundness of the geology, that the use of those sites should not be pursued.
Organisation /	Question	Agree	Response

Group			
Blindbothel Parish Council	Letter		<p>GEOLOGICAL DISPOSAL OF RADIOACTIVE WASTE IN WEST CUMBRIA</p> <p>I [the Clerk] refer to the above consultation document which was on the agenda to be discussed by members at the recent Parish Council meeting.</p> <p>Members decided at the meeting that too little information is available at this stage to make a meaningful decision whether or not to participate in the search for a site.</p>
Organisation / Group	Question	Agree	Response
Blindcrake Parish Council	Email		<p>The Council considered the matter this week.</p> <p>We are not opposed to the nuclear industry or nuclear storage as such. However we came out against the continued search in west Cumbria on the basis that as there were no others areas involved in the UK then it would be very likely that our area would be found suitable by default.</p> <p>White the financial inducements were likely to be good, we do not trust Allerdale BC to spend it in the areas directly concerned but they are very likely to use the money in Workington & Maryport.</p>
Organisation / Group	Question	Agree	Response
Boltons Parish Council	Email		<p>MRWS was fully discussed at the Boltons Parish Council meeting last night and we would like to 'object' to this going any further ahead.</p> <p>We have many concerns some of which we have noted below;</p> <ul style="list-style-type: none"> • This process puts part of the National Park and its tourist & agricultural business at risk. • Not convinced that Cumbria has suitable geology, are there not far more suitable areas in England? • Do the economic benefits justify searching for a site in unsuitable geology and spoiling part of the national park? • Insufficient information with regards to risk, gas emissions etc. • Can we be confident in the Right of Withdrawal? • Safety, health etc.
Organisation / Group	Question	Agree	Response
Borrowdale Parish Council	Covering letter to response form		<p>SHOULD WEST CUMBRIA CONTINUE WITH MRWS?</p> <p>Adopted position of the Borrowdale Parish Council (Adopted & Approved by all councillors)</p> <p>Position currently:</p> <p>The Managing Radioactive Waste Safely White paper of 2008 set out the government's policy on dealing</p>

		<p>with radioactive waste. The outcome of this paper is that a Geological Disposal Facility (repository) is the safest way to store this type of waste. By the nature of radioactive waste the half life of some of the substances to be buried in the proposed underground repository would have a half life of tens or even hundreds of thousands of years.</p> <p>The MRWS process was commenced back in 2009, and has six stages. The sixth stage being the building and commencement of operations at the repository. Across England only three councils have volunteered to be part of the siteing investigations (Allerdale Borough Council, Copeland Borough Council & Cumbria County Council), the current consultation which this paper is a response to is to decide on if the relevant local authorities should progress to stage 4 (desk based studies) or if they should withdraw.</p> <p>Stage 4 is concerned with desk based studies and trying to identify suitable sites for a nuclear waste repository within the ABC & CBC area. Within the two boroughs some areas have already been deemed as unsuitable for the underground repository by the British Geological Society due to the fact that they house natural resources that humans may wish to access at some point (however the surface facilities could potentially still be built on one of these excluded areas). All the area (ABC & CBC) within the LNDPA boundaries is still potentially a site i.e. it hasn't been excluded.</p> <p>Once stage 4 was completed (which would take a number of years) a further decision would be made on if to enter stage 5 (physical research on potential sites e.g. boreholes) or if to withdraw.</p> <p>A number of issues of concern have been raised that Borrowdale Parish Council feel are important & would need to be addressed before any decision to continue to stage 4 was made:</p> <p>Geology</p> <p>Geology is key, as the substances to be buried in this underground repository are highly dangerous, with a very long half life and they need to be stored securely away from faults and water sources as it is likely that at some point during the storage of this waste that it will leak out of the underground repository (We are talking about building something to contain substances for 10,000 of years, the substances themselves have only been created by man in the last 100 or so the research is not there to support the containment methods for this prolonged period of time). Any water that came into contact with any of this material would be contaminated by radioactivity. Therefore the geology is key, to ensure that as little contamination as possible ever reaches the surface.</p> <p>Borrowdale Parish Council feel that the most rationale way to have considered this process would be to first look at areas in the UK that have the correct geology and then to try and convince the local areas to host the repository. The MRWS process is using the opposite approach, find a community happy to host it and then look for the correct geology. There is no guarantee that suitable geology will be found.</p> <p>Professor David Smythe has said that nowhere in Cumbria has suitable geology, because of two</p>
--	--	---

		<p>observations:</p> <ul style="list-style-type: none">- Cumbria is very mountainous- There is a lot of faulting, folding & other geological issues <p>Professor Smythe described it at a recent public meeting held in Keswick that the mountains act like a cistern. The push water at high rates through the ground towards the coast and because of the cistern effect can drive underground water up to the surface. Due to the complexity of the geology it is hard to predict where groundwater will carry contamination from any leakages from a potential repository.</p> <p>Borrowdale Parish Council agree with the opinion of Professor David Smythe that it is a waste of time & money to look at an area with unsuitable geology when it is known that other places in the UK exist where the geology is more promising. It is also of concern that the government are wanting to fast track the MRWS process, originally the target was for the repository to be open in 2040, they would now like it to open in 2020.</p> <p>Right of Withdrawal:</p> <p>Throughout the MRWS process it has been made clear that a repository will only be sited where a community has volunteered to have it, this is the 'voluntarism' approach. A key part of this voluntarism approach is the Right of Withdrawal, which according to the MRWS documentation can be exercised at any point up until the actual underground construction is about to start (end of stage 5).</p> <p>Q1. Does this mean that if a geologist purported to have found suitable geology under Borrowdale Parish Council's area, that people living within the parish could decide that they did not want to volunteer to have a nuclear waste underground repository beneath their homes and so withdraw?</p> <p>The relevant MRWS documents seem to imply that this is not the case, that in fact Parish Councils can't exercise a right to withdraw, that only ABC, CBC and CCC can do so. These three bodies as the decision making bodies in this process have to make a decision for the greater good, so this seems to prevent a parish council from being able to exercise its right to withdraw. It also appears that the further down the process we go the harder it becomes to exercise the right of withdrawal, pages 93-94 of the partnership's report state that to withdraw 'reasoned justification' would be required. As the further down the process we go, the more detailed & technical geological investigations become, making it harder & harder for parish councils & members of the public to provide the reasoned justification necessary to withdraw. It is also made clear on the same pages of the partnership report that the Community Siting Partnership (which would advise the decision making bodies) could still reject a reasoned justification if by allowing them to withdraw would prevent the repository from going ahead. Borrowdale Parish Council have noted from the 2008 MRWS white paper that it is made clear within this document that once expensive boreholes have been drilled a community would find it very difficult to withdraw.</p>
--	--	--

		<p>The MRWS 2008 White Paper further goes on to say that the Government reserves the right to abandon a 'voluntarism' approach, if it seems that by using such an approach a site for a repository would not be found.</p> <p>Currently the 3 decision making bodies (ABC,CBC &CCC) could withdraw now (at the end of stage 3) without having to provide a reasoned justification, if the process is continued with to stages 4 & 5 this would no longer be the case. There is also no mechanism in place to allow a parish, or cluster of parishes to withdraw. Finally there doesn't appear to be any other options for sites outside of Cumbria, raising concern within the Borrowdale Parish Council that the Right to Withdraw may not be as it seems.</p> <p>Planning & the National Park</p> <p>At this stage it is not fully clear how a planning application for a repository would be determined, however it seems likely that the LDNPA would not determine the application, but a body such as the Major Infrastructure Planning Unit, would a take the decision.</p> <p>Currently the position is that the current planning regime might rule out putting the surface facilities within the National Park. However it is not definitely ruled out, so to have the whole facility surface & repository within the National Park is a possible outcome of continuing with the MRWS process. A potential large surface facility & the associated infrastructure links we feel could have a disastrous affect on the part of the National Park' s landscape and its tourism & farming industries.</p> <p>Another physical effect of the underground repository is that when it is built the waste from the building of the repository would need to stay on site, forming large pyramid type mountains (A similar volume of waste would come out of this repository as was generated by the building of the channel tunnel).</p> <p>In our opinion it is not clear what effect an underground repository sited within the National Park would have on the tourism market. Would people still want to visit an area if they knew that a large quantity of radioactive waste was buried under the area? Would the image of the Lake District's agricultural produce be damaged?</p> <p>Something that is clear is that the borehole investigations in Stage 5 would possibly require a number of large sites in open country. This would involve heavy duty rigs and infrastructure may need to be put in place to enable the heavy equipment to be transported to the sites. These investigation sites would be noisy & intrusive.</p> <p>Borrowdale Parish Council feel that the potential risks to the National Park & its thriving tourism international tourism industry are to great, and as such we should not proceed any further with the MRWS process.</p> <p>Impacts & Benefits</p>
--	--	---

		<p>Based on the partnership documents it is suggested that the repository would directly employ around 550 people over a period of 140 years. During the construction years this might raise to 1000 people directly employed. The government has estimated that between 1-1.5 jobs would be indirectly created for each 1 in the repository. It is impossible legally to make sure that these jobs go to Cumbrians.</p> <p>It has to be recognised that there is no doubt that the kind of economic development and employment created would be welcomed. However it could be perceived that Government investment in jobs, road improvements and health screening in return for hosting the dump are 'bribes'.</p> <p>Safety</p> <p>Borrowdale Parish Council has concern that the government's recent request for acceleration in the opening of the waste facility could jeopardise the need for careful management & safety. The Nuclear Decommissioning Agency are responding by looking at ways to increase resources allocated to the program, undertake more work in parallel, and transfer technology from more advanced programs overseas.</p> <p>The original planned date of 2040 to bring the underground waste facility into service was based on the time it took other countries to select the proper site & technology to dispose of dangerous nuclear waste. To give a comparison Finland took 37, France took 32 & Sweden took 31 years.</p> <p>We are concerned that based on the things mentioned above that the issue of safety needs further work before any decision can be made to progress to the next stage.</p> <p>Conclusions:</p> <p>Borrowdale Parish Council feels that 'West Cumbria' should withdraw from the MRWS process now because:</p> <ul style="list-style-type: none">- We have no confidence in the right of withdrawal- There is a strong argument that nowhere in Cumbria has suitable geology- It is a waste of time & money to continue the process in Cumbria, when there are more suitable areas in England- If the MRWS process were continued it would risk parts of the National Park & its tourist & agricultural businesses- The potential economic benefits to Cumbria do not justify searching for a site in unsuitable geology or spoiling part of the national park & its associated industries
--	--	--

			<p>- We are concerned that the governments idea of accelerate the MRWS process could lead to corner cutting</p> <p>- There is too little information available on impacts for the community to make a meaningful decision to continue to be involved in the MRWS process.</p> <p>Adopted by Borrowdale Parish Council by unanimous resolution.</p> <p>12th March 2012</p>
Borrowdale Parish Council	1 – Geology	No	<p>Borrowdale Parish Council feel that the most rationale way to have considered this process would be to first look at areas in the UK that have the correct geology and then to try and convince the local areas to host the repository. The MRWS process is using the opposite approach, find a community happy to host it and then look for the correct geology. There is no guarantee that suitable geology will be found.</p> <p>Professor David Smythe has said that nowhere in Cumbria has suitable geology, because of two observations:</p> <ul style="list-style-type: none"> - Cumbria is very mountainous - There is a lot of faulting, folding & other geological issues <p>Professor Smythe described it at a recent public meeting held in Keswick that the mountains act like a cistern. The push water at high rates through the ground towards the coast and because of the cistern effect can drive underground water up to the surface. Due to the complexity of the geology it is hard to predict where groundwater will carry contamination from any leakages from a potential repository.</p> <p>Borrowdale Parish Council agree with the opinion of Professor David Smythe that it is a waste of time & money to look at an area with unsuitable geology when it is know that other places in the UK exist where the geology is more promising.</p> <p>Borrowdale Parish Council also feel that it is an oversight on the part of the MRWS partnership to have not considered the NIREX report that was undertake in the 1990's a large amount of money and scientific investigations were done on areas in Cumbria and they concluded that the geology was not suitable for the storage of radioactive waste.</p> <p>Borrowdale Parish Council feel that along with the queries mentioned above being addressed, that further information that would assist them in making a decision on if to proceed to stage 4 or not would be, a description or an idea of what is 'suitable' geology to house an underground storage facility, and some indication based on previous work & studies if this type of geology exists in Cumbria.</p>
Borrowdale Parish Council	2 – Safety, security,	No	<p>Borrowdale Parish Council feel that again there is a lack of sufficient information being provided to enable a reasoned decision to continue to be made. Further information is required on:</p>

	environment and planning		<p>- Who would take the decision on the planning for a repository, if it is to be take outside the of the LDNPA how can Cumbria's be assured that all the knowledge that the LDNPA has about the area is taken into account when making such a decision</p> <p>-What impact on safety will the governments request to bring the opening date forward by 20 years have?</p> <p>-What impact/and how close to the surface repository will the waste material have to be stored? Does this have an environmental impact? E.g. leaching of minerals from the waste material into surface water? Visual impacts? What is proposed to be done with this waste?</p>
Borrowdale Parish Council	3 – Impacts	No	<p>- Insufficient research has been done into the potential impacts on the tourism & agricultural industries in Cumbria</p> <p>-It is hard to make such a decision on this issue when it is not clear what the benefits of a potential repository would be, it is only specified that a Community Benefits package would be put in place...</p>
Borrowdale Parish Council	4 – Community benefits	Not Sure/ Partly	<p>It is very difficult to answer this question as the information available at this stage is merely a set of principles that may be considered when deciding on the benefits package, and this is caveated by stating that it is impossible to set out a specific package that the government may agree to this far in advance. This is concerning to the Borrowdale Parish Council, at what stage would the benefits package be specified? Would it be specified with enough time for a community/area to withdraw? Or would it be the case that the work was commencing and then the benefits package would be agreed, by which time it would be too late for the community to withdraw if the benefits package is not suitable.</p>
Borrowdale Parish Council	5 – Design and engineering	Not Sure/ Partly	Not sure on this issue.
Borrowdale Parish Council	6 – Inventory	Not Sure/ Partly	Not sure on this issue.
Borrowdale Parish Council	7 – Siting process	No	<p>The main and overriding concern of the Borrowdale Parish Council is that the right to withdraw does not seem clear, and seems to become more and more qualified the further down the process we go. Until clarity on the right of withdrawal, how to action it, who can action it etc is received it is impossible to make a decision to continue with this process.</p>
Borrowdale Parish Council	8 – Overall views on participation		<p>Referring to the above questions and the covering letter enclosed with this consultation Borrowdale Parish Council feel that the Allerdale should withdraw now from the MRWS consultation for the below reasons (taken from our covering letter):</p>

			<ul style="list-style-type: none"> - We have no confidence in the right of withdrawal - There is a strong argument that nowhere in Cumbria has suitable geology - It is a waste of time & money to continue the process in Cumbria, when there are more suitable areas in England - If the MRWS process were continued it would risk parts of the National Park & its tourist & agricultural businesses - The potential economic benefits to Cumbria do not justify searching for a site in unsuitable geology or spoiling part of the national park & its associated industries - We are concerned that the governments idea of accelerate the MRWS process could lead to corner cutting - There is too little information available on impacts for the community to make a meaningful decision to continue to be involved in the MRWS process.
Borrowdale Parish Council	9 – Additional comments		Many of the comments that Borrowdale Parish Council have made on this form and in our covering letter are common issues & concerns from a number of parishes surrounding Keswick including Above Derwent, St Johns, Thirlmere & Wythburn, Under Skiddaw
Organisation / Group	Question	Agree	Response
Bothel and Threapland Parish Council	Letter		<p>GEOLOGICAL DISPOSAL OF RADIOACTIVE WASTE IN WEST CUMBRIA</p> <p>I [the Clerk] refer to the above consultation document which was on the agenda to be discussed by members at the recent Parish Council meeting.</p> <p>Members agreed at the meeting in their opinion the area of West Cumbria is geologically unsuitable and believe there are more suitable areas in the UK for a site and feel that the MRWS Partnership should now withdraw from the process of searching for a site.</p>
Organisation / Group	Question	Agree	Response
Bowness-on-Solway Parish Council	Letter		<p>Geological Disposal of Radioactive Waste in West Cumbria – Consultation Response</p> <p>The information received to date has been considered carefully by Councillors, and discussed at the March Parish Council Meeting. The Parish Council acknowledges the importance of the nuclear industry to the economy of Cumbria, though the local benefit is considered to be small. However, it is equally aware of the detrimental effects that a repository could have on the landscape, economy and other</p>

			<p>aspects of the immediate area. Serious concerns were voiced by Councillors over the impact a nuclear repository would have on this Environmentally Sensitive Area.</p> <p>The Parish Council arrived at the view that it does not wish to object to the search for a repository at this stage of the process. The Council wishes to receive regular updates and reserves its right to object to the proposal at a later stage.</p>
Organisation / Group	Question	Agree	Response
Bradwell for Renewable Energy	1 – Geology	No	There is uncertainty amongst experts over the suitability of the geology, starting with the initial screening in 1997 which cast doubt. Over and above local problems, there is an emergent perception of unknowns in geological behaviour due to climate change. These could be sudden or gradual. There should be an exploration into this. In fact, the suitability of Cumbrian geology to support high level nuclear waste is so contentious, there should be a national exploration of this issue, involving all opinions. The Lake District is of great importance in our national heritage, and the heart of any such project should be protection of this national asset.
Bradwell for Renewable Energy	2 – Safety, security, environment and planning	Not Sure/ Partly	The prospect of security into the far future is based on optimism that future generations will indeed take on the role. Has the Partnership any specific idea of who would actual do the security? How far into the future would this extend?
Bradwell for Renewable Energy	3 – Impacts	No	<p>West Cumbria is a sitting duck, because so much of the waste is in situ. So, to avoid such waste being moved, there is the danger of bending over backwards, and falling over, to make the project "acceptable" in many technical and social ways.</p> <p>Furthermore, there should be a separate project of research and consultation regarding new build wastes, which are of a different order. These do not necessarily have to be hosted in Cumbria. It would be interesting to see local views on this.</p>
Bradwell for Renewable Energy	5 – Design and engineering	No	As the geology is not 100% suitable, safety is largely reliant upon engineered barriers. This is a vulnerability. How far has this aspect been explored by the Partnership, and how are they going to assure the people whom they represent?
Bradwell for Renewable Energy	7 – Siting process	No	This community group was involved in the initial CoRWM nationwide consultation. We only signed up to the document on moving towards a repository provided that there was a programme of r&d that could give the public something to go on in their evaluation. This has not happened, and there is a lack of trust. This trust has since been eroded due to the programme of new build which seeks to sneak in new build waste. This should be a separate issue and a separate consultation.
Bradwell for	8 – Overall views		These local councils have the burden of Sellafield to deal with, and have been given tremendous

Renewable Energy	on participation		responsibility without adequate process and information. They should not give an opinion on any other possible site.
Bradwell for Renewable Energy	9 – Additional comments		It is dismaying that all roads lead to a repository, when the CoRWM recommendations were more equivocal. Given the geographical and geological conditions of the UK, there should be serious attempts at dealing with alternatives. The general public gudgingly went for a repository in the belief there would be the possibility of retrieval. This will be impossible in future generations. This should be borne in mind.
Organisation / Group	Question	Agree	Response
British Society for Social Responsibility in Science	1 – Geology	No	There are rigorous governmental guidelines set out exactly for public consultations. The partnership approach has quite deliberately sought to evade their purpose. This question for example is about opinion, not fact. It is clear the partnership opinion was NOT informed by geological expertise. When it was offered them they refused to hear it. The partnership Attitude to geology is:- 'whatever's down there, it's all we've got and we'll have to make the best of it' (and the worst won't happen for a good few generations yet).
British Society for Social Responsibility in Science	2 – Safety, security, environment and planning	No	This question seeks to circumvent government guidelines on public consultation. There is no way a partnership 'opinion' can wish away the fact that a public enquiry ruled out the possibility of a safety case for burial of intermediate level radwaste. The UK is already in contravention of Nuclear Safety Directive. It is only a matter of time before Neighbouring EU govts take action to enforce the precautionary principle - something the partnership was expressly conceived to evade - which is why they now include high level waste as well.....
British Society for Social Responsibility in Science	3 – Impacts	No	The partnership does not seem to have allowed itself an opinion on the scale of the excavation work its proposals entail. Nor does DECC nor the NDA. It is however, impossible to conceal the fact that an equivalent quantity of spoil to the channel tunnel would be brought to the surface and given a destination of some kind. Nowhere has this impact been properly assessed. Nor have the true impacts on Cumbrian agriculture or tourism. The partnership needs to form an opinion - preferably in the light of real factual evaluations 0 before they ask the population for their criticism.
British Society for Social Responsibility in Science	4 – Community benefits	No	The current dismantling of public services which local authorities are pursuing in W. Cumbria under the austerity regime of the present Govt. are irrevocable. Once schools and libraries are closed and the buildings sold these community assets are irretrievable. There is not way that W. Cumbrians can have confidence that the priorities shown by their local Government in 'partnership' with a Central government determined to 'dispose' of the Nuclear wastes problem will have anything but a deleterious effect and unmitigated hardship for the population.
British Society for Social	5 – Design and engineering	No	Without candidate sites you are unable to answer any design questions that are site-specific. Without nominating a host rock formation you cannot specify how you will 'tailor' your design to last hundreds of

Responsibility in Science			millennia. It is the same hubris as that shown by Nuclear Industry in the years before it was banned from tipping Nuclear Waste at sea (in concrete-lined barrels which are now beginning to contaminate the bay of Biscay). You have no clear-cut approach to the chemical transformations that radioactive decay will occasion. It is NOT a positive waste.
British Society for Social Responsibility in Science	6 – Inventory	No	<p>This is one of the areas where the most tortured obtuse of language is deployed. The misrepresentation of the various stockpiles that accumulate from fuel cycle operations started with the 'separation' of civil and military fissile materials. The obfuscation never ceases... it is deliberately misleading to give 'in terms of volume' any estimate of existing or prospective burials because the capacity of the excavation to house it will have to be scores of times bigger.</p> <p>The 'inventory' word is intended to give an idea of a fixity of physical properties - false - the heat-generating wastes will undergo continuous change; and chemical inertness - also false their chemical nature will also evolve.</p>
British Society for Social Responsibility in Science	7 – Siting process	No	<p>As the proverbial Irishman says "If I were going to Dublin, I wouldn't start from here" of the many thousands mineshafts and adits that have now all been abandoned, all but one, Goldscope, are flooded (Goldscope was an uphill drive which is therefore a perpetual watercourse itself). No matter how deep a geological repository is situated in W. Cumbria, the dynamics of groundwater circulation will defy predictability.</p> <p>A mathematician was found on hands and knees, hunting around in the street. He was asked 'what are you looking for?' - my keys - 'where did you drop them?' - down the street - 'so why are you looking for them here?' - because, here there is a street light and I can see....</p>
British Society for Social Responsibility in Science	8 – Overall views on participation		Borough councils are not competent to promulgate sustainable and integrated minerals and wastes plans. The current waste plan core strategy comes up for review this year. There can be no question of Allerdale or Copeland proceeding unilaterally without legal challenge. The relevant law reflects EU and Euratom directives which it is no part of a local authorities' capability to seek to overturn. Of course wasting money on a lavish scale is well within their competence.
British Society for Social Responsibility in Science	9 – Additional comments		Your questions have been constructed so that a level of ignorance in their formulation can be exploited in the way people answer. That is deliberate predetermination of the outcome and overtly contradicts the governments criteria for making consultation an element in policy formation. Asking for public responses to questions devoid of any of the serious factual background (or mention of the previous history) is called "manufactured" consent. It bears NO relation to the real meaning of 'voluntarism'.
Organisation / Group	Question	Agree	Response
Buttermere Parish Council	Letter		On the 13th March 2012 a special meeting of the above Council was held to discuss the MRWS consultation. After discussion the Council voted unanimously as follows:

			<p>Buttermere Parish Council recommends withdrawal from continuing with any further investigation into the deep geological disposal of radioactive waste.</p> <p>This council has determined that the present consultation process is ill conceived and fatally flawed.</p> <p>In 2008 the Government knew only that a small block of three councils had joined the consultation. They also knew that the area had already been surveyed (Nirex 1989) and at that time 'the whole of Cumbria' was declared unsuitable. We now have the prospect of another set of geologists decrying and rubbishing their predecessors work.</p> <p>The whole process should have been reversed so that a national geological survey and search could be made to find the best sites instead of wasting time and money on one of the worst areas. This is a National problem which should be solved Nationally without opt out and without the bribes of future jobs and 'community benefits packages'.</p> <p>Over the past twenty years much time and money has been spent on cleaning up and levelling the pit and slag heaps which disfigured the coastline north of Ravenglass to Maryport and some inland. The volume of spoil generated would dwarf all of that which has been done. There would also be some visual impairment from the western fells of the Lake District National Park.</p>
Organisation / Group	Question	Agree	Response
Campaign for National Parks	Emailed letter		<p>Geological disposal of radioactive waste in West Cumbria</p> <p>The Campaign for National Parks (CNP) welcomes the opportunity to respond to this consultation. CNP is the independent charity that inspires people to look after and enjoy National Parks.</p> <p>We recognise that consultation remains at an early stage and that no in principle decisions have yet been taken. However, there are a number of important principles relating to the Lake District National Park that should, in our view, be given greater prominence in the partnership's information and consultation materials and in the ensuing decision making process on siting.</p> <p>Page 42 – early consideration of planning policies, strategies and legislative frameworks</p> <p>CNP welcomes the reference to the importance of early consideration of planning policies, relevant strategies and the legislative framework. We believe that the test for assessing major or nationally significant infrastructure development proposals within National Parks should be specifically cited in future information materials emanating from the partnership. This is the key test against which any proposals will be assessed. All partners and decision makers should be made aware of the test and its presumption against major developments within National Parks from the outset.</p>

			<p>The Government continues to regard National Park designation as conferring the highest status of protection as far as landscape and natural beauty is concerned (paragraph 20, UK Government Vision and Circular 2010) – this protective status should also be referred to in future partnership materials.</p> <p>Page 62 – surface facilities within the National Park boundary</p> <p>CNP welcomes the recognition that current planning policies would rule out certain scenarios such as surface facilities within the National Park boundary. However, the policy framework governing nationally significant infrastructure or major development proposals within National Parks is much wider than this – the presumption against such developments applies regardless of their surface extent.</p> <p>The major development policy test requires both exceptional circumstances and public interest to be proven, and a number of criteria to be satisfied, including need in terms of national considerations, availability of alternatives and effects on the environment and the extent to which they could be moderated. CNP asks that these requirements and criteria are listed in the partnership’s information materials in future.</p> <p>Page 69 – definition of ‘community’</p> <p>We welcome the recognition that the term ‘community’ has to be considered in its broadest sense when considering community benefits and that ‘communities of interest’ includes National Park users and future generations. We suggest that a further community of interest is added – those people that do not or are no longer able to visit the National Park but who nevertheless have a view on the siting of a major infrastructure development within or close to the National Park boundary.</p> <p>Please do not hesitate to contact me should you require clarification or amplification of any of the above.</p>
Organisation / Group	Question	Agree	Response
Campaign to Protect Rural England, North Yorkshire Branch	1 – Geology	Yes	No comment was made
Campaign to Protect Rural England, North Yorkshire Branch	2 – Safety, security, environment and planning	Not Sure/ Partly	<p>Given my experience in the sector I am concerned that the consultation does not mention transport to the site. This has caused heartache in the past and should surely be a factor in the choice of West Cumbria.</p> <p>In my view rail transport should be a condition of any site.</p>
Campaign to Protect Rural England, North	3 – Impacts	Yes	My concern with this consultation (and many others on Nuclear matters) is that it does not state the local ambient radiation levels and estimate the increase, if any, a repository might cause.

Yorkshire Branch			<p>I estimate the effect would be negligible but think that practice should be to state levels and offer comparisons with other sources. Examples might be the ambient levels in (say) Aberdeen or Johannesburg - indeed of any area where the natural radiation is high but demonstrably does not materially affect people living or working there.</p> <p>There is a natural, but overstated, fear of radiation and I have found quoting such statistics helpful in quietening some fears</p>
Campaign to Protect Rural England, North Yorkshire Branch	4 – Community benefits	Yes	I support the package suggested but would offer caution in promoting it. WE find that opponents frequently use the word Bribery perjoratively when they object to acceptance of (e.g) windfarms et al.
Campaign to Protect Rural England, North Yorkshire Branch	5 – Design and engineering	Yes	This area worried me. Absolute certainty is unattainable yet the slow and cumbersome consultations undertaken by HMG seem to aim at it. We have had Nuclear power for fifty+ years and the result has been far fewer deaths and injuries than virtually any other form of power generation. The US study on this showed the fact quite clearly. The consultation should perhaps show the effect of nuclear waste storage when compared to coal waste oil exploration damage and so on. The best defence of Nuclear always seems to me when I have spoken subject to be a comparison with the actual damage of Nuclear compared with the actual results from other forms of power supply.
Campaign to Protect Rural England, North Yorkshire Branch	7 – Siting process	Not Sure/ Partly	I believe the process to be too slow.
Organisation / Group	Question	Agree	Response
Churches Together in Cumbria	<p>Letter</p> <p>[sent to Rt Hon Ed Davey, Secretary of State for Energy and Climate Change, also copied to West Cumbria MRWS Partnership]</p>		<p>Congratulations on your appointment to this vital ministerial role. As you immerse yourself in your brief, you will no doubt become aware of the current public consultation 'Geological disposal of radioactive waste in West Cumbria'.</p> <p>The Social Responsibility Forum and Environment Group of Churches Together in Cumbria met together on 4 February to discuss the issues around this consultation.</p> <p>We believe that it is the UK Government that should be seen to be taking responsibility for the nature and location of a nuclear repository for the nation because it is the safety of future generations of Britons, and neighbouring countries, which should be the overriding factor.</p> <p>It has long been accepted that parts of the UK other than Cumbria have much more promising geology for the long term storage of nuclear waste. It is the 'voluntarism' issue, fuelled in part by the hope of economic benefits in a time of economic uncertainty, which has focussed the search in Cumbria because in the whole of the UK only these three local authorities (Allerdale District Council, Copeland Borough Council</p>

		<p>and Cumbria County Council) have shown an interest in volunteering to proceed. This places the decision to expend vast sums on the search for a possibly sub-optimal nuclear repository de facto in the hands of local councillors in Cumbria</p> <p>We believe most strongly it is wrong for West Cumbria to be evaluated in isolation as a possible site. While we accept a decision to investigate further the geology of West Cumbria, this should be part of a wider investigation of other potential sites of appropriate geology in the country, including deep clay formations.</p> <p>We emphasise that any repository must meet certain universal criteria. It should be:</p> <ul style="list-style-type: none">• in geological formations that are seismically stable and have provable water impermeability;• engineered to prevent water penetration and to allow interception, removal, and if necessary treatment of any water that does enter;• deep enough to exclude possible future glacial disturbance and immune from any terrorist action on the surface;• monitored to alert managers to any leakage of radioactive material;• capable of entry to retrieve the stored material should containment fail or a better method of long-term storage or disposal present itself in future. <p>We welcome the assurances given by Government that wherever a repository is built there will be a package of benefits in recognition of the service being rendered by the local community to the nation.</p> <p>We are aware that in West Cumbria other major energy-related developments, including at least one new nuclear power station, are being considered and it is also the scene of major offshore renewable developments. We urge that these are also backed by measures designed to enhance local communications and provide integrated social and economic benefits to the community as a whole.</p> <p>In conclusion, we stress that while community acceptance of any possible repository site is of course desirable, the imperative is its environmental suitability for thousands of years to come. A bad site remains a bad site even if it currently has a willing community, while a good site will be safe effectively forever, whoever lives on top of it!</p> <p>We hope that you will take full responsibility for this vital issue back to where it properly resides, in Central Government, and not leave it unfairly on the shoulders of the local authorities of Cumbria.</p> <p>We look forward to hearing from you in this regard.</p>
--	--	--

Organisation / Group	Question	Agree	Response
Cleator Moor Town Council	Letter		<p>Cleator Moor Town Council considered the information presented at recent consultation meetings, and discussed the topic at an ordinary meeting of Cleator Moor Town Council, held on 13th March 2012.</p> <p>Members agreed that a decision to move forward with a repository for radioactive waste was important one for the community, now and in the future. Cleator Moor Town Council decided to support further investigations, with reservations.</p> <p>They felt at the moment, there was insufficient evidence to dictate whether the package of proposals would be beneficial in the long term for the community. This support is granted on the assurance that withdrawal from the process would be possible at a later date.</p>
Organisation / Group	Question	Agree	Response
Cockermouth Town Council	Email		<p>At our meeting held on 21 March 2012, Cockermouth Town Council resolved that:-</p> <p>'The siting of a repository for the geological disposal of radioactive waste in Allerdale be not supported and not taken to the next stage'</p>
Organisation / Group	Question	Agree	Response
Colton Parish Council	8 – Overall views on participation		Colton Parish Council opposes any underground repository for radioactive waste in Cumbria and therefore feels that there is no purpose in Copeland and Allerdale taking part in this exercise.
Organisation / Group	Question	Agree	Response
Copeland and Workington Liberal Democrats	Emailed letter		<p>Concerns on the MRWS Consultation and the way forward.</p> <p>Copeland and Workington Liberal Democrats met last night to consider the consultation and the further implications of the proposals. We felt the consultation was thorough in the aspects that it covered but that there were issues that were not covered that could affect the way forward and the views of the community.</p> <p>In particular:-</p> <ol style="list-style-type: none"> 1. No details were given of the possible engineering process to convert the waste, especially the legacy waste, into a form suitable for transfer to the GDF or other storage. This could be already happening but there is no indication of the work involved. The local interest would be in the long term jobs to undertake this process. 2. The geology would appear to raise concerns but could these concerns be ameliorated by better, and more expensive, engineering of the facilities of the GDF? What would be the cost and job implications? 3. The assumptions of the time that the GDF would need to be safe did not include any discussion of the

			<p>impact of emerging technologies, such as transmutation, on the half life of the waste. Has any work been done on this?</p> <p>4. Though withdrawal from the process is said to be possible up to stage 5 it would appear to be increasingly difficult/unlikely.</p> <p>5. We believe there must be a presumption against any activity either above or below ground in the Lake District National Park.</p> <p>We realise it is not possible to consult on every aspect and that some of these decisions eg on cost, are matters for Government but any decision that affects the economy of West Cumbria should be discussed with the community whoever is making it.</p>
Organisation / Group	Question	Agree	Response
CORE (Cumbrians Opposed to a Radioactive Environment)	Letter		<p>CORE rejects the claim that the West Cumbria MRWS Partnership has provided sufficient information, or delivered a sufficiently balanced assessment of such information as has been provided, for public consultation. Any advice to the Decision Making Bodies to move to the next stage of the Government's MRWS process – the Decision to Participate – would therefore be highly premature and dangerously unsafe.</p> <p>The case for moving to the next stage of the process has not been made, and the Decision Making Bodies should accordingly be advised to exercise their Right of Withdrawal and abandon any further involvement in the process.</p> <p>CORE has chosen not to respond directly to the specific questions posed in the consultation document and comments instead on the basic flaws in the national MRWS process, the Partnership's handling of the process locally and the poorly reasoned conclusions submitted for public consultation.</p> <p>Background</p> <p>CORE is an independent and local anti-nuclear group which, since its formation in 1980, has focused its campaign work on Sellafield's reprocessing operations and associated detriments which include the production and management of legacy and current nuclear wastes.</p> <p>On nuclear waste disposal issues, CORE has submitted written and oral evidence to Government Select Committees, its (now defunct) Radioactive Waste Management Advisory Committee (RWMAC), and to the Public Inquiry into the application by the Nuclear Industry Radioactive Waste Executive (NIREX) for a Rock Characterisation Facility (RCF) at Longlands Farm near Gosforth.</p> <p>In opposing the policy of the untested 'out of sight, out of mind' dumping of nuclear waste underground, either nationally or internationally, CORE continues to propose a policy of waste disposal at the nuclear</p>

		<p>sites of origin of the wastes (in conformity with international principles) in custom-built above ground storage facilities where wastes can be properly and safely managed.</p> <p>This policy offers a raft of benefits that are not provided by a sole underground site as envisaged by the current MRWS process in that disposal sites are self-selecting (the licensed nuclear facilities producing the waste) thus obviating the need for volunteerism, the eradication of the need to transport nuclear wastes and spent fuel from one site to another, and the placing of the moral responsibility for waste disposal on the industry that produced the wastes.</p> <p>CORE has advanced the same views in subsequent consultation responses to the Government's Managing Radioactive Wastes Safely (MRWS) programme, and to CoRWM 1 and CoRWM 2.</p> <p>In a number of written responses to CoRWM, and in meetings with CoRWM members, CORE has repeatedly opposed the volunteer system on the grounds that i) it absolves the nuclear industry from its responsibilities towards waste disposal and transfers the burden to the general public and ii) via financial inducements, a volunteer system relegates the selection of the best possible geology as a secondary consideration.</p> <p>On the 14th October 2008, a CORE submission to CCC advised the County Council against expressing an interest in support of Copeland, again stating opposition to underground dumping and volunteerism. We suggested instead that CCC should adhere to the principles and objections it had raised at the 1995/96 NIREX RCF Public Inquiry and concentrate its efforts on the safe management of Sellafield's existing wastes at Sellafield – with no further imports/exports of wastes into or out of West Cumbria.</p> <p>CORE has rejected a number of invitations to join or contribute to the West Cumbria MRWS Partnership initiated after Copeland Borough Council's expression of interest was made in 2008. The rejection was made on the basis that CORE would not wish to participate in a Partnership designed to take forward a process that could lead to the underground dumping of nuclear waste in West Cumbria – a policy vehemently opposed by CORE. Further, CORE could see no merit whatsoever in participating in a process in which alternative options for waste disposal (such as above ground storage) were not up for discussion. The outcome – with other NGO's also refusing to participate in the Partnership – has inevitably resulted in a one-sided process that has lacked proper balance.</p> <p>MRWS & Volunteerism – the National Process.</p> <p>The policy of volunteerism was inherently flawed in a number of respects:</p> <p>i) The policy has unjustly transferred the responsibility of nuclear waste disposal to UK communities – thus absolving the nuclear industry from its moral responsibility of dealing with the wastes it has produced over the decades with little or no thought to its eventual disposal. The consequence of 'passing the buck' from the industry to communities has been to provide the industry with carte blanche approval to continue</p>
--	--	--

		<p>producing waste in the knowledge that its disposal is now a matter for the public and of no further concern to the industry.</p> <p>ii) CoRWM's 2006 recommendation to Government was that "within the present state of knowledge (CORE emphasis) CoRWM considers geological disposal to be the best available approach for the long-term management of all the material categorised as waste". The qualification on the present state of knowledge was made in relation to the potential for undeveloped or new technologies/techniques/processes mitigating against the committee's recommendation for deep disposal, or overturn it completely. The current MRWS process makes no allowance for such developments.</p> <p>iii) The policy wrongly elevates the volunteering of communities above the clear and obvious pre-requisite of finding the right geology for nuclear waste disposal. In putting 'the cart before the horse', the MRWS process has been compromised from the start. CORE notes particularly the caveat expressed by Dr Dearlove (Doc 175, page 2) that "the current volunteerism process constrains selection to less than ideal sites".</p> <p>iv) The Right of Withdrawal from the MRWS process is restricted to the Decision Making Bodies who, under almost all circumstances, can overrule the wishes of other process participants who have chosen to withdraw. This is not only undemocratic and makes a mockery of the much vaunted importance of stakeholder involvement but also leaves the decision on moving to a further stage of the MRWS process at the mercy of the vested interests of the Decision Making Body. This is particularly relevant in the case of the West Cumbrian Decision Making Bodies whose membership is widely considered to be pro-nuclear and to have a pre-disposition to accepting an international underground nuclear dump in West Cumbria.</p> <p>The pro-nuclear stance of the Decision Making Bodies and their licence to overrule other MRWS participants, such as Parish Councils, will inevitably lead to a deep mistrust of the process and an alienation of those parishes or other organisations and individuals who choose to reject moving to the next stage of the process.</p> <p>West Cumbria MRWS Partnership.</p> <p>Whilst they are well understood by discerning stakeholders, the transparent weaknesses of the national process as outlined above appear to have been completely ignored or sidelined by the Partnership. This says little about the Partnership's capacity to view the wider picture and a great deal about its predisposition to push ahead with its inducement-driven desire to take forward an already compromised process.</p> <p>This weakness is compounded by the Partnership's failure to comprehend the dynamics of the shift from what was designed by Government as a national process to one of a local process whose sole focus is now on West Cumbria. Not one single voice has been raised within the Partnership about the validity of taking forward a clearly unbalanced process, and no queries have been raised about the implications of</p>
--	--	--

		<p>geological scrutiny being restricted to West Cumbria alone where, in comparison to other known areas of the UK, the geology is suspect and always likely to be second-best.</p> <p>Additionally, CORE notes a general failure by the Decision Making bodies to properly conform with the Government guidelines on the pre-requisites to arriving at a decision to Express an Interest in joining the national process.</p> <p>The June 2008 MRWS Document suggests, at Para 6.18, Page 52: the local authority should have canvassed opinion, for example, through existing Local Strategic Partnerships or specifically convened meetings with potential local partners. These partners might include Parish/Town Councils, local Community, Business and Environmental stakeholder groups, and neighbouring local authorities.</p> <p>An Expression of Interest must be made in writing and Government would expect it to outline the actions taken to gather opinion and arrive at the Expression. (emphasis added).</p> <p>For Copeland Council, the failure to conform is particularly abject. In a 12th June 2008 press release, the Council officially welcomed the MRWS White Paper Process and in a further press release just two weeks later, announced its decision to Express an Interest on 24th June. The Secretary of State DEFRA was officially informed by letter on 3rd July of Copeland's decision. In an Annex to this letter, Copeland BC confirms that 'key partners' had been consulted.</p> <p>Such consultation, held in 2007, was however in respect of the Council's draft nuclear policies and NOT on the embryonic MRWS process. Subsequent consultation by Copeland in 2007, on the MRWS Implementation Framework for Geological Disposal, again did not involve canvassing opinions on the making of an Expression of Interest.</p> <p>In short, such canvassing as has been undertaken by Copeland BC up to June 2008 has been unrelated to canvassing opinion on making an Expression of Interest, and later records show that in the two-week period 12th -25th June, Copeland BC made no further effort to canvas opinions from the wider public or communities. Copeland BC's evidence of prior consultation is therefore at best misleading and at worst disingenuous.</p> <p>Whilst Copeland BC's failure contrasts somewhat with the request for comments made by Cumbria County Council to a wide group of stakeholders before it officially expressed an interest, the overall efforts by these Decision Making Bodies to accurately gauge West Cumbrian opinion as a whole has fallen far short of the spirit, if not the letter, of the Government's suggested guidelines. This has further undermined the validity of the Partnership's work.</p> <p>Moreover, the Partnership's work smacks throughout of being 'insular' in that stakeholder engagement has been concentrated on Copeland and Allerdale – at the expense of the rest of Cumbria which, with twice the population of Copeland and Allerdale [330,700: 163,600 - Office of National Statistics, mid-year</p>
--	--	--

		<p>estimates 2010], has been poorly canvassed and under-represented in the Partnership's process despite the prospect of the County as a whole being significantly impacted by a Decision to Participate.</p> <p>Common sense should have dictated that the acknowledged complexity of the well researched geology of West Cumbria – a complex geology with higher hydraulic gradients – was unlikely to meet the accepted international criteria for siting an underground dump. Given the highly contradictory geological evidence provided for consultation and the warning of 'less than ideal sites', the Partnership's willingness to ignore the evidence of geological unsuitability and pursue inferior dumping sites provides the clearest indication of its determination to 'make the geology fit' irrespective of the long-term safety implications.</p> <p>It must also be noted that a significant number of scientific and technical issues, raised by a number of NGOs in 2009 and relating to the making of a robust safety case for an underground dump [The Issues Register], remain unresolved today. It is complacent in the extreme for the Partnership to project that these outstanding issues may be satisfactorily resolved at some future point after a Decision to Participate has been made and when any failure to resolve such issues could result in drastic consequences for the safety of an underground dump.</p> <p>Whilst the geology of Copeland and Allerdale – other than those areas already ruled out by the British Geological Society – remains the focal point for further study and exploration, there can be little doubt that the official intent will be to focus on a site as close to Sellafield as possible. That the Partnership should believe otherwise – and there is no indication that any consideration has been given to the logistical implications of cross-county nuclear waste transports to a site remote from Sellafield – or to the increased levels of hostility within remote communities - is naïve in the extreme.</p> <p>The Partnership's silence on these most basic issues speaks volumes on its ability to objectively advise West Cumbria's Decision Making Bodies whether or not to move to the Decision to Participate stage.</p> <p>By maintaining its focus on the Copeland and Allerdale areas as potential underground dump sites, the Partnership has failed to register the significant impacts such a facility would have on the County as a whole or on adjacent regions. Indeed, the Partnership has produced little evidence that it has fully complied with the Government's further guidelines on 'Wider Local Interests' contained in the June 2008 MRWS document which, at Para 6.8 on Page 48, suggests:</p> <p>Outside the Host Community, there are likely to be other communities that have an interest in the development of a facility in the Host Community, and there needs to be a mechanism that allows them to become involved in the process. Such a community might be the next village, a neighbouring district or a community on the local transport routes to the Host.</p> <p>On this guideline, there is little evidence that the West Cumbria MRWS Partnership has seriously sought the involvement and views of communities located at the extremities of the County border or of adjoining Counties – particularly in relation to communities located on transport routes whether they be for dump</p>
--	--	--

		<p>construction traffic or subsequent transports of nuclear waste from across the UK to West Cumbria. This blinkered stance by the Partnership lends further support to the view that it has failed to grasp the wider implications of moving to the Decision to Participate stage.</p> <p>Coupled with this failure, the Partnership has clearly given no thought to the lack of a 'Plan B' in the Government's MRWS process and the consequences for West Cumbria should the current process be abandoned for any reason. Given the Government's haste to 'solve' the nuclear waste disposal issue – and in the absence of Expressions of Interest being made by any other UK Local Authority – the most likely Plan B to be adopted will be the imposition of an underground dump by Government. The unbridled interest and support for such a facility already shown by the West Cumbrian Local Authorities and the Partnership must inevitably lead to West Cumbria being the front runner for such Government imposition.</p> <p>The Partnership's assessment of the detriment that an underground dump would impose, not only on West Cumbria, but on the County as a whole, has been less than thorough. In assessing the underground dump largely in isolation – rather than in combination with Sellafield's ongoing operations, the prospect of new reactors at NuGeneration's Doomrise site and other nuclear facilities that are springing up in West Cumbria.</p> <p>The overall detriment from these combined facilities will consign the area as a pariah nuclear state in which incentives for diversification and inward investment for non-nuclear enterprises will be stifled. The Partnership' suggestion that any negative impacts can be mitigated and that the 'brand and reputation' of the area can be protected by some future strategy is simply not credible and demonstrates the deficient reasoning at the heart of the Partnership's work.</p> <p>CORE notes for example the County Council's strident and widely supported warning – outside the MRWS process - that the use of West Cumbrian landfill sites for low level nuclear wastes will turn the area into a nuclear ghetto in which neighbourhoods will be blighted and the chance of economic development damaged by the discouragement of non-nuclear investment.[Councillor Tim Knowles, Whitehaven News 19/1/12].</p> <p>The relevancve of these detriments and the implicit warnings they carry for West Cumbria have clearly had no impact whatsoever on the Partnership's assessment of the significantly greater and longer lasting damage that will inevitably be inflicted on the area by an international underground waste dump for higher activity wastes and spent reactor fuel. The Partnership's inability to extrapolate the scale of detriment from low level wastes in landfill sites to higher activity wastes in an international dump highlights the Partnership's illogical approach to the issue.</p> <p>The Partnership's view of the economic sustainability of an underground nuclear dump in West Cumbria has clearly been stimulated by the external and internal input from Energy Coast West Cumbria Limited – a company whose primary objective is to ensure that the nuclear stranglehold on West Cumbria is consolidated. CORE notes, for example, that during the Partnership's consultation period , Copeland MP</p>
--	--	---

			<p>Janie Reed – a leading proponent of the Energy Coast plan – is widely reported as calling ‘for no time to be wasted in securing an underground dump for Britain’s nuclear waste in the borough’ and that “the whole of our economic future depends on this.”. [North West Evening Mail 8th February 2012]</p> <p>This claim on economic dependency by Copeland’s MP is without foundation and will have been made intentionally to exert influence on local stakeholders - particularly those in his own constituency - to respond positively to moving to the next stage of the MRWS process. That the Partnership should even consider ‘buying into’ the Energy Coast mantra when the company’s motives are so clearly flagged, provides a further measure of the Partnership’s willingness to submit to the exaggerations of the pro-nuclear lobby and an inability to strike a balanced view on such a vital issue.</p>
Organisation / Group	Question	Agree	Response
Crosscanonby Parish Council	Letter		<p>Managing Radioactive Waste Safely Consultation</p> <p>The siting of a repository for the geological disposal of radioactive waste in Allerdale is not supported by Crosscanonby Parish Council and should not be taken to the next stage</p> <p>We also believe that “West Cumbria” should now withdraw from the MRWS process because;</p> <ul style="list-style-type: none"> i. We have no confidence in the Right of Withdrawal. ii. We are convinced by the argument that nowhere in Cumbria has suitable geology. iii. We believe that it is a waste of time and money to continue the process in Cumbria when there are other, more promising, areas in England. iv. We consider that the potential economic benefits to Cumbria do not justify searching for a site in unsuitable geology or spoiling part of a national park. v. We have concerns that Governments aspiration to accelerate the MRWS process will lead to corner-cutting. vi. We have concerns about safety, particularly gas emissions. vii. There is insufficient information about additional waste and the inherent increased risk. viii. Far too little information is available on impacts for the community to make a meaningful decision to participate. ix. Rail transportation of waste would pass through this parish and is not proven safe. <p>This is the adopted position of Crosscanonby Parish Council.</p>
Organisation / Group	Question	Agree	Response
Crosthwaite and Lyth Women’s Institute	1 – Geology	No	according to independant scientific reports not enough is known as to future degradation of waste underground regarding gases water contamination and escape of radioactivity
Crosthwaite and Lyth Women’s	2 – Safety, security,	No	No comment was made

Institute	environment and planning		
Crosthwaite and Lyth Women's Institute	3 – Impacts	No	No comment was made
Crosthwaite and Lyth Women's Institute	4 – Community benefits	No	No comment was made
Crosthwaite and Lyth Women's Institute	5 – Design and engineering	Not Sure/ Partly	No comment was made
Crosthwaite and Lyth Women's Institute	7 – Siting process	No	We have a high incidence of cancer in the surrounding locality, and feel that further future escape of radiation will be even more detrimental to health. We have already paid a high price, and continue to do so.
Crosthwaite and Lyth Women's Institute	8 – Overall views on participation		They should not consider it, apparently it was refused in 1997, still independent research is not favourable.
Organisation / Group	Question	Agree	Response
Cumbria LGBT Alliance & OutREACH Cumbria	1 – Geology	Yes	<ul style="list-style-type: none"> • All aspects have been considered and that far more in depth research needs to be carried out, to confirm suitability. • Public concerns such as fault lines – poor quality subterranean rock.
Cumbria LGBT Alliance & OutREACH Cumbria	2 – Safety, security, environment and planning	Yes	<ul style="list-style-type: none"> • The principles of underground storage is safer than surface. • Being below ground – there is a security in the fact it is “out of reach” – potential threats. • Negative impact on surface – i.e. areas of natural beauty.
Cumbria LGBT Alliance & OutREACH Cumbria	3 – Impacts	Yes	<ul style="list-style-type: none"> • The effect of building and construction will impact on areas in the county. – dust and noise – depending on the site. • We feel that the process so far has tried to identify the negative impact – whilst promoting positive benefits. • New railway and roads? • Potential economic investment.
Cumbria LGBT Alliance &	4 – Community benefits	Not Sure/ Partly	<ul style="list-style-type: none"> • The benefits are for ALL Cumbrians, not just the West. • Investment in social housing.

OutREACH Cumbria			<ul style="list-style-type: none"> • Money to support community groups. • Economic infrastructure. • Hospitals and Air Ambulance.
Cumbria LGBT Alliance & OutREACH Cumbria	5 – Design and engineering	Yes	<ul style="list-style-type: none"> • The design as shown • Flexibility to add to the amount • Retrieval – income • Future scientific knowledge may change the picture of nuclear waste.
Cumbria LGBT Alliance & OutREACH Cumbria	6 – Inventory	Yes	<ul style="list-style-type: none"> • If we take waste from outside UK then we benefit financially and environmentally from taking this waste. • The flexibility of being able to take in waste and possibly generate further employment – surface processing of nuclear waste.
Cumbria LGBT Alliance & OutREACH Cumbria	7 – Siting process	Yes	Desk-based studies – what does it mean? How will the public continue to be involved – at what stages and what information will be publicly available?
Cumbria LGBT Alliance & OutREACH Cumbria	8 – Overall views on participation		If they hope to benefit in the longer term – then it makes sense that they participate in the ‘search’ process,
Organisation / Group	Question	Agree	Response
Cumbria RIGS (Regionally Important Geological Sites)	1 – Geology	Yes	The BGS has carried out extensive research into movement of water within bedrock.
Cumbria RIGS (Regionally Important Geological Sites)	2 – Safety, security, environment and planning	Yes	I disagree with the 'Rock Solid?' report (Document g) the risk of a build up of heat by radioactive decay is minimal.
Cumbria RIGS (Regionally Important Geological Sites)	3 – Impacts	Yes	West Cumbria is the logical place to have a repository. The knowledge and skills required are available locally.
Cumbria RIGS (Regionally Important Geological Sites)	4 – Community benefits	Not Sure/ Partly	I have no view on the community benefits package.

Cumbria RIGS (Regionally Important Geological Sites)	5 – Design and engineering	Yes	The design is well thought out and is safe.
Cumbria RIGS (Regionally Important Geological Sites)	6 – Inventory	Yes	No comment was made
Cumbria RIGS (Regionally Important Geological Sites)	7 – Siting process	Not answered	The partnership must follow BGS guidelines.
Cumbria RIGS (Regionally Important Geological Sites)	8 – Overall views on participation		The community should be fully involved with the siting process.
Organisation / Group	Question	Agree	Response
Dean Parish Council	Letter		<p>On the 27th February 2012 Dean Parish Council held a public meeting in the Kirkstile Community Centre, Dean. The meeting was chaired by the council chairman, Tony Worsley, and the main speaker was Guy Richardson, CALC's representative on the MRWS Partnership. The DVD supplied with the consultation pack was shown to open the meeting, following which Guy Richardson addressed the meeting for approximately 45 minutes, followed by questions from the floor.</p> <p>Guy outlined the process so far, which has reached stage 3 in the process. He expressed the serious doubts that CALC has had about the process, in particular the definition of a 'Host Community' when it comes down to withdrawing from the process.</p> <p>The main issues which were raised by parishioners who attended were:</p> <ol style="list-style-type: none"> 1. Have any extensive discussions taken place with other countries who are contemplating, or actually building, nuclear waste repositories (Finland in particular who are the farthest advanced), and are there any plans to visit these countries to learn about their experiences? It was pointed out that the population density of some of these other countries (Scandinavia in particular) is considerably lower than ours. 2. Why do we need to take a decision on whether to proceed with a desk-top geological study - as part of the work has already been done, and as considerable knowledge is available from the Nirex study of the Gosforth area in the 1990s, this could proceed without any commitment to go further, as no major expenditure would be incurred (such as borehole drilling). Concern was expressed that the findings of the Nirex enquiry appear to be completely excluded from the current process.

		<p>3. It was agreed that the decision to use this 'voluntarist' approach was purely political, as the Government has not received and is unlikely to receive any volunteers from the geologically suitable parts of the country, eg the south east or Norfolk.</p> <p>4. Concern was expressed about the long term safety of material currently stored above ground at Sellafield.</p> <p>At the end of the meeting, a show of hands indicated that 2/3rds of those present were in favour of proceeding to the desk top study, and 1/3rd were against.</p> <p>On the 5th March 2012, Dean Parish Council held its regular Council meeting, which was attended by 10 out of 12 councillors, plus our Allerdale Borough and Cumbria County Council representatives, and an open discussion was held on the issue of proceeding to stage 4 (desk top study).</p> <p>The main issues raised at this meeting were:</p> <ol style="list-style-type: none">1. Concern at the democratic process involved, in particular whether decisions taken by the borough and county councils, ostensibly on behalf of the residents of Allerdale and Copeland, would be by the 'Cabinets' or the full councils, and also the effectiveness of the public consultation exercise currently taking place. Doubt was expressed on whether a vote, even if taken by the full council, would be a free one, or whether a 'party line' would take precedence, in which case common sense may not prevail.2. How realistic the right to withdraw which is enshrined in the consultation document would be, when hidden away in the 'small print' is the following statement (repeated): "in the event of the partnership concluding that the omission of a potential host community (parish, borough?) would create insurmountable problems for the siting process, then it could recommend the inclusion of the community concerned if this was supported by a full justification and explanation". It was felt that this statement effectively wiped out any chance of 'opting out' by any parish or group of parishes.3. The huge impact of the construction process on host and surrounding communities was not felt to be fully grasped.4. It was felt that the further the process moves on, the more momentum it will gain, making it more difficult to pull out at a later stage. The right to withdraw, and by who, at later stages is far from clear. There was a strong view about the difficulty of overcoming government (of any political persuasion) momentum once potential compliant communities had been identified. The original decisions by Allerdale and Copeland, both of which have vested interests arising from their nuclear- centric industry, and the complete absence of a Plan B, make it difficult to imagine that smaller communities (eg Parish Councils), would have any influence on later decisions on whether to proceed.5. Retrievability was considered an important issue, particularly if alternative means of disposal or
--	--	--

			<p>recycling/reprocessing are developed in the future.</p> <p>A vote taken at the end of the discussion resulted in 5 votes in favour of proceeding to stage 4, 6 against proceeding, and 1 abstention.</p> <p>The importance of individuals making their views known to the partnership by responding prior to the 23rd March 2012 was stressed at both meetings.</p>
Organisation / Group	Question	Agree	Response
Derwent & Solway Housing Association	Letter		<p>Derwent & Solway would like to support the public consultation regarding the disposal of radioactive waste in West Cumbria and will encourage our tenants and residents to put their views forward.</p> <p>We will do this by promoting the consultation in our offices, on the Harvest Housing website/Facebook pages and by consulting with our Scrutiny Panel and our E-panel. We will encourage people to leave feedback via your website, or will post feedback on their behalf if customers do not have access to the internet.</p>
Organisation / Group	Question	Agree	Response
Eden District Council	Letter		<p>We have been represented at the Partnership meeting over the period it has been in place. We understand that academic geologists consider that the geology is not appropriate for such a facility in Cumbria. There may also be impacts upon the quality of the landscape and also the National Park. We understand that more work is needing to be undertaken and prior to any final decisions being taken that certainty needs to be assured by Government and the Private Sector companies involved that there will be no danger to life, the system of storage will be safe for the period that it needs to be, no demonstrable harm to the landscape, no demonstrable harm to the National Park, that traffic routes for transporting the materials are safe and secure, that the road network is appropriate, that compensation for the loss of value to properties and to businesses etc in the vicinity of the storage facility is payable, that the local authorities most directly affected are provided with appropriate resources to be able to overcome any negative impacts that may derive to their communities.</p> <p>These assurances are ones which are fundamental. We would like to continue to be involved in any partnership working and engagement on any proposals that are developed in order to necessarily represent the interests of our community.</p>
Organisation / Group	Question	Agree	Response
Egremont Town Council	1 – Geology	Yes	<p>It would seem that the Partnership's work on geology can only be limited due to no sites being identified.</p> <p>The amount of land not excluded at this stage again would seem ample for a GDF if one was agreed.</p>
Egremont Town Council	2 – Safety, security,	Yes	<p>The UK has a long history of nuclear therefore confidence in the regulators is acceptable. The only concern would be the ability of the regulators to gain knowledge on a project that spans many years.</p>

	environment and planning		<p>More information on all aspects of safety and environmental impacts would be needed to ensure a community would have confidence in a GDF.</p> <p>Details on the planning system would need to be known but as this seems to change depending on who is in Government, we understand it is difficult at this moment in time to finalise the details. But communities would want to know how they could influence the planning discussions.</p> <p>There is some slight concern that the NDA are responsible for developing a safety case as implemented of a GDF and the community would expect these documents to be independently assessed at the appropriate time.</p>
Egremont Town Council	3 – Impacts	Yes	<p>We don't think any more impacts can be identified until site specific work has started.</p> <p>Recognition of the impacts on different areas need to be understood more fully.</p>
Egremont Town Council	4 – Community benefits	Yes	<p>Egremont Town Council only agree because it is so early in the process to go into any details.</p> <p>Communities would like to be informed and ask to influence any benefits package and recognition of the differing impacts should be replicated in the community benefits package.</p>
Egremont Town Council	5 – Design and engineering	No	<p>It is difficult not to agree, as we recognise that all thanks can be considered and generic designs as detailed design work will be site specific.</p>
Egremont Town Council	6 – Inventory	Not Sure/ Partly	<p>Egremont Town Council understand that at this stage, details can't be discussed or even known but this is an important area and firmer assurances will be needed from Government. Using the word significant is not detailed enough.</p> <p>At this stage, we don't think there is further information that can be provided.</p>
Egremont Town Council	7 – Siting process	Yes	<p>As representatives from an area that could be directly or indirectly impacted upon we would want the opportunity to be involved, the ability to influence and represent our communities.</p> <p>Early discussions, if a decision to participate is taken, would be welcomed.</p>
Egremont Town Council	8 – Overall views on participation		<p>Egremont Town Council recognises the need to find a long term solution for higher activity wastes but feel there is not enough information to make a final decision so we will reserve our judgement until more information is available. However at this stage, we are supportive of the proposed way forward if a decision to participate is taken.</p>

Organisation / Group	Question	Agree	Response
Embleton & District Parish Council	Letter		<p>At the recent meeting of Embleton and District Parish Council the following question was put to councillors:</p> <p>Does this Parish Council believe that the Managing Radioactive Waste Safely Project should move forward to Stage 4 of the project, this being desk based studies to ascertain the suitability of the geology of Allerdale for housing an underground repository.</p> <p>Members of the public were also present at the meeting and engaged with the debate that councillors undertook. A variety of issues and concerns were raised and at the end of the debate the vote was as follows:</p> <p>Those in favour of the move to Stage 4: 2 councillors Those opposed to the move to Stage 4: 6 councillors Abstentions: 1 councillor</p> <p>The main reasons for not supporting the move to Stage 4 were:</p> <ul style="list-style-type: none"> • Concerns for the tourism in the area and the negative impact continuing the MRWS process will have on tourism business. • A belief that there is already enough geological information available that shows Allerdale is not suitable for an underground repository. <p>The decision of the Parish Council not to support the MRWS Project moving to Stage 4 in Allerdale will be relayed to the following organisations:</p> <ol style="list-style-type: none"> 1. Allerdale Borough Council: whom we will be urging to withdraw from the process. 2. Cumbria County Council 3. Cumbria Association of Local Councils 4. Lake District National Park <p>Should you wish any further information regarding this decision then please do not hesitate to contact me.</p>
Organisation / Group	Question	Agree	Response
Ennerdale & Kinniside Parish Council	Letter accompanying response form		<p>At the recent meeting of Ennerdale and Kinniside Parish Council the following question was put to councillors:</p> <p>'Does this Parish Council believe that the Managing Radioactive Waste Safely Project should move forward to Stage 4 of the project, this being desk based studies to ascertain the suitability of the geology of Copeland for housing an underground repository.'</p> <p>A wide ranging debate took place and at the end of the debate the vote was as follows:</p>

			<p>Those in favour of the move to Stage 4: 2 councillors Those opposed to the move to Stage 4: 4 councillors</p> <p>The reasons for the decision of Ennerdale & Kinniside Parish Council not to support the MRWS Project moving to Stage 4 in Copeland are given in the attached document [the response form] and will be relayed to the following organisations:</p> <ol style="list-style-type: none"> 1. Copeland Borough Council 2. Cumbria County Council 3. Cumbria Association of Local Councils 4. Lake District National Park <p>Should you wish any further information regarding this decision then please do not hesitate to contact me.</p>
Ennerdale & Kinniside Parish Council	1 – Geology	No	<p>The Consultative Document states that the integrity of the BGS report has no significant criticism. Prof. Smythe makes numerous criticisms of this report and supports his criticisms with evidence.</p> <p>Prof. Smythe also concludes that the areas in West and North Cumbria are unsuitable or unlikely to be suitable. There is a part rebuttal by Dr. Dearlove. However Dr. Dearlove offers little or no evidence to support his position.</p> <p>The most optimistic outcome is that there is a small prospect of finding a suitable geological area. Such a situation does not justify further expenditure of public monies, until a consensus is reached between the differing expert opinions.</p> <p>Furthermore there are unclear or no criteria for identifying what constitutes suitable geology for a repository.</p>
Ennerdale & Kinniside Parish Council	2 – Safety, security, environment and planning	No	<p>Safety:</p> <p>See Geology comments above as these have a bearing on Safety.</p> <p>We are undecided on the NDA's R&D programme.</p> <p>Regulatory and Planning Processes:</p> <p>There is uncertainty about which planning process that will be used. The planning role of the DMB councils needs to be clarified. There is a potential for conflict of interests between the councils role as DMB and as a planning authority.</p>

Ennerdale & Kinniside Parish Council	3 – Impacts	No	<p>Direct Impacts:</p> <p>The Issues Register is incomplete. Some aspects and impacts cannot be assessed until a specific site is found. However, there are many such aspects and impacts that could be assessed in advance of Stage 4 but this was not done.</p> <p>Long-term Direction:</p> <p>There is little note made of the long-term impact on tourism and the rural economy. It has certainly not been given the same weight as that for job creation in the energy sector.</p> <p>Economic Sustainability:</p> <p>The Chair of the MRWS Partnership has stated that the adverse impact, of high volumes of low level waste has on communities, tourism and inward investment , has not been weighed. How can we be confident that a high level waste repository will not have a net negative impact resulting in an overall lessening of employment opportunities, unless this is also weighed?</p>
Ennerdale & Kinniside Parish Council	4 – Community benefits	No	<p>The only reference, in the 12 Principles, to the Host Community and adversely affected groups is in Principle 1. This only states that Community Benefits are used to provide a positive contribution to affected communities.</p> <p>Principles 6 seeks to “transform the economic and social well-being of West Cumbria”. The suggestion that this transformation should not be done to the detriment of the Host Community was rejected by the MRWS Partnership.</p> <p>The 12 Principles do not offer the assurances that the Host Community and adversely affected groups will be given priority claim on Community Benefits funding.</p>
Ennerdale & Kinniside Parish Council	5 – Design and engineering	Yes	No Comments.
Ennerdale & Kinniside Parish Council	6 – Inventory	Yes	No Comments.
Ennerdale & Kinniside Parish Council	7 – Siting process	No	<p>The Chair of the MRWS Partnership has confirmed that if a Host Community is unwilling to participate, then the decision can be subjected to a review. However this same review mechanism does not apply to a willing Host community. He has also confirmed that if a DMB considers it appropriate, then it can override the wishes of an unwilling Host Community and include that community within the siting process.</p>

		<p>What is not disclosed is the justification, in principle, each of the individual DMBs would offer for acting against the wishes of their respective electorates.</p> <p>The Right of Withdrawal is offered as a safeguard to the affected communities. However this right is exercised by the DMBs, who have already shown that they are willing to act against the wishes of an unwilling Host Community. So why would a Host Community expect the DMBs to respect their wishes to use this right of withdraw?</p>
Ennerdale & Kinniside Parish Council	8 – Overall views on participation	<p>There are fundamental flaws in the way the MRWS Partnership has been managed, resulting in serious concerns with the integrity of the process.</p> <p>This is compounded by the Chair of the MRWS Partnership statement that councils (who are also DMBs) will be included on the Siting Partnership, despite the Partnership having not taken a view on this matter. One is left wondering what other matters are being decided without consultation.</p> <p>Fundamental questions, on how Voluntarism will operate, took over three months to be answered. Why?</p> <p>The Opinion Survey has misleading explanatory text:</p> <p>In Q2, the statement that communities would have the right of withdrawal is untrue. There is a right of withdrawal but it is not in the remit of the host community to exercise this right. The DMBs (local councils) retain this right and may not respond the community's desire to withdraw.</p> <p>In Q3, the statement that the Partnership assists the DMBs in reaching decisions does not explain the true position. The three DMBs are represented on the Partnership and actively participate in the decision to consider proceeding to Stage 4. The same DMBs will then make the final decision on proceeding to Stage 4 based on the Partnership's advice, to which they had already contributed.</p> <p>This lack of genuinely independent advice and the role played by the DMBs ought to be made clear to those being surveyed. The conflict of interest within the DMBs ought also to be explained.</p> <p>In Q4, the statement that local communities will be involved in discussions about the location of possible sites fails to explain that DMBs may act against an unwilling community's wishes, if there are difficulties with excluding any particular host community.</p> <p>The possibility, of DMBs acting against the wishes of the communities, has been confirmed by the Chair of the MRWS Partnership.</p>
Ennerdale & Kinniside Parish Council	9 – Additional comments	<p>There is a lack of transparency and misleading statements arising from the MRWS process resulting in an overall lack of confidence in the integrity of DMBs to respond to the wishes of the communities they represent.</p>

Organisation / Group	Question	Agree	Response
Environment Agency	Email		<p>The West Cumbria Managing Radioactive Waste Safety (MRWS) Partnership invited the Environment Agency to comment on the initial opinions it has presented in its consultation document, and in particular the section on Geology. We provide our response here.</p> <p>As the Partnership is aware the Department for Energy and Climate Change is responsible for selecting a site or sites to be characterised and developed for geological disposal within the MRWS Site Selection process. The Environment Agency is independent from the MRWS Site Selection process. Therefore in developing our response to the Partnership's invitation we have been mindful of the need to maintain our independence. Below we provide some key points regarding our regulatory role, our involvement in the high-level geological screening and on our review of the Nuclear Decommissioning Authority Radioactive Waste Management Directorate's (RWMD's) recent generic safety case for geological disposal. We have previously made the Partnership aware of this information as part of our support to their work programme.</p> <p>The Environment Agency is the environmental regulator for the nuclear industry in England and Wales. We are responsible for making sure that if a Geological Disposal Facility is built it will meet the required high standards for protecting people and the environment while it is being developed and operated, and after it is closed. In addition we are the statutory body responsible for the protection and management of groundwater resources in England and Wales. We work jointly with the Office for Nuclear Regulation on matters related to geological disposal and we provide advice and comment on matters within our respective regulatory remits to make sure that any future disposal facility meets the required high standards for environmental protection, safety, security, waste management and radioactive waste transportation.</p> <p>The Environment Agency welcomed the opportunity to review and comment on the high level screening of areas beneath west Cumbria undertaken by the British Geological Survey (BGS) as Stage 2 of the MRWS Site Selection process for these areas. The screening exercise is a significant and novel piece of work, which we consider to be a significant step in the MRWS Site Selection process.</p> <p>Whilst we don't have a statutory responsibility to regulate a developer's activities during this part of the MRWS Site Selection process, we reviewed the BGS's draft report to provide our regulatory views on radioactive waste disposal and groundwater protection. As part of our review, we provided additional information on use of groundwater resources in the study area and made suggestions on how to present the information to different audiences. We were pleased that the BGS found this additional information useful and that they incorporated most of our comments. In our view the West Cumbria MRWS Partnership can rely on this study as a preliminary screening report at this stage in the MRWS Site Selection process.</p> <p>The developer of a geological disposal facility will need the Environment Agency to issue permits to</p>

			<p>initially allow a candidate site or sites to be characterised using boreholes, and if subsequently to then construct and operate any facility. The Environment Agency will only issue the necessary environmental permits if we are satisfied that the proposals meet our demanding requirements. The developer will also need to provide an environmental safety case in order to apply to close a site and only if we are satisfied then we would revoke the environmental permit.</p> <p>In February 2011 RWMD published a suite of generic safety case reports for a future GDF. The safety cases are based on RWMD's understanding of the scientific and engineering principles supporting geological disposal. A specific site for a GDF has not yet been identified. The safety cases are based on assumptions regarding possible geological settings and facility designs, and are referred to as the 2010 generic Disposal System Safety Case (gDSSC).</p> <p>We reviewed the gDSSC under the terms of our agreements with, and at the request of, RWMD. Our regulatory review brings together the views of transport safety and nuclear safety specialists from the Office for Nuclear Regulation and radioactive waste disposal specialists from the Environment Agency. Our review provides advice and comment to RWMD on matters within our respective regulatory remits; it does not form the basis of any regulatory decision.</p> <p>We consider that the broad structure of the gDSSC is acceptable in terms of the general coverage of the documents and of the links shown between them, and that the documentation is of generally high quality. The gDSSC provides confidence, to a degree appropriate at this early stage in implementing geological disposal, that a safety case for a GDF in the UK could be made, providing a suitable site is available. Our position is, however, subject to some reservations that we present in our review.</p> <p>If a Decision to Participate were taken by the Decision Making Bodies in west Cumbria or any other area, we would provide support, advice and comment on matters within our regulatory remit to local communities, through for example a Community Siting Partnership, if requested. In doing so we would be mindful of the need to maintain our independence from site selection.</p> <p>I hope that this response is useful. Please do not hesitate to contact me if you wish to clarify anything or discuss this further.</p>
Organisation / Group	Question	Agree	Response
Friends of the Earth England, Wales and Northern Ireland (EWNI)	1 – Geology	No	<p>There is evidence that the geology and hydrology is unsuitable for deep disposal, most prominently from leading geologist Professor David Smythe (see for example http://davidsmythe.org/nuclear/Unsuitability%20of%20Cumbria%2012April2011%20plus%20figs.pdf).</p> <p>There are risks of geological instability due to the complex geology of West Cumbria and proximity to a fault line in the coastal area. There has been insufficient research and assessment carried out to progress to participation in siting a repository in West Cumbria.</p>
Friends of the	2 – Safety,	No	There are major environmental, health and security risks posed by a repository for highly radioactive and

Earth England, Wales and Northern Ireland (EWNI)	security, environment and planning		intermediate levels wastes. Risks include escaping radioactive gas underground and from storing thousands of tonnes of highly radioactive spent fuel in untested facilities above ground. There are localised and significant negative impacts of increased road traffic, air and noise pollution and waste spoil heaps during construction and operation. The loss of biodiversity and landscape value, in itself a huge negative for Cumbrian ecology, may also impinge on the visitor economy. There are concerns that planning reforms to enable 'fast-tracking' of infrastructure that is deemed by government to be in the national interest may further disempower local communities in decisions over the siting of a repository.
Friends of the Earth England, Wales and Northern Ireland (EWNI)	3 – Impacts	No	<p>The consultation document vastly underplays the environmental, economic and health risks of a repository. Cumbria, and particularly the Lake District, is internationally renowned and treasured for its unique and precious environment. Cumbria's tourism economy is worth over £2 billion annually with Allerdale and Copeland accounting for over half a billion http://www.cumbriaobservatory.org.uk/economy/tourism.asp). The food and farming industry is also vitally important and likely to suffer negative association of proximity to a nuclear waste dump. New businesses may be less likely to locate in West Cumbria due to the negative association, therefore a repository may affect future investment.</p> <p>The consultation document concludes the potential impacts are not sufficient as to warrant an end to the siting process yet no mitigation is put forward to back up the assertion that the process will 'either sufficiently reduce their effect or compensate for them'. How, for example, has the effect of a repository on Cumbria's visitor economy been calculated and by what measures is the Partnership confident that this can be compensated? The 550 new jobs in building and operating a repository forecast by the Nuclear Decommissioning Authority is dwarfed by the thousands reliant on the tourism industry.</p>
Friends of the Earth England, Wales and Northern Ireland (EWNI)	4 – Community benefits	No	The proposal for a package of 'community benefits' completely undermines the principle of a 'volunteer' community. It is inappropriate to assume that the unknown and potentially huge risks for communities can be neutralised by improved facilities and new infrastructure. It leaves the whole process open to the idea that communities can be 'bought off'. There are no direct benefits to the communities from a repository itself apart from the relatively low number of jobs.
Friends of the Earth England, Wales and Northern Ireland (EWNI)	5 – Design and engineering	No	It is far too premature to judge the design and engineering because the consultation is seeking approval of 'a decision to participate' without having carried out a proper assessment of all regions and suitable geology for a site, and the environmental, health and security risks for West Cumbria.
Friends of the Earth England, Wales and Northern Ireland (EWNI)	6 – Inventory	No	There is no international precedent for the mix and amounts of waste that are intended for this repository, taking both high level and intermediate radioactive waste. The consultation does not consider whether new nuclear waste would go into a repository although Government's stated intention is that new nuclear waste would be disposed of at the site (Managing Radioactive Waste Safely White Paper). If the problem of dealing with new nuclear waste is deferred and not taken account of in the consultation, it removes a key consideration of the disposal facility and could enable assessments of new nuclear capacity to be

			skewed and assessed more favourably.
Friends of the Earth England, Wales and Northern Ireland (EWNI)	7 – Siting process	No	<p>The process is premature and is running ahead of the national debate that is needed on the future for nuclear energy and how to deal with legacy wastes and any new nuclear wastes. The communities who would be affected by the repository are not able to participate in the broader decisions regarding our nuclear future, new nuclear build and disposal of new nuclear wastes.</p> <p>The documentation in the consultation presents a positive tone to the option of a repository in West Cumbria. The three councils support new nuclear build in Cumbria and therefore have a compromised position, unable to approach the assessment from a neutral standpoint.</p> <p>Millions have been spent on the process so far and were it to progress to the next stage and further public monies spent on it there would be a significant pressure on the councils involved to continue. The Managing Radioactive Waste Safely White Paper states that parties 'should work positively to seek to avoid' exercising the right to withdrawal, particularly 'when considerable investment will already have been made' (para 6.39).</p> <p>Local opposition groups have raised concerns regarding the stakeholder engagement process and the over-managed nature of public events. For example, the numbers of government, regulatory and Partnership-affiliated professionals at stakeholder events has been large – while the opportunity for opponents to present their views to the public has been side-lined – and local residents and visitors could be overwhelmed by the technical language and bureaucratic nature of the process.</p>
Friends of the Earth England, Wales and Northern Ireland (EWNI)	8 – Overall views on participation		<p>Friends of the EWNI does not support the proposal of a deep geological radioactive waste disposal facility in West Cumbria and does not support the three councils involved - Allerdale Borough Council, Copeland Borough Council and Cumbria County Council - in participating in any further stages of identification of a repository site in West Cumbria.</p> <p>Friends of the Earth EWNI calls upon the Partnership and the three councils to withdraw from the process for the following reasons:</p> <ul style="list-style-type: none"> - the 'volunteer' community approach is inappropriate and the process if flawed - we need a national and fully informed debate on dealing with the nuclear waste legacy and new nuclear waste - there is scientific uncertainty of the impacts of deep geological disposal and suitability of Cumbrian geology - there are potentially grave environmental and economic impacts for Cumbria - the lack of consideration of new nuclear wastes creates a flawed process and may lead to a skewed appraisal of new nuclear build and waste issues - there is very strong local opposition including eight local Cumbrian Parish Councils
Friends of the	9 – Additional		This response is on behalf of Friends of the Earth England, Wales and Northern Ireland (EWNI). We have

Earth England, Wales and Northern Ireland (EWNI)	comments		over 100,000 active members and over 200 local groups. The consultation over a proposed geological disposal facility for nuclear waste to be sited in West Cumbria has attracted a significant amount of interest amongst our members, from Cumbria and across the UK, all very strongly against the proposal and the continuation of this process.
Organisation / Group	Question	Agree	Response
Friends of the Earth Scotland	1 – Geology	No	The Partnership says “further investigation” is needed. West Cumbria is one of the most investigated geological areas in the country with a long history of mining. Mines were abandoned not because they were mined out, but because of the energy needed to dewater them. Areas of “high rainfall, permeable rocks and hills and mountains to drive the water flow” would guarantee leakage to the surface (1999 Government sponsored video – Pangea).
Friends of the Earth Scotland	2 – Safety, security, environment and planning	No	This Government aims to put “first wastes into the repository by 2029.” A Public Inquiry and Appeal agreed with Cumbria County Council’s view 15 years ago that the risk was too great for geological disposal of intermediate level wastes. Today’s plan includes high level wastes – a world first.
Friends of the Earth Scotland	3 – Impacts	No	A nuclear dump would blight both agriculture and tourism- Cumbria’s largest industries. Even before the emplacement of wastes’ the mining operation would rival the biggest mines in the world adding to the earthquake risk and disrupting West Cumbria’s water table.
Friends of the Earth Scotland	4 – Community benefits	Not Sure/ Partly	West Cumbria should be assured of essential infrastructure such as schools, roads and hospitals without being bribed.
Friends of the Earth Scotland	5 – Design and engineering	No	The Partnership says that “ A facility will not be built unless it will be safe during its operations and for future generations.” Their own advice contradicts this: “Geological disposal safety plans do not assume that total containment by engineered barrier systems for ever is possible.” Dr Adrian Bath.
Friends of the Earth Scotland	6 – Inventory	No	The inventory is meaningless as this plan includes existing wastes (which are already outside of the scope of any inventory) and new build wastes from untried “high burn” nuclear power plants.
Friends of the Earth Scotland	7 – Siting process	No	Longlands Farm and the surrounding area was ruled out by the Nirex Inquiry. New criteria have been written to rule Longlands Farm back in.
Friends of the Earth Scotland	9 – Overall views on participation		This is part of a plan to keep the process and the nuclear agenda on track. The government is sinking tax payer £millions into a timetabled ‘process’ “too big to fail.” There would be a geological nuclear dump NOW in the Eskdale area if CCC had not opposed the plan 15 years ago. The Councils must say NO to

Organisation / Group	Question	Agree	Response
			the geological dumping of nuclear wastes.
Friends of the Lake District	Introduction to emailed letter answering consultation questions		<p>Introduction</p> <p>Friends of the Lake District's policy for nuclear energy is neutral on the principle for or against. This reflects the divergent views of our 6,000 members (Cumbria or elsewhere). Our landscape charitable remit means we objectively focus on physical impacts and indirect effects on people's enjoyment/experience and the wider economy of those landscapes. The disposal of High Level Waste (HLW), which remains highly toxic and harmful to human health for 1000 years or more, into an underground repository has many significant uncertainties (climate, political, economic and so on), which makes consideration of this proposal of unique importance.</p>
Friends of the Lake District	1 – Geology	Not answered	<p>A safe and secure suitable rock formation barrier is the essential overriding factor.</p> <p>Awareness about:</p> <ul style="list-style-type: none"> - The complexity of the underlying geology beneath West Cumbria and the Lake District; - The faulting in the Borrowdale volcanics; - The conclusions from the previous NIREX inquiry; - The related uncertainties in the permeability of the different rock systems; <p>High rainfall, high topography and hydrological water flow questions; coupled with the governance structures, has created huge anxiety around geological suitability. As a consequence of this we recommend a suspension of the decision to proceed to Stage 4 and to carry out further geological analysis to address the critical points in the 'What the study did not do' section on the bottom of page 28 (see question 7 below).</p>
Friends of the Lake District	2 – Safety, security, environment and planning	Not answered	<p>The LDNPA is the local planning authority for any planning applications within or under the Lake District National Park and, therefore, we support reference to the National Park (page 42). With such major infrastructure developments the planning test requires both exceptional circumstances and public interest to be proven, and a number of criteria satisfied, including the need in terms of national considerations, availability of alternatives and effects on the environment and the extent to which they could be moderated.</p> <p>Given the scale of the surface facilities and the associated infrastructure, we agree with the LDNPA's opinion that they could not be located within the National Park, or equally in its setting where significant impact would be caused.</p>
Friends of the Lake District	3 – Impacts	Not answered	<p>The potential impacts for residents, visitors and the economy outside the nuclear and allied industries must be represented openly to the full extent. We welcome the initial independent research covering the different qualities within the Lake District and Cumbrian 'brand', including unspoilt countryside,</p>

			<p>green/clean/peaceful and quality of life/safe place. We expect that the actual risks can be addressed through the regulatory and planning decision making processes covered above (although as highlighted, changes can be expected over the timeframes of this proposal).</p> <p>In the context of the contested geological evidence/information (see our comments to Questions 1 & 7) perceptual safety risks of future contamination could play a significant role in causing major knock-on effects. We are especially concerned about potential damage to Cumbria's tourism, farming, water supply industries and also higher paid employees, home workers or those establishing business attracted to the county because of its high quality environment. In this context the process should recognise that potential 'blighting' affects are not concerned narrowly with residential home owners and are wider than the immediate area of a potential site. Taken together the resident and visitor numbers of people within this locational zone represent several 100,000 each year which is a significant matter to consider.</p> <p>We recommend the Partnership's membership is reviewed prior to any future stage in light of the need for these wider industry interests to be fully represented (they may require funding support to participate).</p>
Friends of the Lake District	4 – Community benefits	Not answered	<p>The community benefits principles seem sensible, although we feel strongly that they must not form part of the judgement at this stage of the process. It would help alleviate 'bribery' concerns if the public information openly showed the process by which these would be determined.</p> <p>Friends of the Lake District would want the scale and nature of any transport infrastructure to be related to the needs of the geological disposal facility and be based upon wider life-cycle analysis, sustainability and carbon emission reduction targets.</p> <p>We strongly support the clear recognition that 'community' incorporates broader local and national interests that those of the host community. This is particularly relevant to the potential impacts of a repository (Question 3 above).</p>
Friends of the Lake District	5 – Design and engineering	Not answered	<p>No detailed comments, although we would recommend Risk Analysis around the issue of retrievability, ie. what would trigger that option, processes and infrastructure requirements for handling the materials etc.. as this will have a bearing on locational and design factors.</p>
Friends of the Lake District	6 – Inventory	Not answered	<p>No comments at this stage.</p>
Friends of the Lake District	7 – Siting process	Not answered	<p>Taking our response to the above questions together we are not able to support progressing to the next stage. We feel strongly that further geological desk-based analysis, together with the Environment Agency's environmental safety case framework, needs to be conducted independently and openly, engaging a wide range stakeholders during this before progressing to Stage 4.</p> <p>The overriding emphasis on voluntarism is clearly a significant departure with the IAEA and other</p>

			<p>internationally accepted guidelines underpinning the geological disposal consensus. This in itself has generated massive distrust in the objectivity of the site search process as a whole in conflict with the Principles of Community Involvement. For example, we note the comments submitted by the Churches Together in Cumbria in this regard: “The Social Responsibility Forum and Environment Group accept a decision to investigate further the geology of West Cumbria, but believe strongly that it is wrong for West Cumbria to be evaluated in isolation as a possible site. Rather they consider that this should be part of a wider investigation of other potential sites of appropriate geology in the country, including deep clay formations.” (27.2.12)</p> <p>We hope you will consider our suggestion for further geological research as a positive move to assist with the decision making process. Importantly, this might also help to negate any potential waste of public money covering the costs associated with all the siting assessment work within Stage 4, which might become redundant if geological unsuitability if proven one way or the other.</p>
Friends of the Lake District	8 & 9 – Additional comments		We support the Principles of Community Involvement (pages 90-91), however, we are concerned that there is a democratic deficit in relation to the representations of the wider local interests in the governance structure for the decision of whether or not to proceed to Stage 4.
Organisation / Group	Question	Agree	Response
The Geological Society	Letter		<p>Thank you for inviting the Geological Society to comment on the West Cumbria MRWS Partnership’s public consultation on ‘Geological disposal of radioactive waste in West Cumbria?’. As the consultation is aimed principally at local individuals, communities and stakeholders, and many of the areas covered are outside our area of expertise, we did not think it appropriate for the Geological Society to make a full formal response. Instead, we felt it was more likely to be helpful to you if I wrote as I am now, setting out the Geological Society’s position on some matters of geoscience in the process, and making some observations about the role we see for ourselves now and in the future.</p> <p>The Society keeps an active watch on the way in which geoscience is used in the MRWS process, and on deliberations and decision-making about how it is to be used in future stages. We regularly respond in detail to consultations from DECC, NDA, parliamentary committees and others, and meet with representatives of CoRWM and NDA to discuss these matters. Overall, we are content with the current place of geoscience in the process, the approach which has been taken to geological work thus far, and its integration with other factors and inputs.</p> <p>But we will make (and have made) critical comments where we feel this is warranted. Our experience is that when we make such comments, we are listened to, and our comments are taken on board. We fiercely defend our independence and authority, and this is also highly valued by those who consult with us. An example is DECC’s 2011 consultation on plans for phase 4 of the MRWS process (Desk-based Identification and Assessment of Potential Candidate Sites for Geological Disposal). We were concerned that the type of geoscientific work which will be required at that stage, and the geological factors which</p>

		<p>ought to be considered, were not sufficiently well-defined in the document. As a result of our comments, we have since had detailed discussions with NDA to understand better their plans in this area, to provide help with strengthening them, and to ensure that these are more effectively communicated in future public documents. We would be happy to supply you with consultation responses and other documents which we have generated to date, and to discuss with you any of the issues we have raised in them.</p> <p>The Society is also involved in developing and delivering the R&D agenda, as well as keeping the wider geoscience community informed about the MRWS process, for instance through convening conferences and meetings for NDA, alone or with other societies. And we help to communicate relevant geoscience to non-specialists, such as through our October 2008 meeting 'The Geological Disposal of Radioactive Waste: How geologists understand the Earth beneath our feet' (see resources at www.geolsoc.org.uk/geological_disposal), which was attended by local authority representatives from West Cumbria.</p> <p>We do not see geoscience inputs to the process as being 'in competition' with other scientific and technical inputs, social and ethical considerations, and public and stakeholder engagement (PSE). Weighting and integrating these factors is not a zero-sum game. Rather, we regard timely deployment of appropriate high-quality geoscience and its communication to a variety of audiences as essential to ensuring that PSE and other inputs are meaningful and effective, and as a vital part of the 'tool kit' for building public and stakeholder confidence in decision-making. The Geological Society is committed to continuing to play its part in monitoring the place of geoscience in the process, and communicating the science to others. We hope that this strengthens the Partnership's confidence that the geological work done so far is sufficient and appropriate; and that future geological work will be capable of supporting effective deliberation and decision-making should the Partnership decide to enter the siting process.</p> <p>The Society agrees with the approach and criteria set out in the consultation document regarding geoscience, for the purposes of deciding whether to proceed with the process. And we agree with the Partnership's assessment of the integrity of the BGS report, following its iteration in response to the feedback from other geoscientists who have been involved in the process. In particular, the Partnership is correct in asserting that the consensus in the geoscience community is that the whole of West Cumbria cannot be ruled out at this stage on geological grounds. In light of the comments above, we are as confident as we can be at this time that, should the entire area in fact turn out to be unsuitable, the use of geoscience in the MRWS process in future will be robust enough to reveal this in a timely manner.</p> <p>Geologists are comfortable and confident in dealing with uncertainty, both in terms of inadequacy or incompleteness of data, or the conceptual and structural interpretation of those data – but we recognise that the nature of this uncertainty can be difficult for non-specialists to understand, and that this can undermine confidence in situations where important decisions have to be made with a high level of public and stakeholder confidence. We are currently working with the NDA to ensure that geological uncertainty in the process is dealt with appropriately, and that public and stakeholder concerns about such uncertainty are addressed. There may be lessons to be learned from experience overseas, such as Sweden where a</p>
--	--	--

			<p>major project to identify and constrain a geological uncertainty is getting underway, as part of the regulator's review of SKB's licence applications.</p> <p>Geoscience will also be key to constructing a rigorous safety case, and to effective planning and regulation. Insofar as they relate to our geoscience expertise, we are content with the approach the Partnership has taken to these issues, as well as to the NDA R&D programme, and with the assessment it has made at this stage that its criteria in these areas have been met.</p> <p>Please do not hesitate to let me know if you wish to discuss any of these matters further, or if the Society can help in other ways as the Partnership decides whether to enter the siting process.</p>
Organisation / Group	Question	Agree	Response
Gosforth Parish Council	Overall summary of letter answering consultation questions		<p>OVERALL SUMMARY</p> <p>We have no confidence in the MRWS Partnership report for the following reasons:</p> <p>1. Geology. With its steep hydraulic gradients, its faulted and complex geology, and its associated difficulties of rock characterisation West Cumbria is certainly not an obvious first choice for a Repository. The relevance of the suitability or otherwise of the geology rests in providing the general public with the confidence and reassurance that a Repository can be safely sited in West Cumbria and remain safe over tens of thousands of years. This confidence and reassurance is absent in the consultation document and the representation of a more positive picture than is implied by the underpinning documentation serves only to emphasise this absence.</p> <p>2. Impacts. We have serious concerns about the impacts of a Repository on West Cumbria. We do not believe that these would be uniform, and it is our opinion that the impacts of siting a Repository would be felt more severely on the less nuclear dependent Allerdale than on Copeland. More seriously we find it difficult to understand how your opinions on the criteria can be expressed with such certainty when the brand protection work which you commissioned has not been completed, and we remain gravely concerned about the implications of this situation. Direct impacts on any Host Community during construction, which would be enormous in scale and for many years, appear to be totally ignored.</p> <p>3. The engagement and siting processes. The June 2008 White Paper clearly sets out that Government policy expected a Repository to be delivered by Voluntarism and Partnership Working, through the key mechanism of a Community Siting Partnership. The consultation document represents a radical departure from Government policy and institutes in its place the primacy of the Principal Authorities. This is completely unacceptable. Moreover as a result of this departure from Government policy, we are now faced with the illogical and absurd situation of spending several years attempting to decide whether to make a Decision to Participate in locating a Repository in West Cumbria, without having actually located a suitable site beforehand, and with less than helpful geological indicators.</p>

			<p>4. Benefits Packages. We have concerns that early discussions about benefits packages could give the impression of a 'done deal', and the emphasis on benefit packages at this time is misplaced.</p> <p>5. Retrievability. Retrievability should not be a core part of disposal and we have serious concerns that discussions relating to the retrievability of emplaced waste are illogical and misleading.</p> <p>OUR OVERALL VIEW IS THAT GOVERNMENT SHOULD NOW INTERVENE TO TERMINATE THE MRWS PARTNERSHIP AND ASSOCIATED PROCESS, AND IN ITS PLACE INSTITUTE A PROCESS ALONG THE LINES OF THOSE ALREADY USED IN SWEDEN AND FINLAND.</p>
Gosforth Parish Council	1 – Geology	No	<p>We do not agree with the Partnership's initial opinions on geology.</p> <p>Summary Response:</p> <p>1. The work on the integrity of the BGS study was unnecessary.</p> <p>2. Having reviewed the underpinning documentation relating to geology, it is clear that the consultation document has presented a more favourable balance of the facts than is evidenced in the underpinning reviews and independent comments. Thus while it is arithmetically correct that 1890Km² were not ruled out as unsuitable by the BGS study, the criteria used in arriving at this figure were severely restricted, and it is misleading to claim that this entire area is available for investigation, especially as a substantial proportion is within the National Park.</p> <p>3. 'Not unsuitable' does not necessarily mean 'suitable' and the results from the 1990's NIREX investigations indicate that the area of land suitable for investigation is, at best, severely curtailed, and at worst non-existent.</p> <p>Detailed Response:</p> <p>a) Given the history of the evolution of the criteria used by the BGS – suggestions from learned societies, the involvement of leading Professors of Geology, endorsement by HM Government, plus the reputation of the BGS itself – about all of which the Partnership should have been aware, endorsement by independent reviewers seems to have been totally unnecessary.</p> <p>b) The MRWS consultation document has produced a more favourable presentation of the facts than the underpinning documentation and independent opinion support. For instance Dr Tim McEwen, an independent and expert geologist who worked with the BGS and NIREX throughout the 1980's states:</p> <p>"I understand CORWM's statement (See Ref. d) below) to mean that it is not possible, based on the current level of geological knowledge of the area of West Cumbria, to state that the area is definitely unsuitable for geological disposal. This is a perfectly reasonable statement to make as there is insufficient</p>

		<p>evidence to state anything more at present, although if it were possible to select anywhere in the UK for repository development, based on geological factors alone, one's first choice would not be western Cumbria.”</p> <p>c) Furthermore the extensive NIREX investigations of the late 1980's – 90's support this contention. Those investigations were based on work by Chapman et al (1986). This latter work described the generic geological settings required for potentially safe siting of a geological disposal facility and was specifically developed for the UK, though subsequently it has become something of an international benchmark. Using these generic settings NIREX concluded that there existed only one area of West Cumbria with the appropriate geology, though there was even some dispute and confusion about this. Despite (at a cost thought to be in the region of £M400) the drilling of 29 deep boreholes, extensive seismic surveying and sub-surface testing, NIREX later abandoned two potential sites (Sellafield A&B) and had its planning application for a Rock Characterisation Facility at Longlands Farm turned down and therefore we conclude that there remains very significant uncertainty over the suitability of the geology.</p> <p>d) Your opinion that “there is enough possibly suitable land to make further progress worthwhile” appears to be based on appraisal of the NDA report ‘Geological Disposal: Steps Towards Implementation’, which also appears to provide the basis for CORWM's position. We note a selection of independent comments on this report:</p> <p>Dr J Dearlove and Dr R Smith, FWS Consultants labelled the document a “politically expedient response”.</p> <p>Professor David Smythe writes – “One might have expected geology to comprise a large portion of this document given the subject matter but this is not so. Chapter 4 deals with the geology in 21/2 pages out of a total of 65 pages of text”.</p> <p>Dr Tim McEwen is even more scathing – “Nevertheless I have some sympathy with his (Smythe's) comments, as this report is very poor. I have been involved with radioactive waste disposal since the late 1970's and in fact it is probably the worst report, geologically speaking, that I have ever read on the subject. It is replete with geological errors and inaccuracies and should never have been published”.</p> <p>These comments lead us to conclude that there is a lack of confidence among experts in the underpinning documents used to reach the Partnership's opinions.</p> <p>e) In conclusion we reaffirm our fundamental disagreement with your opinions. The so-called Partnership area is an area of complex folding and faulting characterised by strong hydraulic gradients. It is perfectly obvious that any such area is inherently less safe than an area of low or zero groundwater flow. Such areas do exist within the UK. A safety case for a site within the Partnership area would have to be built on theoretical modelling and for a period over tens of thousands of years. Such modelling is beyond validation, or as Dr Tim McEwen writes, also in relation to the Partnership area and a potential Repository, “There is a greater probability that it will be shown that a convincing safety case cannot be made and,</p>
--	--	---

			thus, that a Repository cannot be developed”.
Gosforth Parish Council	2 – Safety, security, environment and planning	No	<p>We do not agree with your opinions.</p> <p>Summary Response:</p> <ol style="list-style-type: none"> 1. Safety, Security and Environmental matters are site specific and in any case for the majority part are the province of the Regulators. Without a potential site the relevance of this section is somewhat elusive. 2. Planning is almost certainly to be dealt with centrally by a body such as the Independent Planning Commission (IPC) or its proposed successor the Major Infrastructure Planning Unit (MIPU). 3. We have concerns at the low level of visibility throughout the process to date of the Office of Nuclear Regulation (ONR). <p>Detailed Response.</p> <ol style="list-style-type: none"> a) Safety, Security, and Environmental matters are all very much the province of the various Regulatory Bodies. It is the responsibility of the Regulators to convince and reassure the general public, and in particular the residents within a Host Community, that appropriate protective measures are in place to deal with any uncertainties or misgivings they may have. All these matters are site specific and without a potential site chosen for a Repository, the relevance of this section is difficult to understand and it hardly provides much in the way of assistance with the Decision to Participate. b) On the question of Planning we understand that a project of this size would not be dealt with at District or even at County level but by the IPC/MIPU. That is not to say that either of the aforementioned councils should not be able to provide an appropriate input to the planning process – likewise the Lake District National Park Authority (LDNPA) if the National Park is in any way affected. It should go without saying, that those who may have to live with the reality of a site being developed, constructed, and operated within their community, should have appropriate input to the planning process at the earliest possible time. c) Currently the ONR is the lead Regulator for the Sellafield and LLWR sites. Regulation of nuclear sites by an established nuclear regulator provides confidence and reassurance that nuclear safety is being adequately monitored and regulated, and due care and consideration is given to any potential impacts on the public from nuclear operations. Having read the Regulatory section of the consultation document we are concerned at the low visibility afforded to the ONR’s role. It is noted that at the Gosforth drop-in session the Environment Agency (EA) supported the event and not the ONR, giving rise to some concern that nuclear safety impacts on the public are not receiving the degree of priority that they ought to have.
Gosforth Parish Council	3 – Impacts	No	We do not agree with your opinions.

		<p>Summary Response.</p> <ol style="list-style-type: none">1. The research and strategy to protect the brand and reputation of the area seems to be fundamental to this section of the consultation document. Publication of the latter before completion of the brand protection work undermines confidence in the consultation document and this section in particular. The reasons for the publication of the consultation document before completion of the brand protection exercise are obscure and not readily comprehensible.2. We have concerns that an error is being made in regarding West Cumbria as a single homogeneous economic unit.3. We are seriously concerned about the NDA's assumption that spoil from any Repository excavation/construction "would be kept on site by building embankments 12 metres high". <p>Detailed Response.</p> <ol style="list-style-type: none">a) The absence of the brand protection work in the consultation document is not only a weakness in itself, but a major contributory factor to undermining the confidence in both the consultation document and the MRWS Partnership, and makes any detailed assessment of the impacts very difficult. Conversely it seems to us that to make any claim, as occurs with some degree of certainty in this section, about 'direct impacts', 'long term direction', and 'economic stability', without having the results of the brand protection work to hand is unacceptable. What is the point of the brand protection work when the Partnership's opinions are so firmly stated? There is a sense here that whatever the results of the brand protection work the Partnership's opinions have already been reached, and that any adverse repercussions on conclusions have already been determined. That too is unacceptable and we wonder who is pushing the time-line?b) We have concerns at your treatment of West Cumbria as a single economic unit. It is not. It is evident that Copeland is far more nuclear dependent than Allerdale which, with relatively good transport links to Mainline Rail and Motorway and to Carlisle, has met with a greater degree of success in attracting a more diverse economic base than has Copeland.c) Similarly with tourism; Allerdale, encompassing as it does Cockermouth and Keswick, has a far more developed and successful tourist sector than does Copeland. The inability of Copeland to attract industrial diversification as well as a greater tourism sector is as much to do with the presence of the nuclear operations at Sellafield as it is with its relative geographical isolation and attendant infrastructure problems.d) The locating of a nuclear installation in Allerdale, especially one with connotations of a 'dump' in popular imagination, could have serious adverse repercussions for Allerdale's existing economic base, any potential inward investment, and also for its tourist industry. To assess potential adverse effects one
--	--	---

			<p>only has to note the reactions of the local (rural) populations to the recent proposals to site two new nuclear reactors (two miles north and fifteen miles south of Sellafield), and this in 'nuclear supporting' Copeland, and to view the absence of economic diversification in Allerdale's southern neighbour. Locating a Repository in Copeland will simply reinforce its already existing nuclear image and its continuing dependency on the nuclear industry, and ensure very little, if any, future economic diversification.</p> <p>e) There are also serious concerns about the assumption contained in this section that Repository construction spoil would be kept on site in 12 metre high embankments, and that some spoil could be used as backfill in the Repository closure process. To ensure the stability of 12 metre high embankments it would appear necessary to have a base size of a minimum of twenty metres. For the smallest proposed Repository (Ref. Fig 5, Page 16) any such embankment would extend for tens of Kilometres; for the largest proposal the area of land to accommodate the spoil would be enormous. Moreover the time span involved in maintaining such embankments would cover a period from the start of construction to its final closure - some hundred years or so at today's estimate. These embankments would not only be wasted as a valuable resource but would also be an enormous blot on the local landscape for generations, and this would be in a community already blighted by hosting the Repository, adding insult to injury. A serious and radical rethink needs to take place about what to do with the spoil.</p>
Gosforth Parish Council	4 – Community benefits	No	<p>We do not agree with the Partnership's initial opinions.</p> <p>Summary Response.</p> <p>1. We believe it right, as expressed in the White Paper, that a Community that hosts a deep geological disposal facility for nuclear waste for the benefit of the nation, should be 'rewarded' by means of benefits packages. However there are concerns that early discussions about benefits packages could be exploited to gain acceptance of a Repository by the general public while at the same time portraying the engagement process as a 'done deal'. The cart must not come before the horse!</p> <p>2. Any agreement with Government relating to the benefits packages, especially given the likely inter-generational aspects of such packages, must be 'legally binding'.</p> <p>3. We believe also that it is essential that any Host Community has to be actively and formally involved in all discussions and decisions regarding a benefits package which would include measures specifically benefiting (ie ring-fenced for) that Host Community, separately from and in addition to measures benefiting the area as a whole.</p> <p>Detailed Response.</p> <p>a) Principles – not only can we not be certain about the specific Government package that might/might not be agreed so far in advance but we cannot even be sure that a set of principles agreed with Government this far in advance will be honoured by subsequent Governments, over what is to be a very</p>

		<p>long period of time. Furthermore among the twelve principles listed, terms such as flexibility, equity, and fairness are used. These terms are all subjective and judgemental. It is not clear who is going to be the judge.</p> <p>b) It seems to us that to ensure and retain Governmental agreement, especially as any agreement will have to cater for inter-generational time-spans, legally binding agreements are a necessity.</p> <p>c) We are extremely concerned that at this time a benefits package could be exploited to gain acceptance of a repository by the general public. A benefits package must not be a 'carrot' and it must not be used to divert attention away from far more serious issues such as the long-term safety of a Repository, and its effects on the welfare and well-being of the local population and the immediate environment.</p> <p>d) While we advocate a very low profile for a benefits package for now and the short-term future, nevertheless we wish to emphasise that any benefits package would need to be agreed and protected by a legally binding agreement, before any work commences on construction/excavation of a Repository.</p> <p>e) We believe that consideration should be given to 'disruption benefits packages' designed to compensate smaller local communities subject to any site investigative work. These packages would necessarily be of a much more limited scope than a benefits package and should be targeted solely and exclusively at and for the benefit of affected communities.</p> <p>f) We believe that at the right time in the process, any Host Community must be actively and formally involved in any discussions and decisions regarding a benefits package, which would include measures specifically benefiting (ie ring-fenced for) that Host Community, separately from and in addition to measures benefiting the area as a whole. The prime reason for any such package has to be to benefit the Host Community, and must not support any attempt by Government or the Principal Authorities to tie any benefit to the need for a business plan to demonstrate economic viability.</p>
<p>Gosforth Parish Council</p>	<p>5 – Design and engineering</p>	<p>YES. We agree with your opinions on general design concepts.</p> <p>No. We do not agree with your overall opinions nor do we agree with your opinions on retrievability.</p> <p>Summary Response.</p> <p>1. As far as design concepts are concerned your opinion is a statement of the obvious. As for your overall opinions given that you say correctly that design issues are largely site specific the actual absence of a specific site makes it difficult to understand your opinion that design concepts being developed are appropriate.</p> <p>2. Your opinion on retrievability is wrong and very misleading. Retrievability is not a feature of disposal and nor can it ever be. Retrievability is a feature of storage. (Ref. definition by CORWM in E-bulletin 49).</p>

			<p>Detailed Response.</p> <p>a) As far as general design concepts are concerned we accept your opinion. As for your overall opinions we do not understand how you can be satisfied that “design concepts being developed are appropriate and flexible enough at this stage” when you have clearly stated that “design issues are largely site-specific” and there is no certainty as to the exact location of a Repository.</p> <p>b) Your opinion on retrievability is wrong and misleading. Logically, as well as historically, retrievability is associated with, and can be accommodated only by storage, not by disposal. Claiming that a disposal option can support retrievability, or can be decided upon in the future, undermines the very attributes upon which disposal putatively benefits society – ie the removal of the burden of the duty of care from future generations (if indeed that really is feasible), and the achieving of a greater degree of security than hitherto, principally from terrorist attack.</p> <p>c) The CORWM process and conclusions (and the ‘scoring’, as those of us who took part in the CORWM workshops will recognise) were compromised by the inclusion of a disposal variant which claimed that it could offer “removal of burden to future generations” while at the same time offering flexibility, in that the Repository could remain open for up to 300 years to facilitate waste retrieval – an option known as the Phased Geological Repository Concept (PGRC) – and somewhat naively developed by NIREX in the wake of the RCF fiasco. It should be noted here that ‘Phased’ should not be confused with ‘Staged’, which would allow retrievability during waste emplacement up to the point of a Repository’s final closure.</p> <p>d) The disposal variant even found its way into the June 2008 White Paper. However at the end of Section 4.20, Government policy quite clearly states that: “closure at the earliest opportunity once the facility operations cease, provides greater safety, greater security from terrorist attack and minimises the burdens of cost, effort and worker radiation dose transferred to future generations”.</p> <p>e) Your opinion that “we have confirmed that retrievability is an option to be decided on in the future” is not sustainable and puts you very much at odds, indeed considerably outside, Government policy. It is also we believe high time that the general public is made aware, clearly and concisely, of the real facts in relation to retrievability. Attempts to mislead the public are unlikely to succeed and the backlash from the public, on discovering any attempted deception is likely to be severe and sustained. The case for a Repository should stand on its own merits and attempts to soften the case by the inclusion of the retrievability option should cease.</p>
Gosforth Parish Council	6 – Inventory	No	<p>We do not agree with your opinions on the inventory.</p> <p>Summary Response.</p> <p>1. It is recognised that any inventory predicted over a significant timescale is bound to change as</p>

		<p>knowledge of details become available. That knowledge is likely to have an impact on principles agreed at an earlier date.</p> <p>2. Agreement about the inventory with the Host Community is essential and the Host Community must have a right to veto disposal of waste types.</p> <p>3. Generally we believe that at the present time there exist too many uncertainties to be able to record that you have a “good understanding” of what could go into a Repository.</p> <p>Detailed Response.</p> <p>a) We note what you say about the UK’s baseline inventory and the upper inventory and that Government has given a “realistic estimation” of the latter. However an estimate, even a realistic one, hardly provides a sound basis for a “good understanding”. As acknowledged, nuclear new-build provides an unknown factor. Since CORWM in June 2007 made its estimate of new-build waste to be added to the legacy waste based on “10 new reactors”, the number of possible new-build reactors has fallen. What will the situation be in a further 5-10 years time?</p> <p>b) In addition to these uncertainties there remain questions regarding the future for the present inventory of Spent Fuel, Plutonium and Uranium. Any attempted assessment today of what might be placed in a Repository would surely have to take account of the possible reprocessing (Spent Fuel), further MOX production (Plutonium and Uranium) and for the further development of Plutonium-based fuel reactors. As we understand it, as of today, no decision has been taken, making it all but impossible to gain anything other than an extremely generalised ‘understanding’ of what could go into a Repository. We too have a realistic estimation, and that is, that it is very unlikely that Spent Fuel, Plutonium and Uranium will be emplaced in the quantities outlined in either baseline or upper inventories.</p> <p>c) We have concerns about the principles outlined in this section and we note that there is still uncertainty. Agreement with Government now is capable of repudiation by a future Government. A legal framework is required for such principles to be effective. We also note that there is no mention in the principles of a Host Community veto in the event of changes to the inventory, nor for the availability of additional community benefits in the event of such changes being required.</p> <p>d) We note that the principles do contain mention of a Community Siting Partnership (CSP). Having read the following section of the Report (Chapter 10 – Siting Process) we note there is no mention in this latter section of a CSP. It would appear that a CSP does not translate from Section 9 (Inventory) to Section 10 (Siting Process). This is surprising and of deep concern. The CSP is of course the mechanism for delivering a Repository through Voluntarism and Partnership Working, and very much a key plank of Government policy in the White Paper. We are somewhat taken aback at the disconnect between Sections 9 and 10 of the consultation document and left wondering about the applicability of the principles, as it seems that the CSP is being written out of the process for siting a Repository, even though it is very</p>
--	--	---

			much central to Government policy, and also why the authors of these two sections seem to have such widely divergent views about a CSP.
Gosforth Parish Council	7 – Siting process	No	<p>We do not agree with your opinions on the process for siting a Repository.</p> <p>Summary Response.</p> <ol style="list-style-type: none"> 1. We have no confidence whatsoever in the siting process as set out in this section - the intent, and at times the content of the June 2008 White Paper, has been undermined and basically ignored. 2. The Community Siting Partnership (CSP), the mechanism by which Government expects a Repository to be delivered, has disappeared from the language of the MRWS Partnership (Section 9 excepted). <p>Voluntarism appears only to apply to Principal Authorities and statements on Host Communities are incoherent and contradictory. Smaller communities which decide not to volunteer can be selected anyway by the DMB – the complete antithesis of the principle of voluntarism.</p> <p>MRWS Partnership policy is put forward as Government policy. There is no mechanism in the White Paper for a Principal Authority to act on its own after stage 3, but this is being ignored.</p> <ol style="list-style-type: none"> 3. We question the legitimacy of the MRWS Partnership itself, bearing as it does, no relationship at all to Government policy as set out in the White Paper. 4. The Government should immediately intervene to ensure that the principles and guide lines of the White Paper are adhered to, and in the changes it will have to make, the Right of Withdrawal (RoW) should be vested in a Host Community, and not exclusively in a Decision Making Body. <p>The siting process as described is completely without basis and impossible to support.</p> <p>Detailed Response.</p> <ol style="list-style-type: none"> a) We note that your treatment of Host Communities and their membership of “the new Partnership” is contradictory and incoherent. Consider the following three statements: <ol style="list-style-type: none"> 1. P96, Box32 – “Representatives of potential Host Communities and Wider Local Interests should be members of the new partnership from the outset and should be involved in all aspects of Stage 4 work including discussions on Community Benefits”. 2. P93 a&b – “.... The Partnership would lead on engagement with potential Host Communities and others” and... “The new Partnership should engage closely with potential Host Communities keeping them up to date with technical work....”.

3. P90, 3rd Bullet Point – “Although potential Host Communities would become clearer by the start of Stage 5....”

These sections appear to have been written by three different authors, each unaware of the others’ views on Host Communities, traversing a sweep from Partnership membership “.... from the outset...” to becoming “....clearer by the start of Stage 5....”.

b) There appears to be similar confusion with Voluntarism:

1. End of P91 – “We believe the emphasis on strong commitment to voluntarism and community willingness to participate is one that parties should keep at the forefront of their minds if this process continues. At each stage any future Partnership should seek to maximise consensus among the Decision Making Bodies, Local Authorities, potential Host Communities and Wider Local Interests”.

2. P93 e), repeated at P94 i) – “ In the event of the Partnership concluding that the omission of a potential Host Community would create insurmountable problems for the siting process then it would recommend the inclusion of the community concerned if this was supported by a full justification and explanation.”

So much for the Partnership keeping “community willingness to participate.... at the forefront of their minds”. We are not certain if the latter of the two statements has created a new concept of involuntary voluntarism or voluntary involuntarism – both oxymoronic concepts – but we do know that it totally contradicts the first statement, is far removed from the co-operation sought by the White Paper, and returns us all back twenty years to the NIREX era.

c) You head Section 10.3 “The Government’s proposals for the siting process” and set out “a brief summary” of these proposals in Box 29, P89. Based on what is in the White Paper, and on the fact that we are not aware of any other Government publication since June 2008 detailing the views on Stage 4, it is quite obvious that Box 29 is not a summary of Government’s proposals for Stage 4 but rather the MRWS Partnership’s proposals. The White Paper makes no mention of Potential Site Areas (PSA’s), a concept which seems to have made its appearance in the consultation document. With regard to Box 29, none of the 4 bullet points in Stage 4a appears in the White Paper, and as far as we can ascertain nor do any of the 7 bullet points in Stage 4b, nor the 3 in Stage 5.

It seems here that that there is a complete confusion between Government proposals and the MRWS Partnership proposals, with the latter apparently confusing itself with the former as far as the MRWS process is concerned. While this affords an interesting psychological insight into the workings of the MRWS Partnership, it is nevertheless untrue that Box 29 represents a summary of the Government’s proposals for Stage 4, and we remain extremely concerned about a so utterly and completely misleading message.

		<p>d) Perhaps the most perplexing aspect of the repository siting process relates to the divergence - more of a radical departure - from the siting process set out in the White Paper, and how this has come about at the instigation of the MRWS Partnership. A White Paper sets out Government policy on a subject, in this case the safe management of radioactive waste. Given that the White Paper does not mention or foresee a role for a Partnership (such as the MRWS Partnership), and neither does it envisage any Principal Authority, after making a Decision to Participate, acting in any way other than through a CSP, which Government is very careful to define, then surely questions as to the legitimacy of the MRWS Partnership have to be asked. By what right/means has it taken over the process, and more importantly from where does it derive its authority to ignore Government policy? DECC, the Government Dept. which wrote the White Paper sits in on MRWS Partnership meetings and must be aware of how far the process has moved away from that originally envisaged. One can only assume a reluctance on the part of DECC to intervene is occasioned by their fear of losing West Cumbria as a possible area for a Repository – assuming that is a realistic possibility. If that is the case, then one can conclude only that wittingly or unwittingly the MRWS Partnership/DECC axis, has created numerous opportunities for judicial challenges at some future date. In the meantime our view is that the MRWS Partnership has no legitimacy and there exists no mechanism for a Principal Authority to act on its own, other than through a CSP as defined in the White Paper, once a Decision to Participate is declared.</p> <p>e) The extent to which the MRWS Partnership has ignored and moved away from the siting process requirements of the White Paper can be shown only by a somewhat laborious process. Nevertheless we feel that it is essential to point out the chasm which has opened up, and we have done this by summarising the key points of the siting process - Ch 6 of the White Paper – and key points at the beginning of Ch. 7 – the site assessment process. It is worth pointing out here that the correct title to Ch. 6 is “Site Selection Process using a Voluntarism and Partnership approach”.</p> <p>The key points are:</p> <ol style="list-style-type: none">1. “Government believes that nothing has emerged from the MRWS consultation (CORWM version) that alters its view that an approach based on Voluntarism and Partnership Working is the best means of siting a geological disposal facility”.2. Voluntarism is defined thus – “ For the purpose of this White Paper ‘an approach based on Voluntarism’ means one in which communities voluntarily express an interest in taking part in the process which will ultimately provide a site for a geological disposal facility.3. Communities are defined clearly in the White Paper. These definitions cover 3 different types of community. These are, in the order in which they appear in the White Paper – Host Community, Decision Making Body and Wider Local Interests.4. Partnership Working is described – “By a partnership approach Government means the setting up of a formal Community Siting Partnership such that the Host Community, Decision Making Bodies and Wider
--	--	---

		<p>Local Interests will work with the NDA's delivery organisation and with other relevant interested parties to achieve a successful outcome".</p> <p>5. At the end of Stage 3 of the 'Site Assessment Process' Government states: "Following this Decision to Participate, Government expects that a formal Community Siting Partnership will be set up such that the Host Community, Decision Making Bodies and Wider Local Interests work with the NDA and other interested parties for the remaining stages".</p> <p>6. The importance attached by Government to the CSP as the mechanism for the successful delivery of a Repository can be seen in Appendix C of the White Paper – "Community Siting Partnership: Guidance. It is one of 3 appendices and over 5 pages it details how Government expects a Community Siting Partnership to work. It reinforces its message in Ch6 of the White Paper. Section 6.37 states – "Government does not wish to be prescriptive about the form of a Community Siting Partnership although guidance providing example objectives, rules and responsibilities should be taken into account by interested parties. This guidance is at Appendix C".</p> <p>7. In Stage 4 of 'The Site Assessment Process' Government policy makes it clear that "The NDA's delivery organisation will work with the CSP to ensure that local issues are addressed in the assessments", while discussing "the package of measures that they would like to see implemented alongside a disposal facility to develop the community's social and economic well-being".</p> <p>Here is a straightforward, well designed process for the delivery of a Repository. Why its requirements have been ignored is not accountable, though it seems by not adhering to its requirements grave difficulties are being placed in the way of a successful outcome.</p>
<p>Gosforth Parish Council</p>	<p>8 – Overall views on participation</p>	<p>Our view is that the above mentioned areas should not take part in the search to site a Repository.</p> <p>The reasons for this are:</p> <p>1. The geology of the area, complex and characterised by folding and faulting and with strong hydraulic gradients, seems most unlikely to provide the geological setting required to give assurances about the safety of a Repository over an intergenerational time span of many tens of thousands of years. Your inability to represent the geological facts in a balanced manner, implying a more positive picture than represented by the underpinning documents and independent comments, only serves to increase concerns about long term and very long term safety.</p> <p>2. We have serious concerns about the impacts of a Repository in West Cumbria and on the National Park. These concerns are heightened by your decision making ability, which saw fit to proceed with the publication of the consultation document before the availability of the brand protection work. Such decisions do not engender confidence.</p>

		<p>3. Your almost total departure from Government policy as set out in the White Paper in relation to the engagement and siting processes, in particular your treatment of smaller communities (Host and Wider Local), and particularly your subverting and abandoning of Community Siting Partnerships, invites no trust at all from other would-be partners in these processes, thereby achieving quite comprehensively that which the Government sought to avoid in the first place via the White Paper. This somehow seems to be a commentary on the workings of the MRWS Partnership and only serves to underline why the search for a Repository in the Allerdale and Copeland districts should not proceed.</p>
<p>Gosforth Parish Council</p>	<p>9 – Additional comments</p>	<p>ADDITIONAL COMMENTS</p> <p>1. It has always been the intention of Gosforth Parish Council to act on behalf of its parishioners in the MRWS engagement process following the publication of the June 2008 White Paper. It has never been the intention of the Parish Council to make any decision on behalf of the community to host, or not as the case may be, a deep geological disposal facility. The Parish Council feels that its parishioners, given access to all relevant information and expertise, are more than capable of taking such an important decision themselves. In the event that a potential site was sought within the parish, the Parish Council would seek to give effect to its view, that parishioners must take any decision relating to a Repository, by means of a Parish referendum held under normal electoral rules. To that end the terms of a referendum would need to be drawn up in advance and would require a representative proportion of the parish population of a voting age to participate, in order to be valid.</p> <p>Any future processes therefore must:</p> <ul style="list-style-type: none"> a) Allow adequate time and funds so that parishioners might have access to all relevant information and expertise relating to the siting of a Repository. b) Allow adequate time and funds for the holding of a referendum. c) Be prepared to accept the outcome as the community's final decision on whether or not to host a Repository. <p>2. We note that in European countries where it was claimed that the principle of voluntarism was exercised, an extensive desktop elimination process was first carried out, and only a handful of areas were recognised as inherently safe enough to be open to further consideration. Only at this point were negotiations opened and volunteers sought from within the pool of potential sites. We understand that this process was used in Sweden and Finland. The result of this is that Host Communities could be genuinely included in negotiations because the sites were known, while the whole population could take confidence in the knowledge that any of the sites chosen would be among the safest possible within that country. In the UK to the best of our knowledge, no attempt was made to rank different regions for comparative suitability, and the principle of voluntarism appears to have been used intentionally to exclude from</p>

			<p>consideration all but one region (which has very doubtful geology). Attempts to compare solely within the so-called Partnership area two or more sites for safety can be no substitute for a proper scientific search nationally for suitable sites.</p> <p>The continuation of this process, without one or more geologically suitable sites being identified, has the potential to commit large sums of money wastefully to a fruitless search. We believe it is a well- founded fear that when such sums have been committed, the strong temptation will be to continue the selection in the face of doubtful or adverse evidence. The fact that all previous initial generic criteria of the safety of the natural barrier have been abandoned gives us no confidence that this will not be the case.</p> <p>3. It seems to us that the difficulties in finding a suitable site in the UK as set out in the White Paper, have been greatly increased by a) concentrating the search solely in West Cumbria, which has severe geological shortcomings for the safe siting of a Repository and b) by having what appears to be a perfectly reasonable Government process taken over by the MRWS Partnership, especially by the three Principal Authorities 'participating' in that partnership.</p> <p>The White Paper suggests implicitly – probably expressed explicitly at the end of Stage 3 of the Site Assessment Process – that potential sites for a Repository had to be identified before the making of a Decision to Participate by Principal Authorities. Certainly that must have been Government thinking which led to Host Communities and Wider Local Interests making an appearance at the end of Stage 3. {Perhaps the Government had in mind a process similar to those in Sweden and Finland described above}. It would also have been a far more rational situation than we have at present, it quite obviously being a more realistic scenario to have a potential repository site identified, before a Decision to Participate, rather than after. There does appear to be little logic in spending several years trying to decide whether or not to make a Decision to Participate if in the event a suitable repository site cannot be found, unless of course the whole process is something of a 'done deal' and a site has already been /will be chosen come what may.</p> <p>Thus this part of the process pre-supposed a lead role for both types of community (Host and Wider Local) something which without doubt was unacceptable to the Principal Authorities, particularly Copeland BC whose 'dash for cash' may not have been the only reason why it acted so precipitately and without any consultation on the White Paper. Allerdale Borough Council (also we believe without White Paper consultation) and Cumbria County Council (with a bare minimum of consultation, the results of which do not appear to have been made public) swiftly followed suit. It was this rush on the part of the Principal Authorities to 'Express an Interest' which upset the dynamics of the process envisaged in the White Paper and threw the whole thing out of kilter, leading also to the necessity to form the MRWS Partnership, in effect merely a cover for the aims and ambitions of the Principal Authorities.</p>
Organisation / Group	Question	Agree	Response
Greenpeace UK	Opening section		Greenpeace UK is the autonomous regional office of Greenpeace, an international campaigning

	<p>of letter answering consultation questions</p>	<p>organisation whose main objective is the protection of the natural environment. Greenpeace has worked on the issue of nuclear power since its inception. It has gathered expertise and access to expertise on all issues to do with nuclear power – including safety, health, security, economics, transport, waste and proliferation.</p> <p>Greenpeace believes that the issue of whether West Cumbria should engage further in the government’s efforts to find a suitable location for a geological disposal facility is a very important one. We do not believe the communities in Copeland and Allerdale should continue with the process. The question of whether to host a repository should be decided first and foremost by geology. The geology of West Cumbria is well understood and known to be unsuitable.</p> <p>Greenpeace is concerned with the approach that the Partnership has taken with this consultation. Considerable sums have been spent on public relations but they seem designed to generate a specific outcome from this consultation. The impact of a PR and politically-driven process is evident in the structure, form and content of this consultation.</p> <p>The consultation document states that it has been produced with an eye to the government’s code of practice on consultations. However, Greenpeace questions whether this consultation is in accordance with this guidance, particularly criterion 3, which states that “Consultation documents should be clear about the consultation process, what is being proposed, the scope to influence and the expected costs and benefits of the proposals”.¹ In many instances, it was unclear what question was being asked; in others it was not clear why the question was being asked (e.g. where the answer could only be ‘these are site specific issues which will be resolved later’). The format – does the respondent agree with the Partnership’s initial opinions – is leading, in that it assumes that the default position is to agree with the Partnership. There are frequent references to 263 other documents which are only available from the MRWS Partnership’s website and which are not referenced in accordance with any standard referencing system (academic or otherwise). We are also unhappy at the extensive use of technical terms and acronyms, which are used throughout without any obvious means of identifying their meaning.</p> <p>Greenpeace is also concerned about the legality of this process. Local people and councils have expressed concerns and (at time of writing) thirteen parish and town councils have already voted to withdraw from the process. We echo their concerns, especially in relation to ‘voluntarism’, which appears to be designed to mislead local people as to the extent of their right to opt in or out of the search for a repository. It is poor practice to ask people whether they want to continue when the ability to withdraw at a later stage is unclear and ill-defined and their ability to participate in a later decision to withdraw has not been established.</p> <p>Finally, the government published documents relating to this process on 13 March – ten days before consultation ended. These documents are material to the consultation, as they relate to the process going forward. This is of particular concern as councils have questioned whether the right of withdrawal from the process would be exercisable in practice. These documents should either have been released before or</p>
--	--	---

			<p>after the consultation period, but not during the period of consultation.</p> <p>Footnote</p> <p>1 Code of Practice on Consultation, Department for Business, Enterprise and Regulatory Reform (2009) p4. http://webarchive.nationalarchives.gov.uk/+http://www.bis.gov.uk/files/file47158.pdf</p>
Greenpeace UK	1 – Geology	No	<p>Greenpeace does not agree with the Partnership’s initial opinions. We are concerned that the Partnership seems determined to proceed with further attempts to find a site despite the weight of geological evidence to the contrary. This suggests that the process of identifying a suitable site will be influenced more by a determination that there should be a repository in West Cumbria than by the geological, hydrogeological and topographical suitability of the site in question.</p> <p>It is clear from the British Geological Survey that the overwhelming majority of West Cumbria which is not within the Lake District National Park has been ruled out at the first instance. This was not the only survey to discover that West Cumbria’s geology argued against its suitability. As Professor David Smythe, Emeritus Professor of Geophysics at the University of Glasgow, has explained, “Even before any Nirex-sponsored research was started in West Cumbria, the region was already as well understood as any other region in the UK. Post-Nirex, the region has become exceptionally well understood.”² These comprehensive studies and his own work on the subject leads Professor Smythe to conclude that “The well-understood geology and hydrogeology, and hence the inherent safety of any chosen potential site, is categorically against the region’s suitability to host a nuclear waste repository.”³</p> <p>The West Cumbrian geology and hydrogeology was examined in detail as part of the application by Nirex to construct a repository in the mid-1990s. The Longlands Farm site, where Nirex proposed to construct the repository on the grounds that it was the most suitable location, was found by the inquiry inspector to be unsuitable for the long-term storage of radioactive spent fuel and waste.</p> <p>This consultation attempts to downplay the relevance of geology to the outcome of the Nirex planning inquiry. In fact, the lack of a suitable geology was a material argument against using the Longlands Farm site. Chris McDonald, the public inquiry inspector, commenting on the inquiry and the present push to identify a suitable site, says that, “The relevant geology in west Cumbria is apparently now claimed to be ‘stable, although imperfect’. But 10 years ago the nuclear industry had not found a way of maintaining the stability of that geology when physically exploring the underground site.</p> <p>“The site should be in a region of low groundwater flow, and the geology should be readily characteristical and predictable, whereas the rocks (in west Cumbria) are of a complex volcanic nature, with faulting. The site is not suitable and investigations should be moved elsewhere. The site selection process was flawed, not treating safety as the most important factor, and irrationally affected by a strong desire to locate close to Sellafield.”⁴</p>

			<p>In trying so hard to keep alive the possibility that one or more suitable locations are out there, waiting to be discovered, the consultation only serves to reinforce our concerns, echoed by local residents, and parish and town councils, and the inspector tasked with examining the previous application, that this exercise is more about the political desire to build a repository in West Cumbria than the geological suitability of the region.</p> <p>Footnotes</p> <p>1 Code of Practice on Consultation, Department for Business, Enterprise and Regulatory Reform (2009) p4. http://webarchive.nationalarchives.gov.uk/http://www.bis.gov.uk/files/file47158.pdf</p> <p>2 Smythe, D. Why a deep nuclear waste repository should not be sited in Cumbria: a geological review, p 4. 12 April 2011. http://www.westcumbriamrws.org.uk/documents/Letter_from_David_Smythe_re_unsuitability_of_Cumbria_12April2011.pdf</p> <p>3 Ibid, p 1.</p> <p>4 'Cumbria "irrational" place for nuke dump', Whitehaven News and Star (5 July 2007). http://www.newsandstar.co.uk/cumbria-irrational-place-for-nuke-dump-1.149559</p>
Greenpeace UK	2 – Safety, security, environment and planning	No	<p>Greenpeace does not agree with the Partnership's initial opinions. We do not understand how the Partnership can be confident that it would be possible to devise a safety case which adheres to standard ALARP principles and which could protect the population and the environment for the hazardous life of the waste. Deep geological disposal facilities at the depth proposed are not established practice. It is unclear what the design of the facility will look like, because, as the Partnership rightly accepts, this will depend on the location. Although other countries are exploring deep geological disposal, Professor Smythe, in his submission, notes that "no other country is searching or has searched for a suitable waste repository site below the water table in similar extreme topography."</p> <p>Given the number of variables at play, we cannot know whether the population can be protected for the duration that the waste remains harmful to public health and the environment, and it is misleading for the Partnership to state otherwise.</p> <p>Neither do we understand how the Partnership can be confident about the planning process that the GDF would need to proceed through and in which a decision on whether to support a repository would need to be taken. This is because the planning process has not yet been determined. DECC has expressed an opinion that it might in future fall under the remit of the Infrastructure Planning Commission (IPC), but that is unconfirmed. The IPC is a relatively new body and has already been fundamentally restructured since</p>

			<p>its inception under the 2008 Planning Act, with the transfer of its original decision-making powers to the Secretary of State. Its processes and remit are still being developed. Further, the process for submitting an application for a development consent order to the IPC is very different to the processes of submitting an application for planning permission to a council with powers over planning.</p> <p>If the decision as to whether or not to approve an application to construct a GDF is to be taken by Cumbria County Council, as would appear to be the present situation, then the involvement of Cumbrian councillors in the MRWS Partnership creates unavoidable conflicts of interest which, we suspect, would tell against the legality of any decision.</p>
Greenpeace UK	3 – Impacts	No	<p>Greenpeace does not agree with the Partnership’s initial opinions. The Partnership claims to be confident that any impacts can be identified and the negative effects mitigated at a later stage. However, as the impacts have yet to be identified in anything but a generic sense, it cannot be clear how serious they are and whether they can be mitigated.</p> <p>It would have been helpful if the Partnership had expanded upon their list in the consultation document and provided respondents with a qualitative understanding of the likely generic impacts. This would not have been difficult, because the Nuclear Decommissioning Agency’s reference document expands upon the generic impacts contained within the consultation document and provides a more helpful indication of how these impacts might affect people and the environment:5</p> <ul style="list-style-type: none"> • Landscape and visual effects: changes to or loss of views from drilling rigs and surface facilities, traffic movements; • Land use: land will be required for boreholes, the disposal facility, infrastructure; • Cultural heritage: impacts on heritage sites, archaeological disturbance; • Geology and soils: effects on the host geology, soil quality; • Ecology and nature conservation: creation, disturbance or loss of habitat, impacts on wildlife from construction; • Traffic and transport: new infrastructure, increased traffic from transport of materials, personnel and waste • Air quality and climate: dust and emissions from transport and construction; • Noise and vibration: from construction and transport; • Water resources: changes in usage, discharges and water quality; • Community effects: employment, population, skill levels; • Health effects: risks from construction and operation of the facility and transport associated with it. <p>The inadequacy of this section – the contents of which are of critical importance to the matter of local support or opposition to the GDF – adds further weight to our concerns that this consultation is aimed at generating a positive response instead of being a genuinely open process of public and stakeholder engagement.</p>

			<p>Cumbria's 'brand' is based on the attractiveness of its natural environment, which will be negatively affected by the planned construction of a large-scale nuclear waste repository in the area. The Partnership appears to be more concerned about the county's 'brand' – i.e. the way the public perceives it – than about the quality of the natural environment on which that public image is based.</p> <p>Footnote</p> <p>5 Summary Note on Potential Impacts of Implementing Geological Disposal, Nuclear Decommissioning Agency (2009). http://www.westcumbriamrws.org.uk/documents/27Potential_impacts_of_implementinggeological_disposal.pdf</p>
Greenpeace UK	5 – Design and engineering	No	<p>Greenpeace does not agree with the Partnership's initial opinions. We do not see how the Partnership can be satisfied with the design and engineering concepts, because the Partnership admits that it is too early to know what a GDF would look like, how large it would be, or any other material considerations.</p> <p>This section of the consultation is particularly unhelpful and opaque. The questions being asked are, to paraphrase, "do you agree with the Partnership that it is too early to tell what the design of the repository would be?" and "do you agree with the Partnership that the as-yet-undecided design may or may not include retrievability?" It is not obvious how to provide a meaningful response to these question. We believe that this section in particular does not comply with the government's Code of Practice on Consultations, in particular with criterion 3 (quoted above).</p>
Greenpeace UK	7 – Siting process	No	<p>Greenpeace does not agree with the Partnership's initial opinions. Greenpeace believes that the process, and its 'volunteer approach' does not offer any protection to local communities. The right of withdrawal is insufficiently robust and we have no confidence that a community's decision to withdraw from the process would be honoured.</p> <p>The White Paper states that the power to decide to withdraw lies in fact with the borough and county councils, not with the communities upon whom a repository would be imposed. Parish and town councils – even those which have already opted out of the search – would have no redress if Copeland, Allerdale or Cumbria wished to search or to build a repository in their area.</p> <p>It is also unclear who would take the final decision on whether to proceed – the borough councils or the county council. What, for instance, would be the process if the borough councils wanted to proceed against the wishes of the county? How might that be resolved at a planning level? These are issues which the consultation could helpfully have considered.</p>
Greenpeace UK	8 – Overall views on participation		<p>Greenpeace does not agree that Copeland or Allerdale borough councils, or Cumbria County Council, should proceed with this flawed and opaque process. We do not believe that the right to proceed 'without any commitment' exists in practice and can be relied upon by communities in West Cumbria. We believe</p>

			that the geology is unsound; that the science and technology is untested; that there are serious questions about the process itself and that the process so far has in fact been designed to massage public opinion to produce a pre-determined result.
Organisation / Group	Question	Agree	Response
Greysouthen Parish Council	Letter		<p>Consultation on Geological Disposal of Radioactive waste in West Cumbria</p> <p>With regard to the ongoing debate, consultation and numerous documents/leaflets on this very important subject Greysouthen Parish Council considered the matter in detail at their meeting last night.</p> <p>Their unanimous decision was that West Cumbria should now withdraw from the MRWS process once and for all. There should be no Stage 3.</p> <p>In reaching this decision the Parish Council concluded that the geology is neither suitable nor safe with no guarantees that we are not leaving a toxic legacy for the future. There is no confidence in the right of withdrawal particularly if huge sums of money have already been spent. Furthermore the potential economic benefits are far outweighed by safety and risk concerns. There is no point in wasting more time and money as this area is totally unsuitable.</p> <p>The Parish Council also wondered if the continuing involvement of CALC is now worthwhile and would support any decision by CALC to withdraw from the consultation process.</p> <p>I hope this helps in reaching a global decision in this extremely important subject.</p>
Organisation / Group	Question	Agree	Response
Haile and Wilton Parish Council	1 – Geology	Not Sure/ Partly	<ul style="list-style-type: none"> • Why is the data obtained by the Nirex study not in the public domain and being consulted and used? • Concerns regarding that a 'make do' attitude will be adopted to enable a solution to be found and help bring forward the siting programme to 2029 • Conflicting external information with regard to the geological suitability of the area by specialists like Professor Smythe
Haile and Wilton Parish Council	2 – Safety, security, environment and planning	Not Sure/ Partly	<ul style="list-style-type: none"> • We deem this question not applicable at this stage in the process but we assume that all legislation will be covered. This matter should be further reviewed should the siting process progress – These matters will become very important in the later stages of the project.
Haile and Wilton Parish Council	3 – Impacts	Yes	<ul style="list-style-type: none"> • A very comprehensive list has been drawn up and acknowledges the areas requiring more attention. • The chapter lacks depth around the disruption that will be caused during the construction of the facility and the huge environmental impacts of the rock removal process; the creation of spoil heaps,

			infrastructure issues, extra traffic involved, land needed and general scale of the operation.
Haile and Wilton Parish Council	4 – Community benefits	Not Sure/ Partly	<ul style="list-style-type: none"> • Any community package needs to be sustainable, transformational and offer long-term inward investment to help mitigate the perceived environmental decline of the area. • The 'host community' should be consulted and gain the maximum benefit package with a ripple effect of benefit packages for others areas. • The identified 'host communities' needs to have the right of withdrawal at any point in the process • The community needs to be engaged and details of the proposed benefits package outlined at the earliest opportunity in the process.
Haile and Wilton Parish Council	5 – Design and engineering	Not Sure/ Partly	<ul style="list-style-type: none"> • Too early in the process to comment on the design and engineering of the facility. It could, at least, have discussed the anticipated arrangements for dealing with water flows, gases, explosive hazard, criticality, etc. • There is no mention of the extent of monitoring that is foreseen for the facility, nor the period during which waste could be retrieved.
Haile and Wilton Parish Council	6 – Inventory	Not Sure/ Partly	<ul style="list-style-type: none"> • Very wide inventory spectrum from sludge's to uranium/plutonium which is not necessarily currently well defined.
Haile and Wilton Parish Council	7 – Siting process	Not Sure/ Partly	<ul style="list-style-type: none"> • The 'Partnership's Seven Principles for Community Involvement' seem to encompass a viable way forward. • The consultation document acknowledges the need to change the representation on the decision making body to reflect the evolving situation. <p>Problems arise from the way that the 'way forward' might be interpreted:</p> <ul style="list-style-type: none"> • The areas highlighted in red on the map on page 27 encompassing the industrial areas of Carlisle, Workington, Whitehaven, Egremont and Maryport which have already been excluded due to the BGS screening study, therefore it is only right that representatives from these towns should now have much less of an influence in the process going forward. • Also, it is a current perception that it is very unlikely that the repository will be sited within the Lake District National Park, therefore like the above; representatives from it should have less of a say. • Once any area is identified as a suitable site that community should be consulted to see if they are agreeable to the benefit package on offer. • Throughout the process the identified host community should have the option to withdraw and 'Voluntarism' should be core principle, not just for the County Council and Borough Councils but for those individuals communities directly affected by the siting process. A 'free' right of withdrawal should be available at any stage to all concerned as the project progresses.
Haile and Wilton Parish Council	8 – Overall views on participation		<ul style="list-style-type: none"> • All areas of the UK were invited "to take part in the search for somewhere to put a repository, without any commitment to have it". Our views are that the areas covered by Allerdale and/or Copeland Councils have the same opportunity as the rest of the UK to take part or not, without any commitment to have it.

Haile and Wilton Parish Council	9 – Additional comments		<ul style="list-style-type: none"> • The majority of the current Public Relations activities are not seen to be very engaging for the majority of the community in the consultation area. • The language in the consultation document is very ambiguous, to the extent that it could be interpreted that the repository is good or bad for the area. • The process is at a very early stage, so a lot of information is unavailable to make an informed submission to the consultation process currently. • There is no thought given in the document to how an independent Scotland's waste might be dealt with, particularly in-light of the NDA's move to relocate waste from the Dounreay site in Scotland to Sellafield over the coming decade. • What kind of geology would automatically eliminate an area from the process? • There is no mention that individual compensation packages will be offered to businesses and individual households affected by the siting of the repository.
Organisation / Group	Question	Agree	Response
Holme East Waver Parish Council	Letter		<p>Geological Disposal of Radioactive Waste in West Cumbria – Consultation Response</p> <p>The information provided to date has been considered carefully by Councillors and discussed at the March Parish Council Meeting.</p> <p>The Parish Council does not wish to object to the search for a repository at this stage of the process. The Council wishes to receive regular updates and reserves its right to object to the proposal at a later stage.</p>
Organisation / Group	Question	Agree	Response
Holme St Cuthbert Parish Council	Letter		<p>Adopted Position of Holme St. Cuthbert Parish Council</p> <p>At the present time</p> <p>It is generally accepted that there needs to be a proper plan for the safe disposal of nuclear waste, and it also accepted that, at the current level of human development and intelligence, the safest way is to bury the waste deep underground. With this waste potentially being dangerous for a hundred thousand years it is vital that the most suitable place possible is found to store it.</p> <p>The six stage MRWS consultation, now nearing the end of the 3rd stage, has made a fairly low profile attempt at finding out the opinions of the local population and as the consultation moves in to the 4th stage, and more money is invested, it will become progressively more difficult for councils to withdraw from the process.</p> <p>Right of Withdrawal</p> <p>The Government says that a repository will only be put somewhere where there is a community that has</p>

		<p>volunteered to have it. An important part of this “voluntarism” approach is the Right of Withdrawal, which can supposedly be exercised up to the point where underground construction is about to begin at the end of Stage 5. Does this mean that, if geologists claimed to have found “suitable geology” under or near Holme St. Cuthbert that the people living here could decide that they did not, after all, want to volunteer to have the UK’s radioactive waste buried under their homes and businesses and so withdraw? It is difficult to see how they could. Parish Councils, for example, cannot exercise the Right of Withdrawal: only Allerdale Borough Council or Cumbria County Council could do so. Even if a parish council could exercise the right, it would become increasingly difficult to do so as we proceeded through the MRWS process as stated in paragraph 1.</p> <p>It says on pages 93 and 94 of the Partnership’s report that “reasoned justification” would be required. Members of the public and small parish councils would find it very difficult to produce ‘reasoned justification’ against determined government ‘experts’. Even if they did have the technical expertise to produce such ‘reasoned justification’, it is also made clear on pages 93 and 94 of the report that the Community Siting Partnership (which would advise the Councils) could still reject their reasoned justification if allowing them to withdraw would prevent the repository from going ahead. The 2008 MRWS White Paper also makes it clear that, once expensive boreholes had been drilled, a community would find it very difficult to withdraw.</p> <p>The government reserves the right to ignore a community’s wishes if they mean that the repository project would have to be abandoned.</p> <p>Holme St. Cuthbert parish council held a film and discussion evening for residents of the parish. Many queried whether or not the government were sincerely interested in the response to their consultation if they could choose to ignore it at will and override any community’s decisions.</p> <p>All present at the meeting expressed a desire that the parish council request Allerdale and Cumbria County Council to withdraw from the process now.</p> <p>Parish council members have also taken every opportunity to speak to residents on other occasions to gauge their feelings concerning the waste repository and there has been a unanimous decision to request the councils to withdraw.</p> <p>The 3 councils could still withdraw at this stage but as the process continues, this will become increasingly difficult and there is no way a parish could withdraw by itself.</p> <p>Holme St. Cuthbert Parish Council therefore has no faith in the Right of Withdrawal</p> <p>Geology</p> <p>Geology is important because the Government admits that the repository will eventually leak. Water</p>
--	--	---

flowing through the leaking repository will be contaminated with radioactivity. The geology needs to ensure that as little contamination as possible will reach the surface.

The rational way to approach siting is first to look for an area in the UK that has the desired geology and then to tackle the problem of convincing the local population that the repository poses no threat. The opposite approach is taken by the MRWS process: first, find a “nuclear-compliant” community and then look for suitable geology. This is a very unscientific and ultimately expensive way to find a suitable area for a repository.

It has been argued, particularly by Professor David Smythe, who conducted a geological survey of West Cumbria for the government in the 1980s that it is already obvious that nowhere in Cumbria has suitable geology. His argument is based on two observations:

- Cumbria is mountainous
- There is a lot of folding, faulting and other geological complexities

The mountains act like a cistern in the roof of a house. They drive water at high rates through the ground towards the coast and, because of the cistern effect, can drive underground water upwards to the surface. Because of the complexity of the geology it is very difficult to predict where groundwater will carry contaminants from a leaking repository.

We agree with Professor Smythe’s view that it is a waste of time and money to look at an area with unsuitable geology when it is known that other places exist where the geology is more promising, and wonder whether or not the traditional British Government attitude of ‘stuffing unpleasant things’ well away from the home counties in remote areas, regardless of the effect on the communities there, will win the argument yet again.

As there appears to be no other areas being considered, and the Government wish to speed up the whole process, the parish council wonders if the repository will be put in Cumbria regardless of arguments against it, secure in the knowledge that they (the government) will not be around to take the flak if and when things go wrong.

Planning

It is not clear how a planning application for the repository would be determined. The Partnership Report (P. 42) says “much could change in the 15 years before an application could occur”. However, it seems likely that it would not be the local authorities who would determine the application, but a body such as the new Major Infrastructure Planning Unit (MIPU): which would advise the responsible minister, who would make the decision. We think that a 1km² industrial complex with its road and rail links would be disastrous for local tourism and agricultural industries. West Cumbria already struggles to attract tourist due to being associated with Sellafield. It is possible, though unable to be proven, that other industries are also deterred by this. A second large nuclear facility would definitely deter many people and businesses from

		<p>coming to the area. Any thoughts of the nearby LDNP achieving World Heritage status to boost our tourist industry will be finished.</p> <p>In addition the underground repository would expand if a decision is made to accommodate new waste. Would people want to visit an area when they knew that a large quantity of nuclear waste was buried under the hotel, B & B, campsite or cottage they may have chosen? It is also relevant to ask 'would the image of Cumbrian agricultural produce be damaged by an association between "Cumbrian produce" and nuclear waste?</p> <p>Stage 5 borehole investigations would probably require a substantial number of sites in open country. They would be heavy-duty rigs and tracks would need to be driven to allow heavy equipment to be transported to the sites. They would require generators to run. They would be noisy and visually intrusive. It might be argued that the disruption caused by stage 5 might only last for 10 years or so. But it is not clear whether any lasting surface structures (such as ventilation shafts) would remain. Again detrimental to the countryside.</p> <p>Impacts and Benefits</p> <p>The lure of employment is always used to put some unattractive project where people are reluctant to accept it. However the fact that this facility would, as stated in the previous paragraph, deter many businesses coming to the area and destroy tourism means that as many jobs would be lost as gained if this were to go ahead.</p> <p>Improved infrastructure adjacent to the site i.e. large roads and rail links would in all probability split small communities, and, if previous experience is anything to go by, communities farther away would suffer consequences, but receive none of the benefits. This parish suffered this fate when building work was being done at Sellafield and a great many extremely large heavy vehicles were taking building materials to the site along totally inadequate roads.</p> <p>The repository would commit the host community to a "nuclear future for many generations to come". Is this the legacy that Allerdale, Copeland and the CCC wish to leave for future generations? We feel that this repository would result in an economic nuclear monoculture in West Cumbria.</p> <p>Safety</p> <p>The Government's wish for acceleration in making a waste facility available by 2029 could potentially jeopardise the need for careful management. The NDA are responding by looking at ways to increase resources allocated to the programme, undertake more work in parallel, and transfer technology from more advanced programs overseas.</p> <p>The original planned date to bring an underground waste disposal facility into service was 2040 and was</p>
--	--	--

based on the time it took for other countries to select the proper site and technology to permanently dispose of the most dangerous nuclear waste. Sweden took 31 years, France, 32 and Finland, 37.

It is clear that a lot of scientific and technical problems have not yet been solved. Therefore the Nuclear Decommissioning Authority (NDA) has a research programme that is running alongside the search for a site. One problem to which there is not yet an answer is gas. It is now known that a large amount of hydrogen will be generated by a repository. It would be a problem particularly once the repository closes and is backfilled. Where should it go? If it is vented to the surface, the vents defeat the object of sealing the repository to prevent radioactivity from reaching the surface. If it is allowed to build up, what are the consequences?

The hydrogen would not itself be radioactive (though it can explode). However, another gas, methane, is likely to be formed and this would be strongly radioactive. Again, simple and fault-free geology is required to keep it underground. That is not the kind of geology that exists in West Cumbria.

We conclude that, given the local geology, the problem of gas generation is of particular concern.

Conclusions

We believe that "West Cumbria" should now withdraw from the MRWS process because:

- We have no confidence in the Right of Withdrawal in future stages of the process
- We are convinced by the argument that nowhere in Cumbria has suitable geology
- We believe that it is a waste of time and money to continue the process in Cumbria when there are other, more promising, areas in England
- Continuing the process puts west Cumbria and its tourist and agricultural businesses at risk
- We consider that the potential economic benefits to Cumbria do not justify searching for a site in unsuitable geology
- We have concerns that Government's aspiration to accelerate the MRWS process will lead to corner-cutting
- We have concerns about safety, particularly gas emissions
- There is insufficient information about additional waste and the inherent increased risk
- Far too little information is available on impacts for the community to make a meaningful Decision to

			<p>Participate.</p> <p>Holme St. Cuthbert Parish Council request that the 3 councils concerned withdraw from this process</p>
Organisation / Group	Question	Agree	Response
Isle of Man Government	Letter		<p>A submission by Isle of Man Government's Department of Environment, Food and Agriculture (DEFA) to the Public Consultation by the West Cumbria Managing Radioactive Waste Safely (MRWS) Partnership</p> <p>The West Cumbria MRWS Partnership ('the Partnership') requested views on proposals for the further investigation of the potential in West Cumbria for geological disposal of radioactive waste. More specifically the Partnership asked for comment on their 'initial opinions on a range of issues', as set out in the public consultation document. Having read the consultation document, together with several supporting documents (on the Partnership's website), I am pleased to make this submission on behalf of the Isle of Man Government.</p> <p>In response to Question 1 – the Partnership's initial opinions on geology:</p> <p>Firstly, I can say that Isle of Man Government does not wish to comment on the 'Screening Report', prepared by the British Geological Survey, instead wishing to comment only on the issue of 'suitability of geology'.</p> <p>On the geology issue, I shall begin by referring to what I understand is the stated position of the advisory Committee on Radioactive Waste Management (CoRWM), regarding current knowledge to assess the suitability of West Cumbria for disposal of nuclear waste. Presently, I believe the CoRWM 'view is that. At this stage in the MRWS process, it is not known whether or not there are suitable geologies in West Cumbria'. [Ref.1]</p> <p>I am also aware that the Partnership has received additional information in support of CoRWM's view, from FWS Consultants Limited. I note that in their published correspondence FWS Consultants report on their 'brief discussions' with the British Geological Survey, which they claim indicates that West Cumbria does have an 'area of potentially suitable sedimentary formations'. [Ref.2]</p> <p>Consequently in view of the aforementioned advice, I note the Partnership's 'initial opinion that there is enough possibly suitable land to make further progress worthwhile.' [Ref.3]</p> <p>Nevertheless, as the Partnership will know, that seemingly reasonable statement by CoRWM continues to be a matter of contention with certain independent geologists; the Committee's opinion having been challenged most prominently by Professor David Smythe (Emeritus Professor of Geophysics, University of Glasgow). [Ref.4]</p>

		<p>I am convinced that Professor Smythe's submissions to the Partnership do raise important questions regarding the geology and hydrogeology of West Cumbria. Based on published geological data, the Professor's assertion that West Cumbria is an area with a complex and faulted geology seems to me an entirely reasonable comment. Similarly, the proximity of the Cumbrian mountains would also appear to have significant consequences for the hydrogeology of West Cumbria, as they could drive underground water movement through the potential repository host rocks, towards the sea.</p> <p>Such major issues, which are contested in the exchange of published letters between Professor Smythe and the geologist Dr Dearlove (FWS Consultants Ltd) seem, at least to my reading, to be issues as yet unresolved. [Refs. 5,6,7]</p> <p>Additionally I would consider of relevance to the debate, the critical review of Professor Smythe's evidence by the geologist Dr Tim McEwen, who concedes he has 'some sympathy with some of Smythe's comments' on the same issues:</p> <p>West Cumbria's complex geology</p> <p>'.. it would certainly be easier to develop a convincing safety case for a repository located in a simpler geological environment' [Ref.8]</p> <p>The Cumbrian mountains</p> <p>'It is true that the hydraulic gradients in much of west Cumbria are relatively high. Smythe however places too much emphasis on these gradients... and this is not sensible'. [Ref.8]</p> <p>Although Professor Smythe's view that there is already sufficient geological information to discount the entire West Cumbrian region, may be considered an extreme interpretation of the existing geological data, he has to my mind made a forceful case, suggesting that his main assertion will likely prove correct.</p> <p>Therefore after due consideration of the evidence made available by the Partnership, and the arguments presented for and against a West Cumbrian location to date, Isle of Man Government is of the opinion that there is only a weak case for the further investigation of West Cumbrian geology, to assess its suitability for a nuclear waste repository.</p> <p>In response to Question 2 – the Partnership's initial opinions on safety, security, environment and planning:</p> <p>If I may now offer some brief comment on the matter of the Nuclear Decommissioning Authority (NDA) proposals for a 'research programme on geological disposal' and more specifically the review of that</p>
--	--	---

		<p>programme, by Professor Stuart Haszeldine (Edinburgh University, School of GeoSciences). [Ref.9]</p> <p>Isle of Man Government has noted the critical comment from Professor Haszeldine on issues such as: the sequencing of tasks to be undertaken, the assumptions being made as to the required timescale to find solutions to a number of significant technical challenges, and also the availability of technology by which they could be overcome. [Refs 9,10] Moreover, having also considered the NDA's response to Professor Haszeldine's review of their proposed research programme [Refs.11,12], Isle of Man Government remains unconvinced that all of the repository performance problems can be resolved in the required timescale.</p> <p>In summary, whilst the UK Government has stated that it will only construct the geological repository if a safety case can be approved by the nuclear regulatory authorities, there remains the question of the likelihood of a suitable location being found in West Cumbria. Having now read the Consultation document together with the submissions made by opponents of further investigation in West Cumbria, I have been persuaded to the view that there is a high degree of uncertainty over the potential suitability of West Cumbria. Similarly for the reasons I have stated in this submission, Isle of Man Government is strongly of the opinion that West Cumbria is unlikely to be a suitable location for geological disposal of nuclear waste.</p> <p>Lastly, in the event that the Partnership does make a 'final recommendation' to their communities, to enter into the siting process for the geological disposal facility, Isle of Man Government would nevertheless wish to be informed of subsequent developments. Therefore, I very much hope that my Department can maintain its liaison with the Partnership, or indeed any successor organisation (e.g. Community Siting Partnership), as may be established to involve the wider local interests, beyond the host community.</p> <p>References</p> <p>Ref.1 Committee on Radioactive Waste Management, Letter from CoRWM Chairman Prof R. Pickard to Prof Smythe, 1st Jun 2011</p> <p>Ref.2 Dearlove J. Overview of Professor David Smythe's rebuttal of CoRWM's views, Letter from FWS Consultants to West Cumbrian MRWS Partnership, 13th May 2011</p> <p>Ref. 3 West Cumbria MRWS Partnership, Public consultation document, November 2011 to March 2012, page 34</p> <p>Ref. 4 Smythe D. Why a deep nuclear waste repository should not be sited in Cumbria: a geological review. (15 pages and appended maps and diagrams) 12th April 2011</p> <p>Ref. 5 Dearlove J. Requested response to Professor Smythe's papers, Letter from FWS Consultants to</p>
--	--	---

			<p>West Cumbria MRWS Partnership, 26th October 2011</p> <p>Ref. 6 Smythe D. Response to letter submitted to MRWS:Cumbria by Dr J Dearlove, 16th September 2011</p> <p>Ref. 7 Smythe D. Response to letter submitted to West Cumbria MRWS by Dr J Dearlove dated 26th October 2011, 7th December 2011</p> <p>Ref. 8 McEwen T. Comments on David Smythe's letter (10 pages), Tim McEwen Consulting May 2011</p> <p>Ref. 9 Haszeldine, R.S. Review of research on geological disposal of radioactive waste proposed by the UK Nuclear Decommissioning Authority document 146, March 2011</p> <p>Ref.10 Haszeldine, R.S. Reply to the NDA response to MRWS paper 146, 22nd May 2011</p> <p>Ref.11 Nuclear Decommissioning Authority, Geological Disposal, Further information on R&D for West Cumbria MRWS Partnership Paper no. 146, March 2011</p> <p>Ref. 12 Nuclear Decommissioning Authority, Geological Disposal, Further information on R&D for West Cumbria MRWS Partnership, July 2011</p>
Organisation / Group	Question	Agree	Response
Keswick Tourism Association	Letter		<p>As Chairman of Keswick Tourism Association I recently attended a meeting organised by CALC (Cumbria association of local councils) in which Professor David Smythe gave a talk on the possible site for a high level nuclear waste repository in West Cumbria.</p> <p>Professory Smythe, a geologist who worked for the British Geological Survey BGS (the natural environment research council) gave a two hour presentation on the unsuitability of the local geology for a repository of this nature.</p> <p>He together with a colleague from Edinburgh University explained that the proposed areas are totally unsuitable, as the geology is very complex. Borrowdale volcanics was given as one example of being highly fractured with many faults.</p> <p>Diagrams were presented showing how hydraulic pressures could push the waste to the surface; abroad similar disposal sites are away from mountains, high rainfall and have geological simplicity.</p> <p>His claim was worst case scenario there could be leakage within a few hundred years.</p> <p>Without going into all the detail at the presentation it was of concern that, although CALC had invited BGS</p>

			<p>and other government departments to the meeting, none were willing to present a counter argument.</p> <p>Whilst we fully understand the need to find long and short term solutions to secure power supplies for our country, and whilst we are not anti-nuclear, we do have serious concerns about the stability of the geology based on Prof. Smythes figures.</p> <p>We would welcome an assurance that any proposed site for High Level Nuclear Waste will be based on sound geological suitability and not political expediency.</p>
Organisation / Group	Question	Agree	Response
Keswick Town Council	8 – Overall views on participation		Following a debate on the issues surrounding the consultation, Keswick Town Council resolved at its meeting held on Thursday 16th February 2012 to support entering the next stage of the process to find a site for a repository for the UK's higher activity nuclear waste in the Allerdale area, without any commitment to have it.
Organisation / Group	Question	Agree	Response
Kirkbride Parish Council	Letter		<p>Geological Disposal of Radioactive Waste in West Cumbria – Consultation Response</p> <p>The information received to date has been considered carefully by Councillors, and discussed at the March Parish Council Meeting. The Parish Council acknowledges the importance of the nuclear industry to the economy of Cumbria, but is equally aware of the detrimental effects that a repository could have on the landscape, economy and other aspects of the immediate area.</p> <p>The Parish Council arrived at the view that it does not wish to object to the search for a repository at this stage of the process. The Council wishes to receive regular updates and reserves its right to object to the proposal at a later stage.</p>
Organisation / Group	Question	Agree	Response
Kirkoswald Parish Council	Letter		<p>Deep Disposal of Radioactivity in Cumbria</p> <p>After representations to the Parish Council by concerned parishioners, Councillors would hope that those considering the proposals would consider the long term effects on the County and they believe that nothing should be buried underground that will be unsafe for future generations. It is also hoped that much consideration is paid to the impact upon the water table in the County as a whole.</p>
Organisation / Group	Question	Agree	Response
Lake District National Park Authority	Letter		<p>RE: Consultation response to the MRWS Partnership public consultation November 2011 – March 2012</p> <p>The Lake District National Park Authority (LDNPA) is pleased it has been a full member of the Managing Radioactive Waste Safely Partnership. As such we have assisted the preparation of this consultation document and support in principle the initial opinions.</p>

However this consultation provides us with an opportunity to further clarify our stance on a number of points prior to the Decision Making Bodies taking a decision to participate in the search for a geological disposal facility in West Cumbria.

Question 1

Do you agree with the Partnership's initial opinions on geology?

We agree with the Partnership's initial opinions. The extent of the research undertaken at this stage leaves many areas that have not been ruled out. . The process of the British Geological Survey study and subsequent scrutiny appears to be robust and has enabled the Partnership to draw its initial conclusions. We note that there remain a number of disagreements but we are not qualified to assess the detailed technical points.

Any future decision to participate, if agreed by the Principal Authorities, will necessitate significant geological investigation. The Partnership should be aware that one of the special qualities of the Lake District National Park (LDNP) is its complex geology and geomorphology. This complexity may severely limit potential host areas.

Question 2

Do you agree with the Partnership's initial opinions on safety, security, environment and planning?

We agree with the Partnership's initial options. The LDNPA is the Local Planning Authority under current legislation for any planning applications within the Lake District National Park boundary including for minerals and waste development as well as other types of development, for example, boreholes

We welcome the statement in section 5.2 (p42) of the consultation document regarding the National Park which says:

'We recognise that planning policies, relevant strategies and legislative frameworks relating to land use will need to be considered as an early step if the process moves forward. This may rule out certain scenarios, for example siting surface facilities within the National Park.'

It is noted from the consultation document that surface facilities could be in the region of 1 square kilometre (100 hectares). To put this into perspective the LDNP is aiming to deliver 9.2 hectares of new employment land up to 2025 within the National Park. This in itself has proved challenging. To help achieve this figure the Authority is proposing to allocate land for employment use, and the single largest site that has been identified which is considered to be suitable for employment use is approximately 3 hectares in size. We do not believe it will be possible to accommodate a surface facility in the region of 100 hectares in the National Park, and which mayor may not include construction material and spoil from the underground element. There would inevitably be adverse impacts upon the character of the National

		<p>Park and its special qualities.</p> <p>It is Government's longstanding view that major development (surface facilities would fall under this definition) should not take place in National Parks save in exceptional circumstances outlined in the English National Parks and Broads UK Government Vision and Circular 2010, and Planning Policy Statement 7. In addition our Core Strategy Policy CS12: Major developments, outlines criterion which development must overcome in order to be granted permission. Based on the criterion listed in Policy CS12 and policy CS01, National significance and distinctive nature of the Lake District, it is our view that surface facilities for a geological disposal facility could not be supported in the National Park.</p> <p>Should a surface facility be located outside the National Park boundary but within close proximity there is potential for surface facilities to affect the setting of the National Park. If a 'Decision to Participate' is taken then the setting of the National Park will need to be a consideration of the siting process. Our position in this event would depend wholly on context and location, as we have already demonstrated in relation to proposals for wind farm developments outside the National Park.</p> <p>Question 3 Do you agree with the Partnership's initial opinions on the impacts, both positive and negative, of a repository in West Cumbria?</p> <p>It is clear that the development of a geological disposal facility will have direct impacts on the economy, society and the environment, and the MRWS partnership recognises that not all of these will be positive.</p> <p>We welcome the additional research on Brand Protection and await the outcomes of the research. This will hopefully build on the perception research undertaken by GVA Consultants which highlighted concerns amongst visitors to the Lake District National Park and Cumbria in general.</p> <p>It remains a concern that significant media interest highlights the potential location of the geological disposal facility in the 'Lake District' rather than 'West Cumbria'. As a result of the association of a geological disposal facility and the Lake District we remain very concerned that there may be a direct impact on businesses operating within and trading off the brand of the Lake District. The findings of the Brand Protection study must be a key consideration as to whether it is appropriate to include areas of the Lake District National Park in the search for a geological disposal facility. We view tourism as a crucial element of all parts of the Lake District economy, and that of wider Cumbria. Anything that harms this aspect of the economy has to be treated with great care.</p> <p>It is important for the Partnership to continue to engage and seek to improve its engagement with the 'national community', wherever possible. National Parks are a national asset with the Lake District also having an international popularity. Consequently it is crucial that if a geological disposal facility were to impact upon the National Park then the national community are fully engaged.</p>
--	--	--

		<p>Question 4 Do you agree with the Partnership's initial opinions on a community benefits package?</p> <p>The initial options relating to a community benefits package is considered to satisfy the requirements at this early stage in the process. The principles clearly establish a way to take discussions forward if a Decision to Participate is taken. Our view is that community benefits should include all national park users in some respects.</p> <p>Question 5 Do you agree with the Partnership's initial opinions on design and engineering?</p> <p>We agree with the Partnerships initial opinion on design and engineering.</p> <p>Question 6 Do you agree with the Partnership's initial opinions on inventory?</p> <p>We agree with the partnership initial opinion regarding inventory. If a decision to Participate is taken it will be necessary to undertake further work in establishing the inventory to understand the potential size of a facility.</p> <p>Question 7 Do you agree with the Partnership's initial opinions on the process for siting a repository?</p> <p>We agree with the partnerships initial opinion on the siting process. However we are concerned that the process will not develop smoothly in line with a voluntarism approach and believe it likely that certain communities may well decide to withdraw from the process posing significant challenges for any future Partnership.</p> <p>Question 8 What are your views on whether the areas covered by Allerdale and/or Copeland Borough Councils should take part in the search for somewhere to put a repository, without any commitments to have it?</p> <p>No further comments to make at this stage.</p> <p>Question 9 Please use this section to make any additional comments</p> <p>It is important to consider the impact of infrastructure associated with a geological disposal facility on the special qualities such as the spectacular landscape of the National Park as part of the siting process if a Decision to Participate is taken.</p>
--	--	--

			In summary we welcome the Partnerships position with regard to surface facilities within the National Park, as we believe it will not be possible to locate such surface facilities within the National Park without resulting in adverse impacts upon its character and special qualities. The study being undertaken on Brand Protection is crucial as concerns remain regarding the impact on businesses within and trading off the brand of the Lake District. We welcome the partnership's efforts in engaging with the National Community and it would be important to maintain and improve the level of consultation wherever possible if a Decision to Participate is taken.
Organisation / Group	Question	Agree	Response
Lancaster Diocese Faith & Justice Commission	1 – Geology	No	<p>Geological storage does appear to be the only possible long term way forward.</p> <p>We have a number of concerns.</p> <p>We believe that it is the UK Government that should be taking responsibility for the nature and location of a nuclear repository for the nation because it is the safety of future generations of Britons, and neighbouring countries, which should be the overriding factor.</p> <p>It is not clear from the West Cumbria consultation document whether they are planning a store or a disposal site. They are two very different engineering proposals. Disposal - once sealed they could not readily be retrieved. Storage - involves the construction of an engineered, watertight, vault deep in the rocks - but capable of being monitored to detect both radiation levels and any water entry, and allowing intervention should this become necessary.</p> <p>We emphasise that apparent convenience (eg proximity to Sellafield) should not be allowed to compromise a decision which must involve the whole system over its whole life cycle (insofar as that is humanly possible).</p> <p>There has been no thorough geological survey done throughout the UK that would enable an informed decision on where the best site for geological disposal would be.</p> <p>The planned Geological Survey in the 70's was cancelled after only two sites were surveyed –this appeared to be due to public (electorate) concerns.</p> <p>There are different opinions as to which geological make-up would provide the best/safest place to site a repository.</p> <p>The screening out of shallow aquifers (supplying drinking water/surface water) and deep waters in limestones that feed warm springs at the surface are obvious. But the screening of mineral resources at depth - seems to have been divided arbitrarily: so carbon resources are acceptable for screening out (on</p>

			<p>the assumption that future generations may still be deep mining for coal, gas, oil), while other mineral resources (evaporites, industrial minerals, some metal ores) are not. This pre-supposes that future generations might not wish to exploit, by deep mining, resources for which there is currently no great demand; or to over-exploit resource which are currently regarded as having a wide distribution, or 'low resource value'.</p> <p>This then leaves all other criteria (geological/tectonic stability; deep aquifers; complex geological environments..) being regarded as insufficient as pre-screening criteria.</p> <p>One (Bath et al, 2006) reports investigations of deep groundwater compositions in the Sellafield area. While the idea may be to 'seal' a repository deep below the fresh-water aquifer, since there are plenty of deep saline fluids around, such a project would have to ensure that the potential thermal effects of the repository, and the disturbance to the rock permeability around the repository, would not allow warm brines to rise into the overlying aquifer on geological timescales.</p> <p>The fact that waste needs to be stored safe from human attack or a reduction in the integrity of the geological site over many hundreds of years poses a great challenge to any regulatory system. For example, there can be no direct scientific evidence that the containing vessels will be free from corrosion over the necessary timescale. We urge therefore that the precautionary principle should always be invoked in matters of site selection and design. The overriding objective must surely be to identify the site which is most likely to lead to the well-being of future generations.</p> <p>Whether the Sellafield area, some other part of West Cumbria, or any other particular location in the UK is suitable for such a store can only be decided by rigorous scientific examination of the geology and hydrology. While public acceptance is desirable the imperative is environmental suitability. A bad site remains a bad site even if it has willing neighbours. A good site will be safe, whoever lives on top of it!</p>
<p>Lancaster Diocese Faith & Justice Commission</p>	<p>2 – Safety, security, environment and planning</p>	<p>No</p>	<p>In the community consultation and the planning a distinction should be made between legacy waste and new build waste.</p> <p>Volunteer communities should be asked a set of questions that distinguishes between legacy and new build waste.</p> <p>Volunteer communities should have the opportunity to accept legacy and reject new build.</p> <p>If a volunteer community agrees to a geological disposal facility to legacy waste only that would mean a second facility if the government continued with plans for new nuclear power stations.</p> <p>(The cost of this second disposal facility should be included in proposed builds –not an automatic assumption that the waste produced can be dealt with alongside the legacy waste)</p>

			<p>We believe there should be no new build until science has developed a sustainable, safe way forward.</p> <p>It is crucial to consider the whole system of treatment, intermediate storage, transport and deposition from the outset – a bit-by-bit design won't do. This necessarily implies that a wide range of communities must be consulted and involved if there is ever to be public confidence in the system of waste management. It also implies an unprecedented level of collaboration between the regulatory bodies.</p> <p>Regulation – the biggest problems come from the need for the closest collaboration at every level of the different regulatory bodies and the constraints on the availability of information which are a result of confidentiality and security concerns – this is very dangerous and not good for public trust. It is clear that the risk of terrorist attack on part of the waste treatment and disposal chain is more likely to increase rather than decrease over the next decades. At the same time decision makers should be fully aware that it is difficult for the public to have confidence in the robustness of a system in which information is not forthcoming because of security reasons. See, for example, the report from the Parliamentary Office of Science & Technology (2004) on terrorist attacks: how can people really believe that the conclusions of a study of the impact of an accident are wrong simply on the basis of a statement by the operating company that “none of the authors have access to current information necessary to undertake a credible study”.</p> <p>We strongly urge that the process should be as transparent as possible, given the circumstances, and that ways are sought to involve all genuinely interested parties.</p> <p>The details of transport arrangements should be made public. We believe that communities on either rail or road links in the transport system should be made fully aware of the implications, and that their views should be expressly sought in the consultation.</p> <p>There is no doubt that the psychological effect on the public of any nuclear-related accident or incident would be enormous – so while assurances about the levels of risk and their consequences may be realistic in scientific terms, this doesn't mean that the public will therefore be convinced or reassured.</p> <p>The fact that waste needs to be stored safe from human attack or a reduction in the integrity of the geological site over many hundreds of years poses a great challenge to any regulatory system. For example, there can be no direct scientific evidence that the containing vessels will be free from corrosion over the necessary timescale. We urge therefore that the precautionary principle should always be invoked in matters of site selection and design. The overriding objective must surely be to identify the site which is most likely to lead to the well-being of future generations.</p>
<p>Lancaster Diocese Faith & Justice Commission</p>	<p>3 – Impacts</p>	<p>No</p>	<p>Time scale of 140 years for the development of the facility and during this period average employment of 550 people per year is not going to increase employment chances, and legally jobs cannot be set aside for local people</p> <p>It will not increase the likelihood of investment from other industries other than in arms and nuclear</p>

			<p>industries.</p> <p>For a long period the effects of construction will have a detrimental affect on Cumbria.</p> <p>There is no doubt that the psychological effect on the public of any nuclear-related accident or incident would be enormous – so while assurances about the levels of risk and their consequences may be realistic in scientific terms, this doesn't mean that the public will therefore be convinced or reassured.</p> <p>There would be a big impact on the tourism industry and this would have an effect on the food industry as the tourist often provides an essential second business for the farming community.</p>
Lancaster Diocese Faith & Justice Commission	4 – Community benefits	Not Sure/ Partly	<p>We can have no knowledge to what the Government might agree to, and what they might describe as “community benefits” so far in advance and whether these would be seen as such by the community.</p> <p>The definition of community is absolutely critical. The facility is not a stand alone site – it will be part of the national system and people affected (eg at key transport links) should be given a say in the process.</p> <p>We are also concerned that communities which are relatively poor economically are given a balanced and realistic picture of the true costs, benefits and risks to them, particularly if they see it as a way to finance development and to bring employment to their area.</p>
Lancaster Diocese Faith & Justice Commission	5 – Design and engineering	No	<p>We agree that geological storage does appear to be the only possible long term way forward.</p> <p>It is not clear from the West Cumbria consultation document whether they are planning a store or a disposal site and these are two distinctive engineering proposals.</p> <p>We are concerned that it is inferred in the document that the facility is designed to take waste from new build as well as legacy nuclear build. BUT a distinction should be made between legacy waste and new build waste.</p> <p>The current problem is the waste from nuclear facilities built since 1950; this could all be in the geological disposal it is suggested by 2130.</p> <p>The plans to build new nuclear facilities will create more waste after their maximum 60 year productive life. Proposed build from 2018 so by about 2080 a further waste inventory will be created before the initial inventory has been completely dealt with.</p> <p>As such we believe that volunteer communities should be asked the question that distinguishes between legacy and new build waste. If a volunteer community agrees to a geological disposal facility to legacy waste only that would mean a second facility.</p>

			<p>The cost of consultation, planning and building of the second site should fall wholly on companies that build new nuclear power stations.</p> <p>We believe there should be no new build until science has developed a sustainable, safe way forward.</p>
Lancaster Diocese Faith & Justice Commission	6 – Inventory	Not Sure/ Partly	<p>We agree with the types of waste that could be sent for geological disposal.</p> <p>But there is no distinction between legacy waste and new build waste.</p> <p>There is no information on the plans to deal with LLW in the future in Cumbria as the facility at Drigg is becoming close to capacity.</p>
Lancaster Diocese Faith & Justice Commission	7 – Siting process	No	<p>It is important to keep the community informed about the process and possibilities. Community acceptance of any possible repository site is, the imperative is its environmental suitability for thousands of years to come.</p> <p>BUT</p> <p>We believe that it is the UK Government that should be seen to be taking responsibility for the nature and location of a nuclear repository for the nation because it is the safety of future generations of Britons, and neighbouring countries, which should be the overriding factor.</p> <p>A bad site remains a bad site even if it currently has a willing community, while a good site will be safe effectively forever, whoever lives on top of it!</p>
Lancaster Diocese Faith & Justice Commission	8 – Overall views on participation		See response to Q.7
Lancaster Diocese Faith & Justice Commission	9 – Additional comments		<p>Our concern, along with many others, is for the protection both of people within the area, however wide this has to be defined, and of the countryside. Our desire to protect these is driven by our belief that life as represented by humanity and all fauna as well as flora, together with all of the created world is a gift given to us by God which we have a duty to preserve. In a similar way it is a gift we are invited to enjoy and enable those who come after us to enjoy as well.</p> <p>Whatever permanently damages humanity and the wider creation is something that we should always avoid.</p> <p>The questions we would have therefore are whether what is going to be done, does do permanent damage, and whether there is a not a better way of approaching how we deal with the nuclear waste. This may mean that we have to wait until we are able to answer these questions more effectively.</p> <p>Another area that raises concern is that various departments at Universities (Lancaster for one) and</p>

			<p>elsewhere are looking into the use of radioactive waste. It seems unlikely that all will be recyclable, but some may be. If we are to face the question of what we do with the waste that we already have, we need to be working closely with these departments so that should recycling become possible then the waste is as available as possible.</p> <p>However we believe that this research is at an early stage and so we should not stock-pile more waste from new build hoping for this research to deal with the problem.</p> <p>The waste we have now has to be dealt with. Just because West Cumbria is a poor county with a lack of industry, it should not be tempted into to being evaluated in isolation as a possible site. Any investigation into the geology should be part of a wider investigation of other potential sites of appropriate geology in the country, including deep clay formations</p>
Organisation / Group	Question	Agree	Response
Lorton Parish Council	Letter		<p>Re: MRWS Consultation: The response of Lorton Parish Council</p> <p>At the recent meeting of Lorton Parish Council the following question was put to councillors:</p> <p>'Does this Parish Council believe that the Managing Radioactive Waste Safely Project should move forward to Stage 4 of the project, this being desk based studies to ascertain the suitability of the geology of Allerdale for housing an underground repository.'</p> <p>Members of the public were also present at the meeting and engaged with the debate that councillors undertook. A variety of issues and concerns were raised and these included:</p> <ul style="list-style-type: none"> • The geological studies to be undertaken during stage 4 would almost certainly prove that the geology of the area was not suitable for a repository, as proven by work undertaken during the Nirex investigations. • The project as a whole would have some economic benefit to the area though the likelihood of large numbers of new, sustainable jobs being created for local people was remote. • There is unhappiness about the process as a whole and feel that it should be driven by geology not geography. The areas with the most stable geology in the country should have been identified first and then volunteer communities should have been sought. The deep clays of Norfolk, Oxfordshire and London provide the most suitable geology for a waste repository. • Although there are further opportunities in the process for withdrawal, it is uncertain whether parish councils or the public will have another opportunity to have their say. It maybe that once into stage 4 the whole process becomes unstoppable. • The waste created by the massive excavation works would cause massive problems locally. • Both the tourism and farming industries could be adversely affected by the project. <p>At the end of the debate the vote was as follows:</p>

			<p>Those in favour of the move to Stage 4: 1 councillor Those opposed to the move to Stage 4: 5 councillors</p> <p>The decision of Lorton Parish Council not to support the MRWS Project moving to Stage 4 in Allerdale will be relayed to the following organisations:</p> <ol style="list-style-type: none"> 1. Allerdale Borough Council 2. Cumbria County Council 3. Cumbria Association of Local Councils 4. Lake District National Park <p>Should you wish any further information regarding this decision then please do not hesitate to contact me.</p>
Organisation / Group	Question	Agree	Response
Loweswater Parish Council	Letter in addition to response form		<p>Re: MRWS Consultation: The response of Loweswater Parish Council</p> <p>At the recent meeting of Loweswater Parish Council the following question was put to councillors:</p> <p>'Does this Parish Council believe that the Managing Radioactive Waste Safely Project should move forward to Stage 4 of the project, this being desk based studies to ascertain the suitability of the geology of Allerdale for housing an underground repository.'</p> <p>Members of the public were also present at the meeting and engaged with the debate that councillors undertook. A variety of issues and concerns were raised and these included:</p> <ul style="list-style-type: none"> • The geological information already available about West Cumbria is some of the most detailed in the country and it is doubtful whether there is a need for further investigations. The geology is already known to be unsuitable for a repository. • The project as a whole would have some economic benefit to the area though the likelihood of large numbers of new, sustainable jobs being created for local people was remote. • There is unhappiness about the process as a whole and feel that it should be driven by geology not geography. The areas with the most stable geology in the country should have been identified first and then volunteer communities should have been sought. The deep clays of Norfolk, Oxfordshire and London provide the most suitable geology for a waste repository. • Although there are further opportunities in the process for withdrawal, it is uncertain whether parish councils or the public will have another opportunity to have their say. It maybe that once into stage 4 the whole process becomes unstoppable. • The waste created by the massive excavation works would cause massive problems locally. • Both the tourism and farming industries could be adversely affected by the project. The Lake District is of national importance and nothing should be done that could impact upon the World Heritage application.

			<p>At the end of the debate the vote was as follows:</p> <p>Those in favour of moving to Stage 4: 2 councillors Those opposed to the move to Stage 4: 4 councillors</p> <p>The decision of Loweswater Parish Council not to support the MRWS Project moving to Stage 4 in Allerdale will be relayed to the following organisations:</p> <ol style="list-style-type: none"> 1. Allerdale Borough Council 2. Cumbria County Council 3. Cumbria Association of Local Councils 4. Lake District National Park <p>Should you wish any further information regarding this decision then please do not hesitate to contact me.</p>
Loweswater Parish Council	1 – Geology	No	<p>I have no doubt that the geology of the Lake District National Park is UNSUITABLE for the location of the dump.</p> <ul style="list-style-type: none"> • Reports on the NIREX (1995-6) confirmed unsuitability in the Longlands Farm site area. • Both the Skiddaw Slates and the Borrowdale Volcanics consist of a range of Lithologies (6 in the Skiddaw Slates area of the Loweswater Parish). There is a lack of sequence and succession of the rocks. There are many UNCONFORMITIES. • In many of the areas reviewed in Scandinavia the basement rocks are SHIELD areas – ancient resistant rocks MUCH MORE appropriate – these are the ONLY other areas in Europe where waste is being buried at present. • Rocks within the Park act as aquifers with at best uncertain geology. Aquifer areas very inappropriate for a dump. • There is a need to dispose of the WASTE – below ground – and therefore we should select the BEST GEOLOGICAL AREAS in the UK and focus on these sites for further RESEARCH first. • Rocks in the Lake District National Park are mainly pyroclastic rocks; they have complicated patterns with faulting and folding as well as considerable angles of dip and weakness. • 3 zones of England are more appropriate <ol style="list-style-type: none"> a) London clays b) Oxford clays c) Part of Lincolnshire, West Norfolk, Bedfordshire.
Loweswater Parish Council	2 – Safety, security, environment and planning	No	<ul style="list-style-type: none"> • We are asked to take on trust that the safety problems will be solved in the future! Regulatory bodies were in place for Three Miles Island (USA) Chernobyl (USSR) Fukushima (Japan) and even for the recent banking crisis – hardly giving the public confidence! • Lake District National Park covers 900 sq miles (approx). Its raison d’etre is protection of the environment yet this is the proposed area for the dump! • Huge amounts of rock spoil to be stored for ages, above ground, for backfill – waste is an eyesore.

			<ul style="list-style-type: none"> • Lake District Park being considered for WORLD HERITAGE STATUS – incompatible with underground dump.
Loweswater Parish Council	3 – Impacts	No	<ul style="list-style-type: none"> • Visual impacts underestimated within the document. • Large spoil heaps inevitable, arranged in bunds. Very visible undermining the principles behind a National Park. • Technology of the above ground facilities not so far implemented anywhere in the UK. Stores needed for some of our reactors when their lives are ended maybe prodigious. • Very doubtful of local job opportunities. Skilled labour almost certain to be brought into Cumbria, on a temporary basis. • *House and land prices are very likely to fall certainly WILL NOT be enhanced. Some businesses unlikely to be attracted to the area. • Rural industry, especially farms, food products and tourism MORE likely to suffer – NOISE, POLLUTION, HEAVY TRANSPORT (Lorries/ rail movements) will increase – leading to a poorer environment and deleterious effects. • *N.B. Land/house prices in the Sellafield area are significantly lower than the Duddon valley/Ennerdale areas.
Loweswater Parish Council	4 – Community benefits	Not Sure/ Partly	<p>It is clear that the principles agreed with the Government as the basis for future negotiations are very important. We are NOT told these principles in specifics BUT only in general. This is accepted at the stage of the investigation.</p> <p>We are insufficiently confident that the negotiations will be adequately managed. We believe the benefits, whether it be in terms of remuneration packages or infrastructural and /employment opportunities, are unlikely to be appropriate relative to the impact of the M.R.W.S. programme.</p>
Loweswater Parish Council	5 – Design and engineering	Not Sure/ Partly	<ul style="list-style-type: none"> • It is extremely difficult to respond in detail to this section since the generic design concept and engineering choices are SITE specific. The principles outlined in the document should be appropriate since all options are being kept open. Uncertainties and recommendations for future work will need substantial further work before Loweswater Parish Council could be persuaded that the design concepts and retrievability options are adequate. • However, technical and engineering matters should not be left to the NDA to solve in the future. The NDA is also responsible for the waste so an independent scrutiny panel must be appointed.
Loweswater Parish Council	6 – Inventory	No	<ul style="list-style-type: none"> • There are real problems of DEEP DISPOSAL. Nowhere in the world, to our knowledge, is there a repository like this ONE being recommended since this will be for BOTH – HIGH LEVEL and INTERMEDIATE LEVEL radioactive waste. • There would have to be more detail and certainty as to what is to go into the repository before any final decisions are made (see Page 86).
Loweswater Parish	7 – Siting	No	<ul style="list-style-type: none"> • Insufficient confidence in the “Right of Withdrawal” programme as outlined. We recognise that the

Council	process		voluntarism approach is appropriate in theory but in practice lack the confidence that this maybe implemented if it is felt work should be stopped if the programme moves to Stage 4 (Figure 13 p 87)
Loweswater Parish Council	8 – Overall views on participation		It is to be emphasised that although both Councils have put themselves forward to be considered as possible sites this was not the right way forward. Loweswater Parish Council is NOT against Nuclear Energy. It is supportive of the UK's programme and nuclear is an integral part of the UK's energy programme. But as shown on pages 1,2 and page 3 the locations to be considered should initially have been located PRIMARILY with geological, environmental and planning and impacts of the repository as the key factors initially DETERMINING locations in the UK.
Organisation / Group	Question	Agree	Response
Lowick Parish Council	Comments slip		We are very concerned about three matters: 1) RADIOACTIVE FALLOUT HERE FROM ACCIDENT. The best advice we can access (a local scientist with an INTERNATIONAL reputation!!) suggests that longterm waste needs to be buried at, at least, THREE KILOMETRES down. 2) TOTAL CIVILIAN EVACUATION FROM WEST CUMBRIA. Any possible routes SOUTH, especially the A595, A5094 and A5082, are HIGHLY UNSUITABLE for any mass evacuation. 3)TRANSPORT OF WASTE TO WEST CUMBRIA. See note 1. AND WHY BARROW DOCKS? - WHITEHAVEN would be safer!
Organisation / Group	Question	Agree	Response
Maryport Town Council	Letter		Underground Nuclear Repository in West Cumbria The Town Council has considered the potential implications of siting an underground nuclear repository in West Cumbria. The Council do not support moving to the next stage in the process to develop an underground nuclear repository on the following grounds: 1) There is concern that if the three responsible councils, (Allerdale Borough Council, Copeland Borough Council & Cumbria County Council), agree to move to stage 4, the way the process is designed will make it very difficult to withdraw from the process. 2) There is concern that the complexity of the geology in the area would make it unsuitable & that the review should focus on areas of the country which have suitable geology, rather than on seeking suitable geology after an area has expressed an interest in hosting this type of facility. 3) There is concern that the impact of surface sites & the knowledge of the presence of an underground facility would have a negative impact on tourism.

			<p>4) The Council believes that the potential economic benefits are negligible in comparison to the overall negative impact on the area.</p> <p>5) There is concern about safety aspects, in particular, the uncertainty about the potential impact of gas emissions & additional waste.</p> <p>6) The Council believes that there is too little information available to enable a balanced decision to be made on the Decision to Participate.</p> <p>Please can you ensure that the Council's concerns in this matter are taken into account.</p>
Organisation / Group	Question	Agree	Response
Millom Town Council	1 – Geology	Yes	Has the process of 'Fracking' been looked at as a potential hazard. Would there be any implications to the local area?
Millom Town Council	2 – Safety, security, environment and planning	Yes	Planning consultation at local level needs to be an essential part of the consultation process.
Millom Town Council	3 – Impacts	Not Sure/ Partly	More information is needed.
Millom Town Council	4 – Community benefits	Yes	More details are needed.
Millom Town Council	5 – Design and engineering	Yes	No comment was made
Millom Town Council	6 – Inventory	Yes	Should not have responsibility to store waste from overseas.
Millom Town Council	7 – Siting process	Yes	No comment was made
Millom Town	8 – Overall views		Millom Town Council agree that Allerdale and Copeland Borough Councils should take part in the search

Council	on participation		for the place to put a repository without any commitment.
Millom Town Council	9 – Additional comments		As Millom Town Council are making this initial decision on behalf of the community and future generations, we would wish that this process is rigorous and open with consultation continuing before any final decisions are made.
Organisation / Group	Question	Agree	Response
Millom Without Parish Council	1 – Geology	No	The Parish Council does not support the current proposals for the following reasons: i)the present consultation to identify a suitable site is too narrowly focussed, offers no geographic comparisons and gives priority to community acceptance in the areas volunteered by principal councils rather than geological suitability and secure containment, ii)the extreme longevity of this project and nature of the elements to be stored makes the utmost caution essential, iii)the opportunity for the Parish Council's views to be influential may be lost when decision making defaults to principal councils, perhaps before the extended consultation period ends, iv)remaining mineral deposits (e.g. iron ore which was previously mined in the Millom and Furness areas up to 1968) may be made unrecoverable in future centuries by the proximity of a nuclear repository
Millom Without Parish Council	2 – Safety, security, environment and planning	No	1. The Parish Council recognises the national importance of the proper disposal and storage of nuclear waste. It is also aware of the time-scales involved both in building and storage. On the one hand urgent action is necessary because of the unsatisfactory nature of the present storage arrangements. On the other hand the essential longevity of storage makes, for example, the eight-and-a-half thousand years since the land-bridge to Europe was lost (due to rising sea levels) seem as yesterday compared with the expected duration of this programme. 2. In view of the above, the Parish Council is of the opinion that it is the duty of the government and the nuclear industry to investigate widely and give principal weight to criteria based upon geological considerations in the most rigorous sense. Therefore, the search for a site should not be confined to the areas of those principal councils which have, at present, expressed an interest, thus excluding a truly wide and impartial study which offers a range of choice.
Millom Without Parish Council	3 – Impacts	Yes	It is tempting for the Parish Council to take the suggested process forward as indicated in the public consultation documents ('Geological disposal of radioactive waste in West Cumbria') due to its urgency and importance and thus agree to await more information at a later date. The Council is of the opinion that this is an unsatisfactory way to address the matter, • First, because it is wrong in principle as the criteria of selection is too restrictive and does not best serve the national interest. • Secondly, in waiting for more information the opportunity to decline to become further involved may pass from small councils and the decision making power default to the principal councils whose views will not necessarily reflect the views of this or other Parish Councils.

Millom Without Parish Council	4 – Community benefits	Not Sure/ Partly	The examples of community benefits referred to in the report are a minimum starting point for this generation and perhaps the next. However, any benefits for the present community would be relatively short-lived and trivial when put alongside the enormity of the project and its longevity. Any disadvantages, on the contrary, will be long lived and serious.
Millom Without Parish Council	5 – Design and engineering	No	A long-term project such as this should be sited at an optimum location and be inherently as flexible as possible. It is very likely, that in the time-scale envisaged the methods of disposal, processing or containment of nuclear waste will be modified or improved. It is of fundamental importance, therefore, that flexibility should be built into the system and allow for future developments at a safe and secure site
Millom Without Parish Council	6 – Inventory	No	The Parish Council recognises the national importance of the proper disposal and storage of nuclear waste. It is also aware of the time-scales involved both in building and storage. On the one hand urgent action is necessary because of the unsatisfactory nature of the present storage arrangements. On the other hand the essential longevity of storage makes, for example, the eight-and-a-half thousand years since the land-bridge to Europe was lost (due to rising sea levels) seem as yesterday compared with the expected duration of this programme.
Millom Without Parish Council	7 – Siting process	No	<p>The present consultation to identify a suitable site is too narrowly focussed, offers no geographic comparisons and gives priority to community acceptance in the areas volunteered by principal councils rather than geological suitability and secure containment.</p> <p>The Parish Council is of the opinion that it is the duty of the government and the nuclear industry to investigate widely and give principal weight to criteria based upon geological considerations in the most rigorous sense. Therefore, the search for a site should not to be confined to the areas of those principal councils which have, at present, expressed an interest, thus excluding a truly wide and impartial study which offers a range of choice.</p>
Millom Without Parish Council	8 – Overall views on participation		<p>Summary:</p> <p>The Parish Council does not support the current proposals for the following reasons:</p> <ul style="list-style-type: none"> i) the present consultation to identify a suitable site is too narrowly focussed, offers no geographic comparisons and gives priority to community acceptance in the areas volunteered by principal councils rather than geological suitability and secure containment, ii) the extreme longevity of this project and nature of the elements to be stored makes the utmost caution essential, iii) the opportunity for the Parish Council's views to be influential may be lost when decision making defaults to principal councils, perhaps before the extended consultation period ends, iv) remaining mineral deposits may be made unrecoverable in future centuries by the proximity of a nuclear repository. <p>Comment:</p> <p>A long-term project such as this should be sited at an optimum location and be inherently as flexible as possible. It is very likely, that in the time-scale envisaged the methods of disposal, processing or</p>

			<p>containment of nuclear waste will be modified or improved. It is of fundamental importance, therefore, that flexibility should be built into the system and allow for future developments at a safe and secure site.</p> <p>Any benefits for the present community would be relatively short-lived and trivial when put alongside the enormity of the project and its longevity. Any disadvantages, on the contrary, will be long lived and serious.</p>
Millom Without Parish Council	9 – Additional comments		<p>Argument:</p> <p>1-The Parish Council recognises the national importance of the proper disposal and storage of nuclear waste. It is also aware of the time-scales involved both in building and storage. On the one hand urgent action is necessary because of the unsatisfactory nature of the present storage arrangements. On the other hand the essential longevity of storage makes, for example, the eight-and-a-half thousand years since the land-bridge to Europe was lost (due to rising sea levels) seem as yesterday compared with the expected duration of this programme.</p> <p>2-In view of the above, the Parish Council is of the opinion that it is the duty of the government and the nuclear industry to investigate widely and give principal weight to criteria based upon geological considerations in the most rigorous sense. Therefore, the search for a site should not to be confined to the areas of those principal councils which have, at present, expressed an interest, thus excluding a truly wide and impartial study which offers a range of choice.</p> <p>3-It is in the national interest that:</p> <ul style="list-style-type: none"> •First, the proposed site should be determined by a wide examination of suitable areas and that the final selection should be made only from among those sites which best satisfy scientific and geological requirements. •Secondly, South Copeland and the, nearby, Furness peninsula are potentially rich sources of mineral deposits. The cessation of mining in the Millom area was due to the ingress of water and the cost of pumping rather than exhaustion of deposits. It is understood that the possible future availability of mineral deposits has led to other areas being excluded from consideration as suitable sites. <p>4-It is tempting for the Parish Council to take the suggested process forward due to its urgency and importance and thus agree to await more information at a later date. The Council is of the opinion that this is an unsatisfactory way to address the matter,</p> <ul style="list-style-type: none"> •First, because it is wrong in principle as the criteria of selection is too restrictive and does not best serve the national interest. •Secondly, in waiting for more information the opportunity to decline to become further involved may pass from small councils and the decision making power default to the principal councils whose views will not necessarily reflect the views of this or other Parish Councils. <p>5.For the reasons given above this Parish Council does not give its assent to the present proposals.</p>

Organisation / Group	Question	Agree	Response
Moresby Parish Council	1 – Geology	Not Sure/ Partly	<p>It is accepted that the BGS study was required to ensure that an area that had expressed an interest was not an area where the geology was totally unsuitable. West Yorkshire has been given as an example where coal seams proliferate. However once that test has been undertaken and areas not worth pursuing at all have been eliminated then DECC should permit the relevant organisation be it the NDA or others to provide the local authority who has expressed an interest with as much information as is available. There is much more knowledge about the geology of West Cumbria available which is being held back and will be published if the authority decides to participate. It is unfair to the residents and a potential willing host community to be denied this information. There is a view that no geology in West Cumbria exists that is suitable. That is not the universal view but it will gain ground if government refuses to release or permit to be released studies that would demolish that argument. The partnership should make clear in their report to the decision making bodies that they do not believe that authorities should move to stage 4 until information concerning geology which is now known is put in the public domain and the population are consulted. Geologists must know what type of rock they are looking for and where it might be in West Cumbria. A clear and unambiguous statement of the geological requirements for the repository would assist all parties in identifying a suitable site and would support the public justification of the site selection. If then it is clear that there is reasonable chance that further work may provide a suitable area the relevant authority could seek the consent of its residents to take the matter further. The proposed MRWS process is open to the suspicion that a site will be selected and then a pseudo-scientific justification back-fitted to support the selection. We need to know now the prospects of finding suitable site not simply that all data and knowledge can be released after a decision to participate is taken.</p>
Moresby Parish Council	2 – Safety, security, environment and planning	Not Sure/ Partly	<p>There is a vast amount of work to be undertaken by the regulators but there are concerns that as an arm of government it will not have the resources that are necessary to carry out the tasks. There are concerns that the developer will contract the most suitable and experienced officers and the regulators will struggle to find staff with the necessary competences. The NDA R and D programme has been criticised by a number of different organisations including CORWM and it is a step in the dark to move to stage 4 on the basis that “we are as confident as is possible at this stage” when in fact there is very little evidence to support that statement. At a more fundamental level, if our current state of knowledge on the interactions of the geology, the waste packaging and the waste are such that we require any R&D at all, it represents a significant risk to the project. Until the R&D is complete there can be no detailed design. Given the intrinsic uncertainty as to what the results of the R&D will tell us and more importantly when, there can be no confidence in the timescales of the programme.</p> <p>The opinions reached on the planning aspect are weak. There is no mention of a requirement to address the question of a formal environmental assessment pursuant to European Directive 2001/42/EC. It should be noted that those opposing H2 are looking to judicial review on this issue. It surely isn't good enough for the government to argue that there is no need at this stage to commit the repository, wherever it is located, to being a development included within the scope of the major infrastructure planning unit or its</p>

			<p>successor in title. It is quite clear that no application of this magnitude could be considered locally especially when the DMB's would be the planning authority. This raises the question of whether a national policy statement will be in place before the final right of withdrawal has passed and if so as a statutory document whether the principle of "voluntarism" will be enshrined in the NPS. These are clearly issues of great importance and until adequate responses are given by the sponsoring government department no decision to participate should be taken.</p>
Moresby Parish Council	3 – Impacts	Not Sure/ Partly	<p>No mention is made in the document of the application pending by a commercial organisation to site and store large volumes very low level waste at a site formerly open cast close to the village of Pica some 18 miles from Sellafield. The parish council raise this issue because all the DMBs who have expressed an interest in entering stage 4 have objected to the low level application on the grounds of proximity, adverse perceptions by the general public and fears that other commercial developments would not proceed in an area where nuclear waste was stored. It is difficult to accept that the same grounds do not apply when considering a GDF.</p> <p>The section refers to brand perception work but it does appear from the CORWM observers report to their 7th March 2012 meeting that a major proposal from the consultants that an overarching Cumbria Brand organisation should be developed was not accepted. This rather suggests that the partnership does not want to take the issue seriously.</p> <p>The sponsoring department have been clear from the outset that jobs created by a move towards a GDF in the district cannot be reserved for local people and it is not note that those involved in preparation work for a new nuclear power station in another part of the country have plans for a contractor's village. The partnership in its final report to the DMBs should not seek to overplay the benefits new jobs would bring to the area when it is more likely that as with the THORP construction the overwhelming majority of workers will be from away.</p> <p>Whilst Copeland may be wedded to a nuclear future the same cannot be said of Allerdale who are really hoping to diversify their industrial base. A GDF may not help this aspiration especially in the more tourist orientated areas of the district. It has to be accepted that the Western Lakes and the hopes to improve the tourist footfall in the area cannot benefit from a GDF and consultation document is correct when it suggests that the rural economy needs to be looked at quite separately from the urban economy.</p> <p>It does not appear that the partnership has seen any independent views on the subject of spoil and simply skates over the problem of vast amounts of rock to be moved and the consequent traffic movements by repeating the assumptions of the NDA. This unacceptable and before moving to stage 4 the local population should have a much clearer idea of what is involved.</p>
Moresby Parish Council	4 – Community benefits	Not Sure/ Partly	<p>There is much local cynicism about the delivery of community benefits packages because local experience is not good. In one case, the local community cannot trace where the money which was promised went, and in another case the money is tied up in a community fund which has backfitted rules which prevent the</p>

			<p>local community accessing the funds in the way they understood would be accessible. There is clearly a lack of confidence that central government would deliver a suitable benefit package but equally worries abound that communities in their broadest sense would not be involved to the degree that many feel necessary. It is difficult to believe that individual government departments will simply hand over some part of their budget to satisfy some agreement between say the county council and DECC. By way of illustration should an improvement to local roads be agreed this would surely require the sanction of the Department for Transport who may have in their view more important/urgent plans within their forward plan? We understand that it has been difficult enough to obtain the funding that has been necessary to properly consult during stage 3. How much more difficult will it be to persuade central government that genuine additionality requires substantial funds. This is another area where to accept a decision to participate is to take a step into the dark with no certainty that any government now or in future will deliver on promises. It is bound to be a concern that until the right of withdrawal has passed no meaningful benefits will be forthcoming. Furthermore, the partnership's opinion on this criterion lacks required information as to who would negotiate with central government. Principal 10 suggests that it would be between two levels of government with a community siting partnership standing to one side. If this is the case, there is a concern that the DMB may not represent the views of the host community. In any event, Principal 6 appears to indicate that the scale necessary would preclude a host community from making a really meaningful input. There is a view that leaders of the DMB's would see a community benefits package as being an area where they and they alone hold sway.</p>
Moresby Parish Council	5 – Design and engineering	Not Sure/ Partly	<p>It is difficult to accept that the design concepts being developed are appropriate at this stage when the information provided so far is almost non-existent. The generic design image shown in the consultation document is of little help to a respondent to this consultation. More could be said about monitoring and how that might be undertaken and over what period. More could be said about engineering of tunnels and how they could affect the countryside between the surface site and the underground repository especially so far as they would relate to river/stream flows. More could be said about the barriers introduced in the packaging and any additional barriers built into the repository as well as the barrier of the rock to illustrate the reliability of the assessment for the safety case. The potential for a leak of radioactive material from the repository is a critical concern for parishioners and the feeble response that this will be looked at as part of the engineering design is not very convincing. There is little mention of studies carried out and design concepts developed elsewhere in the world which might inform the design of a UK repository. There is not mention of the possibility of a rock characterisation chamber being built as part of the validation of the design to fill in any gaps and to ensure that the concepts work under UK geological conditions. Retrievability is a big issue for people who are concerned about what happens in the future if the safety case is incorrect, and also for people who look to the future and see a valuable energy resource in the uranium, plutonium and spent fuel that the present government plan to categorise as waste. The consultation document says that how a repository might be designed and engineered is important because it helps people to visualise what a repository might look like and appreciate the scale of the project. The final report to the DMBs should therefore be illustrated with possible plans and contain responses to the type of question posed here which are only given to illustrate the many and varied issues that would help people visualise and appreciate the scale of the project and allay fears.</p>

Moresby Parish Council	6 – Inventory	No	<p>The inventory statements would appear to be designed to confuse and from press reports would appear to have been successful in confusing the MRWS partnership. This is unfortunate, as this section is one which generates a great deal of unease. One of the concerns of the parishioners is that the repository will be justified with a modest inventory and then there will be a series of incremental additions which make the repository substantially larger. The introduction of a lower inventory and an upper inventory would appear to support the cynics, particularly as the upper inventory is not an upper limit. The lower inventory is based upon a publicly available document which we are told represents the current and future arisings from a list of sites which comprise the majority of the nuclear establishments in the UK. The upper inventory we are told comprises three parts – additional material from projected new build and NPP lifetime extensions, some “additional material owned by the MOD” and “uncertainties” in the baseline.</p> <ul style="list-style-type: none"> • The uncertainties would appear to be very large. The new build inventory assumes not reprocessing which would generate additional HLW. It is therefore surprising that the packaged volume rises from 7000m3 to 12000m3 (a rise of 71%) between the lower and upper inventories (these figures are in the consultation document). The NDA technical note 12877243 quoted in the consultation document gives a figure of 23000m3 for the upper inventory which is over three times the lower inventory. • The future inventory from New Build has a huge impact on the footprint of the repository because of the spent fuel which is presumed to be of a high burn-up. It is surprising that the inventory only takes an allowance for the next generation of nuclear power plants for a repository which is planned for such a long lifetime. It is also surprising that there is no sensitivity analysis on the effect of reprocessing on the footprint of the repository. • The “additional materials from the MOD” presumably include the radioactive materials listed in the public consultation document for the submarine decommissioning programme which uses the same image of a geological repository for the final destination of the material. It is not clear from the inventory statement whether the additional plutonium inventory is military origin or another “uncertainty”. <p>In the circumstances we do not consider the government response to principle two acceptable in that the principle suggests that the DMB would have the right of veto and not the Host Community or the siting partnership and in any event the government does not sign up to a veto arrangement and further the Minister of Energy does not commit other government departments. The consultation document and the partnerships opinions do not give us the confidence that any local community could influence the inventory. As a minimum we would need to see a better undertaking by government departments that there would be a genuine veto and it can be wielded by the community siting partnership with the DMB being simply the method of delivering the message.</p>
Moresby Parish Council	7 – Siting process	No	<p>The first matter to acknowledge is that any decision making body moving forward to stage 4 need not take any notice of the “suggested steps” outlined in this section and DECC requires in the framework it has published only that “decision making body/ies must agree a mechanism with which they are comfortable”.</p>

		<p>It is not clear who “they” are. Is it the community at large or the DMB’s? The framework at page 11 shows at figure 3 seven steps to identification of potential candidate sites. Host communities in areas such as West Cumbria where no decision to participate will be made in respect of specific locations are not brought into the process until step 5 and at paragraph 5.3 the decision making process is outlined. All this indicates that the potential host community will be volunteered rather than genuinely stepping forward. That must be taken together with the DECC statement at 2.13 that partners would be expected to work together to avoid the need to exercise the right of withdrawal at a late stage. The question must be posed. How much easier for DMB’s to follow a nationally laid down process where they dominate and host communities are sidelined rather than a “suggested” scheme which may give potential host communities an actual voice. There is bound to be concerns with a suggested scheme when (excluding the county council) the consultation required by a DMB in the White paper at 6.18 was very limited in one case and non-existent in the other. It is hardly surprising that cynicism is wide spread and many believe that DMB’s will only agree to a process where they dominate, and rather than taking advice from a wide ranging community partnership will seek to go their own way. Given that the stage three partnership has been chaired by leading members of the three DMB’s and other partnership members may well have been seen by the public as add ons it does not bode well for the future. Whilst the facilitators have been seen to provide an excellent service they are not process managers and have to bow to the wishes of the steering group which is totally dominated by members and officers of the DMBs. The consultation document says that some people are sceptical that the government will honour commitments to a right of withdrawal. It might be said that many are sceptical that DMB’s would follow the advice and recommendations of the Community siting partnership. It ought to be remembered that a CSP may well be lead by the local MP. The present member for Copeland has made his position quite clear and he would be undoubtedly reluctant to withdraw from the process. We do not believe that sufficient weight is given in the consultation document to paragraph 7.25 of the whitepaper nor to one stated aim of the process that the procedure will only go forward with the consent of a willing host community.</p>
<p>Moresby Parish Council</p>	<p>8 – Overall views on participation</p>	<p>It is clear that the partnership has undertaken a vast amount of work and the consultation process throughout have been exemplary. However, it is very difficult to see whether there can be any clear outcome at this stage when there has been very little hard information presented. Even with the few details which are revealed many issues have arisen which need to be tackled. Whilst it can be said that the right of withdrawal remains until much later in the process, it is only at this stage that those local authorities who expressed an interest in finding out more about the process can walk away without any comeback. To agree to participate means that the area is committed to making it work and therefore the decision at this stage is of utmost importance. It has to be made with the full consent of the residents of the two areas and whilst it can be argued that a representative opinion poll will give a really good indication of the views of those residents it will not satisfy those who say “I want my vote to count”. It is trite to say that “it is too early in a process that may last many years and there will be plenty of opportunities at a later stage” but this is the one time when a referendum will not be coloured by views on locations. At this point all the areas covered by the two district councils are in the frame either for an underground repository or the surface facilities or both. Once decisions have been taken about potential site areas then a full referendum is bound to attract shouts of foul because those in the south of the area</p>

			<p>may be quite happy to see a location in the north chosen (or urban voters a rural location) and vote accordingly. If a poll is limited to the potential site area(s) then those outside who believe in principle that the county should not be involved are disenfranchised. The DMB's may not want to see a very local referendum knowing that it is likely to be against moving forward. It does seem that credible support has to be at two levels both area wide and local to the particular potential host(s) communities. Is now the time to satisfy the first requirement? Should the borough councils together with the county council take part in a search? No. Not at this point with what we know.</p>
Organisation / Group	Question	Agree	Response
Muncaster Parish Council	Letter		<p>To whom it may concern. I have been asked by my council to respond to you.</p> <p>We have discussed the proposals at three council meetings and have decided not to comment either way on the proposals. We wish to "sit on the fence" until further notice.</p>
Organisation / Group	Question	Agree	Response
National Farmers Union	Letter		<p>The NFU represent the business interests of 47,000 farmer and grower members across England & Wales. Given that the NFU are represented on the West Cumbria Managing Radioactive Waste Safely Partnership by Robert Morris-Eyton we feel it more appropriate to respond to the consultation providing general comments and observations on the process.</p> <p>The geological disposal of radioactive waste is obviously an issue surrounded by contention. To date however we feel the partnership have gone to great lengths to provide a great deal of information on how such a repository would operate were an appropriate site, within which to locate it, to be found in West Cumbria.</p> <p>At this point the question of whether a suitable site exists within the area of search remains unanswered. The NFU are involved with the Partnership on the assumption that one can be found and if that happens not to be the case that the development will not go ahead. We assume that a substantive amount of additional investigative work will take place within the next steps in this process in relation to identifying such a site.</p> <p>We concur with the view taken by the Committee on Radioactive Waste Management (CoRWM) which suggests that geological disposal offers the best long term approach in comparison with other ways of managing higher-activity radioactive waste.</p> <p>In terms of waste being moved around the country to any suitable site in West Cumbria we would need to be persuaded that the volume of approximately 30% not currently situated at Sellafield could find its way here safely. It seems that as long as any repository is fit for purpose, 100% of the country's high and medium level radioactive waste could be stored within the area of search without any increased detriment to West Cumbria, given that 70% is already located here.</p>

			<p>Long term and short term safety will be overseen by government agencies specifically tasked with nuclear safety. The location of radioactive waste will almost certainly give cause for concern to the residents in close proximity to any potential facility. We would look to the Nuclear Decommissioning Authority to make the safety case to the satisfaction of the regulators and the community.</p> <p>We assume that any agricultural land required for the head workings at any identified suitable site will be purchased at an acceptable rate.</p> <p>The design of any facility will be dependent on the specific location and geology of that site. There are a number of other facilities world-wide being designed and constructed, therefore it seems reasonable to assume that a suitable facility could be designed if an appropriate site is located within West Cumbria.</p> <p>Blighting is obviously an issue which causes great concern. This is likely to occur in the area immediately surrounding and above any repository. It may be considered an unacceptable addition to the existing nuclear industry in West Cumbria given there is also discussion about a potential extension to the existing Sellafield site.</p> <p>We feel it may be possible to mitigate the impact with careful management of the process in terms of Communication and with appropriate compensation where property values stand to be affected.</p> <p>In addition there is the risk that the 'Cumbria' or 'Lake District' brand may encounter adverse publicity, and we understand that some initial research has been carried out into the potential impact. Throughout any development of such a facility which might proceed a carefully managed approach will be required to minimise any impact on sectors such as the tourism industry. We saw the devastating impact that visitors' choosing to stay away during the Foot & Mouth epidemic in the early 2000's had on the Lake District economy. Mitigating measures might take the form of a carefully created marketing campaign to push the message that Cumbria has not changed as one of the most visited locations in Britain.</p> <p>In relation to agriculture particularly we are beginning to see businesses marketing Low Carbon lamb from the Lake District. The Lake District Cheese Company has also achieved a not insignificant market share in recent years. So it's not simply the Lake District as a visitor attraction but the products also associated with the area which must be afforded protection.</p> <p>We feel strongly that if the Councils make the decision to enter the siting process it remains voluntary. In addition we would expect that adequate representation from the agricultural sector and other ancillary industries as well as the rural community is given on the body taking the process forward.</p> <p>And finally if the geological disposal of radioactive waste in Cumbria proceeds a suitable and acceptable 'Benefits' package is agreed.</p>
Organisation /	Question	Agree	Response

Group			
National Nuclear Laboratory	1 – Geology	Yes	<p>We agree with the partnership's view on geology.</p> <p>We recognise the British Geological Survey as having the expertise necessary to carry out the screening and agree that there is no reason to doubt the conclusions.</p> <p>The area of land that has not been ruled out far exceeds the area that is likely to be necessary for the construction of a geological disposal facility. Whilst some of the remaining area may subsequently be shown to be unsuitable there is no valid reason not to carry out further investigations.</p>
National Nuclear Laboratory	2 – Safety, security, environment and planning	Yes	<p>Regulatory and Planning Process</p> <p>We believe that the UK has strong independent regulators and that the responsibilities for regulating issues relating to waste disposal are very clear. The regulator has a sound basis for regulation and has described how they will engage with communities. In any event there will be time to amend the procedure, before an application needs to be made.</p> <p>Safety</p> <p>The evidence presented shows that NDA RWMD has suitable processes and capability. We are also aware that they have a research programme and that it will be possible to change the scope and content of that programme to address any concerns.</p> <p>CoRWM have been set up to scrutinise the plans for the management of higher activity radioactive waste. The members of CoRWM are independent of Government and have the expertise required to comment on the adequacy of the RWMD research programme.</p> <p>The safety cases prepared by RWMD will be subject to a substantial degree of independent scrutiny and planning approval would only be granted if these are shown to be adequate.</p>
National Nuclear Laboratory	3 – Impacts	Yes	<p>We agree with the Partnership's opinions on the impacts of a repository in West Cumbria.</p> <p>We agree that it should be possible to put in place a process to assess and mitigate any potential direct environmental, social or economic impacts of a repository. In the event that this does not prove possible the option of withdrawing from the process will remain open for some time to come.</p> <p>We also agree that the development of a repository offers the prospect of both significant new job-creating opportunities and attractive economic development. These could arise through either direct through the programme for the development of a repository, or through other opportunities that may be linked more broadly to development of the nuclear component of the economy.</p>

National Nuclear Laboratory	4 – Community benefits	Yes	We agree that the Government's acceptance of the 12 Community Benefits Principles set out in the consultation document should provide sufficient confidence to proceed to the next stage of the process.
National Nuclear Laboratory	5 – Design and engineering	Yes	Worldwide a substantial amount of effort has been invested in the development of generic design concepts. There is sufficient consensus that designs can be developed for a wide range of geologies. There is no reason to believe that issues relating to design should prevent entering the next stage of the process. It will be important to understand the requirements for retrievability, but this issue can be addressed in the future, whilst withdrawal remains an option.
National Nuclear Laboratory	6 – Inventory	Yes	There remains significant uncertainty in the actual inventory of waste that may require disposal. However the upper inventory provides a reasonable estimate of the type and quantity of material that could be consigned for disposal. There remains the opportunity to reduce the uncertainty before any final commitment is required.
National Nuclear Laboratory	7 – Siting process	Yes	We recognise that the proposed process is a stepwise process and offers several opportunities for withdrawal. We agree that the Partnership Principles for Community Involvement provide an appropriate basis for engagement.
National Nuclear Laboratory	8 – Overall views on participation		We believe that participation in the search for an appropriate site for a geological disposal facility is compatible with the economic ambitions of West Cumbria. The proposed process offers sufficient opportunity for engagement with the community and there will be several opportunities to withdraw in the future, should this be necessary. We believe that it would be in the interests of West Cumbria to engage with the search and that there is no reason why Allerdale and Copeland should not take part in the search.
Organisation / Group	Question	Agree	Response
National Trust (North West Region)	Letter		GEOLOGICAL DISPOSAL OF RADIOACTIVE WASTE IN WEST CUMBRIA The National Trust is the UK's largest conservation and access charity and a significant owner and manager of land in Cumbria, including parts of West Cumbria that may be affected by the issues addressed in this consultation. For this reason, we are keen to understand the options to be considered and their implications for future management, conservation value and access in relation to the land that we look after on behalf of the nation in accordance with our statutory purposes. Accordingly our comments are concerned with feasibility and impact rather than appropriateness and suitability.

		<p>Overall our comments relate to the amount of information and knowledge available at this time to enable stakeholders to take fully informed decisions in relation to this proposal.</p> <p>Geology</p> <p>It is our understanding that geological investigations undertaken so far have been on the basis of Government White Paper criteria specifically potential impact on mineral reserves and principle aquifers.</p> <p>In light of previous studies and the well known and studied geology of Cumbria we believe that further geological investigations and analysis needs to be undertaken on the basis of risks posed by the complex geology, to the type of development proposed.</p> <p>This appears to be the key feasibility information required to enable such a significant decision to be taken with clarity at this stage. Accordingly, we do not feel that the correct geological questions have been asked as yet to enable this proposal to be considered from a basis of clear knowledge.</p> <p>Safety, security, environment and planning</p> <p>We do not have any specific comments at this stage, however our understanding is that the surface level infrastructure and related facilities would be on a significant scale and in particular would raise a number of planning policy concerns if located within the National Park or impacting upon its wider setting (whether in visual or other respects).</p> <p>Impacts</p> <p>The summary of impact areas set out in Box 15 of the Consultation document (page 57) clearly describe the wide range of physical impact areas that most concern the Trust as a major land owner and Conservation & Access charity. It is a major concern to us that this decision is being considered with Environmental Impact Assessments only being undertaken by NDA later in any process. This implies that EIAs would relate to a specific site whereas the Trust's view is that this is a key area of work required at an early stage to enable stakeholders to make informed decisions and fully understand the physical implications associated with the type of development proposed.</p> <p>This work should be undertaken independently.</p> <p>Whilst there are economic benefits from the construction and infrastructure requirements of the proposal we do not feel that the physical impacts of construction and treatment of spoil generated have been adequately considered.</p>
--	--	---

		<p>The impact on the transportation system associated with this proposal does not appear to have been considered as yet</p> <p>A key concern for the Trust is that the high quality environment and image of West Cumbria and the Lake District as an outdoor destination could be damaged by these developments and whilst we understand a brand protection study is currently being prepared it is not in the public domain at this time. As a major tourism provider in the area, we request to see this study so that we can assess the risks to our operations. We do not believe that there is enough information available at this time to correctly assess the impact on the Cumbria brand and its implications for economic activities outside the nuclear industry.</p> <p>A Community Benefits Package</p> <p>We do not have any specific comments</p> <p>Design and Engineering</p> <p>We do not have any specific comments</p> <p>Inventory</p> <p>We do not have any specific comments</p> <p>The process for siting a repository</p> <p>As set out above we feel that certain key pieces of information (especially in relation to geology and impacts) need to be available for consideration before the process for siting a repository can move forward.</p> <p>Other Comments</p> <p>Clearly the proposal could bring community benefits and economic growth through the nuclear industry. However we do not feel that this proposal can be considered in isolation and should be assessed in the context of key strategic drivers in the area.</p> <p>We believe that the costs and benefits of the proposal should be considered in light of The Energy Coast</p>
--	--	--

			<p>Master Plan and Economic Blueprint for West Cumbria (the latter of which we understand will not be in the public domain until May 2012). These key work areas appear to be significant tools to help contextualise the economic benefits of the proposal within the overall economic development of West Cumbria</p> <p>This, again, suggests that more key information and context is required before the decision to consider this proposal further can be taken.</p>
Organisation / Group	Question	Agree	Response
North Cumbria Campaign for Nuclear Disarmament	1 – Geology	No	<p>The information is slanted and biased towards your obsession with volunteerism. Volunteering to have a repository in Cumbria does not make the geology safe.</p> <p>The Partnership says “further investigation” is needed. West Cumbria is one of the most investigated geological areas in the country with a long history of mining. Mines were abandoned not because they were mined out, but because of the energy needed to dewater them. Areas of “high rainfall, permeable rocks and hills and mountains to drive the water flow” would guarantee leakage to the surface (1999 Government sponsored video – Pangea) Universities of Edinburgh and Glasgow for example have made studies of the area over the past 15 years but you have not allowed Professor David Smythe to give his measured judgement(although you took days to visit France - completely another geology) nor listened to Professor Stuart Haszeldine.</p>
North Cumbria Campaign for Nuclear Disarmament	2 – Safety, security, environment and planning	No	<p>This Government aims to put “first wastes into the repository by 2029.” In 1997 the Nirex Public Inquiry and Appeal agreed with Cumbria County Council’s argument and the findings of experts that the risk was too great for geological disposal of intermediate level wastes. I should like you to let me know how many of the Partnership have read the conclusion of this report?</p> <p>Today’s plan includes high level wastes – a world first.</p>
North Cumbria Campaign for Nuclear Disarmament	3 – Impacts	No	<p>A nuclear dump would blight both agriculture and tourism - Cumbria’s largest industries. Even before the emplacement of wastes, the mining operation would rival the biggest mines in the world adding to the earthquake risk and disrupting West Cumbria’s water table.</p>
North Cumbria Campaign for Nuclear Disarmament	4 – Community benefits	No	<p>West Cumbria should be assured of essential infrastructure such as schools, roads and hospitals without being bribed.</p> <p>What measures have you in mind in the case of a nuclear accident.</p>
North Cumbria Campaign for Nuclear Disarmament	5 – Design and engineering	No	<p>The Partnership says that “ A facility will not be built unless it will be safe during its operations and for future generations.” Their own advice contradicts this: “Geological disposal safety plans do not assume that total containment by engineered barrier systems for ever is possible.” Dr Adrian Bath</p> <p>You have no designs nor any engineering plans as you do not define the waste you are planning to</p>

			<p>deposit in this repository.</p> <p>Thoughts you do have are flawed as gasses from reactions of the fissile materials will escape upwards to ground level and water will become contaminated too and rise to the surface. It is considered likely that this may take place in a matter of decades from the repository being loaded. Cumbria is geologically unsuitable for this repository.</p>
North Cumbria Campaign for Nuclear Disarmament	6 – Inventory	No	<p>You have made no inventory. You say you have one but where is it? Professor Stuart Haszeldine keeps asking too and he found your reply depressingly wanting. The inventory you talk of as your inventory is meaningless as this plan includes existing wastes (which are already outside of the scope of any inventory) and new build wastes from untried “high burn” nuclear power plants.</p>
North Cumbria Campaign for Nuclear Disarmament	7 – Siting process	No	<p>Longlands Farm and the surrounding area was ruled out by the Nirex Inquiry. New criteria have been written to rule Longlands Farm back in.</p> <p>You are choosing this area because it is remote and has few inhabitants. The people who live here are desperate for income. You are exploiting their situation. This is not a robust nor flexible approach to the siting problems. You are using volunteerism. Volunteerism does not make Cumbria geologically safe.</p>
North Cumbria Campaign for Nuclear Disarmament	8 – Overall views on participation		<p>This is a cunning plan to keep the process and the nuclear agenda on track. The government are sinking tax payer £millions into a timetabled ‘process’ “too big to fail.”</p> <p>There would be a geological nuclear dump NOW in the Eskdale area if CCC had not opposed the plan 15 years ago.</p> <p>North Cumbria CND is shocked and deeply unhappy at this process you are running. It is unethical being a complete waste of money and a dangerous approach to the problem of nuclear waste. The whole nation desperately needs to address this problem with intelligence through the democratic process, not just push it onto and under poor Cumbria.</p>
North Cumbria Campaign for Nuclear Disarmament	9 – Additional comments		<p>Cumbria is geologically unsuitable for such a repository. It is dangerous and downright unethical to continue this process.</p> <p>North Cumbria CND says NO to the geological dumping of nuclear wastes in Cumbria.</p>
Organisation / Group	Question	Agree	Response
Nuclear Institute - Cumbria Branch	Letter accompanying consultation response		<p>Introduction:</p> <p>The Cumbria Branch on behalf of the Nuclear Institute (NI) , which is a Professional Institution, and leading learned organisation in the nuclear industry, welcomes the opportunity to respond to this</p>

		<p>consultation, on volunteering to enter the siting process for a Geological Disposal Facility.</p> <p>This response covers each of the 9 questions in the Partnership's consultation document, attached at Annex A.</p> <p>In addition, we have set out below:</p> <ul style="list-style-type: none">- An overview of the Nuclear Institute, and its role- Brief description of how we've involved the NI membership in preparing the response- A summary of the key points in the NI response <p>The Nuclear Institute is content for this response to be made public in its entirety.</p> <p>Overview of NI</p> <p>The Nuclear Institute (NI) is a registered charity and operates as both a professional institution and a learned society. It commenced operations on 1st January 2009, following the merger of the British Nuclear Energy Society and the Institution of Nuclear Engineers, both of whom have origins going back to the 1950's.</p> <p>The NI aims are:</p> <ul style="list-style-type: none">- The promotion of the public understanding of nuclear sciences and the impact on society and the environment- The advancement of education relating to nuclear energy and its applications- The advancement of nuclear science, engineering and technology- In the interests of public safety, the promotion of high standards of education and professional performance amongst those engineers, scientists and others working within the nuclear industry. <p>The NI has a licence from the Engineering Council to qualify Engineering Technicians, Incorporated Engineers and Chartered Engineers and in 2010 received a licence from the Science Council to qualify Chartered Scientists. Anybody who has an interest in nuclear technology can join the NI as a learned member. The NI has about 2,000 members including a thriving group of over 1000 younger professionals, the Young Generation Network (YGN). The YGN are active across the UK and internationally promoting the advancement of nuclear technology, sharing of best practices and the education of the public in promoting nuclear understanding and science and technology as a career path.</p> <p>The NI operates 10 regional branches in the UK, one in South Africa and one in UAE. We have many international links to develop and promote better practice in all aspects of nuclear. The NI is a member of the European Nuclear Society, with a membership second in size only to the French Nuclear Society.</p> <p>The Cumbria Branch is one of the largest of the UK Branches with a membership of approximately 300 nuclear professionals. These professionals are from a spread of geographical locations ranging across the</p>
--	--	--

		<p>Cumbria County. A large proportion of the NI Cumbria Branch membership live and work in and around West Cumbria. Our nuclear professionals have a range of skills which encompass engineering, science and technical capability. We include environmental specialists, nuclear operators and a range of engineering disciplines within our members' core competencies.</p> <p>The NI Cumbria Branch is an extremely active branch engaging with the local public through a series of lectures to promote understand of nuclear science and engineering e.g. the renowned summer lecture series which has previously focussed on topics such as new reactor build and the science behind a GDF. The Branch has also been a significant contributor to nuclear related public consultations relevant to the local area. This includes a Cumbria Branch led response on the NI response to the DECC consultation on MWRS Stage 4 frameworks for siting the GDF. The branch were also significantly engaged in The NI response to the DECC consultations on the Nuclear National Policy Statements, in 2010 and 2011 which reflected the NI Cumbria branch's concerns about the credibility of designating Braystones and Kirksanton as well as Sellafield as new nuclear build sites (in the 2010 consultation response).</p> <p>As the NI offers a range of professional membership grades, many of our members hold professionally recognised Memberships such as Chartered Engineers or Scientists. In addition, a proportion of our members are recognised as leaders in their fields through achievement of the status of Fellow. A significant proportion of our membership hold professional accreditations with scientific and engineering professional bodies e.g. Royal Society of Chemistry, Institute of Mechanical Engineers etc. We hold a body of nuclear expertise and knowledge within our Cumbrian membership community.</p> <p>In addition to our local membership core expertise, we are able to reach out to the Nuclear Institute expertise from across the UK. For instance one Past President, John Earp, is recognised for his nuclear expertise and has been invited to sit on a Pre-Licensing Nuclear Safety Committee for a projected new build in the UK and last year was nominated to become a member of the Nuclear Chief Inspectors Technical Advisory Panel. Our current President Norman Harrison, is invited to sit as an Industry Expert for the Nuclear Liabilities Finance Advisory Board (NLFAB), which advises the Secretary of State as to the adequacy and independence of funds established by new build operators to cover costs of decommissioning and remediation at the end of power plants operating life.</p> <p>We believe that as nuclear professionals working and living in West Cumbria, we have a valuable contribution to make to the consultation on volunteering for the siting process. We also are willing to volunteer independent nuclear expertise to participate in future Partnership sessions and can provide a range of experts to support the Partners.</p> <p>Further information can be obtained at www.nuclearinst.com or from the Executive Secretary Elaine Boyes (e.boyes@nuclearinst.com or 0208 695 8222).</p> <p>NI Response Process:</p>
--	--	--

		<p>Whilst the NI is a national organisation, it was recognised that this issue was concerned with a regional branch and Cumbria Branch lead the discussion, focussing the inputs around those local to West Cumbria.</p> <p>For this consultation a small central Cumbria team was set up to co-ordinate the overall response. Local Cumbrian Branch members were contacted and asked to provide responses to the consultation. These were then collated and factored into a consolidated response which was reviewed by the central team. This consolidated draft was then circulated round the Cumbrian Branch committee for their comments/endorsement. The resultant draft was then produced for endorsement by the Nuclear Institute Board of Trustees. The emphasis throughout the process was to ensure that the response reflected the views of the nuclear professionals located in the regional branch of Cumbria.</p> <p>An Overview of Key Points:</p> <p>The NI recognises that there is a pressing need to find a long term solution for disposal of waste and supports volunteering to engage in the next part of the process and agree that Allerdale and/or Copeland Borough Councils should continue to take part in the search without entering into any commitment.</p> <p>With regard to geology, the NI recognises that there remains significant work to determine the suitability of the remaining land not excluded by the BGS (British Geological Survey) study. . We acknowledge that this may not all be suitable for a GDF but without the evidence to definitively prove this, there is value in continuing to the next phase of the process.</p> <p>The NI recognizes that in England the Environment Agency (EA) is the lead regulator for the disposal of radioactive waste and we are reassured by the rigour with which they are undertaking this role. However the NI does not believe that the role and responsibilities of the Office of Nuclear Regulation, (ONR, previously NII) are sufficiently clearly visible in the MWRS consultation document.</p> <p>The NI advocates that the role of ONR is increased in visibility to give assurance that the lead UK nuclear safety regulator is satisfied with the processes for delivery of a future GDF.</p> <p>The NDA is currently both the customer for and the supplier of the GDF. The NI advocates that the roles for funding and business investment decisions be separated from that of design and nuclear safety in a similar manner to the model used for Site Licence Companies interactions with the NDA.</p> <p>We broadly agree with the conclusions made by the Partnership in that all perceived negative impacts can be mitigated once the next stage of the siting process is underway.</p> <p>The NI recommends that, as part of the community benefits package, the Partnership should insist that investment is made into up-skilling the Cumbrian workforce such that it is well placed to win quality jobs on the project, maintain the existing nuclear infrastructure and eventually draw quality employment into the</p>
--	--	--

			<p>area.</p> <p>The NI is unable to express an opinion on the design and engineering at this early generic or conceptual stage but it agrees with the Partnership's assessment.</p> <p>We accept that the baseline and upper inventory estimates used in the consultation provide a reasonable scenario for the West Cumbria community to use in it's deliberations on participating in the next part of the process.</p> <p>The NI agrees that the siting process is logical, fair and transparent whilst honouring the principles of voluntarism.</p> <p>In order to ensure that the Partnership remains balanced and informed, the NI would like to offer the Partnership our independent professional expertise base in nuclear matters. The NI could provide independent West Cumbria based or National support and expert advice to the process.</p> <p>Submitted and Signed on Behalf of the Cumbria Branch Nuclear Institute and endorsed by Board of Trustees</p>
Nuclear Institute - Cumbria Branch	1 – Geology	Yes	<p>While there are some doubts over the suitability of the remaining land not excluded by the BGS (British Geological Survey) study, we support the methodology used by MWRS in seeking independent peer reviews of the study as best practice. The area of land remaining which was not excluded by the study clearly leaves adequate land available to accommodate the footprint of the GDF (Geological Disposal Facility) up to the estimated maximum 25 square kilometres. We acknowledge that this may not all be suitable for a GDF but without the evidence to definitively prove this, there is value in continuing to the next phase of the process.</p> <p>We do acknowledge that the suitability of the host rock is one of the key factors in deciding the long term safety of the repository in terms of migration of nuclides through the environment, and this needs to be understood intimately when identifying potential site areas. Whilst there remains uncertainty about the suitability of West Cumbria's geology it should be noted that understanding into nuclide transport through groundwater and different rock types has increased significantly in the last decade through R&D and will continue to do so over the future decades.</p> <p>Therefore it is prudent that West Cumbria should remain part of the search to identify a potential site area so that the knowledge can be applied to any decision to participate in future stages of the volunteering process.</p>
Nuclear Institute - Cumbria Branch	2 – Safety, security, environment and planning	Not Sure/Partly	<p>The NI recognizes that in England the Environment Agency (EA) is the lead regulator for the disposal of radioactive waste and we are reassured by the rigour with which they are undertaking this role. The NI believes that the proposals presented to date do meet all safety, security, environment and planning requirements.</p>

			<p>However the NI does not believe that the role and responsibilities of the Office of Nuclear Regulation, (ONR, previously NII) are sufficiently clearly visible at this stage. The ONR has a wealth of experience of the regulation of sites licensed under the Nuclear Installations Act that should be applied to the GDF project.</p> <p>There are three reasons why additional input and involvement of the ONR should be sought:</p> <p>a. Underpinning documentation (Document 36.1 Regulators' roles and processes in the implementation of MWRS) shows that the GDF will be subject to the requirements of the Nuclear Installations Act and therefore subject to licensing and regulation by the ONR. The public consultation pack indicates a low awareness of the ONR role and it required significant research to locate the statement that supported the intent to license the future GDF.</p> <p>b. The proposals for the GDF indicate that the waste will, in principle, be retrievable. In this event it is likely that the waste will be retrieved to ONR licensed sites for treatment, storage or repacking in which case the ONR are a significant regulator in the process.</p> <p>c. The ONR have developed a robust methodology for progressive permissioning of facilities on Nuclear Licensed Sites. This ensures that the safety case is developed in parallel with the design and that work does not progress, nor significant expenditure committed, unless it can be demonstrated that it is compliant with pre-agreed safety principles and likely to lead to a licensable outcome. (The NI strongly advocates the discipline associated with this approach.)</p> <p>Therefore the NI advocates that the role of ONR is increased in visibility to give assurance that the lead UK nuclear safety regulator is satisfied with the processes for delivery of a future GDF.</p> <p>The NDA is currently both the customer for and the supplier of the GDF. As the "controlling mind" for the GDF, at this stage, the NDA occupies a position similar to that of a Site License Company ultimately responsible for the safe operation of the facility but it is also responsible for delivering the Government programme for resolution of the current lack of a long-term disposal route for higher activity radioactive waste. Even at this formative stage the NI believes that a robust but constructive customer/supplier relationship has many advantages in ensuring that safety, security, environment or planning problems are resolved in a pragmatic and affordable manner and also ensures that that the regulators are clear on who has responsibility for demonstrating compliance with regulations.</p> <p>The NI advocates that the roles for funding and business investment decisions be separated from that of design and nuclear safety in a similar manner to the model used for Site Licence Companies interactions with the NDA.</p>
Nuclear Institute - Cumbria Branch	3 – Impacts	Yes	<p>[Ed note - letter]</p> <p>We broadly agree with the conclusions made by the Partnership in that all perceived negative impacts can</p>

			<p>be mitigated once the next stage of the siting process is underway.</p> <p>The NI considers that it is very important that the positive image of the West Cumbria nuclear industry be maintained and notes that the brand reputation work has not been completed and available to support this consultation.</p> <p>West Cumbria has long been affected by industry, both within and outside the National Park. This has not had adverse effects on the region as a whole. Many historic industrial sites are now tourist attractions, e.g. the mining industry. We believe that with adequate planning any impacts can be managed for the benefit of the area, ideally as long as provisions are made to address these impacts before the end of stage 5 is reached (where the right to withdraw from the siting process is removed). Most of the negative impacts will be of a finite nature during the construction phase of the repository. For example, the effect of noise and visual pollution during construction phases need to be taken into consideration as part of any community benefits package to ensure adequate infrastructure investment and to minimise impact on people's day to day lives</p> <p>The NI believes that siting the repository in Cumbria will bring economic sustainability to the region, as the nuclear industry has already done for the last 60 years. Maintaining or increasing the West Cumbria engineering and science base can only benefit other local industries which require these key core skills.</p> <p>The NI note that there is a positive benefit which would sustain the scientific and engineering skills in West Cumbria, particularly as this will occur in the same timeframe as there is a decreasing need for these skills as the national decommissioning programme is delivered at Sellafield.</p>
Nuclear Institute - Cumbria Branch	4 – Community benefits	Yes	<p>[Ed note - letter] The NI recognizes that the nature of a community benefits package is unclear at this stage and agrees that these need to be carefully negotiated and openly scrutinized. The design, construction, commissioning and operation of the GDF will require the employment of a significant number of skilled technicians and engineers. The NI recommends that, as part of the community benefits package, the Partnership should insist that investment is made into up-skilling the Cumbrian workforce such that it is well placed to win quality jobs on the project, maintain the existing nuclear infrastructure and eventually draw quality employment into the area.</p>
Nuclear Institute - Cumbria Branch	5 – Design and engineering	Yes	<p>[Ed note - letter] The NI is unable to express an opinion on the design and engineering at this early generic or conceptual stage but it agrees with the Partnership's assessment. As described in Question 2.2 above, the NI does believe that issues of detailed design, retrievability and site specific issues should be subject to the same rigour of assessment as those applicable to a Nuclear Licensed Site.</p>
Nuclear Institute - Cumbria Branch	6 – Inventory	Yes	<p>[Ed note - letter]</p> <p>As largely professional scientists and engineers working in the nuclear industry, we appreciate the considerable alterations which may occur to the waste inventory estimate as a result of developments in technology, legislative changes, new nuclear projects and the opportunity for reprocessing spent fuel.</p> <p>We accept that the baseline and upper inventory estimates used in the consultation provide a reasonable</p>

			<p>scenario for the West Cumbria community to use in it's deliberations on participating in the next part of the process.</p> <p>We support the principles that the Partnership have proposed and encourage the Partnership to continue to engage with the Government as they seek to improve information on the upper inventory limits. We believe that it is reasonable for the Government to provide greater certainty over the inventory in the reasonably near term and this information should be made available to support any participating community in their decision making process.</p>
Nuclear Institute - Cumbria Branch	7 – Siting process	Yes	<p>[Ed note - letter] Yes, the partnership has taken a methodical approach to the siting process and has provided a conceptual process by which the Government's (already thorough proposals) for stage 4 of the siting process will be honoured. This uses standardised assessment techniques, such as weighted scoring matrices, to determine the overall comparison between potential site areas to be taken forward to stage 5. The NI agrees that the siting process is logical, fair and transparent whilst honouring the principles of voluntarism.</p>
Nuclear Institute - Cumbria Branch	8 – Overall views on participation		<p>[Ed note - letter]</p> <p>The NI considers that local communities should volunteer to engage in the next part of the process and agree that Allerdale and/or Copeland Borough Councils should continue to take part in the search without entering into any commitment.</p> <p>Many of the NI members live and work in the Allerdale and Copeland communities adjacent to the largest producer of radioactive waste in the UK. We are also living in proximity to one of the largest stores of High Level radioactive waste and Intermediate Level radioactive waste, in the world. The NI believes that the local communities should be fully engaged and active in seeking a long term and safe disposal solution.</p>
Nuclear Institute - Cumbria Branch	9 – Additional comments		<p>[Ed note - letter]</p> <p>The NI recognises that there is a pressing need to find a long term solution for disposal of waste.</p> <p>The inhabitants who live and work in the Allerdale and Copeland Boroughs are the community most at risk from the accumulated waste of the early nuclear power and weapons programmes and resolution of final radioactive waste disposal is particularly important for themselves and future generations (both current and future local residents). We note that our NI Cumbria members contribute to this population by living and working in West Cumbria and this NI response to the consultation represents the local Cumbria NI membership.</p> <p>Similar to an infrastructure asset such as a road, the interim surface storage and packaging facilities currently in place require continual maintenance, upgrading when necessary to ensure modern and latest standards are in place, and eventual replacement. Some of the current facilities have been in place since the 1960's and so require considerable investment just to maintain adequate levels of safety. Individual waste products and packaged waste may require re-work if the GDF construction is delayed. Such activities expose the West Cumbrian workforce to risk, as well as costing the taxpayer more money. The</p>

			<p>sooner there is a permanent disposal facility the better for our population. The location will define the required repository design and the corresponding packaging design specification for waste products. Establishment of the location will enable these two issues to be resolved and reduce the need for such re-work of the waste packaging and storage arrangements</p> <p>In order to ensure that the Partnership remains balanced and informed, the NI would like to offer the Partnership our independent professional expertise base in nuclear matters. The NI could provide independent West Cumbria based or national support and expert advice to the process.</p> <p>Submitted and Signed on Behalf of the Nuclear Institute</p>
Organisation / Group	Question	Agree	Response
Nuclear Waste Advisory Associates (NWAA)	Introduction to letter answering consultation questions		<p>Nuclear Waste Advisory Associates (1) (NWAA) Response.</p> <p>Introduction</p> <p>Nuclear Waste Advisory Associates (NWAA) is an independent group of experts with a collective experience of nuclear issues of well over 200 years. We aim to provide information and advice on the risks posed by radioactive waste, and support to decision makers, stakeholders and communities involved in its management. Our membership includes former members of the Radioactive Waste Management Committee (RWMAC) and the Committee on Radioactive Waste Management (CoRWM(i)) and former campaigners who worked for environmental organisations.</p> <p>In March 2010, NWAA produced an Issues Register which lists 101 outstanding scientific and technical issues relating to the production of a robust safety case for the deep geological disposal of radioactive waste.(2) Since producing it we have held various discussions with the Environment Agency, the Nuclear Decommissioning Authority (NDA) and the Health and Safety Executive. It is our view that these outstanding issues need to be resolved, if indeed it is possible to resolve them, at generic level before the Government gives the go-ahead to the continued search for a repository for legacy waste, and at a site specific level, before it embarks on a new nuclear build programme which will give rise to the generation of yet more nuclear waste.</p> <p>The Nuclear Decommissioning Authority (NDA) published a response to the Nuclear Waste Advisory Associates' Issues Register in April 2011 (3) and further detailed its approach to managing outstanding scientific and technical issues in a report in August 2011.(4) A second edition of this report is expected soon. The NDA's register of issues now lists over 900 outstanding issues.(5)</p> <p>NWAA members have given presentations to the Partnership in the past on ethics, the inventory and the NWAA Issues Register.</p>

			<p>While the Partnership appears content with only “suitable regulatory and planning processes” and it appears to be satisfied that the NDA has suitable capability and processes in place to deal with these outstanding scientific and technical issues, NWAA remains of the view that further independent scrutiny work needs to be carried out before any further decisions are taken. The NDA needs to be far more open and transparent about how research on these outstanding issues is being carried out and it needs to acknowledge that simply agreeing to carry out the research does not necessarily mean it will get the answer it wants.(6) Funds need to be provided for scrutiny work to be carried out, including by critical voices.</p> <p>The remainder of our response to the Partnership’s consultation document will be given as answers to the questions posed in that document.</p> <p>Footnotes</p> <p>1 http://www.nuclearwasteadvisory.co.uk/</p> <p>2 http://www.nuclearwasteadvisory.co.uk/wp-content/uploads/2011/06/NWAA-ISSUES-REGISTERCOMMENTARY.pdf</p> <p>3 Geological Disposal: Response to Nuclear Waste Advisory Associates’ Issues Register, NDA, April 2011 http://www.nda.gov.uk/documents/biblio/upload/NDA-RWMD-Technical-Note-GD-Response-to-Nuclear-Waste-Advisory-Associates-Issues-Register.pdf</p> <p>4 RWMD Approach to Issues Management, NDA, August 2011 http://www.nda.gov.uk/loader.cfm?csModule=security/getfile&pageid=47986</p> <p>5 Number mentioned verbally at Geological Disposal Implementation Board meetings. The Update on RWMD Approach to Issues Management, NDA/RWMD 25th November 2012 gives the figure as 500. The note also says that 400 internally raised issues have been removed because these have already been identified as information needs within the RWMD R&D programme.</p> <p>6 The Environment Agency has pointed out that it is possible that the results of disposal research programmes may not actually indicate that disposal would be safe. “Environment Agency, Response to Nuclear Decommissioning Authority Consultation on – Radioactive Waste Management Directorate Proposed Research and Development Strategy”, Environment Agency, November 2008. http://www.environmentagency.gov.uk/static/documents/Research/1976__RWMD_Proposed_RD_strategy.pdf see page 6</p>
	1 – Geology	No	Disposal of radioactive wastes in a coastal environment of sedimentary cover over fractured basement close to a hinterland with high relief and consequent high potential heads is not the prime choice for a geologically safe environment for a Geological Disposal Facility (GDF).

		<p>Despite the current process having greater transparency with pro-active, but in NWAA's view, inappropriate and inadequate, public consultation, the fundamental requirement of any potential site remains unchanged i.e. geological, hydrogeological, geotechnical and geophysical suitability.</p> <p>If an area has permeable sediments (which may not presently be exploited as a major or minor aquifer), overlying igneous, metamorphic or volcanic rocks which are invariably fractured, on both micro- and macro scales, it is obviously not the "best" site in the wider scheme of geologic environments.</p> <p>Indeed, with reference to the previous zoning by the British Geological Society (BGS), the areas currently under consideration, in the northern part of west Cumbria, were considered unsuitable, on regional geological criteria.(7)</p> <p>A good summary of UK progress on the processes of consideration on deep geological disposal of radioactive wastes and the proposals for a (GDF) is given in the Non-Technical Summary; Managing Radioactive Wastes Safely: Initial Geological Unsuitability Screening of West Cumbria. (8) The full report (Managing Radioactive Wastes Safely: Initial Geological Unsuitability Screening of West Cumbria; BGS 2010), presents an updated thorough review of the geology of West Cumbria.(9)</p> <p>It must be recognised the information available for vitally important digital modelling of this area, in terms of the data available, the understanding of that data, assessment methodology, the geological structures, the hydrogeology, geotechnics and rock mechanics have not changed since the unsuccessful UK NIREX planning inquiry into proposals for a GDF at Longlands Farm in 1995/96.</p> <p>Three dimensional geological modelling capabilities (e.g. using packages such as GSI3D, GoCad, Petrel etc. Haslam; 2012) at BGS and by others, have in recent years significantly changed in power and applicability for any potential GDF site proposal. However, to properly characterise such a facility adequately, in the context of typical oil industry exploration activities (the usual application for such complex modelling approaches), far more data than that acquired in the Sellafield- Longlands Farm Potential Repository Zone (PRZ) and district investigations, carried out by UK Nirex during the 1980s and early 1990s, should be available. A conservative approach would be at least twice as much data, with twice as much detail, over at least a 20 km square area, and at least to 2 kms in depth. Since this work (from 1986 through to 1996) cost over £500m, a major exploration commitment is necessary for any new proposed potential UK GDF site.</p> <p>For example RWMAC (the DoE/DEFRA Radioactive Waste Management Advisory Committee – the predecessor to CoRWM) was advised by the former UK NIREX Directors in 2002, that the costs associated with adequate investigations to support two separate potential GDF locations within the UK Mainland, each requiring 20 deep boreholes for geological assessment, would be at least £7 billion.</p> <p>The process currently appears to be putting the voluntarist approach ahead of finding the safest possible</p>
--	--	--

			<p>method to manage these wastes. If we assume that the best method is geological disposal,(10) then the approach currently being followed is putting voluntarism ahead of finding the best geology. There should be a national debate about what constitutes suitable geology and how to find it before proceeding to site selection, whether in West Cumbria or elsewhere.</p> <p>Choosing a location on public acceptability grounds alone, without prime reference to the requirements of a geologically safe and hydrogeologically inactive location, is environmentally and economically irresponsible, in the opinion of the NWWA. It should also be noted that the current process would not allow a comparative assessment of a variety of different sites in different geological environments as is common practice in other countries.</p> <p>Footnotes</p> <p>7 Geoscientist Vol.7 no. 7 pp.18-20 (1997); Kelling G & Knill J</p> <p>8 http://mrws.decc.gov.uk/assets/decc/mrws/744-west-cumbria-non-technical.pdf</p> <p>9 http://mrws.decc.gov.uk/assets/decc/mrws/741-west-cumbria-main-report.pdf</p> <p>10 NB that the CoRWM report in 2006 proposed disposal 'given the current state of knowledge' on the assumption that knowledge would be enhanced to justify disposal. Note also that a majority of CoRWM members recognized disposal as a least worst option and called upon HMG to continue to explore alternative and more appropriate means of radioactive waste management, a recommendation which may render disposal obsolete and archaic.</p>
<p>Nuclear Waste Advisory Associates (NWAA)</p>	<p>2 – Safety, security, environment and planning</p>	<p>No</p>	<p>Safety</p> <p>NWAA does not believe it is sufficient for the Partnership to be satisfied that there are suitable regulatory processes in place. Given the scale of the task involved in developing a robust safety case, with over 900 outstanding issues - one geologist has described the safety case as like predicting the weather on a particular day in thousands of years time - NWAA remains of the view that further independent scrutiny work needs to be carried out before any further decisions are taken, and a process needs to be developed with funds provided to allow that scrutiny work to be carried out, including by critical voices. The NDA needs to be far more open and transparent about how research on these outstanding issues is being carried out and it needs to acknowledge that simply agreeing to carry out the research does not necessarily mean it will get the answer it wants.</p> <p>Security</p> <p>Further concentration of nuclear facilities in West Cumbria and transport of materials between sites could lead to increased risk of terrorist attacks. It is noteworthy that the short paragraph addressing the</p>

			<p>regulation of security (page 38) only makes reference to a 'Site Security Plan' but overlooks security issues raised by the multiple long term transports of nuclear wastes to a GDF host community. The supplementary documentation provided by WCMRWS partnership on security, including DOC 36.1, only makes passing reference (para.3.11) to the need for comprehensive security for nuclear waste in transit. The implications of essential security provisions to en route communities are overlooked. With an estimated 1800 transports a year required to feed the repository over several decades, the security aspects of a GDF are extremely worrying, especially if spent Mox fuel is included in any eventual inventory.</p> <p>Environment</p> <p>An increased concentration of nuclear facilities in West Cumbria must cause additional concerns and be detrimental to tourism in the English Lake District.</p> <p>Planning</p> <p>There appears to be only one brief mention of the possibility of a spent fuel encapsulation plant being built as part of the surface facilities. This would be a major and controversial development in its own right without the associated GDF. Further details should be provided about what such a facility might entail. Current NDA thinking appears to be that the embarrassing length of time (90 years +) between spent fuel discharge and encapsulation might be lessened if spent fuel from different discharge dates was mixed together in the same container, to reduce the overall temperature. The practical implications of such a policy are alarming. It immediately removes any possibility of on-site encapsulation, the most desirable environmental option, and imposes the necessity for a single central store. It is not clear whether any research has been done into the safety of this particular type of waste "mixing". The Partnership should have sought more information on encapsulation and fuel mixing.</p> <p>Another outstanding concern is over the consideration of requirements for the retrievability of emplaced radioactive waste in a GDF. Under the subhead 'Timescale of retrievability' (at p76) it states "while the option of retrievability needs to be designed into a repository (possibly in the next several years), any decision to backfill vaults and tunnels can be taken by future generations under circumstances posed at the time (many years away)." This overlooks the need for local planning authorities to consider the size of any surface footprint that would be created by provision of a surface store with sufficient capacity to safely and securely store potentially an entire inventory of radioactive wastes recovered from a GDF were safety conditions to arise in the GDF necessitating the recovery and retrieval of its contents. It is clear the size of store required would be many times larger than the surface waste receipt building, and that such a large engineering task could not be accomplished when needs arise, but must be available as a contingency, if retrieval is to be presented as a meaningful option.</p>
Nuclear Waste Advisory	3 – Impacts	No	One of the features of the proposed GDF is the sheer scale of the project. The volume of the underground facilities to accommodate wastes could be the equivalent of between six and eleven Albert

Associates (NWAA)			<p>Halls with underground footprint could vary from 6km² to 25km². This would require an engineering project the size of the Channel Tunnel creating vast amounts of spoil to be accommodated at the surface. The project will also require transport infrastructure for the movement of wastes and materials. In view of the scale and impact of the project no site should be considered that lies within or near the Lake District National Park.</p>
Nuclear Waste Advisory Associates (NWAA)	4 – Community benefits	No	<p>Such packages are, unless very widely distributed, likely to divide communities (on a regional/County scale) into “haves, and have-nots” with particular negative impacts on the tourism industry in West Cumbria. It is therefore important to recognise that many communities far from the community hosting the GDF are also affected communities if they are likely to regularly receive transports of radioactive wastes destined for the GDF through their area. Principle 1 (explicitly) and 8&9 (implicitly) (pages 69-70) identify the importance of recognising other affected communities. What is needed in addition is more detail on how these en route communities would be provided with appropriate benefit from community packages.</p> <p>NWAA also believes that benefits packages should be considered for sites where radioactive wastes are stored for the long-term including potential new reactor sites. The Government should support unequivocally the principles for community benefits set out in the consultation document. Benefits must be sustained over the long term to mitigate burdens that will be borne by future generations.</p>
Nuclear Waste Advisory Associates (NWAA)	5 – Design and engineering	No	<p>The NDA, as did its predecessor UK NIREX, places far too much emphasis on engineered barriers to overcome geological, geotechnical and hydro-geological components of a coastal Cumbrian GDF. The selection of a more suitable site, in the total UK geological context would be a better starting point for site selection.</p>
Nuclear Waste Advisory Associates (NWAA)	6 – Inventory	No	<p>The DECC/NDA 2010 Upper Inventory only allows for a 10GW new reactor programme. The total volume of packaged waste in this Upper Inventory is given as 1,160,000m³. Much of the increase over and above the baseline inventory is attributable to extending the life of existing reactors. Using NDA’s figures it appears that a 16GW new build programme would produce an inventory of 1,221,021 m³.¹¹ The baseline inventory is expected to have a footprint of between 6km² and 10km² depending on the rock type. A maximum inventory, which includes spent fuel from 16GW of new nuclear reactors would have a footprint of between 12km² and 25km². So waste from life extensions and new reactors would take up between about a half to two thirds of the repository. The Partnership should, therefore, stop saying that 70% of the waste destined for the repository is already located at Sellafield. In addition, the consultation material should explain to people what type and volume of waste is likely to form the inventory as well as the radiological burden expected to be accommodated in the GDF. The legacy waste alone is expected to produce 78million terrabequerels of radioactivity but with new build waste which is far hotter and contains more fission products produced by the longer burn-up in the reactors, that figure could rise by as much as five times.</p> <p>Footnote</p>

			<p>11 See Slide 8 here: http://www.nda.gov.uk/documents/loader.cfm?csModule=security/getfile&%20PageID=48680</p>
Nuclear Waste Advisory Associates (NWAA)	7 – Siting process	No	<p>Four members of the first Committee on Radioactive Waste Management (CoRWM1), including its first chairperson, wrote to the Secretary of State in November 2009 to point out that the Committee’s proposals for long-term management of radioactive wastes identified a process towards a long-term solution, recognising that deep disposal should be implemented on the basis of ‘an intensified programme of research and development into the long-term safety of geological disposal.’ Such a programme has not been undertaken.(12)</p> <p>Moreover the Committee’s proposals applied to legacy waste only. Should a new build programme be introduced, in CoRWM’s view it would require a quite separate process to test and validate proposals for the management of the wastes arising. In other words the deep geological disposal option was seen by CoRWM as the ‘least-worst’ option which could be applied to existing waste since we have no choice over whether or not we manage that waste. Intentionally creating new waste raises completely different political, thechnical and ethical issues. Such a process has not been carried out, and there do not appear to be any plans to carry out such a process. Instead the Government’s overzealous pursuit of a repository for West Cumbria seems to be a way of removing radioactive waste as an impediment to building new reactors.</p> <p>If a repository is developed it will not be available for new build wastes until well into the next century, if at all. The methods of storage, the need for encapsulation, the movement of wastes are all unknowns but it is likely that new build sites will be responsible for the management of these wastes for well over a century. Yet there is no debate about the principle of long-term storage let alone the option of volunteering for the communities affected. The voluntarist principle should apply to those communities near new nuclear power stations where wastes, including spent fuel, will be stored for the indefinite future.</p> <p>Footnote</p> <p>12 Letter from Prof Andrew Blowers, Prof Gordon Mackerron, Mary Allan, Pete Wilkinson to Ed Miliband, dated 20th November 2009 http://www.no2nuclearpower.org.uk/news/CoRWM1_Letter_201109.pdf</p>
Nuclear Waste Advisory Associates (NWAA)	8 – Overall views on participation		<p>The NWAA view is that the Cumbrian Authorities should NOT take part in the search for somewhere to put a repository.</p> <p>A major waste of public time and money could be in progress unless UK national lessons are learnt from the process. This has happened so often in the radioactive waste disposal debate over the past 50 or so years. The UK has “reinvented so many wheels” and largely ignored lessons learnt from overseas repository consultation and demonstration programmes in the past (e.g. in Sweden, Finland and Germany).</p>

Nuclear Waste Advisory Associates (NWAA)	9 – Additional comments		<p>The Partnership says that because government policy is for geological disposal, it is only discussing geological disposal. This approach, particularly where the area of search for a site is selected by a voluntarism approach rather than a geological one, fails to choose the Best Available Technique for the management of waste.</p> <p>10. Conclusions and Recommendations</p> <p>NWAA believes that alternative methods of management have not been given the attention they deserve, and that the Government has taken CoRWM1's recommendations out of context. It is important to remember that, in the original policy recommendations put forward by CoRWM1, geological disposal was part of an approach, not the sole solution. It cannot be available for many decades and must be preceded by a robust programme of interim storage as well as a commitment to an intensified programme of research and development. Moreover, there is no certainty that geological disposal will ever be developed.</p> <p>The current consultation assumes that Deep Geological Disposal is the only immediate first step to the safer management of the more dangerous categories of radioactive wastes currently in the UK inventory. Some of these stores and categories of wastes could be managed in the short term in a far safer manner by better surface storage facilities and management. Choosing a location on public acceptability alone, without prime reference to the requirements of a geologically safe and hydrogeologically inactive location, is environmentally and economically irresponsible.</p> <p>The argument that further investigation in Cumbria, albeit an area which does not have ideal geology, might lead to the designation of a site which can rely heavily on engineered barriers to make a safety case is a dangerous one. NWAA believes moving on to the next stage will create a momentum in the process which is too great to allow withdrawal in future, leading to the selection of an extremely inferior site.</p> <p>NWAA recommends that the Cumbrian authorities should NOT take part in the search for somewhere to put a repository.</p>
Organisation / Group	Question	Agree	Response
Outreach Cumbria/ONI	1 – Geology	Not answered	<ul style="list-style-type: none"> • Need for more research to confirm it's safe – have all aspects been considered? • Public concerns about geological fault lines and poor quality subterranean rock.
Outreach Cumbria/ONI	2 – Safety, security, environment and planning	Yes	<ul style="list-style-type: none"> • In principle underground storage is preferable to over ground storage – safer. • There is a security knowing it is underground rather than over ground – out of reach. • More preferable appearance underground than ever expanding space over ground. • Needs more consultation on environmental impact. • Concerns about impact on Lake District National Park.
Outreach	3 – Impacts	Yes	Effect of spoil movement, and construction might have a negative effect, disruption, noise, changes to

Cumbria/ONI			road and rail.
Outreach Cumbria/ONI	4 – Community benefits	Not Sure/ Partly	<ul style="list-style-type: none"> • Benefits must be for the WHOLE of Cumbria, not just West Cumbria. • Investment in social housing for the WHOLE of Cumbria to make housing more affordable. • Money to support community groups around Cumbria. • Money to safeguard Air Ambulance, hospices, hospitals. • More information who would be fighting for benefits. • Potential financial benefits from tax.
Outreach Cumbria/ONI	5 – Design and engineering	Yes	<ul style="list-style-type: none"> • Needs more investigation • Long term effects • Capping/sealing/retrieval • Technological advancements - impact • What will happen in future generations?
Outreach Cumbria/ONI	6 – Inventory	Yes	<ul style="list-style-type: none"> • If they agree to take international waste - make charges Local area benefits financially and environmentally. Don't want to be a waste dump from other peoples waste without any benefit • Increase employment
Outreach Cumbria/ONI	7 – Siting process	Yes	<ul style="list-style-type: none"> • What is involved in desk based investigations and will the public be involved. • Mathematical modelling, historical investigations? • How will the public continue to be involved at what stages – releasing public information
Outreach Cumbria/ONI	8 – Overall views on participation		<p>Can the local councils afford to do their search with austerity cuts?</p> <p>Are the nuclear industry paying for it?</p> <p>It makes sense that they take part in the process.</p>
Organisation / Group	Question	Agree	Response
Parish Council of St John's Castlerigg & Wythburn	1 – Geology	No	<p>Finding a suitable rock formation that can act as an effective barrier is essential for the construction of a safe disposal facility. So far we have not heard of any area within the county that is suitable. Geological experts have not recommended any such places in Cumbria.</p> <p>Dr J Dearlove and Prof A Godmundson both stated “The Partnership” can rely on BGS study. The partnership was not originally happy with BGS survey and asked for further clarification. That further work did not use any Cumbria specific data, therefore, it is a fallacy to say BGS work can be relied upon. Prof David Smythe states West Cumbria should be ruled out on geological ...hardly a ringing endorsement of the BGS study!</p>

			<p>Dr Dearlove feels it is only Prof Smythe's personal opinion that the area is not suitable – What is the difference between a personal opinion and a Professional? Surely if a location was suitable, all experts would agree? 20 years ago NIREX deemed that Cumbria was unsuitable to bury nuclear waste hence the above ground storage.</p> <p>Cumbria has volcanic-fractured fault lines and is subject to earthquakes, as recent as 2010. It is the wettest place in England with continual movement of ground water. Other mountainous countries are providing sites away from these locations, e.g. Sweden, Finland and Switzerland. Radiation and gases could easily return to the surface through the many fractures and faults which are filled with water.</p> <p>BGS study has not revealed a suitable place so far, thus we believe that if the area were suitable, a ringing endorsement would have been made by now. We need a definite opinion about suitable geology first. Find first then consult, instead of asking the question and then trying to find a place here in Cumbria. It is not fair to tempt us with money while risking the health and lives of everyone in the future.</p>
Parish Council of St John's Castlerigg & Wythburn	2 – Safety, security, environment and planning	No	<p>Safety – If the area is not geologically safe, a solution elsewhere needs to be found or surface storage needs to be a stopgap. Area not safe as geology not proved. Only preserved safety. Area on coast not safe 20 years ago. This time we know they are going to look further afield but complex geology we know. Security – with such a large development security would be a huge problem, for most of the country. Waste arriving and waiting to be stored.</p> <p>Environment – Given water pollution seeping through the faulted and fractured land, the perception of the whole area will be changed. Cumbria, the Lake District no longer would become a “World Heritage Site”. National Park at present does not seem to address this problem and consider the consequences.</p> <p>Planning – Local Planning rules will not be enforced as this is a Government driven scheme. NO local planning policy. Viability of West Cumbria in particular will change.</p>
Parish Council of St John's Castlerigg & Wythburn	3 – Impacts	No	<p>This will impact on the Lake District and Cumbria as a whole. Not just West Cumbria.</p> <p>A marketing policy for farming and food is to be developed but the fact that this will be needed shows that the impact of the repository will affect the whole area. There is a danger in underestimating people's perception of Cumbria. For example, after Foot and Mouth in 2001, visitors stayed away and went to other places. Will there be a reduction in the consumption of locally produced food, as the “Cumberland Brand” may not be welcomed.</p> <p>Land and property prices will fall, West Cumbria is a very small strip, although well populated, part of the country. Infrastructure, for transportation, north and south will be needed because of the high mountains in the middle.</p>

			This will make great changes which will impact on the landscape people come to enjoy.
Parish Council of St John's Castlerigg & Wythburn	4 – Community benefits	No	As yet the partnership has not said who will benefit. Cost of infrastructure needed. There is insufficient information. There is no trust in going forward to stage four. Questions of ownership and mineral rights. Seems like a bribe for the people of West Cumbria, emphasis on money more than environmental impact on health and safety. Unsafe to rely on the promise of community benefit. Change of government may mean withdrawal of the “promise” of money.
Parish Council of St John's Castlerigg & Wythburn	5 – Design and engineering	No	The ability to retrieve and monitor this waste should be a cornerstone of the design. The waste removable if needed. We are not satisfied that the design addresses the issue of vast quantities of water in region. We have had severe flood episodes in 1985, 1995, 2005 and 2009. The EA now forecast a 20% increase, which will need to be managed. Developments should have been made to make it possible for nuclear waste to be reused or recycled properly and safely. Why should West Cumbria collect everyone else's? Statement does not say it will definitely only be England's. Omit?
Parish Council of St John's Castlerigg & Wythburn	6 – Inventory	No	Partnership tries to reassure us in the document but future changes to government always give rise to questions. One nuclear issue is that it can be said to be irresponsible to continue to produce waste that you can't deal with. Outside England as well! Omit?
Parish Council of St John's Castlerigg & Wythburn	7 – Siting process	No	A suitable place in England should have been found first for such a huge project. We feel it is wrong for West Cumbria to volunteer without a suitable site. It seems a flawed approach to address such a huge question. There are far more suitable areas in England with stable geology. All other countries have found a suitable site first: - Sweden, Finland, France, Switzerland and USA. This should not have gone beyond stage two without a suitable site being found and tested. Canvassed in West Cumbria because they have dealt with nuclear fuels since 1951. The two councils Copeland and Allerdale receive credible local support but only in this comparatively small area immediately affected. Only two on committee but the huge use of the rest of the country has not

			<p>been considered. Infrastructure access around the central massif. Financial pressures problems for host community and people did not bother to object earlier. County compliant. Not a good safety record over the years.</p> <p>Poor record for something so dangerous and not fully understood.</p>
Parish Council of St John's Castlerigg & Wythburn	8 – Overall views on participation		<p>Our conclusion is from the information given that West Cumbria should withdraw.</p> <p>Right to withdraw later gives no confidence.</p> <p>Nowhere in Cumbria seems to have the suitable geology.</p> <p>Need to find somewhere in England first and then consult with community. Not the way it has been done here.</p> <p>Continuing is disrupting life in Cumbria – farmers, tourists especially as the National Park is such an important part of the county and so close to West Cumbria.</p> <p>Continuing concerns about safety in this “fractured fault lined” area with so much water – gas and water emissions.</p> <p>Not enough information about other waste to be stored here – has to arrive from wherever, and “how” a big question. Only narrow coastal strip north and south of Copeland and Allerdale.</p> <p>The impacts on community have not really been addressed in wider area – considering huge area of fells inaccessible in middle of county.</p>
Organisation / Group	Question	Agree	Response
Parton Parish Council	1 – Geology	Partly	We believe that we should know much more about the geology of the area before we are committed to a process which might prove difficult to withdraw from especially as areas where it is said the geology is more suitable have shown no interest. We would not be happy if the government wanted to persuade the area that whilst not ideal the geology would be acceptable.
Parton Parish Council	2 – Safety, security, environment and planning	Not Sure	Why cannot the government now say that any planning application would not be dealt with locally? The planning authority locally would be one of the councils that are involved in the present consultation. That cannot be right. It is said that a planning application is many years away but it offends common sense to argue that the system might change. It could still be said that any planning application would be dealt with the then current national planning authority.
Parton Parish	3 – Impacts	No	The consultation documents underestimate the impacts of a repository on the area. In our area already

Council			there are major worries that a very low level waste site will mean fewer visitors and business unconnected with the nuclear industry will stay away. Young people in the area want to be able to choose different careers and not be wedded to the nuclear industry. We should be aiming to diversify not more of the same.
Parton Parish Council	4 – Community benefits	No	A benefits package must not disadvantage any community. Look at the new road from Howgate to Lilyhall. A real benefit for everyone saw Parton people where it is nigh on impossible to get into the flow of traffic especially when turning towards Whitehaven. If the package is negotiated by local authorities only then it is bound to be unfair to the host community who will suffer most. If a financial package is secured there needs to be an organisation quite separate from the local authorities administering the fund without councillors or at least executive/cabinet councillors being involved.
Parton Parish Council	5 – Design and engineering	Not Sure	Is it not possible to provide more detail? It is said to be the initial opinions but these hardly amount to information on which any one could make an informed decision. Why cannot we be told what will happen to spoil if a host communities only agree on the basis that spoil is moved right away. It is not good enough to keep repeating that issues will be sorted out later. That might be when the area is left with no choice but to stay in the process.
Parton Parish Council	6 – Inventory	Not Sure	Why cannot it be said now that everything that the government decides will go in will go in? Talk of local people negotiating or having an influence about the inventory is beyond belief. The only possible involvement might be the size of the prize (see community benefits).
Parton Parish Council	7 – Siting process	No	The consultation document refers to credible support and the only way that can be measured is by allowing every individual who might be affected a vote. An opinion survey, however it is argued that it will be accurate, does not allow the individual to have their say. This is the only democratic way that credible support can be calculated. It would not be expensive given that there is to be a poll for police commissioners this autumn and the cost of the election/referendum could be shared. Now is the time for a referendum because once the next stage is reached different areas are considered and people might be content that if a GDF is sited many miles away but would not agree if it were on their doorstep. If only a very small poll were undertaken at a later date then those who opposes in principle would be denied a say. A democratic mandate is required by the borough councils and the county council before they can justify entering the next stage.
Parton Parish Council	8 – Overall views on participation		We would need much more detail and the agreement to a referendum on whether the area should enter the stage where a search for a site in Copeland and Allerdale is started before we could agree to move forward.
Organisation / Group	Question	Agree	Response
Ponsonby Parish	1 – Geology	No	Safety is the overriding criterion in determining the construction of a Geological Disposal Facility and in

Council			<p>turn the suitability of the geology of the proposed location.</p> <p>The 1890km² area of land declared as not ruled out as clearly unsuitable by the BGS survey, is misleading.</p> <p>The NIREX explorations previously undertaken using generic geological settings concluded that only 1 area within West Cumbria was potentially suitable. This, after investigation and incurred costs exceeding £M400, was abandoned. An agreement to move forward into the next stage must not be given before further unsuitable areas have been eliminated (and shared with the general public). Without this there is an unacceptable risk of ongoing significant abortive expenditure and delay, and of sustaining an over-optimistic representation of the suitability of the area in the eyes of the general public.</p> <p>The public and stakeholder concerns have not been fully and adequately answered (Ref Box4 and in Prof David Smythe's public presentations). 2 Professors of Geology have stated that the complex and fractured geology of West Cumbria makes it one of the worst places in the UK for a long timescale disposal site.</p>
Ponsonby Parish Council	2 – Safety, security, environment and planning	Partly	<p>Little mention is made of any international regulatory framework with regard to HLW and ILW.</p> <p>The Safety, Security and Environmental concerns are dealt with by the various Regulators and being site-specific will involve the local communities as stakeholders. We have confidence in the independence and integrity of the Regulatory Bodies and their ability to ensure an acceptable safety outcome. However we are disappointed that the Regulators' view of the generic disposal system Safety Case, which should have been published before the end of 2011 for consultation, is not included within this consultation process. Until this document is made available and has been subject to public consultation no decision to move forward should be taken.</p> <p>No reference is made to the inferior infrastructure which is unable to cope with a traffic incident on the A595 south of Calderbridge, never mind an emergency at Sellafield.</p>
Ponsonby Parish Council	3 – Impacts	No	<p>The location of a Repository in West Cumbria will further discourage the investment of non-nuclear enterprises, not only within the proximity of the proposed site, but also throughout Lakeland.</p> <p>The decline of the diversified industries in West Cumbria has much to do with the presence of a large nuclear site and the loss of enterprises in the area of multi Queen's Award success is deplored.</p> <p>It is regrettable that the Brand Protection strategy together with the Government's response on how the impacts will be addressed is not forthcoming. This leads to a loss of confidence. Whilst all the detail cannot yet be provided, a positive binding commitment to sustain a diversified wealth generating base, to both Borough and Host Community, must be given before any decision to move forward is taken.</p>

			<p>The proposal by NDA for spoil to be kept on site by building 12 metres high embankments for an indeterminate number of years is not acceptable.</p> <p>Concern is raised over the market value of domestic and business properties and how the blight problem would be dealt with.</p>
Ponsonby Parish Council	4 – Community benefits	No	<p>The Partnership's Community Benefits principles should incorporate the requirements that Parish Councils are involved in the allocation and use of community benefits. It is essential they have protection in the interpretation of Principles & Flexibility, and Principles & Distribution.</p> <p>This Parish Council has received 'nowt' from the nuclear industry over the years from the establishment of UKAEA at Windscale; rather it has suffered the loss of its local School, Post Office and pub. It has also experienced the drain of local youngsters unable to afford the rents and house prices which can be afforded by incoming contracted employees. The village community has lost its heart!</p> <p>Any commencement of preliminary work on a Repository should be preceded by a benefits package and consideration given to the recompense or compensation for the ongoing disruption to local communities.</p> <p>A binding specific commitment to a large scale benefits to West Cumbria e.g. massive infrastructure improvements, should be sought and obtained before any onward decision is taken and these should be delivered in parallel with the construction of any facility.</p>
Ponsonby Parish Council	5 – Design and engineering	Partly	<p>Generally the opinions on design are acceptable but detailed design issues are largely site-specific. Whilst retrievability is explicitly included within generic designs, it begs the questions 'When does a Storage Facility become a Disposal facility?' and 'Will the Host Community be fully consulted in the making of that decision?'</p>
Ponsonby Parish Council	6 – Inventory	Partly	<p>The Safety, Design and Engineering Safety Cases for a GDF will determine the various levels of inventory for disposal.</p> <p>Box 24 illustrates the imponderables in determining the volumes of inventory to be dealt with and raises concern that some radioactive materials such as spent fuel, plutonium, and uranium, should be treated as waste, when they could be used for reprocessing and fuel manufacture. The large quantity existing of these materials are of deep concern to communities with close proximity to Sellafield. Any change to a new-build programme illustrates the necessity to govern the disposal of new wastes and the logistics covering new reactors within the UK.</p> <p>Within Principle 2 of Box 25, a Host Community must have, along with DMB's, a veto on any changes to the inventory.</p> <p>The report implies strongly that only UK wastes will be placed in the facility; this is just not true. Relatively</p>

			large volumes of ILW derived from the reprocessing of overseas fuel will inevitably be incorporated. This is misleading to the public and should be corrected; failure to do so will reduce confidence in any factual data subsequently presented.
Ponsonby Parish Council	7 – Siting process	No	<p>The White Paper of June 2008 devotes much of its volume to the principle of voluntarism and partnership working and in Chapter 7 clearly sets out the staged process to determine site selection. It is regrettable that the consultation document deviates from this site selection process. Para 6.8 of the White Paper defines the concept of community under the headings of Host Community, Decision Making Body and Wider Local Interests, all of whom should be participants in the formal Community Siting Partnership prior to the Stage 4 assessment. The report is lacking in a timescale for such a new partnership and whilst its suggested steps for organisational arrangements (Box 32) are outlined, it does not record the strong feeling that any Host Community would require Government commitment to immediate infrastructure improvements prior to construction of a GDF. Appendix C9 of the White Paper envisages that potential partners would begin to work together in the next steps leading up to a local Decision to Participate, and if that decision is affirmative the formal Community Siting Partnership would then be established. This is ignored in the consultation document.</p> <p>Under Para 6.40 of the White Paper which refers to the Right of Withdrawal – an objective to obtain a Community Benefits Package to reflect the needs of local communities and their future generations, is stated. However no process is formulated should a Host Community disagree with such a package negotiated by the Community Siting Partnership</p>
Ponsonby Parish Council	8 – Overall views on participation		<p>Should the 3 Principal Authorities move forward</p> <p>The health, safety and well-being of the current and future generational inhabitants of West Cumbria are of fundamental importance as we are all stewards of the West Cumbrian environment with an obligation to protect it from harm.</p> <p>The location of a Repository, no matter where it is to be built, must be demonstrated to be SAFE and the associated impacts managed accordingly.</p> <p>The response to the previous questions reflects the views of the Parish Council and the lack of understanding in the conduct of the Partnership controlled by the 3 Principal Authorities.</p> <p>Until the Partnership/Decision Making Bodies have addressed the points we have raised we do not believe that a decision to move forward should be taken.</p>
Ponsonby Parish Council	9 – Additional comments		The White Paper (Para 6.31, Table 2) – Indicative Steps to a Decision to Participate – in Step 13 suggests that the Decision Making Bodies will make a formal Decision to Participate probably through a full meeting of the councils. It is reprehensible that only 1 of the 3 Principal Authorities has stated that a decision would be made by the full council, hardly encouraging the demonstration of credible support.

			The policy of not having had an independent chairman for the MRWS Partnership calls into question the stance of the leaders of the Decision Making Bodies within the Partnership and their respective authorities.
Organisation / Group	Question	Agree	Response
Portinscale Artists	1 – Geology	No	There is the largest rainfall in England in the area (described as West Cumbria although most of it is in North and South Cumbria). The water in the lakes is used as drinking water. Cumbria has the most diverse types of rock in the country therefore many fault lines between the various rocks. The storage of nuclear waste underground is not a proven technology – there are no sites in the world where such waste has been stored underground for any reasonable length of time. The fracking required to dig out such a site has caused earthquakes (Blackpool). There is a reasonable risk of destroying Britain's favourite National Park. It seems there has been much arm twisting to ensure this goes ahead as there are no other 'volunteers'.
Portinscale Artists	2 – Safety, security, environment and planning	No	This seems a substantial amount of research required before anyone can say it is safe to bury waste of this nature. It would seem that if there is progress to the next stage then it is likely the government will pass legislation to give them sole right of planning permission. Notwithstanding the government looking at comments of the various local planning boards the Secretary of State will be under substantial political pressure to ensure this goes through. Having already spent a lot of money the numbers of residents of the national park is small compared with Workington or Whitehaven (West Cumbria) and it is therefore likely their views will be overridden. The worst danger is to those areas under which the nuclear waste is deposited and its watershed.
Portinscale Artists	3 – Impacts	No	Whilst the job creation would be in West Cumbria (ie Workington and Whitehaven), the underground site is likely to be in North or Central Cumbria over which we have no say. The National Park employs at least 32000 people in the tourist industry. The additional long-term employment prospects for West Cumbria where the above site when finished might be would be about 500. Therefore for 500 jobs could potentially destroy 32000 jobs not counting the destruction of a possible World Heritage site at Britain's favourite National Park. If or when there is any accident remunerative compensation for reduction in house price when sold is poor compensation for the majority who had chosen to live and work in the National Park. Hands off our National Park as a dumping ground for the country's and I'll bet in the future, world toxic nuclear waste. It has already been decided in Essex to ship their nuclear waste to Cumbria as they don't want it in the South East.
Portinscale Artists	4 – Community benefits	No	The benefits package is too vague to be sure. There is at present proportionally less government money going into West Cumbria (none into the rest of Cumbria) as opposed to the North East. Are they holding back so the benefits package looks better? No amount of benefits would compensate for the ruination of the National Park. The government is likely to be short of funds for a long time – can it afford substantial benefits. The siting

			of the above ground operations likely West Cumbrian coast – but the worst possible affects would be where the underground site was established – would this be recognised?
Portinscale Artists	5 – Design and engineering	No	How could one agree to a design not yet formulated. It would appear that there would have to be some access as it is unknown how the highly toxic materials will react over a long period of time. The lead and glass covering of the materials are bound to deteriorate leading to leaking underground and possibly over a long period, probable destruction of the environment. Too little is known about storage of materials of this nature. They are much better being stored at each nuclear site rather than Cumbria being the toxic dustbin of the UK.
Portinscale Artists	6 – Inventory	No	The government are assuming this site will go ahead as they have no other area stupid enough to volunteer. I have already heard that closing nuclear power stations around the country are planning to send their nuclear waste to Sellafield whether or not a suitable geological site is found. The government are therefore proposing to bury everything under the Lakes for at least the next 130 years. Once a site is identified the government is proposing to change planning rules so whatever we say will not count. There is no way they would look for a new site for the waste from the new nuclear power stations. They'll try and bribe us with a new hospital to treat all the people affected by the toxic dump on our doorstep which will last longer than the earth. West Cumbria is making decisions which affect the people in the National Park much more. I understand nuclear waste from abroad (Japan) has been dumped on Sellafield for the last 30 years. Are we so poor that Cumbria will be the world's toxic waste site.
Portinscale Artists	7 – Siting process	No	I notice that where an area disagrees with siting in their area, this may be overridden by governing local authority if they think it would make it difficult to find the right site. This riding roughshod over local opinion. Whitehaven and Workington are keen for this to go ahead under any circumstances and as only they have volunteered so is the government – it's far enough away from London and the South East. When in the final vote comes any referendum would include the larger voting area on the West Coast – which would override the smaller population in North Cumbria who are stuck with West Cumbria councils to make the weight of numbers. Any referendum should include the underground siting areas on their own including the 25 km tunnels. The last place where it should be sited is in Cumbria. There are much better geological sites elsewhere.
Portinscale Artists	8 – Overall views on participation		Allerdale and Copeland do not represent the views of people in North Cumbria despite our being lumped in with them. We have nothing in common. We are being dragged through this process against our wishes. It is the most ludicrous suggestion to site plutonium, uranium etc under a probable World Heritage area. It should never have been considered and we should stop now.
Portinscale Artists	9 – Additional comments		<p>Too many acronyms without knowing what these mean.</p> <p>I have heard on television Cumbria described as the sink of Britain. This is because – without our consent or knowledge highly toxic nuclear waste has already been sent to Cumbria to store above ground. How are much more would it be the sink of Britain with possible at least 25 cubic km being transported and stored under or near a National Park. Tourism, by far the biggest earner and employer, would be</p>

			decimated. Parts of West Cumbria are still throwing milk away from 1957 accident. How much worse for the environment would it be for 25 cubic km of nuclear waste being buried using unproven technology.
Organisation / Group	Question	Agree	Response
Preston Richard Parish Council	1 – Geology	No	The council feel insufficient knowledge is available about the long term effects
Preston Richard Parish Council	2 – Safety, security, environment and planning	No	The council feels safety is only as good as those who implement it and as stated human failure is a possibility and too high a price to pay
Organisation / Group	Question	Agree	Response
Prospect Sellafield Branch	1 – Geology	Yes	We agree that there is sufficient area remaining, with potential for siting a safe repository. We recommend that the search for a suitable site be allowed to take place, along with detailed geological investigation of any such sites that are found in preliminary studies.
Prospect Sellafield Branch	2 – Safety, security, environment and planning	Yes	We agree with the Partnership's opinions on the regulators and safety, and in particular, we share the Partnership's concern that further scrutiny of the planning process would be required if the MRWS process carries on.
Prospect Sellafield Branch	3 – Impacts	Not Sure/ Partly	Whilst we agree that an acceptable process can be put in place, we believe that the Partnership must give a clear and firm steer on the nature, priorities, and timescales of that process, especially with regard to community and human impacts.
Prospect Sellafield Branch	4 – Community benefits	Not Sure/ Partly	We agree with the 12 principles, but feel that more work needs to be done on how a benefits package might be orchestrated in conjunction with other benefits packages accompanying other future projects, such as new nuclear build, so that the effective coordination would result in an aggregate benefit that is greater than the sum of its parts.
Prospect Sellafield Branch	5 – Design and engineering	Yes	We must emphasise that monitoring and retrievability are essential prerequisites for a repository to be acceptable in West Cumbria.
Prospect Sellafield Branch	6 – Inventory	Not Sure/ Partly	We believe that new build waste must be allowed into a repository.

Prospect Sellafield Branch	7 – Siting process	Not Sure/ Partly	We do agree with the Partnership's initial opinions, but with the proviso that the process is not allowed to be unduly delayed or derailed by minority NGOs, and that union involvement continues in the new partnership.
Prospect Sellafield Branch	8 – Overall views on participation		We believe that West Cumbria should participate in the search for a repository site, and cannot understand why we would refuse to, given that the right of withdrawal remains. We believe that the MRWS Partnership should make a strong recommendation to the decision making bodies, that they participate in the next stage.
Prospect Sellafield Branch	9 – Additional comments		We believe that the MRWS process should continue to be followed, in a timely manner, and we believe that the real decision for the community only comes if and when suitable geology is found and thoroughly investigated.
Organisation / Group	Question	Agree	Response
Quakers - Swarthmoor South West Cumbria Area meeting	Letter		<p>Quakers say no to the proposed search for a disposal site in Cumbria for hazardous high-level radioactive waste.</p> <p>We would like you to consider this letter as a formal submission to the consultation.</p> <p>We are writing to say no to the proposed search for a disposal site in Cumbria for hazardous high-level radioactive waste.</p> <p>We are convinced that the waste needs to be deposited in the safest possible place and, however politically convenient, that is not in West Cumbria but in other parts of the UK with much more benign and predictable geology.</p> <p>Saying 'No' delivers a clear message that the nuclear industry is welcome but that it cannot be right to jeopardise the future safety of our community, or investment in other Cumbrian economic sectors - notably tourism and agriculture, for the sake of central Government expediency and in return for 'sweeteners'.</p> <p>The alternative is destabilising the perception of Cumbria and Cumbrian industry for many years to come.</p>
Organisation / Group	Question	Agree	Response
Radiation Free Lakeland	Artwork with accompanying text		<p>[Descriptions of the images and details of the accompanying text are detailed underneath the photographs of the artwork below]</p> <p>Side one</p>

MORE OF THE SAME ?

A PICTORIAL VIEW
OF THE
LAKES NUCLEAR SACRIFICE ZONE?
from the vantage point of
CONISTON OLD MAN



We know enough about Cumbria's
Geology to say NO to
'Geological Disposal'.

To: Managing Radioactive Wastes Safely Partnership
FREEPOST RSKT-LTXU-HAYC
West Cumbria : MRWS Partnership
Copeland Borough Council
Copeland Centre
Catherine St
Whitehaven
CA 28 75J.

Dear MRWS
Please take this as Radiation Free Lakeland's
response to the Consultation
Kind regards,
Marianne Birby
on behalf of RFL
8 Chelsea Court, Milnthorpe, Cumbria LA7 7DD.

Text: More of the same?

Title:
A PICTORIAL VIEW
of the
LAKES NUCLEAR SACRIFICE ZONE?
from the vantage point of
CONISTON OLD MAN

(Map/diagram showing various sites in/near West Coast and transport routes)

Existing:

1. Solway Firth. The M.O.D. test fire depleted uranium shells into the Solway.

2. Workington. First radioactive scrap metal 'recycling' plant in Europe. Studsvik corporate sponsors of Cumbria Wildlife Trust.
3. Sellafield. No long producing electricity.
4. Drigg – UK's National Low Level Waste Repository
Eskmeals – M.O.D. test fire depleted uranium
5. Wastwater. Millions of gallons abstracted daily to cool Sellafield's nuclear waste.
6. Barrow-in-Furness. "Home of Trident"
7. Heysham nuclear power station
8. Springfields nuclear power station
9. Lillyhall landfill radwaste dump

Proposed:

- A. Braystones nuclear power plant
- B. Kirksanton – nuclear power plant
- C. Sellafield – nuclear power plant
- D. Copeland and Cumbria County Council 'expression of interest' in the most risky way of looking after nuclear waste – Geological Disposal
- E. Keekle Head – proposed low level waste 'repository' – maze of old quarries and abandoned mines.
- F. Heysham 3 nuclear power station

(Drawing of pumping station on Wastwater)

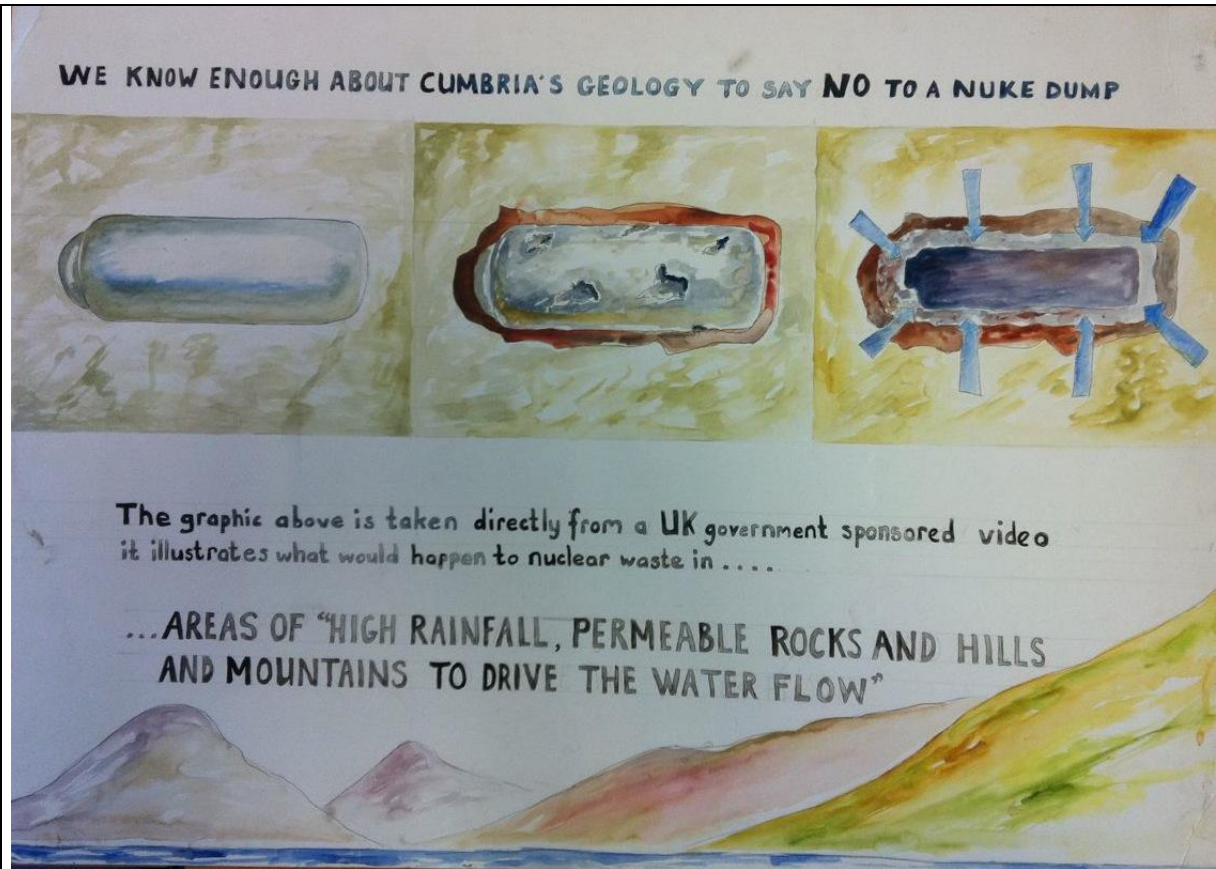
Text: The very noisy pumping station at Wastwater. Constant fresh water is abstracted to cool nuclear waste 24 hours a day seven days a week.

Text: We know enough about Cumbria's Geology to say NO to 'Geological Disposal'.

Dear MRWS

Please take this as Radiation Free Lakeland's response to the Consultation.

Side Two



Text:

WE KNOW ENOUGH ABOUT CUMBRIA'S GEOLOGY TO SAY NO TO A NUKE DUMP

(Drawings of a waste canister)

The graphic above is taken directly from a UK Government sponsored video it illustrates what would happen to nuclear waste in...

...AREAS OF "HIGH RAINFALL, PERMEABLE ROCKS AND HILLS AND MOUNTAINS TO DRIVE THE WATER FLOW"

			Drawing of mountains/a lake
Organisation / Group	Question	Agree	Response
Seascale Parish Council	1 – Geology	Yes	No comment was made
Seascale Parish Council	2 – Safety, security, environment and planning	Yes	No comment was made
Seascale Parish Council	3 – Impacts	Yes	No comment was made
Seascale Parish Council	4 – Community benefits	Not Sure/ Partly	It was argued that each step of the process should be accompanied by visible community benefits. The view was expressed that a government commitment to future community benefits would be insufficient.
Seascale Parish Council	5 – Design and engineering	Yes	No comment was made
Seascale Parish Council	6 – Inventory	No	No comment was made
Seascale Parish Council	7 – Siting process	Yes	No comment was made
Seascale Parish Council	8 – Overall views on participation		Allerdale and/or Copeland Borough Councils should take part in the search for somewhere to put a repository, without any commitment to have it.
Organisation / Group	Question	Agree	Response
Seaton Parish Council	Letter		Underground Nuclear Repository in West Cumbria At its meeting held on 20 February 2012, the Parish Council considered the potential implications of siting an underground nuclear repository in West Cumbria.

			<p>The Council resolved not to support moving to the next stage in the process to develop an underground nuclear repository on the following grounds:</p> <ol style="list-style-type: none"> 1. The Council are concerned that if the three responsible councils (Allerdale Borough Council, Copeland Borough Council & Cumbria County Council), agree to move to stage 4, the way the process is designed will make it very difficult to withdraw from the process. 2. The Council believes that the complex geology in the area would render it unsuitable and that the review should focus on areas of the country with suitable geology, rather than on seeking suitable geology after an area has expressed an interest in hosting a facility. 3. The Council is concerned that the impact of surface sites & the knowledge of the presence of an underground facility would have a negative effect on tourism. 4. The Council is of the view that the potential economic benefits are negligible in comparison to the overall negative impact on the area. 5. The Council is concerned about safety aspects, in particular, the uncertainty about the potential impact of gas emissions & additional waste. 6. The Council believes there is too little information available to enable a balanced decision to be made on the Decision to Participate. <p>The Council asked that I [the Clerk] write to you requesting that you take note of the Council's concerns in this matter.</p>
Organisation / Group	Question	Agree	Response
Sedbergh Parish Council	Letter		<p>Sedbergh Parish Council is aware that the period for response to the consultation ended on the 23rd March. Nevertheless the Parish Council wishes to place formally on record its views on the current process following its meeting on the 29th March not only because of the grave disquiet which it feels as a result of how the matter is being dealt with but also as a declaration of solidarity with those other Parish Council which have expressed opposition to the matter proceeding to Stage 4 (and which in many cases are far closer to the likely site of the proposed repository).</p> <p>The Parish Council has both substantive and procedural reservations to the existing process and is opposed to the matter proceeding further at this time. In summary the reasons for objection are as follows:</p> <ol style="list-style-type: none"> 1. Contrary to the procedure carried out in other countries, "volunteer" communities to host the repository were requested before scientific and geological surveys were undertaken as to the suitability and safety of likely volunteer sites. This is putting the cart before the horse. Common sense alone dictates (let alone

			<p>the practice in all other countries) that the science be done first and only then that volunteers be requested. Otherwise there is the strong danger that the geology will be “bent” to fit the volunteer community which in the present case in fact is the only community in the country coming forward. From the Nirex Inquiry onwards there is abundant evidence to indicated that there are very big question marks over the suitability of the geology throughout the whole of West Cumbria and this alone is enough reason to pause the process until other sites in the country have been investigated.</p> <p>2. The Parish Council is astonished that the principal and most influential members of the Partnership set up to advise the Decision Making Bodies (DMB’s) are the DMB’s themselves. This seems contrary to all principles of natural justice and weights the process in such as way as to lead to the conclusion that the decision to go ahead to the next stage has effectively already been taken.</p> <p>3. For similar reasons we feel that the decision to limit the telephone opinion poll largely to the Districts of Allerdale and Copeland is once again skewing the likely result in favour of proceeding to the next stage. There are many other interests in the County which should be considered at this crucial point in the process apart from the economic benefits which are seen as likely to accrue to the West Coast as a result of proceeding all the way down the road to the construction of a repository. The further the process goes the less likelihood there is of the Government allowing a withdrawal at a later stage.</p> <p>4. So far we feel that the whole process has been lacking in transparency and that the only way in which this can be rectified is by way of a Cumbria wide referendum so that the concerns of everyone in the County may be expressed and given due weight alongside the views of those living in West Cumbria.</p> <p>We ask that the Partnership take these views into account when formulating its advice to the DMB’s.</p>
Organisation / Group	Question	Agree	Response
Sellafield Shop Stewards Committee	1 – Geology	Yes	There are potential areas remaining to site a safe repository. We agree that the search for a suitable site is allowed to take place ,also along side a detailed geological investigation of any sites that are found in any preliminary studies
Sellafield Shop Stewards Committee	2 – Safety, security, environment and planning	Yes	We agree with the Partnerships opinions on the regulators and safety ,and in particular ,we also share the concerns that further scrutiny of the planning process would be required if the MRWS process carries on
Sellafield Shop Stewards Committee	3 – Impacts	Not Sure/ Partly	We agree that ann acceptable process can be put in place and that the Partnership must give a clear and firm steer on the nature ,priorities and timescales of that process, especially with regard to community and human impacts.

Sellafield Shop Stewards Committee	4 – Community benefits	Not Sure/ Partly	We agree with the 12 principals but considerably more work needs to be done around how the benefits might be orchestrated
Sellafield Shop Stewards Committee	5 – Design and engineering	Yes	We must emphasise that monitoring and retrievability are essential for a repository to be acceptable in West Cumbria.
Sellafield Shop Stewards Committee	6 – Inventory	Not Sure/ Partly	We believe that all future waste from new build must be disposed of in the repository
Sellafield Shop Stewards Committee	7 – Siting process	Not Sure/ Partly	We agree with the partnerships initial opinions ,but believe that the process should not be allowed to be unduly delayed by minority NGOs, and the Trade Unions should have continued involvement in any future partnership.
Sellafield Shop Stewards Committee	8 – Overall views on participation		We believe that West Cumbria should participate in the search for a repository site, Given that the right of withdrawel remains why should we refuse. We believe that MRWS partnership shpould strongley recommend to the decision making bodies that we participate in the next stage.
Organisation / Group	Question	Agree	Response
Sellafield Workers Campaign	Letter		<p>The Sellafield Workers Campaign hereby formally RESPONDS to the consultation from the MRWS partnership.</p> <p>Let’s take a cool look at the precise question MRWS, acting on behalf of Cumbria, Copeland and Allerdale councils, is asking us all, including our Sellafield workforce.</p> <p>The MRWS asks: should our community TAKE PART in the SEARCH for a site for a repository, without ANY commitment to host that repository?</p> <p>We can’t understand why any rational person would answer, “No, we will NOT take part in the search.”</p> <p>As West Cumbrians, we’ve worked with nuclear materials day in and day out for more than 50 years. We understand the need for rigorous, sound science, and for top-level technology. We trust ourselves, and we trust our community.</p> <p>We believe that the MRWS Partnership should make a strong recommendation to the decision-making bodies that they participate in the next stage.</p> <p>We see it as essential that the trade unions continue to be involved in ANY FUTURE partnership taking the matter forward in a timely manner, should the decision to take part in the search be made the relevant</p>

			bodies. We say: Yes, West Cumbria should take part in the search for “somewhere to put” a facility.
Organisation / Group	Question	Agree	Response
Shut Down Sizewell Campaign	Emailed letter		<p>Please take this letter as a formal response to the consultation on whether local authorities in Cumbria should make a decision to go forward to the next stage of siting a nuclear dump - near to or under the Lake District National Park - in West Cumbria.</p> <p>This proposal is of concern to those who visit the region or have other connections with it. This not an issue only for those who live in West Cumbria. This is why I am writing to express my concerns.</p> <ul style="list-style-type: none"> • I understand there are significant issues surrounding the geological suitability of West Cumbria as a region to dispose of nuclear waste. Detailed examination has highlighted significant problems with the geology & hydrogeology of W Cumbria and it has been concluded it is not a suitable region for a nuclear dump. • The scale of this proposed project is staggering. It will create vast amounts of waste 'spoil' from digging out the tunnels and vaults. The radioactive waste involved - including thousands of tonnes of highly radioactive spent fuel - is of key concern. The operations may continue for over 150 years. • The plans, if carried out, present a significant risk to the environmental and economic well-being of the Lake District National Park and surrounding regions. • If a dump were to be constructed in West Cumbria, it would ruin the beautiful western landscape of the Lake District National Park and possibly deter visitors. • I support the view that the combined impact of the above and below-ground operations of this dump would to be likely to have significant negative impacts on the Lake District National Park and could prevent the Park becoming a World Heritage Site. • Nowhere in the world is there an operating repository for the kind of waste proposed in West Cumbria. This project is unique in its intention to bury high-level wastes, spent nuclear fuel and intermediate-level radwaste from all past, present and future nuclear activities. <p>I ask the decision making bodies responsible not to make a 'decision to participate' to go forward to the stage of siting a nuclear dump in West Cumbria</p>
Organisation / Group	Question	Agree	Response
Smith Engineering (GB) Ltd	1 – Geology	No	No good reason to bury waste when it can be stored above ground safely

Smith Engineering (GB) Ltd	2 – Safety, security, environment and planning	No	Several new stores are being constructed at sellafield to a very high standard. Why move the waste when it can be stored in the existing high spec facility.
Smith Engineering (GB) Ltd	3 – Impacts	Not Sure/ Partly	The money can be used for decommissioning existing plant . We do not need a repository the economic drivers are profit for companies like nirex. The general public will not benefit.
Smith Engineering (GB) Ltd	4 – Community benefits	No	The money could be used locally for more sensible projects.
Smith Engineering (GB) Ltd	5 – Design and engineering	No	No comment was made
Smith Engineering (GB) Ltd	6 – Inventory	No	No comment was made
Smith Engineering (GB) Ltd	7 – Siting process	No	No comment was made
Smith Engineering (GB) Ltd	8 – Overall views on participation		Several millions have been spent already for temporary storage ,these facilities must be acceptable for the safe storage of waste so why repeat the process by building another stoage facility.
Smith Engineering (GB) Ltd	9 – Additional comments		Look at the reasons for the Gosforth rejection and save alot of time and money.
Organisation / Group	Question	Agree	Response
South Lakeland District Council	Letter		As Partnership members representing South Lakeland District Council we would like the following views to be considered as a response to the consultation. Whilst we acknowledge the significant economic benefits that progressing towards a Geological Disposal Facility, could bring to an area this authority wishes to express concerns over the current information available with regard to the geology of West Cumbria and in particular to those areas remaining following the British Geological Survey (BGS) screening report. We are not persuaded that there is sufficient evidence available at this time to support the view that "there are sufficient areas remaining in West

			<p>Cumbria after initial screening to make further progress worthwhile", particularly in relation to the geological suitability of the remaining areas to host a repository.</p> <p>Whilst we acknowledge that detailed evidence could only be provided by further investigations, at this stage we must question if we know enough, and find, what we know to be acceptable to us to justify entering the siting process. At the current time we do not consider that we can be reassured to this fact and the significant uncertainties about the suitability of West Cumbria's geology lead us to remain sceptical about the prospects of finding a site for a repository that meet all regulatory requirements.</p> <p>We are aware that there may be far more suitable sites to host a repository from a geological perspective elsewhere in the country that have not or are not being considered due to the process of possible site selection by voluntarism. It is understood that whilst other countries have followed a similar approach to this, detailed considerations of the underlying geology were undertaken first to establish a greater level of confidence that a geology may be suitable prior to making requests for volunteer communities in those highlighted areas.</p> <p>We consider, in light of the geological uncertainties, and significant costs to the country of progressing further this process in West Cumbria, the government should reconsider the approach advocated in the white paper to finding a suitable site for a Geological Disposal Facility (GDF) by undertaking detailed studies of other areas of the country where the known geology would be considered by the scientific community to be initially more favourable, then approach those communities for a view of acceptability.</p> <p>We are also concerned with what we consider to be two fundamental flaws in the procedures which have been followed to date:</p> <ol style="list-style-type: none"> 1. That the Decision Making Bodies (DMB) viz Allerdale and Copeland District Councils and Cumbria County Council are being advised by a Partnership of which they themselves are leading and highly influential members. 2. That the telephone opinion poll is being limited to a sample of the residents of Allerdale and Copeland when the consequences of the decision to go ahead has ramifications that are far wider than just these two geographical districts. <p>In addition we are not at all sanguine that, despite assurances to the contrary, the right to withdraw would be allowed once the process had moved on to the next stage of finding a suitable site - especially if no other community in the country was Volunteering to host the facility.</p>
Organisation / Group	Question	Agree	Response
St Andrews Mirehouse (C of E)	Letter		<p>On Monday, 9 December 2012, we held a PCC meeting and on our agenda we included a response to the consultation process.</p> <p>Mirehouse (to the south of Whitehaven) is divided by the rail link that runs down the west coast of</p>

		<p>Cumbria; since there would be an increased usage of this rail link this is a matter of particular relevance to us.</p> <p>Here are some reflections from our discussion:</p> <p>Genuineness of Consultation:</p> <p>Whilst we were impressed by the thorough-going and comprehensive nature of the consultation process, several members, nonetheless, raised the issue of how genuine the consultation process would be. We have all taken part in 'consultation' processes only for our insights to be completely disregarded. The question was asked that if the project (not just the geological surveys etc) were to be given the final go-ahead would that be subjected to some kind of local referendum of the local population (who may not have confidence in the ability or motivation of their local councillors to make a sound decision)?</p> <p>Members were very mindful of their responsibility to ensure a secure decision was made as this will affect our future generations quite substantially.</p> <p>Previous Geological Surveys:</p> <p>Members recalled a geological boring survey some 15 years ago. The video presentation made passing reference to a former survey which concluded West Cumbria was unsuitable. What has changed since then? What new information has come to light? It was felt that the public would need more information about this former survey before we can simply dismiss it's findings.</p> <p>Economic and Environmental Considerations:</p> <p>Whilst the council recognised the attractive economic promise that could be represented by this development that came some way down our list of considerations - such a facility must be as safe as it is possible to make it, and it must be as sensitive as possible to the environment - especially in this beautiful part of England.</p> <p>We also felt that some more information on the environmental implications of construction and eventual running of such a facility would be helpful i.e. how much more freight noise would the rail link that runs through our housing estate cause?</p> <p>Vote on whether they can go to the next step:</p> <p>The council took a vote on whether we felt it was prudent to proceed to the next step in the process of surveying the area, the results were:</p> <p>12 voted for</p>
--	--	---

			<p>2 voted against</p> <p>In summary, St Andrew's PCC felt that the consultation was being carried out in a responsible and open manner. However, more detail needs to be supplied on previous surveys that ruled out the area for such a development and more environmental impacts should be provided as we move towards conclusive decisions.</p>
Organisation / Group	Question	Agree	Response
The University of Manchester - Dalton Cumbrian Facility	1 – Geology	Yes	<p>I believe the Partnership is correct to conclude that there is sufficient reason to proceed with further investigation of the suitability of the geology of West Cumbria. It is also correct, in my opinion, to recognise there remain uncertainties that can only be resolved by detailed geological research and investigation. It will be important such investigations are carried out in an open and transparent manner and that, as far as reasonably practicable, they are carried out in West Cumbria. It would be beneficial to the process if local communities had reasonable access to view research activities to provide assurance in both the process and subsequent conclusions and recommendations.</p>
The University of Manchester - Dalton Cumbrian Facility	2 – Safety, security, environment and planning	Yes	<p>I believe adequate steps have been taken by the Partnership to ensure that, as far as is reasonable at this stage of the process, the required safety, security, environment and planning processes and controls are, or can be expected to be, in place.</p> <p>It is important the NDA's R&D programme is continually reviewed and commented on by suitably qualified and respected independent persons to ensure validity at all stages of the process. It is also important that adequate resources are provided by Government to allow delivery of the relevant R&D projects and that the completion of projects specific to the potential location of a deep geological disposal facility is not detrimental to other areas of the NDA's mission.</p> <p>If, as indicated, the development of a repository, were to be included in the scope of the Major Infrastructure Planning Unit, it will be important to gain an early understanding of if and how this would impact the process in terms of volunteerism. If the scope of MIPU incorporates the siting of projects within its remit where they are deemed to be most suitable in terms of the national interest will this affect the GDF process and impact or override the wishes of local communities.</p>
The University of Manchester - Dalton Cumbrian Facility	3 – Impacts	Yes	<p>I believe sufficient initial consideration has been given by the Partnership on the impacts of a repository in West Cumbria. However, it is important to carry out early detailed research and assessment of the potential social and economic impacts throughout the process. Impacts, both positive and negative, may emerge at greatly different times and to greatly different degrees, than may be initially expected. It will also be important to maintain review of the actual impact against forecast impact throughout the process. I believe it important that the social and economic impacts be subject to the same rigorous research and assessment programme as the technical aspects of a repository. In many ways this research can be expected to be as challenging and important as the detailed scientific and engineering research.</p>

			The University of Manchester has opened a new research base in West Cumbria and investments such as this provide an opportunity to develop a strong independent academic community based in the area that is capable of delivering the research and development necessary to underpin decisions made throughout the GDF process. It will be important that wherever possible research is within and by the local community to engender the necessary trust, engagement and communication. Independent research & development activities should include exhibition space, public viewing areas and a vibrant outreach programme into local schools and community based organisations.
The University of Manchester - Dalton Cumbrian Facility	4 – Community benefits	Yes	<p>I believe it is important that any community benefits associated with the process to develop a geological disposal facility are developed with Government in an open and transparent manner. It will also be beneficial to engage with other countries such as Finland, Sweden & France where the GDF programmes are more advanced to learn lessons from other local communities and governments.</p> <p>The UK Government also needs to recognise the need for early and clear engagement on this topic and the potential for impacts to affect local communities at all stages of the GDF process.</p>
The University of Manchester - Dalton Cumbrian Facility	5 – Design and engineering	Yes	No additional comments.
The University of Manchester - Dalton Cumbrian Facility	6 – Inventory	Yes	I believe at this stage in the process the Partnership has sought the correct information and assurances from Government in understanding what may, and may not, form the inventory of a geological disposal facility. Strategic decisions on the disposition of Plutonium stocks and management of spent fuel arising from new nuclear power stations will clearly impact the GDF process and it is important to gain an early baseline understanding of the proposed inventory that can then be amended as further information becomes available and decisions made.
The University of Manchester - Dalton Cumbrian Facility	7 – Siting process	Yes	I believe the Partnership have adopted a pragmatic approach to the siting process and sought the necessary assurances from Government that can realistically be expected at this stage.
The University of Manchester - Dalton Cumbrian Facility	8 – Overall views on participation		<p>I believe there is sufficient reason to take part, without commitment, in the process to site a geological disposal facility. At this stage in the process it is my opinion that the Partnership have considered the relevant issues and, where necessary, sought the required assurances from Government.</p> <p>I strongly believe that wherever possible independent and respected research communities are utilised or established within West Cumbria such that detailed research, both technical and non-technical, designed to underpin decisions is delivered by the community for the community. It is also important that the facilities, such as The University of Manchester's Dalton Cumbrian Facility, where this research can be delivered are developed to incorporate open access for communities to build the necessary levels of trust and direct engagement. Extensive outreach programmes into the local community will also be vital to provide information and gain feedback.</p>

			I also believe it is vital that the Government recognises that communities who decide to engage with the process to site a repository may be subject to direct and indirect impacts, both positive and negative, from the very earliest stages.
The University of Manchester - Dalton Cumbrian Facility	9 – Additional comments		No additional comments.
Organisation / Group	Question	Agree	Response
Threlkeld Parish Council	1 – Geology	Not answered	See last section
Threlkeld Parish Council	2 – Safety, security, environment and planning	Not answered	See last section
Threlkeld Parish Council	3 – Impacts	Not answered	See last section
Threlkeld Parish Council	4 – Community benefits	Not answered	See last section
Threlkeld Parish Council	5 – Design and engineering	Not answered	See last section
Threlkeld Parish Council	6 – Inventory	Not answered	See last section
Threlkeld Parish Council	7 – Siting process	Not answered	See last section
Threlkeld Parish Council	8 – Overall views on participation		Managing Radioactive Waste Safely Consultation - Parish Council Response Copeland Borough Council, Allerdale Borough Council, and Cumbria County Council made an expression

			<p>of interest in talking to government about siting a repository in West Cumbria. THRELKELD PARISH COUNCIL response to the MRWS consultation</p> <p>As a Parish Council whether we agree or disagree with using nuclear power as a source of energy is not the point – the issue is that in this country we have radioactive waste that needs to be stored safely. Copeland, Allerdale and CCC may believe that ‘volunteering’ may secure jobs for their constituents but their safety, our safety, the safety of our children and our future generations should be their first priority.</p> <p>In Finland, Sweden, Switzerland, Canada, France and Belgium suitable geological sites have been found BEFORE communities have volunteered .The Lake District has complex geology with fault lines prone to movement. We also do have earthquakes – the last in December 2010 was 3.5 on the Richter Scale. Several well respected local geologists have already drawn attention to the Lake District ‘being geologically unstable for high level radioactive waste’. Existing international waste repositories are on flat land for two simple reasons they have simple stable geology and minimal groundwater problems. Everyone in Threlkeld knows that underground and overground water is prone to change on a regular basis – can our colleagues in Copeland and Allerdale predict or model this for the next 100 years or the next 1000?</p> <p>As a Parish Council we would also be concerned about safety on the A66 during construction and excavation of the massive site. It is already a dangerous road and should this project go ahead, how long before an accident and radiation spillage at the Threlkeld Quarry junction?</p> <p>As a Parish Council we watched a DVD produced by MRWS and this raised more questions than answers. You can view this on the website. The impact on safety, security and tourism raises more questions and answers. We find it difficult to comprehend why Allerdale and Copeland are going down the ‘volunteer’ route before a full scientific investigation.</p> <p>We unanimously agreed that the authorities should withdraw from this process.</p> <p>Have your say –get involved</p> <p>Please go to www.westcumbriamrws.org.uk</p> <p>The consultation ends on 23 March 2012</p>
Threlkeld Parish Council	9 – Additional comments		see above
Organisation / Group	Question	Agree	Response
Thursby Parish	Letter		Geological disposal of radioactive waste in West Cumbria – Consultation

Council			<p>The Parish Council unanimously rejects the proposal to bury radioactive waste in West Cumbria.</p> <p>The Parish Council has considered the reassurances regarding safety for this and future generations but remains unconvinced that the necessary protection of local residents, the workforce and the environment can be guaranteed.</p> <p>The Parish Council has concluded therefore that given the uncertainties of West Cumbrian geology, the risks of installing a repository in this area are unacceptable.</p>
Organisation / Group	Question	Agree	Response
UK and Ireland Nuclear Free Local Authorities (NFLA)	Letter		<p>“GEOLOGICAL DISPOSAL” OF RADIOACTIVE WASTE IN WEST CUMBRIA – NFLA RESPONSE TO THE MRWS PUBLIC CONSULTATION DOCUMENT</p> <p>I attach the formal submission of the UK and Ireland Nuclear Free Local Authorities (NFLA) to the public consultation of the West Cumbria Managing Radioactive Waste Safely Partnership. The submission relates to whether the Partnership should go forward with the next part of the process in expressing a formal interest on hosting a deep-underground radioactive waste policy (classed in the consultation as a geological disposal facility).</p> <p>The NFLA is a cross-party body of local authorities from England, Scotland, Wales, Northern Ireland and the Republic of Ireland who raise legitimate concerns across all aspects of nuclear policy. Further information on all its evolving policy work can be found at the NFLA website http://www.nuclearpolicy.info.</p> <p>Executive Summary of NFLA response</p> <ul style="list-style-type: none"> • The Nuclear Free Local Authorities does not believe the areas covered by Allerdale and/or Copeland Borough Councils should take part in the search for a potentially suitable site for a nuclear waste repository. • The NFLA view is that it will be impossible to demonstrate with any scientific credibility that the resultant radiation dose to people from a nuclear waste repository would be at an acceptably low level into the far distant future. • NFLA understands that CoRWM’s recommendation was contingent on there being much more research into the uncertainties associated with deep geological “disposal” as well as robust interim storage before proceeding to a site selection process. • If voluntarism is to mean anything, local communities must be given the right to withdraw from the process at any time up to the start of construction. Local Authorities must not be allowed to override local wishes.

		<ul style="list-style-type: none"> • The NFLA agrees with CoRWM that a new nuclear programme raises different political and ethical issues when compared with the consideration of legacy wastes. CoRWM said new wastes should be subject to a separate public assessment process. By going ahead to the next stage of the process before the generation of new wastes has been given adequate consideration Cumbrian authorities will be being complicit in depriving other authorities (for example those on waste transport routes) of a proper say on the future of UK energy policy. • The NFLA view is that there should be a national debate about what constitutes suitable geology and how to find it before Cumbrian authorities proceed to the next stage. We should not allow the voluntarist approach to override the idea of finding the safest possible method to manage these dangerous wastes. • The Partnership should have made clear in the consultation materials that, in the event of a 16GW new build programme around half of the waste, by volume, destined for the repository is not yet located in Cumbria. • Given that the Government has agreed with the Partnership’s third Inventory Principle to inform a Community Siting Partnership at the earliest opportunity when significant changes occur to the ‘upper’ inventory, the Partnership should have pressed DECC to produce an upper inventory which looked at a 16GW new nuclear programme. • DECC has said it will discuss emplacing spent fuel from new nuclear reactors in the repository with the host community if the process proceeds – implying that the community would have the option of deciding only to accept legacy wastes. The Partnership needs to ask DECC now what the implications would be if the host community said it would only take legacy waste. The Partnership also needs to ask DECC to address the issue of the probability that the risk limit for a single repository being exceeded in the event of inclusion of waste from new reactors. • It is the NFLA view that, should the Cumbrian authorities move on to the next stage, the momentum in the process will be too great to allow withdrawal in future. Cumbria could, therefore end up not only with a disposal facility which takes all the spent fuel from new reactors, but also with more than one dump. <p>1. Introduction</p> <p>1.1 The dictionary definition of disposal is “to get rid of something”. Unfortunately placing nuclear waste in a deep geological facility does not get rid of it because it has a life of many thousands of years. In that time dangerous radioactivity could be transported back to the surface and distributed around the environment presenting a danger to the health of populations living on the surface.</p> <p>1.2 The NFLA opposes ‘deep disposal’ partly because of the uncertainty involved in making a safety case.</p>
--	--	--

		<p>The Nuclear Decommissioning Authority (NDA) and the Environment Agency appear to agree that whilst a deep disposal facility would leak and release radioactivity which could reach the surface, the rate of such leakage can be accurately predicted and is expected to be sufficiently slow that the resultant doses would not be of concern. NFLA believes there is insufficient evidence to support this hypothesis, and that in fact the rate of leakage is likely to be much greater than expected.</p> <p>1.3 The burial of nuclear waste is said to remove the burden on future generations. But assuming the waste is eventually made irretrievable if radionuclides do leak at a faster rate than expected, this problem could not be rectified. This would then create a significant burden for future generations, rather than removing the burden from them. Given the possibility of a high degree of repository leakage, the precautionary approach would be to leave future generations the option of managing the waste in the best way they see fit.</p> <p>1.4 A nuclear waste repository safety case is required to demonstrate that the resultant dose to people would be at an acceptably low level. (1) In the NFLA view demonstrating that such a dose target is achievable is simply not scientifically possible in practice. It is in the nature of chemical elements and geological and biological systems to behave in a variable and hence unpredictable manner such that they make reliable risk/time calculations into the far future not only difficult but virtually impossible.</p> <p>2. Distorting CoRWM's recommendations</p> <p>2.1 The Committee on Radioactive Waste Management (CoRWM) made its recommendations to the Government in July 2006. (2) As the consultation document states the committee did recommend that geological disposal of nuclear waste was the best option available within the present state of knowledge, and that there should be a new approach to implementation, based on the willingness of local communities to participate.</p> <p>2.2 However, CoRWM also made important recommendations which the Government has ignored. For instance, because of the uncertainties surrounding the implementation of geological disposal, it recommended that there should be a major research and development programme on both geological disposal and robust interim storage, and a security review of waste stores to see if they could survive a terrorist attack. Interim storage could be needed for at least 100 years, as well as there being a risk the repository programme will be delayed or fail.</p> <p>2.3 CoRWM said it takes no position on the desirability or otherwise of nuclear new build, but that such decisions:</p> <p>“...should be subject to their own public assessment process [because they] raise different political and ethical issues when compared with the consideration of wastes which already exist”.</p>
--	--	--

		<p>2.4 The Committee also noted that the prospect of a new nuclear programme might undermine support for the Managing Radioactive Waste Safely process. CoRWM specifically said it did not want its recommendations seized upon as providing a green light for new build – yet that is exactly what the Government has been doing. CoRWM warned that new build waste would extend the time-scales for implementation, possibly for very long but essentially unforeseeable future periods.</p> <p>2.5 NFLA understands that CoRWM’s recommendation was contingent on there being much more research into the uncertainties associated with deep geological “disposal” as well as robust interim storage before proceeding to a site selection process.</p> <p>3. Voluntarism</p> <p>3.1 The Government says it is committed to an approach based on voluntarism. This means that communities would be asked to express willingness to search for a site for a potential repository, and perhaps ultimately host a facility, rather than having a facility forced upon them. The Government has invited communities across the UK to talk to them about the possibility of having a deep geological repository in their area, but so far the three local authorities covering West Cumbria are the only ones to have expressed an interest.</p> <p>3.2 The consultation document says the Managing Radioactive Waste Safely Partnership (the Partnership), made up of representatives of the three local authorities and other local interest groups, appreciates that it will be of interest to a wider range of people and responses from people living elsewhere in Cumbria and beyond, including visitors to the area and those with an interest in the Lake District National Park are welcomed. All views received will be considered.</p> <p>3.3 However, it is also made clear that whilst this consultation is about helping the Partnership to decide what to recommend to the three local authorities, it is the local authorities that will decide whether to move on to the next stage – the search for a site. Cumbria Councillor Tim Knowles (3) makes clear that the local authorities could override the views of a local community. It is also a matter of concern that, whilst in Copeland all councillors will take part in the decision about whether to move on to the next stage, in Allerdale only the councillors on the Executive will decide, and on Cumbria County Council only the Cabinet will decide. (4)</p> <p>3.4 The consultation document does not make clear that according to the provisions of the Government’s White Paper Managing Radioactive Waste Safely, Parishes and Towns will not have the right to withdraw from the process if they are identified for a site. If a community within a specific area wished to opt out, it could still be included in the dump proposals - if the decision makers (i.e. the three local authorities) gave ‘justification’ for doing so. This is stated in the second paragraph of (e), page 93 of the consultation document. This means there are significant risks of communities being steamrollered, by financial concerns, or forced, through the ‘justification’ of others, to be involved in the dump. (5)</p>
--	--	---

		<p>3.5 The South Lakeland District Council representatives on the MRWS Partnership have joined Churches Together in Cumbria in deciding they cannot support going into the next stage of the search for a nuclear dump site in West Cumbria. Six Parish and Town Councils have also voted against the proposals. For the Parish and Town Councils the lack of the right to withdraw, despite all the talk of volunteerism, has caused them to express deep concern about the process. (6)</p> <p>3.6 If voluntarism is to mean anything, local communities must be given the right to withdraw from the process at any time up to the start of construction.</p> <p>4. Alternatives to 'Geological Disposal'</p> <p>4.1 The Partnership says Government policy is for geological disposal, so it is only discussing geological disposal and not other potential approaches to managing higher activity radioactive wastes in the long term. The danger of this approach is that the councils could decide to move on to the siting process because they are concerned that something needs to be done to manage radioactive waste and a deep geological repository is the only option, rather than choosing the Best Available Technique for the management of waste.</p> <p>4.2 Local authorities and other organisations may want to comment on this consultation document, not just because of a concern about the impact of a deep geological repository on the Lake District National Park, but also because of the implications of a repository for UK energy policy. These views should also be taken into account even where they do not agree with the Government's policy of favouring a deep repository.</p> <p>4.3 The NFLA agrees with CoRWM that a new nuclear programme raises different political and ethical issues when compared with the consideration of legacy wastes. CoRWM said new wastes should be subject to a separate public assessment process. By going ahead to the next stage of the process before the generation of new wastes has been given adequate consideration Cumbrian authorities will be being complicit in depriving other authorities (for example those on waste transport routes) of a proper say on the future of UK energy policy.</p> <p>5. Geology</p> <p>5.1 The Partnership wants to know what consultees views are on their initial opinions on geology.</p> <p>5.2 Professor David Smythe submitted a number of papers to the Partnership supporting his view that there is currently enough information available to rule out the whole of West Cumbria on geological grounds. (7) Professor Smythe's view is that the evidence is unequivocal - the geology and hydrogeology</p>
--	--	---

of West Cumbria are both sufficiently well known and well understood that it is possible to say that no alternative site to the previously chosen 'least unsuitable' option of Longlands Farm (next to Sellafield) can be found in the region. The Partnership also sought other views and evidence. It concluded that the argument that all of West Cumbria should be excluded now on grounds of unsuitability is not generally accepted within the professional geological community.

5.3 The Partnership, however, does agree that even if West Cumbria enters the siting process, geological conditions may not provide a suitable site for a repository that meets regulatory requirements. The Partnership emphasises that the process must stop if the geology is found to be unsuitable in the future.

5.4 Professor Smythe says that at this stage in the process, it is not the host rock that's important but the regional setting. A regional setting with long geological stability, low hydraulic gradients and simple geology is required. Cumbria has complex geology with high hydraulic gradients. Overall Professor Smythe's main point is that the voluntarist approach should not have been allowed to override the idea of finding areas of suitable geology first. It seems likely that the current approach will end up wasting a lot of time and money because, despite a potentially willing community, there is a high likelihood of not being able to find a suitable site, or alternatively a third-rate site is chosen because the process has travelled so far down the current path that it is difficult to turn back.

5.5 The NFLA view is that there should be a national debate about what constitutes suitable geology and how to find it before Cumbrian authorities proceed to the next stage. We should not allow the voluntarist approach to override the idea of finding the safest possible method to manage these dangerous wastes.

6. Safety

6.1 The specialist independent consultancy group Nuclear Waste Advisory Associates published an Issues Register in March 2010 which lists 101 outstanding scientific and technical issues which will need to be resolved before a safety case can be compiled for a deep geological disposal facility for nuclear waste. (8) Similarly Greenpeace International published a scientific review of international work on the geological disposal of high level radioactive waste. (9)

6.2 The Nuclear Decommissioning Authority (NDA) published a response to the Nuclear Waste Advisory Associates' Issues Register in April 2011. (10) This does not appear to have been examined in any depth by the Partnership – it is not mentioned in the consultation document.

6.3 Earlier the NDA published its Generic Disposal System Safety Case in February 2011 (although it is dated December 2010). (11) This includes a large number of documents. Also in February 2011 the NDA published a Research and Development Programme Overview. (12) The Partnership asked Professor Stuart Haszeldine to critique this document, the NDA responded and then Professor Haszeldine was given a chance to respond to that.

		<p>6.4 The NDA published a report detailing its approach to managing outstanding scientific and technical issues in August 2011 (13) and a second edition of this report is expected soon. The NDA's register of issues now lists over 900 outstanding issues. (14)</p> <p>6.5 Nuclear Waste Advisory Associates, Greenpeace International and Professor Stuart Haszeldine have clearly raised issues around the huge number of uncertainties associated with deep geological repositories which require answers. The Partnership has, in fact, not spent very much time looking at safety issues. Nuclear Waste Advisory Associates for example, were given just a few hours to present information on a couple of examples of issues from their register of 101 issues. Further independent scrutiny of the work being carried out on the NDA's 900 issues should be carried out.</p> <p>6.6 The Partnership, however, appears to be satisfied with only "suitable regulatory and planning processes" to protect residents, workforce and the environment; and it wants to be satisfied that the NDA has suitable capability and processes in place to protect residents, workforce and the environment. It does not intend to scrutinise in the required detail how the NDA is dealing with the 900 outstanding scientific and technical issues. Whilst the Partnership recognises that the NDA's R&D programme will have to be subject to significant independent ongoing scrutiny by any future partnership, by the regulators and by CoRWM, including the use of expert review and independent specialists, it makes no recommendations about how this should be done.</p> <p>6.7 This attitude will have the effect of, at best, delaying independent review until the decision-making process has gone too far down the road towards site selection to reverse the process, because as time goes on it will become more and more politically difficult to withdraw.</p> <p>6.8 In Sweden, any Non Governmental Organisation above a certain size can apply for funds from the Swedish Waste Fund established by the nuclear industry to monitor and become involved in the final repository project. Receiving money from the funds then requires that they attend consultation meetings. (15) The Swedish NGO Office for Nuclear Waste Review (MiljöorganisationernasKärnavfallsgranskning), MKG, was set up by a coalition of five member environmental organizations in 2004. MKG is participating in the consultation process, but aims to provide a critical voice. There is at present no such UK equivalent.</p> <p>6.9 It is the NFLA's view that further independent scrutiny work should be carried out before the Cumbrian authorities decide on whether to proceed to the next stage in the process and that any such decisions are delayed until that scrutiny work has been done.</p> <p>7. Inventory</p> <p>7.1 It is a matter of concern that the DVD which accompanies this consultation document mentions that 70% of the waste by volume destined for the repository is already at Sellafield. This is put forward as a</p>
--	--	--

		<p>reason why West Cumbria should accept building of a repository within its borders.</p> <p>7.2 It may be true that 70% of legacy waste is already located at Sellafield, but the Partnership should also allow for the possibility that the repository will also be required to accept spent fuel from proposed new reactors. The NDA's baseline inventory of legacy waste amounts to 631,000m³. So what the DVD is saying is that 441,700m³ is already located at Sellafield. (16)</p> <p>7.3 The DECC/NDA 2010 Upper Inventory only allows for a 10GW new reactor programme. In this case the total volume of packaged waste rises to 1,160,000m³. Much of the increase will be caused by extending the life of existing reactors. Using NDA's figures it appears that a 16GW new build programme would increase this to 1,221,021 m³. (17)</p> <p>7.4 So it is misleading to say that 70% of the waste is already at Sellafield. With no life extension and no new reactor programme we could avoid creating around half of the waste currently planned to go into the repository.</p> <p>7.5 The waste inventory includes different kinds of waste which generate different levels of heat. The more heat that is generated the more space is required to house the waste. So, in fact, volume is not the most important measure to use in the waste inventory, but the amount of space taken up by the packaged waste or the waste "footprint" is more important. The baseline inventory is expected to have a footprint of between 6km² and 10km² depending on the rock type. A maximum inventory, which includes spent fuel from 16GW of new nuclear capacity, would have a footprint of between 12km² and 25km². So waste from life extensions and new reactors would take up between about a half to two thirds of the repository.</p> <p>7.6 Given that the Government has agreed with the Partnership third Inventory Principle to inform a Community Siting Partnership at the earliest opportunity when significant changes occur to the 'upper' inventory, the Partnership should have pressed DECC to produce an upper inventory which looked at a 16GW new nuclear programme.</p> <p>7.7 The Partnership should have made clear in the consultation materials that, in the event of a 16GW new build programme around half of the waste, by volume, destined for the repository is not yet located in Cumbria.</p> <p>8. One repository or two?</p> <p>8.1 According to a report produced by DECC and the NDA, without a specific site, it is not possible to say using the 2010 Baseline or Upper inventory (which only allows for waste from a 10GW new reactor programme) whether more than one facility might be required. This will be explored through the MRWS process of site selection, through detailed site investigations and through ongoing research and development into disposal concepts.</p>
--	--	--

8.2 It should be noted that the Environment Agency (EA) has set a limit on the risk that may be caused by the burial of radioactive wastes of 10^{-6} (i.e. one in a million). (18) However, the NDA Disposability Assessment Report for waste arising from new EPR reactors states:

“...a risk of 5.3×10^{-7} per year for the lifetime arisings of a fleet of six EPR reactors each generating a lifetime total of 900 canisters is calculated” (19)

8.3 DECC has said it will discuss emplacing spent fuel from new nuclear reactors in the repository with the host community if the process proceeds – implying that the community would have the option of deciding only to accept legacy wastes. The Partnership needs to ask DECC now what the implications would be if the host community said it would only take legacy waste. The Partnership also needs to ask DECC to address the above point about the risk limit for a single repository.

8.4 It is the NFLA view that should the Cumbrian authorities move on to the next stage the momentum in the process will be too great to allow withdrawal in future. Cumbria could, therefore end up not only with disposal facility which takes all the spent fuel from new reactors, but also with more than one dump.

9. Conclusion

To reiterate, the NFLA does not believe the areas covered by Allerdale and/or Copeland Borough Councils should take part in the search for an appropriate site for a deep-underground nuclear waste repository.

If you have any queries on this submission please contact myself using the details at the top of this letter. On behalf, and with the approval of, the Nuclear Free Local Authorities Steering Committee

Consultation Submission References

(1) Geological Disposal Facilities on Land for Solid Radioactive Wastes: Guidance on Requirements for Authorisation, Environment Agency, February 2009. Page 47 para 6.3.17 <http://publications.environment-agency.gov.uk/pdf/GEHO0209BPJM-e-e.pdf>

(2) Managing our Radioactive Waste Safely: CoRWM's recommendations to Government, CoRWM, July 2006. <http://tinyurl.com/7xooy8z>

(3) Letter to Whitehaven News 2nd Feb 2012 <http://www.whitehavennews.co.uk/letters/you-say/the-nuclear-waste-debate-1.920956?referrerPath=letters/you-say> and responses Whitehaven News 9th Feb 2012 <http://www.whitehavennews.co.uk/letters/you-say/nuclear-waste-the-great-debate-continues-1.923190?referrerPath=home>

(4) Whitehaven News 23rd Feb 2012 <http://www.whitehavennews.co.uk/letters/you-say/ill-conceived-unworkable-nhs-bill-opens-door-to-privatisation-1.927854?referrerPath=letters>

		<p>(5) Save Our Lake District website, Consent & Planning. http://mrwsold.org.uk/more-information/consent-planning-2/</p> <p>(6) SOLD Press Release 14th March 2012 http://mrwsold.org.uk/2012/03/14/disquiet-emerges-in-mrws-partnership/</p> <p>(7) See for example: Why a deep nuclear repository should not be sited in Cumbria, David Smythe 12th April 2011 http://www.davidsmythe.org/nuclear/Unsuitability%20of%20Cumbria%2012April2011%20plus%20figs.pdf</p> <p>(8) NWAA Issues Register, March 2010. http://www.nuclearwasteadvisory.co.uk/wp-content/uploads/2011/06/NWAA-ISSUES-REGISTER-COMMENTARY.pdf</p> <p>(9) Rock Solid, Genewatch for Greenpeace International, September 2010, http://www.westcumbriamrws.org.uk/documents/Rock_Solid.pdf</p> <p>(10) Geological Disposal: Response to Nuclear Waste Advisory Associates' Issues Register, NDA, April 2011 http://www.nda.gov.uk/documents/biblio/upload/NDA-RWMD-Technical-Note-GD-Response-to-Nuclear-Waste-Advisory-Associates-Issues-Register.pdf</p> <p>(11) http://www.nda.gov.uk/aboutus/geological-disposal/rwmd-work/dssc/main-docs.cfm & http://www.nda.gov.uk/aboutus/geological-disposal/rwmd-work/dssc/index.cfm Press Release on publication dated 23rd February 2011 https://www.nda.gov.uk/news/multi-barrier-approach-key-to-safety.cfm</p> <p>(12) R&D Programme Overview, Research and Development needs in the Preparatory Studies Phase, NDA February 2011 http://www.nda.gov.uk/documents/upload/Geological-Disposal-Research-and-Development-Programme-Overview-February-2011.pdf</p> <p>(13) RWMD Approach to Issues Management, NDA, August 2011 http://www.nda.gov.uk/loader.cfm?csModule=security/getfile&pageid=47986</p> <p>(14) Number mentioned verbally at Geological Disposal Implementation Board meetings. The Update on RWMD Approach to Issues Management, NDA/RWMD 25th November 2012 gives the figure as 500. The issue groups are listed in (13). The note also says that 400 internally raised issues have been removed because these have already been identified as information needs within the RWMD R&D programme.</p> <p>(15) Geological Disposal: Brief Overview of NGO involvement in the radioactive waste management process in eleven overseas countries, NDA, July 2010 https://www.nda.gov.uk/documents/upload/Geological-Disposal-Brief-overview-of-NGO-involvement-in-radioactive-waste-management-process-in-eleven-overseas-countries-July-2010.pdf See MKG website: http://www.mkg.se/en/the-swedish-ngo-office-for-nuclear-waste-review-mkg</p> <p>(16) The 2010 Estimate of Radioactive Waste for Geological Disposal, DECC & NDA, March 2011 http://www.nda.gov.uk/documents/upload/Radioactive-Wastes-in-the-UK-The-2010-estimate-of-radioactive-waste-for-Geological-Disposal.pdf</p> <p>(17) See Slide 8 here: http://www.nda.gov.uk/documents/loader.cfm?csModule=security/getfile&%20PageID=48680</p> <p>(18) Environment Agency (February 2009) Geological Disposal Facilities on Land for Solid Radioactive Wastes: Guidance on Requirements for Authorisation, page 46 para 6.3.10 http://publications.environment-agency.gov.uk/pdf/GEHO0209BPJM-e-e.pdf</p> <p>(19) NDA (22nd Jan 2010) Generic Design Assessment: Disposability Assessment for wastes and spent</p>
--	--	---

Organisation / Group	Question	Agree	Response
Ulpha Parish Meeting	1 – Geology	Not Sure/ Partly	<p>fuel arising from operation of the UK EPR. Part 1 Main Report. para 5.4 page 97.</p> <p>The BGS screening report is not fully reflected in Figure 9, Page 27 of the consultation document as the presence of aquifers are mentioned but not shown. Why?</p> <p>Figure 13, Page 72 of the BGS report shows that the entire coastal plain from Carlisle to Millom has areas of Sherwood sandstone aquifers and carboniferous secondary aquifers.</p> <p>Aquifers are listed in the BGS report as being applied as an exclusion criteria.</p> <p>There is no specification of what is considered to be 'West Cumbria' however the coastal strip seems to cover the whole potential West Cumbria area.</p> <p>Is it likely that there will be sufficient area remaining after the initial screening to make further progress worthwhile? This seems unlikely.</p> <p>In the 1980's when a repository was first suggested the top of the list in geological terms was the area around Bedford. Following protests by residents of this area the location was quietly dropped by the government of the day. Nirex in more recent times had considerable problems with rising groundwater in their boreholes. Again the whole thing was dropped.</p> <p>Ulpha Parish Meeting insists that safe geology for the siting of the repository is crucial.</p>
Ulpha Parish Meeting	2 – Safety, security, environment and planning	Not Sure/ Partly	<p>It is our understanding that the nuclear industry is highly regulated and monitored and rightly so.</p> <p>Our concern is that the present government is intent on greatly relaxing the planning process.</p> <p>A development of this type and size must be held under the utmost scrutiny to ensure the safety, security and environment of the plant itself during its construction and operational phases with due consideration of the local workforce and its neighbours far into the future.</p> <p>When the new reprocessing plant at Windscale and Calder works was proposed in the 1970's a public enquiry was held in Whitehaven. Should this be necessary do we have an assurance that the same will occur with this project?</p>
Ulpha Parish Meeting	3 – Impacts	Not Sure/ Partly	<p>The Cumbria infrastructure from Calder Bridge to Millom/Barrow in Furness is at best poor. The road/rail links and utilities are in need of substantial improvement particularly in the light of current and proposed developments.</p> <p>At present any improvements tend to be to the north from Sellafield, thus leaving the area to the south,</p>

			<p>Millom and Barrow in Furness in dire straits as regards security of supply of utilities with outdated unsuitable supply lines for present & future demands.</p> <p>Any work which remedies this situation will be advantageous to the southern area and will help bring it into the 21st century. A high standard infrastructure fit for the future should be the right of the area to replace the present 19th century standards.</p> <p>Improved job prospects with full time working at rates greater than minimum wage are to be welcomed.</p>
Ulpha Parish Meeting	4 – Community benefits	Not Sure/ Partly	<p>Is this a carrot or a stick?</p> <p>All areas must be covered by the benefit, both urban and rural with the emphasis on all residents having ready access to facilities that the rest of the country takes for granted.</p>
Ulpha Parish Meeting	5 – Design and engineering	Yes	<p>Will the design and engineering be undertaken to accommodate the worst possible case?</p> <p>The design must give high priority to health & safety and security.</p>
Ulpha Parish Meeting	6 – Inventory	Not Sure/ Partly	<p>This is very much like confirming the length of a piece of string before knowing what it will be used for.</p> <p>The design and engineering will have to take into account the inventory and its implications.</p> <p>Will the initial repository have the facility for extension build in? What will be the implications of that?</p>
Ulpha Parish Meeting	7 – Siting process	Not Sure/ Partly	<p>Allerdale/Copeland are currently volunteering for the siting and no other authority/location has.</p> <p>There is insufficient information to show that should the area wish to withdraw as still the sole volunteer what pressure the Government will put on the area to remain nominated whether the geology is safe or not.</p>
Ulpha Parish Meeting	8 – Overall views on participation		<p>Yes, the primary assessment must be based of safe geology</p>
Organisation / Group	Question	Agree	Response
Underskiddaw Parish council	1 – Geology	No	<p>1.1 a) You asked yourselves if you were confident in the integrity of the BGS screening survey, and your Initial Opinion was that you were satisfied.</p> <p>1.2 a) The Parish Council would not dispute that the BGS survey is sound so far as it goes, but it does not go very far. It is a very high level screening survey which only excluded 2 kinds of area : those where coal oil or gas might be found and which might therefore attract mining operations in the future which could</p>

			<p>break into the Repository; and those where it was necessary to protect exploitable groundwater. Since the study is so limited to say there was no criticism of it is neither here nor there.</p> <p>1.1 b) You asked yourselves if there were sufficient areas remaining to make further Progress “worthwhile” {we shall assume you mean “to make it worthwhile investigating if further progress would be possible}.</p> <p>In terms of square metres you decided that there was enough land. However about 75% of this area falls within the National Park. In section 5.2 you say that siting a surface facility in the National Park “may be ruled out”. The Parish Council considers this should be ruled out and also that drilling boreholes within the National Park to investigate the underground facility should also be ruled out – in view of the destruction this would cause to the landscape in what is geographically a very small area, and in terms of landscape value a priceless and national asset. Leaving aside the National Park there is a considerably smaller area remaining about which concerns remain as to its suitability.</p>
Underskiddaw Parish council	2 – Safety, security, environment and planning	No	<p>Safety and Security</p> <p>The Parish Council has studied Chapter 5 carefully, including the many quite technical documents annexed to it. While a fully-informed and accurate evaluation of the information provided is beyond the resources of the Parish Council, the overall impression gained is that the endorsement by the peer reviewers of the present safety regime is somewhat lukewarm and qualified, and the findings in the scientific critique also raise a number of doubts. Even at this stage we would have hoped to be able to feel greater confidence in what is the most significant concern for local people, and in particular our own residents : i.e. that the safety regime is first class.</p> <p>Environment</p> <p>There are several Regulatory Bodies – Environment Agency, Health and Safety Executive (with several sub-divisions) ONR, with quite complex responsibilities, and some in the process of being changed. The Dept for Transport also has involvement, NDA will prepare safety cases, and the Planning system also has a regulatory although not an initiatory function. Some members of the Partnership have expressed dismay at the interlocking roles which make it difficult to identify sometimes who is responsible for what. Further more these bodies will have to undergo further change to deal with a major issue such as this.</p> <p>The Parish Council does not feel that a clear picture has emerged, and therefore it is not possible to be satisfied that the regulatory system is satisfactory or effective, nor is it confident that the system will improve in future, when responsibilities will be vastly enlarged.</p> <p>The Parish Council notes that the Partnership asked for written reassurance about liaison with a future Partnership in the later Stages, but did not find that this had been obtained.</p>

			<p>With regard to Communication, the local experience with the Environment Agency has not been particularly good, and this does not inspire confidence.</p> <p>Planning</p> <p>The special requirements of and duties falling on the National Park are given no prominence. By legislation the National Park has a duty to preserve the special environment of the Park – which is why the Park was set up. The Park has to conserve the natural beauty and cultural heritage of the area and this is an overriding duty. There should therefore be no question of the surface facility being placed in the Park or of boreholes being drilled from the surface within the Park while looking for a Repository site. This should be categorically stated.</p>
Underskiddaw Parish council	3 – Impacts	No	<p>The Parish council agrees that there is much uncertainty about the impacts.</p> <p>3.1 a) You asked if you were confident that possibilities exist to assess and manage environmental social and economic impacts appropriately if they occur; your opinion was that mostly an acceptable process can be put in place to manage impacts but that you had insufficient evidence to decide whether the “brand” and reputation of the area could be protected and you would decide this before reporting.</p> <p>3.2 a). Much of your evidence was taken from NDA reports – but NDA is not a disinterested party being itself a waste producer. The perception issue is of great concern to this parish and surrounding ones where tourism is the main industry, and this is not dealt with thoroughly as the research is, you say, incomplete. Presumably the evidence you acquire after the close of the consultation will not therefore be presented to the public for consultation. The Parish Council does not consider this to be convincing. Your table shows that assessments of impacts are only being made at such a high level of generality that there is little to be learnt from them.</p> <p>3.1 b) & c) You wanted to be confident that the possibility of a Repository fits with the overall direction of the area and your initial opinion was that it was broadly compatible with the economic aspirations of West Cumbria although the long term implications have not yet been fully understood or properly considered.</p> <p>3.2 b) and c) You note the Vision for West Cumbria which acknowledges that West Cumbria is now nuclear dependent and likely to suffer economic fall back unless there is nuclear investment : the Vision would therefore be compatible with development of a Repository, which is not to say it is realistic. You estimate up to 1000 people would be employed during the construction period, with indirect employment increasing by 1000 to 1500 jobs. There is no certainty that these jobs would be taken up by Cumbrians – international companies tend not to recruit locally, but the indirect employment could be local. There might be a negative effect on tourism and agriculture and also on property prices. The negative and positive effects are both uncertain. As you say more substantial evidence is required. These considerations are linked to the Community Benefits package.</p>

<p>Underskiddaw Parish council</p>	<p>4 – Community benefits</p>	<p>No</p>	<p>4.1 You asked yourselves if you were confident that an appropriate community benefits package can be developed. Your initial opinion is that you have agreed a set of principles with the government as the basis for any future negotiations. You say you cannot be certain what the government might agree to in the future, and therefore what the amount and type of benefits might be. You say that future negotiations would need to be carefully managed. You do not say whether you were confident about this or not – therefore the Parish Council finds it difficult to say yes or no. If you feel confident, then the Parish Council would not agree with you. If you do not feel confident then the Parish Council would agree with you.</p> <p>The Parish Council does not feel confident that a suitable package can be relied upon.</p> <p>4.2 You defined 12 Principles with which a Community Benefits Package should be compatible. You asked the Government if it agreed with the Principles. The Government wrote back to say that it agreed that the Principles formed a basis for negotiations. Since the Principles themselves were at a high level of generality, with no detail, for the Government to say that they form a basis for further negotiation is not to promise any adherence to the Principles. The government’s reply is worded with extreme caution and is full of phrases like “may” and “might” and “subject to local needs, affordability and value for money considerations.” In particular no promises are offered in relation to “additionality”. Since this community is entirely dependent on the Government to decide the benefits package</p>
<p>Underskiddaw Parish council</p>	<p>5 – Design and engineering</p>	<p>No</p>	<p>5.1 You ask yourselves whether you are satisfied that the design concepts being developed are appropriate at this stage. Your Initial Opinions are that you can understand the generic designs being worked on, and they fit your expectations. You say detailed design can only be done in relation to a specific site. You have satisfied yourselves that retrievability is not being ruled out at this stage. You consider the design concepts are appropriate and flexible at this stage given that detailed design issues should not be resolved at this stage.</p> <p>5.2 You say that the design of the Repository would be tailored to the geography and specific geological structures of the actual site. The Parish Council considers this is another example of looking at things the wrong way round. Amongst the manifold uncertainties one certain starting point is that we have a large body of existing waste here in Cumbria which has to be disposed of safely (i.e., according to government policy, underground). Surely the design should be primarily influenced by the proposed contents. We know now what these are. The design should accommodate these and a search should be made for geology suitable to accommodate the design. If possible the design should allow for future waste produced in the UK. Some uncertainties might be resolved if this approach was adopted.</p>
<p>Underskiddaw Parish council</p>	<p>6 – Inventory</p>	<p>No</p>	<p>6.1 You asked yourselves whether you were satisfied with the proposed Inventory to be stored in the Facility. You say that you understand the difference between baseline and upper inventories and therefore what could go in a Repository, although there are still uncertainties. You believe that satisfactory progress has been made towards agreeing the principles that define the process for changing the inventory, including the influence of the community in this. Overall you think you have received the information you were looking for at this stage.</p>

			<p>6.2 You made a list of 6 principles for which you sought government agreement. You seem satisfied with the response. However : Principle 1 ~ you ask for Government to make clear its commitment to agreeing the Inventory: Answer : Decc does not provide this specific commitment. Principle 2 ~ you ask for a mutually acceptable process to be agreed in relation to changing the contents of the Inventory and for a veto on changes in the future: Answer : the Government would expect to develop a process (not a commitment) and “this process might reach decisions based on pre-agreed principles” (not necessarily these 6 Principles however). “These principles should recognise the need to provide a means to safely dispose of the higher activity radioactive waste in the UK which requires geological disposal”. In other words if it needs to be disposed of it will be disposed of. There was no agreement to the veto.</p> <p>There is reference to the right of withdrawal but changes to the Inventory might occur after the right of withdrawal has lapsed – when waste is already being stored. If it is not possible to obtain a commitment from the government that the local community should always be able to veto the contents of the Repository, then these could be changed at any future time, and the point of having had an agreement about contents in the first place would be lost.</p>
<p>Underskiddaw Parish council</p>	<p>7 – Siting process</p>	<p>No</p>	<p>7.1 You said you wanted to be confident the siting process is robust and flexible enough to meet our needs. Your Initial Opinions are that you “ are confident, at least during Stage 4. No further assurances can be expected from the Government. Everyone is committed to consensus and fairness : however the practical challenges of making voluntarism work should not be underestimated.”</p> <p>7.2 Concerns centre on how voluntary this process really is. Stage 1 (where councils expressed interest in participating) and the present stage (where the 2 councils who have volunteered to participate decide whether to move into Stage 4) are entirely voluntary : no-one was forced to participate or give reasons for doing so or not doing so. Once the volunteers move into stage 4 the picture changes. Potential Host communities have no right to withdraw – although they would be the actual sites concerned they have no decision making powers. On page 94 you state that if a Host Community wished to withdraw, and if this was based on reasoned justification and demonstrable community support, and if the Partnership decided it could manage without these communities, then the Host Community could be left out. If the Partnership decided it needed that Host community then “it could recommend its inclusion if it could produce a reasoned justification and explanation” – in other words at that point for the Host community the process has become compulsory. During Stage 5, once the expense of Stage 4 had been incurred, withdrawal becomes difficult even for the decision making bodies. The government White Paper states 6.5 “6.5 In the event that at some point in the future, voluntarism and partnership does not look likely to work Government reserves the right to explore other approaches. “</p> <p>The result is that having volunteered to get into the process West Cumbria might not be able to volunteer to quit it.</p> <p>A Host Community which finds itself volunteered to host a facility which it had not sought and does not</p>

		<p>welcome is faced with the problem of acquiring the detailed knowledge necessary to make a reasoned argument against having the facility, and the likelihood that in any opinion poll or referendum or District Council vote it will be outvoted by people living elsewhere.</p>
<p>Underskiddaw Parish council</p>	<p>8 – Overall views on participation</p>	<p>Underskiddaw Parish Council does not wish Allerdale and Copeland Councils to move into Stage 4 or to continue to participate in the process of searching for a site for a Repository.</p> <p>This decision is based on a close reading of the Consultation Report and of many of the attached documents, discussions in Council Meetings and listening to the views of Parish residents.</p> <p>The following points are relevant to our decision :</p> <ul style="list-style-type: none"> • The process is mis-conceived, and by recommending withdrawal from it we hope that the process will come to an end, and the government will have to start again. It is important to find the best site for the Repository : the best site is the safest: safety depends primarily on geology. Therefore the first consideration should be : where is the best geology. Instead of looking for the best site, the voluntarism principle has produced only a range of sites where the population is willing. Enough is known about the geology of England and Wales, and Cumbria in particular, to be able to say with certainty that there are better areas. The 1986 study recommended suitable sites, none of which was in Cumbria, which were turned down for political reasons. Other countries look for suitable geology first – they are more logical. • The next stages will cost many millions of pounds : the Council believes that this public money should not be spent as their view is that it is more likely than not that either a second-best site will emerge, or no site will be found. If the former then the money will not have been well spent; if the latter then it will have been totally wasted. • The Parish Council does not believe that Cumbria should be left to wrestle with this problem alone. They do not believe there is the expertise amongst the decision-makers to engage effectively with the enormous complexity of this task – nor should a decision with national and international consequences be left to relatively small local authorities. There are signs in the documentation of highly trained civil servants running rings round the Partnership as it attempts to extract promises for the future. • The Parish Council also believes that this process should be stopped at this stage because they do not have faith in the Right of Withdrawal promised to be exercisable up to the end of Stage 5. A close reading of the Report shows that this right is always limited, and as the process goes on it becomes increasingly illusory. The community most affected either by the surface facility or the drilling of boreholes to explore for the underground site (the Host Community) does not have a right of withdrawal. It is the decision making bodies (Allerdale and Copeland) who can withdraw. A small town or village affected by a proposal would be helpless if the remainder of Allerdale wished it to go ahead. This is clear from reading pages 93 to 97. Even the DMB's could be overridden by the government (see White Paper). The expenditure of large sums of money on the forthcoming stages itself creates a momentum for pressing

Organisation / Group	Question	Agree	Response
United Utilities PLC	1 – Geology	Not Sure/ Partly	<p>ahead.</p> <p>United Utilities PLC would seek assurance that the critical public water supply system such as boreholes is protected.</p> <p>[to be read in conjunction with main comments]</p>
United Utilities PLC	2 – Safety, security, environment and planning	No	<p>United Utilities PLC is not a statutory consultee in the planning application process therefore has limited influence in the approval of an application.</p> <p>So far, United Utilities PLC has limited inclusion in the public and stakeholder engagement process.</p> <p>[to be read in conjunction with main comments]</p>
United Utilities PLC	3 – Impacts	No	<p>United Utilities PLC supplies water to and treats wastewater from approximately 160,000 customers in our West Cumbria Resource Zone. United Utilities PLC has a number of sources of water in this area including lakes, rivers and groundwater and hundreds of kilometres of water supply network infrastructure.</p> <p>In the future, it is expected that United Utilities PLC will begin to source less water from lakes and rivers in the West Cumbria Resource Zone and a greater emphasis will be placed on groundwater sources, beginning with the boreholes currently being sunk in the Egremont area.</p> <p>United Utilities PLC operates and maintains a number of wastewater treatment works and sewerage infrastructure assets in the area. Any potential change, whether they are a temporary or permanent may affect the operation of these wastewater infrastructure assets and could result in a major environmental incident, therefore the need for ongoing discussion and inclusion in United Utilities PLC's business plans.</p> <p>[to be read in conjunction with main comments]</p>
United Utilities PLC	5 – Design and engineering	No	<p>Due to this shift in water sourcing and the future protection of United Utilities PLC's assets and service to customers, it is imperative that United Utilities PLC is engaged and consulted in all aspects of the project, including the investigation process; design, construction phase, operation and maintenance of the permanent and temporary facilities.</p> <p>[to be read in conjunction with main comments]</p>
United Utilities PLC	7 – Siting process	No	<p>So far, United Utilities PLC has limited inclusion in the public and stakeholder engagement process.</p> <p>[to be read in conjunction with main comments]</p>

<p>United Utilities PLC</p>	<p>9 – Additional comments</p>	<p>United Utilities PLC supplies water to and treats wastewater from approximately 160,000 customers in our West Cumbria Resource Zone. United Utilities PLC has a number of sources of water in this area including lakes, rivers and groundwater and hundreds of kilometres of water supply network infrastructure.</p> <p>United Utilities PLC support the consultation proposal to carry out more detailed geological investigations to locate potential suitable repository sites and the opportunity for United Utilities PLC to be consulted in this procedure going forward. United Utilities PLC would seek assurance that the criticality of the public water supply system of West Cumbria is acknowledged and any risks to the associated infrastructure, water quality or water resource is accounted for. Supplies of potable water to the repository from the United Utilities PLC network [e.g. for administration buildings, offices, workshops] whether they be temporary or permanent also need to be discussed with United Utilities PLC as this could affect our customer's level of service for the water supply zone and wastewater treatment if not fully accounted for in our business plans.</p> <p>In the future, it is expected that United Utilities PLC will begin to source less water from lakes and rivers in the West Cumbria Resource Zone and a greater emphasis will be placed on groundwater sources, beginning with the boreholes currently being sunk in the Egremont area.</p> <p>United Utilities PLC operates and maintains a number of wastewater treatment works and sewerage infrastructure assets in the area. Any potential change, whether they are a temporary or permanent may affect the operation of these wastewater infrastructure assets and could result in a major environmental incident, therefore the need for ongoing discussion and inclusion in United Utilities PLC's business plans.</p> <p>In particular, construction of the repository and associated facilities may generate large volumes of groundwater, the disposal of which may require United Utilities PLC to be involved through its existing wastewater network and treatment facilities</p> <p>Due to this shift in water sourcing and the future protection of United Utilities PLC's assets and service to customers, it is imperative that United Utilities PLC is engaged and consulted in all aspects of the project, including the investigation process; design, construction phase, operation and maintenance of the permanent and temporary facilities.</p> <p>Water and wastewater services are vital for the future health and well-being of the North West community and the protection of the environment. When developing your future policies, designs and specifications you should consider the impacts on the health and well-being of the community, environment and ensure infrastructure capacity is available and protected for future generations. If these cannot be addressed, an alternative design, location and/or timescale should be sought.</p> <p>Inappropriate development could result in the closing of a hospital and/or school etc, due to the inappropriate development siphoning off the historical water or wastewater infrastructure capacity; no</p>
------------------------------------	---------------------------------------	--

			water supply for washing and catering facilities and/or sewerage flooding of the property/highway.
Organisation / Group	Question	Agree	Response
Waberthwaite & Corney Parish Council	Email		Waberthwaite & Corney Parish Council have considered the MRWS Partnership Consultation document. It feels there are many unanswered questions that can only be answered by moving to stage 4. It was proposed and resolved unanimously that Copeland Borough Council should move to stage 4 and that Voluntarism and the Right to Withdraw be enshrined in law by the Government.
Organisation / Group	Question	Agree	Response
Walton Parish Council	1 – Geology	Yes	Subsurface storage safer than above ground storage. Disagree future communities not able to manage waste. Geology still being considered and more detailed investigation required. Therefore not finalised and as long look at this in more detail with an open mind – agree
Walton Parish Council	2 – Safety, security, environment and planning	Yes	This is an initial opinion and has considered all of the areas we would consider important. The next stages as this moves forward will require detailed information and a more thorough review.
Walton Parish Council	3 – Impacts	Yes	Do not know anyone else's opinion though. The impact will be significant - but at this stage most of the impact areas have been identified and need to be considered fully in the fullness of time.
Walton Parish Council	4 – Community benefits	Not Sure/ Partly	This is not clearly defined. Or how it would move forwards. The fact benefits are required has been identified is good but very vague at this time. Getting local buy-in is v important.
Walton Parish Council	5 – Design and engineering	Yes	Based on information from other facilities around the world. As long as lessons learned are carried forward for this depository.
Walton Parish Council	6 – Inventory	Yes	Well thought through at this stage. Need to finalise waste volume and type at an early time and have strict rules for changing this.

Walton Parish Council	7 – Siting process	Yes	Location seems sensible given Sellafield location. Only query is additional infrastructure needed. This needs careful planning as current infrastructure is a problem for traffic.
Walton Parish Council	8 – Overall views on participation		Agree. No reason why not as long as not committed to it.
Walton Parish Council	9 – Additional comments		Questions and information very positive towards this option. Would be good to see other viewpoints. The fact that this is only the first stage of many should allow more detailed consultation moving forwards. Excellent initial work.
Organisation / Group	Question	Agree	Response
Waverton Parish Council	Letter		Waverton Parish Council wishes to strongly object to the proposed building of an underground repository to dispose of radioactive waste in West Cumbria or anywhere in Cumbria. The council feel it is important to safeguard the environment for the safety of the next generation of the local population. If you require any further information, please contact me.
Organisation / Group	Question	Agree	Response
West Cumbria and North Lakes Friends of the Earth	1 – Geology	No	No comment was made
West Cumbria and North Lakes Friends of the Earth	2 – Safety, security, environment and planning	No	No comment was made
West Cumbria and North Lakes Friends of the Earth	3 – Impacts	No	No comment was made
West Cumbria and North Lakes	4 – Community benefits	No	No comment was made

Friends of the Earth			
West Cumbria and North Lakes Friends of the Earth	5 – Design and engineering	No	No comment was made
West Cumbria and North Lakes Friends of the Earth	6 – Inventory	No	No comment was made
West Cumbria and North Lakes Friends of the Earth	7 – Siting process	No	No comment was made
West Cumbria and North Lakes Friends of the Earth	9 – Additional comments		<p>[Ed note - Emailed letter and Note to Appendix are detailed in full below. For the Appendix which was also submitted see the attached document: WC&NLFOE Appendix - Copeland FOI Reply 5 April 2011]</p> <p>[Letter]</p> <p>Preamble</p> <p>There are many flaws in this process and consultation and this response does not address all of them in detail, in the knowledge that other responses have provided detail in certain important areas.</p> <p>This response is divided into two – the first section is for the purposes of counting responses to the forced-choice questions, and the second provides some more detailed arguments.</p> <p>Part One: Responses to the forced-choice consultation questions</p> <p>Question 1.1: no Question 2.1: no Question 3.1: no Question 4.1: no Question 5.1: no Question 6.1: no Question 7.1: no Question 8.1: no</p> <p>Part Two: Reasoning behind these responses</p> <p>Section One: Critique of the process</p>

1. Legitimacy of the process

1.1. There being no legal underpinning to this process means that both the White Paper and the MRWS Partnership itself have problematic claims to legitimacy. To compound this problem, the MRWS Partnership's processes themselves depart significantly from the processes as set out in the White Paper.

The decisions to express an interest

1.2. The MRWS partnership was set up in March 2009 as a means to implement the MRWS White Paper published in June 2008 process' (Defra BERR & Devolved Administrations 2008). This White Paper called for 'Expressions of Interest' by 'communities' in 'discussions about potential involvement in the siting process' (op cit: 49).

1.3. By the end of that month on June 24th Copeland Borough Council had lodged such an expression, a move that for some expressed not so much voluntarism as positive enthusiasm.

1.4. The White Paper provides a table outlining the 'indicative steps' they would 'expect communities to take' prior to such a decision after publication:

- 'preliminary soundings. For example through existing Local Strategic Partnerships' etc. and to follow these up with discussions requiring
- 'clarification from Government / NDA', or
- 'further soundings from to be taken from potential partners' (op cit: 50)

1.5. It is not known how or whether Copeland Council was able to take such steps within a matter of days. But it seems most unlikely that all this activity could have occurred within such a short space of time, and so the very first sequence of steps in the White Paper appear to have been contravened.

1.6. Allerdale Council also took a decision later in 2008 to make an expression of interest. As far as we know, its initial 'soundings' took the form of a seminar in Workington on 21st October 2008 to which a wider constituency of 'partners' including environmental groups was invited. W Cumbria & N Lakes FoE attended this meeting but contrary to an undertaking made at the meeting was not invited to comment on the report that was presented to Allerdale Council following this meeting, and which informed their subsequent decision to express an interest. Once again we see a Council acting in haste, and without the appearance of having conducted the detailed discussions and meetings outlined in the White Paper.

1.7. Cumbria County Council invited a wide range of potential partners in August 2008 to provide it with written views prior to its decision to express an interest. West Cumbria & North Lakes FoE presented a petition containing 896 signatures, gathered in a 6 week period, against the idea to Tim Knowles on October 14th 2008. The Council held a full debate but made the decision in cabinet. The discussions and meetings recommended by the White Paper appear to have been substituted by a paper exercise and so

were absent from these deliberations too.

1.8. All three Councils were represented at a 'Nuclear Influencing Strategy Workshop' held in Kendal on January 15th 2008, where the minutes show they agreed hosting a nuclear dump would be a 'trump card' in making the case for new reactors in West Cumbria

Note 22. No consensus on how/when to play trump card - that West Cumbria has a community willing to host high level (radioactive waste) repository, but perhaps only if we get new build and socio economic money follows to benefit community. This does of course assume (sic) that no other communities are equally willing!' (Appendix)

This makes abundantly clear that all three Councils thought that West Cumbria WOULD host a repository, even before any announcement had been made, or invitation offered, and that the willingness of the 'community' was (a) the only issue that mattered and (b) could be taken for granted.

It is hard to avoid the conclusion that these 3 Councils supported the idea of a repository in West Cumbria, were in great haste to express their interests, and in so doing, ignored the detailed discussions and meetings recommended by the White Paper.

The minutes of the Nuclear Influencing Strategy Workshop (Appendix) also indicate pre-determination of the issue, by some parties, of siting a repository West Cumbria. This calls into question the validity of 'voluntarism'.

The operation of the MRWS Partnership

1.9. The White Paper is, unfortunately, muddled with regard to expectations from 'communities' and 'decision-making bodies'. It defines the terms 'host community' ('the community in which any facility will be built') and 'decision-making body' (Local Government) but frequently uses the term 'community' without indicating which it means.

1.10. The White Paper's advice does not specifically recommend the setting up of a Partnership along the lines that subsequently developed. The Partnership does have draft Terms of Reference which state that its aim is to explore

whether they should participate or not in the Geological Disposal Facility siting process (Doc no 2 Draft 4)

But they have not implemented the conventional application of such an aim – namely to explore the pros and the cons of participation equally thoroughly. The deliberations have been biased in favour of promoting the process, with 'challenges' permitted from time to time. Where such challenges have produced arguments that are difficult – or perhaps impossible - to deal with (eg the Nuclear Waste Advisory Associates Issues Register, the papers put forward on Inventory by Pete Roche and the NDA's R

& D Programme by Prof Stuart Haszeldine), these have been handed to the NDA who have produced plans, some quite vague, about how they will be dealt with later in the process. In this way, the 'cons' – ie the arguments against participation – have re-appeared in the 'pros' column as problems that will be solved at some time in the future. The 'pro' position has always had the last word on any dialogue that has taken place.

The Partnership has not followed its own draft Terms of reference in exploring 'whether OR NOT to participate'. The deliberations have favoured the 'pro' position with any positions 'against' framed as 'challenges'. The 'pro' position always gets the last word.

1.11. The role of the NDA in providing assistance for the process has not always been helpful. For example, a request was made to the Partnership to review practice overseas for involving environmental groups in similar projects, which the NDA undertook. Not only did the NDA produce a flawed review by neglecting the case of Canada where a very rigorous procedure operates, but it ignored its own knowledge base that had previously explored this very case as part of its work for the White Paper. The Partnership drew the conclusion that little was to be learned about how NGOs might be involved, on the basis of what can only be construed as a deliberately biased account provided by the NDA (www.westcumbriamrws.org.uk/documents/100, <http://www.nda.gov.uk/documents/upload/TN-17086>).

The NDA has taken an important role in undertaking research for the Partnership. Some of this has of course been necessary. But the NDA's clear interest in promoting the process should have led the Partnership to consider the allocation of work to the NDA more carefully in order to avoid bias to the work it undertook.

1.12. Because the Partnership embraces three Local Authorities, it has become unduly dominated by a single constituency - the decision-making bodies (DMBs). The White Paper clearly envisaged that there would be just one of these DMBs in these early discussions, but in this case we have 3 which multiplies greatly the number of representatives (officers and members) of DMBs. The membership of 4 Councillors and 1 Officer for each Council means that they collectively occupy 15 seats in the Partnership.

The dominance of the Local Authorities in the process undermines its legitimacy, since the MRWS Partnership will be reporting to the same authorities to take the next decision.

1.13. The Partnership has taken no steps to rectify this imbalance. Places have been offered generally on the basis of providing a single seat within the Partnership to a whole constituency. Environmental groups were offered one place at first when Copeland set up an initial Partnership. This was some time later increased to two. The flaws in the Partnership's constitution and operation meant these places were not attractive to those invited, and the work produced for the Partnership by the NDA (see above) on models of involvement failed to make known to the Partnership the details of good practice that exists elsewhere, despite this information having already been researched by the NDA.

		<p>1.14 There is no reference in the White Paper to any need for the funding of Public Relations, but this in fact has been funded to a significant degree. Despite the large budget for this activity, there has been little coverage in the media over the period of the MRWS Partnership's operations. The messages that the media appear to have been receiving were that the various preliminary discussions were not significant and not worthy of publicity. Most publicity has been confined to the Letters pages of the local press.</p> <p>1.15 A high profile was given to Public Relations within the process and this has resulted in an overlap between 'public engagement' and 'public relations' with the result that activities sponsored by the Partnership have been dominated by communicating positive messages about the Partnership's work, instead of seeking to create forums where open debate and deep scrutiny are rehearsed and analysed. Instead, there has been an appearance of welcome, but a reality in which opposing views have been granted a minority platform only.</p> <p>There has been confusion between 'public relations' and 'communications' on the one hand and 'public engagement' on the other, resulting in Public Engagement Forums being dominated by Partnership members promoting 'messages' in favour of the process.</p> <p>1.16. Credible opposing views have been dismissed by Partnership members as 'just one view among many' as though the number of people holding a view were all that is needed to testify to its validity. Clearly there are members who have not considered the case of Galileo. The views of Prof David Smythe and other geologists who consider the entire area geographically unsuitable are absolutely crucial for the Partnership to understand, yet Prof Smythe was offered just 15 minutes to present a summary. Such views, if correct, are 'show-stoppers' yet they have not been treated with the seriousness they merit.</p> <p>1.17. The unwillingness of the MRWS Partnership to provide a proper platform for opposing views has meant that others have been obliged to do this – eg hosting of the lectures given by Prof David Smythe in February 2012 - without the benefit of the public funding that the White Paper promised.</p> <p>1.18 There has been a category confusion within the Partnership about the meaning of the term 'representation'. It has consistently been used in the political sense of representing a constituency or 'community' of interest, and debates have been organised to represent a range of stakeholders (eg Consultation document P 31 – 32 Box 4). The alternative sense, of representing the different sides of an argument in order to analyse and test the logic of the arguments and get at the truth, has not been used – yet this is what is needed. This has also contributed to the failure of the Partnership properly to rehearse and scrutinise the evidence, especially with regard to geology, engineering and inventory.</p> <p>1.19. The Partnership has also failed properly to understand the concept of 'peer review'. It has appointed an 'independent' geologist as 'peer reviewer' who coincidentally supports the idea favourable to the process proceeding, that somewhere in W Cumbria there might be a suitable place for a repository. The principles of peer review are acknowledged by the academic community as offering a good – though imperfect - way of judging the worthiness of claims to knowledge by testing such claims through the</p>
--	--	---

judgement of academic peers. This testing usually involves a number of reviewers who hold disparate views.

1.20. Many issues connected with engineering, inventory, containment, etc have been raised. The Nuclear Waste Advisory Associates identified 100+ issues in their 'Issues register' (www.nuclearwasteadvisory.co.uk), and the 'Rock Solid' report reviewed the literature on disposal of high level waste, concluding that 'the existence of road maps and the rejection of other options do not automatically mean that deep disposal is safe' (Wallace 2010 p 48). Both documents identify issues which are very serious indeed – for example the contradictory requirement for some gases to be vented while others should be contained. The NDA's response to these takes a procedural not a substantive form – ie not responding to these arguments now, but promising to put in place procedures that will lead to their solution later.

The MRWS Partnership's ability to deliver credible public engagement has been compromised by promoting the case for a repository in W Cumbria. Arguments against have been heard not for their substance, but rather for the purpose of fine-tuning its 'messages'. The process has more resembled a political debate with a premium on being 'right' than the provision of a forum for full scrutiny and open debate.

Its scrutiny of the geological arguments, engineering and inventory in particular have been partial to the case in favour of a site in West Cumbria.

1.21. The MRWS Partnership has never been able to agree its own Terms of Reference. This undermines its credibility and means that it cannot be understood as speaking with one voice. More seriously, it means there is a danger that ultimately the dominant interests – those of the DMBs - will prevail.

The absence of agreed Terms of Reference for the MRWS Partnership undermines its credibility. There is a danger that the dominant interests of the DMBs together will prevail.

1.22. All 3 of the Local Authorities support a new generation of nuclear reactors in England & Wales, and at Sellafield. They are thus committed to the need for a 'solution' to the problem not only of legacy waste but also of waste associated with new build reactors.

1.23. Not only do all 3 support a new generation of nuclear reactors and the waste they will create, but the minutes of the County-wide Nuclear Influencing Group which embraces all three, reveal a belief that a decision to host a GDF in W Cumbria will prove to be 'a trump card' in getting new reactors sited at Sellafield (Appendix One)

The DMBs are all in favour of new nuclear reactors, whose development is predicated on there being a solution in place for existing nuclear waste. More seriously, they all have supported the notion that there already is 'a willing community' for hosting a GDF and that this represents a 'trump card' in attracting new

nuclear reactors to West Cumbria.

1.24. The section in the White Paper on 'Community Siting Partnerships' is – surprisingly, since this comes at a later stage – somewhat more detailed, and the implication is that a 'host community' – and hence an area where there is a potential specific site, will already have been identified (paras 6.28, 6.29 p 54). This has not happened – at least not in public, although there is a widespread view that the NDA wish to return to the site of the Nirex Inquiry, Longlands Farm.

1.25. The absence of a 'host community' having been identified for Stage 4 will mean that the decision-making body / ies would be the ones to set up a Community Siting Partnership. Once a site were identified then representatives of the 'host community' would be invited to join a process that was set up by the Local Authority / ies. This will replicate the current situation of undue political dominance.

Pro-nuclear Local Authorities who have already expressed support for the idea of a GDF in W Cumbria dominate the existing Partnership. Under the proposals for the next stage, the absence of a host community will enable this dominance to continue.

1.26. The principles for identifying and assessing potential candidate sites were not published in time to be incorporated into this consultation. Instead, a summary of what might be included in such a process has been offered.

Their publication in March indicates further confusion at DECC about 'community and what it signifies:

'In relation to consultation timing, the Government wanted to ensure that communities currently considering whether to make a Decision to Participate have sufficient information to be able to understand what would be involved in Stage 4 of the MRWS process. Government also wanted to ensure that the plans for Stage 4 were developed in some detail in preparation for a possible Decision to Participate.' (DECC 2012a p 25).

This means that once again, the DMBs are considered to be the 'communities' and have been privileged over wider community interests.

1.27. The confusion over what is a 'community' persists in the DECC guidance over identification and assessment of potential candidate sites. It states:

'Right of Withdrawal: up until the point at which underground construction of the facility is due to begin, a community can withdraw from the MRWS process. However, as outlined in the White Paper, all parties in a Community Siting Partnership would be expected to work together to avoid the need to exercise the Right of Withdrawal at a late stage.' (DECC 2012b p 9)

- yet in the White Paper the Right of Withdrawal is vested in the DMBs. If this is a policy change then the

DECC paper should make this clear.

Section Two: Flaws in the consultation document

There are a number of ways in which the Consultation document is misleading, and therefore it is compromised as a way to collect the views of people about whether to go forward with a decision to participate. This is not meant to provide a full account of its flaws, just some of the most serious.

2.1. Throughout the consultation document the views of the Partnership on a Decision to Participate are put forward. Despite the Partnership's draft Terms of Reference embracing the notion that they should be exploring whether or not to volunteer, nowhere in the Consultation Document is the contrary view rehearsed or even so much as alluded to – namely a summary of the arguments against a Decision to Participate. This is standard practice in Option Appraisals that often accompany consultations: Option One = No Change / do nothing. The document is therefore biased in favour of promoting a position to take a decision to Participate. In fact it is only recently that the Partnership has changed the term 'Decision to Participate' (DtP) to 'Decision about Participating' (DaB).

By ignoring any analysis of the option NOT to participate the consultation document is biased in favour of participating.

This clearly contravenes the draft Terms of Reference which state that the Partnership's aim is to consider 'whether OR NOT to participate'.

2.2. 'A repository'

2.2.1. Throughout the document the project is referred to as 'a repository'. But it is not made clear that there could be more than one. This is due to the lack of clarity about several matters:

- whether this project would be confined to so-called 'legacy' waste, or whether waste from new reactors would need to be accommodated. The fact that Government has not yet reached agreements with the potential operators of new plants but is still in discussion with them over the question of waste allows the possibility that these operators and the Planning Authorities will expect waste from new build to be sent to Cumbria. This was the attitude of Essex County Council and Southend Borough Council until opposition groups pointed out their error (Essex County Council 2011);

- the difficulties inherent in co-disposal of high level waste and intermediate level waste, in particular the question of how to dispose of heat-generating waste alongside other wastes. The consultation document fails to make clear these difficulties, calling the waste 'higher activity' instead of using the usual terms with which people in West Cumbria are familiar. It also fails to make clear that this type of repository is a totally new type of project, not tried anywhere else in the world;

2.2.2. Furthermore, although the scale of the project has been characterised as being significantly large (equivalent to the size of the channel tunnel), the scale of the associated infrastructure works, and impact of both removing and storing the spoil have not been mentioned. Yet these would be highly significant.

2.2.3. It is already evident that West Cumbrian infrastructure could not accommodate the traffic that a repository would need. But only the comings and goings of waste packages have been considered in any detail within the Partnership, and merit just a reference in the consultation document (Mrws document no 178). The question of construction is one of the many issues that the Partnership will not consider now because of its commitment to site-specific criteria rather than generic criteria, yet it is possible to estimate even at this stage that construction will require an industrial zone of several square kilometres which will remain for more than 100 years (<http://mrwsold.org.uk/more-information/safety-issues/>).

2.2.4. The question of spoil has been completely glossed over in Document no 178 which states 'we have assumed that all of the excavated rock spoil could be stored on the surface and then either re-used in construction and backfilling or for landscaping and site restoration.' (Mrws no 178). Neither the nature nor the likely scale of the surface required for such storage have been estimated. Yet it is already clear that the requirements of a repository to deal with spoil would extend the project well beyond a single 'host community'.

2.2.5. In Kent, an entire new Country Park jutting out into the English Channel (Sapphire Hoe) was built with just some of the spoil from the channel tunnel project. A repository in West Cumbria would not just require huge amounts of spoil to be removed, but also huge amounts to be retained for backfill some 150 years or so after emplacement. A place in West Cumbria would have to be found to accommodate the berms it would need to be kept in (<http://mrwsold.org.uk/wp-content/uploads/2012/01/spoil-11oct11.pdf>, <http://mrwsold.org.uk/more-information/safety-issues/>).

Nowhere else in the world is undertaking co-disposal, and the Consultation document does not make clear the unique nature of the project in attempting to accommodate both high and intermediate level waste, probably along with spent fuel.

It is also different from the previous proposal by Nirex to site a Rock Characterisation Facility at Longlands Farm in Gosforth for intermediate level waste only. Instead the consultation document refers to 'higher activity wastes', a term unfamiliar to West Cumbrians. The unique nature of this project is hidden from view.

The size and scale of this project have not been properly depicted. The idea that it would just affect a single 'host community' with perhaps a neighbouring community affected too with some surface facilities does not stand up to scrutiny – in fact, the project would affect communities far beyond the place where any repository were to be located. It would affect much of West Cumbria and taken in its totality would be very significant and clearly visible over a very long period from many of the western fells of the Lake District National Park.

2.3. Geology

2.3.1. With regard to geology, the Consultation document claims that there is 'enough possibly suitable land to make progress worthwhile'. This makes a fundamental assumption that the basic criteria for geological suitability are host rock dependent, and that the overall regional geological setting is not important. However, the research, experience and recommendations for deep radioactive waste disposal both in the UK and abroad since the early 1990s have been summarised as follows:

1. Select regions for site search based on geographical, geological and hydrogeological attributes
2. The basic criteria for site selection are host rock independent
3. The regional geological setting of the site is of paramount importance
4. Low hydraulic gradients and a long-term groundwater return time are essential
5. Simple geology is preferable
6. Long-term geological stability is desirable – inasmuch as it can be predicted.

In contrast, the MRWS process has resulted in a single region based primarily on 'voluntarism', rather than on the geological criterion (1) above. The process also highlights a purely host rock approach, in contradiction to (2) above. Criterion (3) is simply ignored. West Cumbria meets neither criterion (4) nor (5). Nor can geological stability (6) be guaranteed if a site along the coastal region – which is near a major fault line - is selected. (<http://mrwsold.org.uk/more-information/international-perspective/>)

2.4. The waste

2.4.1. In the DVD which accompanies the consultation document, it is stated that 70% of the waste by volume that would go into a repository is already located at Sellafield. This 'fact' has been a major plank of the argument in favour of seeking a site for a repository in West Cumbria – indeed it has been framed as constituting a 'responsibility' to seek to locate it here.

However, while it is true that 70% of 'legacy' waste is already at Sellafield, there remains the possibility that this repository will also be asked to accept waste from new reactors. In this case, the situation would be very different. In the event of a 16 gigawatt new build programme, around half the waste, by volume, is not located at Sellafield.

In the event that waste from a 16 gigawatt new build programme would be included, around half the waste would come from outside Cumbria, contradicting that statement that '70% of the waste is already at Sellafield'

2.5. Principles of Voluntarism

2.5.1. According to the detail in the White Paper the principle of voluntarism does not really extend to local communities, despite impressions early on in the document that it might. Their views may be taken into

account, but all the guidance ends with the Decision-making Bodies taking decisions on behalf of smaller areas where a site might be located – and indeed beyond, where surface facilities, spoil, new transport infrastructure etc will be located - and the DMBs exercising Rights of Withdrawal from the process.

The notion of a 'willing community' could ultimately be restricted to a very small number of politicians, acting in cabinet or executive.

2.5.2 By not providing any background information about the process of voluntarism to host nuclear waste in other countries, the consultation document fails to show just how far they are departing from accepted practice.

2.5.3. The logical way to find a site for a repository is to apply generic criteria to identify suitable settings and then to invite volunteers, but in West Cumbria it is the reverse. Members of the Blue Ribbon Commission on the America's Nuclear Future visited the MRWS Partnership to get an understanding of what was happening in the UK. They have not adopted our model, but instead followed the logical procedure:

'First the Environmental Protection Agency and the Nuclear Regulatory Commission should develop a generic disposal standard and supporting regulatory requirements early on in the siting process. Generally-applicable regulations are more likely to earn public confidence than site-specific standards. In addition, having a generic standard will support the efficient consideration and examination of multiple sites.' (<http://brc.gov/>)

2.5.4. The repositories under construction in Sweden, Finland, France and Switzerland are all of interest to the case here. In all these countries a geological suitability search came before any attempt to get communities involved. It is true that at a late stage in the site search in both Sweden and Finland political considerations to some extent overrode the geology; but both these countries are unusual in having ancient hard crystalline rocks of a similar type at the surface over all of their low-lying regions. This means that the choice of an actual site was less important, because the geology was already constrained – which is not the case in the UK.

Nowhere else in the world is pursuing a voluntarism approach to deep disposal that does not first identify settings with suitable geology / geography and then seek volunteers. This country is unique in seeking volunteers first.

2.5.6. The Blue Ribbon Commission favours the use of generic criteria for several reasons, including earning 'public confidence'. Once again, we note the contrast with the MRWS process where site-specific criteria are to be used. This avoids the inconvenient unsuitability of the geology & geography of West Cumbria, and posits the hope that some small area might eventually be found somewhere in the region. The difficulty here is that by the time sub-surface investigations are taking place, it may be too late to withdraw.

2.5.7. The Blue Ribbon Commission also states:

'these criteria will ensure that time is not wasted investigating sites that are clearly unsuitable or inappropriate' (<http://brc.gov/>)

The application of site-specific criteria carry a risk that time will be wasted investigating sites that prove not to be suitable. They also risk the possibility of reaching a point where withdrawal would be difficult.

2.6. Only one volunteer

2.6.1. The Blue Ribbon Commission also states:

'Encourage expressions of interest from a large variety of communities that have potentially suitable sites - as these communities become engaged in the process, the implementing organization must be flexible enough not to force the issue of consent while also being fully prepared to take advantage of promising opportunities when they arise.' (<http://brc.gov/>)

2.6.2. The invitation from the White Paper has produced expressions of interest from one area of the country only. This is a serious flaw to the idea of voluntarism, compromising as it does, the possibility of comparing alternative sites in order to find the most suitable. A volunteer of one is unsatisfactory.

2.6.3. Yet the White Paper does not address the question of how the relative merits of competing sites might be evaluated. Instead it only puts forward 'Criteria for assessing and evaluating candidate sites' (p 66). If it were genuinely wishing to create an open competition among volunteers, the rules for judging the winner have not been stated. The idea that siting a repository in West Cumbria has been a 'done deal' from the outset between government and Councils in West Cumbria is therefore not so far-fetched. If this is true, then the consultation has been prejudiced from the outset.

2.6.4. The fact that Copeland Council was so enthusiastic at the outset may well have engendered complacency among other Councils over the question. The evidence from Essex and Southend testifies to this (Essex County Council & Southend-on-Sea Borough Council 2011).

The existence of a single area volunteering early on in the process may have engendered complacency elsewhere in the country.

2.7. Incrementalism

2.7.1. The version of voluntarism that is being pursued here is an incremental one, where each step that is taken is not a huge one, there is an implication that each might be reversible - but there is a high risk that little by little they will add up to a fait accompli. This is strongly supported by the decision not to use generic criteria, and instead to use site-specific criteria. The result is that far too much cannot be decided at this early stage because a site has not been identified.

2.7.2. Compelling questions have been raised which are very serious indeed by Nuclear Waste Advisory Associates, Prof Stuart Haszeldine, Prof David Smythe, Pete Roche, and the Rock Solid Report. All challenge the NDA, whose response takes a procedural not a substantive form – ie not responding to these arguments now, but promising to put in place procedures that will lead to their solution later.

2.7.3. The use of a geological framework that emphasises host rock and dismisses overall regional geology as important also favours incrementalism. If regional geology had been used, then West Cumbria would be rejected. Making the host rock a criterion for site selection goes against international criteria, but allows for the theoretical possibility of a site.

The incremental approach allows following tendentious arguments on the basis that what is clear now may somehow perhaps be disproved some day. This brings a real risk that once the process has moved sufficiently far, the investment of time and money will be deemed too significant - and the research to find another solution to nuclear waste will not have taken place.

AND A DUMP IN AN UNSUITABLE PLACE WILL BE OUR LEGACY TO FUTURE GENERATIONS.

References

http://brc.gov/sites/default/files/documents/disposal_report_updated_final.pdf

DECC 2012a Managing Radioactive Waste Safely – Government response to the consultation on desk-based identification and assessment of potential candidate sites for geological disposal London DECC URN 11D/950

DECC 2012b Managing Radioactive Waste Safely –A framework for the desk-based identification and assessment of potential candidate sites for geological disposal London DECC URN 11D/951

Defra BERR & Devolved administrations 2008 Managing Radioactive Waste Safely –A framework for implementing geological disposal London Cm 7386

Essex County Council & Southend-on-Sea Borough Council Waste Development Document: Preferred Options November 2011

<http://mrwsold.org.uk/more-information/safety-issues/>

<http://mrwsold.org.uk/wp-content/uploads/2012/01/spoil-11oct11.pdf>

<http://mrwsold.org.uk/more-information/international-perspective/>

http://www.westcumbriamrws.org.uk/documents/100-NGO_involvement_overseas_TN17681.pdf,

http://www.nda.gov.uk/documents/upload/TN-17086-Managing-Radioactive-Waste-Safely-Literature-Review-of-International-Experiences-of-Partnerships-pdf-version_v1.pdf

<http://www.nuclearwasteadvisory.co.uk>

Wallace H 2010 Rock Solid? A scientific review of geological disposal of high-level radioactive waste
Genewatch UK & Greenpeace International

[Note to Appendix - for the Appendix see attached document Copeland FOI Reply 5 April 2011]

APPENDIX - NOTE

This note is an introduction to the Appendix which consists of a series of minutes of meetings obtained under Freedom of Information which involved representatives from the following Cumbrian organisations over the time-period:

Councillors and Officials from the NDA,
Cumbria, Copeland and Allerdale Councils,
Cumbria Vision,
West Lakes Renaissance,
Sellafield Unions,
North West Development Agency,
Invest in Cumbria,
Sellafield Ltd,
Mercury Stone (Marketing company),
AMEC (nuclear service company),
Furness Enterprise,
a representative of Jamie Reed, Copeland MP, and
John Hetherington an independent consultant.

Also attached are true copies of slides (which are impossible to scan) of a presentation of the first meeting noted in the minutes.

These are submitted as they indicate pre-determination of the issue, by some parties, of siting a repository West Cumbria. This is absolutely fundamental to the issue of voluntarism.

They also raise many questions over the openness and transparency of the MRWS process on the part of a number of the organisations which have taken part in that process - including the three Councils which

are Decision Making Bodies – which were a party to these meetings.

The attached information was only made public following protracted requests under Freedom of Information legislation. How much more remains hidden from the MRWS process is of course unknown.

There are also references to MRWS member organisations in the minutes e.g. the Lake District National Park Authority, but as these do not link to the MRWS issue directly they are not referenced below.

For ease of reference the following notes are made on the most relevant points of the minutes and slides. Page numbers refer to the pages in the printed documents.

References to key points in the document:

Links of repository to new build

Minutes 15th January 2008 (p 1-4) - the day after the Government launched the White Paper 'Our Energy Challenge' and six months before the MRWS White Paper was published.

Page 1, note 2

Government is 'salami slicing' nuclear renaissance by a) getting NDA up and running and 'dealing' with legacy (waste) b) now rehabilitating nuclear energy c) progress on waste management next, then d) re-examination of fuel cycle to follow (nuclear power WP leaves big door open to future reprocessing)

Nuclear dump as a 'trump card'

15/1/08 (p 3) Note 22 reveals that the prime interest in possibly hosting a 'geological disposal facility' is in order to leverage new build in West Cumbria:

Note 22. No consensus on how/when to play trump card - that West Cumbria has a community willing to host high level (radioactive waste) repository, but perhaps only if we get new build and socio economic money follows to benefit community. This does of course assume (sic) that no other communities are equally willing!

The above ties in with the thinking behind Note 2 on page 1 (above) and the NDA dealing with legacy waste, as all being part of facilitating new build.

Further notes:

? 13/2/08 (p 7) mention is made of MRWS 4 months prior to its publication

			<p>? 13/3/08 (p 11) 'MRWS - SK completed a scoping paper'. It is not known if this was made public</p> <p>? 30/4/08 (p 21) 'Sellafield still in frame for second phase - indirect link with the repository (NB, this refers presumably to the thinking at the time that the disadvantages associated with the Sellafield site might mean it would only reach a second-list of approved new reactor sites)</p> <p>? 27/1/0/09 (p 91) 'need to draft what the Cumbria offer is to the market place'.</p> <p>? 09/2/10 (p 115) - David Hayes - under New Missions - is 'running workshops on the 18th June to look at a strategy for Nuclear Fuel Management and Nuclear Waste.'</p> <p>See also points in the same record re. NDA and reprocessing.</p> <p>See also:</p> <p>slides 13-14 (p 5) of presentation: e.g. 'new build planning inquiry will expect to see a Repository siting and implementation process 'roadmap', with achievement of early milestones and confidence in a forward programme' and: 'By 2010/2011, the MRWS programme can be expected to have invited volunteer communities and to have received responses.</p> <p>slide 23 (p 8) of presentation document The slides are white printing on black and so very difficult to scan. A hard copy can be sent if it is required.</p>
Organisation / Group	Question	Agree	Response
Whicham Parish Council	1 – Geology	No	<p>The consultation document states that there is no significant public or stakeholder criticism of the study's integrity. It therefore follows that there is some criticism and this is not described in the main part of the document</p> <p>Varying opinions amongst geologists and the evidence of previous investigations lead us to doubt that any of West Cumbria (not already screened out) is suitable for a repository</p>
Whicham Parish Council	2 – Safety, security, environment and planning	No	<p>The conclusion on page 51 is very conditional, e.g., "will have", "will be in place". This does not inspire confidence, neither does the fact that safety is enclosed in inverted comma on that page.</p> <p>We are not confident of the impartiality of the NDA.</p> <p>The White Paper on which this consultation is based states that the aim of a GDF is to "ensure no harmful quantities of radio activity ever reach the surface" There is no such thing as a safe level of radiation - if</p>

			there is to be even slight leakage, then a GDP can not be considered to be a safe, permanent way of disposal of high level nuclear waste
Whicham Parish Council	3 – Impacts	No	<p>We question the integrity of the impacts study. 377 people were questioned, all bar 0.8% in towns. This is not a representative sample. And almost half of these people questioned were in Workington and Whitehaven - these areas have already been ruled out by the initial screening process. This means the "evidence" is skewed, by questioning people who will not have the repository in their immediate vicinity. There is an implication that rural areas do not favour a repository, but there are no figures given.. As a rural area we feel that our views are not represented in the study</p> <p>The study on impacts was carried out prior to the Japanese disaster and it is likely that this event has coloured people's perception and it could be argued that the impact study is no longer valid</p> <p>The main impacts of a repository have been defined as physical, social, environmental and economic. Of these categories the only one that may be a benefit is economic with jobs created during the construction. This benefit would be outweighed by the loss of jobs in the tourist and farming industries.</p> <p>The research into protecting the brand and reputation of the area was not complete when the consultation document was published. This was completed and reported in the MRWS bulletin no 17, point 7. The recommendation was "putting in place a phased communications campaign to emphasise the area's strong points" It is difficult to see how this extra advertising will mitigate the negative perceptions that would arise from siting a nuclear waste repository in West Cumbria</p> <p>The full report will not be available on the web site until the end of the month. This is after the end of the consultation period, so respondents have to take on trust the precis published in the bulletin. It could be the case that the findings were that it would be very difficult to protect the area's reputation, should a repository be sited in West Cumbria. This is another example of the flawed nature of this consultation</p> <p>We do not agree that an "acceptable process can be put in place during the next stage of the MRWS process to assess and mitigate any negative impacts" as some of the impacts, e.g. visual and disturbance will be impossible to mitigate.</p>
Whicham Parish Council	4 – Community benefits	No	<p>There are, and can be, no firm proposals. "We cannot be certain what specific package the Government might agree to this far in advance", so there are no guarantees</p> <p>Impact mitigation is discussed - in our opinion there can be no mitigation for the impact of a repository in terms of visual impact and effect upon tourism and farming. In other words community benefits on offer would not address the disbenefits.</p> <p>There is also the point that the Community Benefits package is in the gift of the Government. In the life time of this process it is likely that there will be at least one change of government.</p>

Whicham Parish Council	5 – Design and engineering	Not Sure/ Partly	We agree that waste should be retrievable We agree that it is too early to consider specifics
Whicham Parish Council	6 – Inventory	Not Sure/ Partly	It is too early in the process to be considering the detail
Whicham Parish Council	7 – Siting process	No	The Decision Making Body is remote from Whicham, more than 30 miles away and in this context is not accountable to our residents. We are concerned that if there is progression to the next stage it appears that the wishes of the host community can be over ruled "If omission of a potential host community would cause insurmountable problems for the siting process" the Partnership could recommend inclusion of the community concerned. In other words, we find the Right of Withdrawal suspect, especially as it would be exercised by Copeland Borough Council.
Whicham Parish Council	8 – Overall views on participation		Whicham Parish Council do not wish to host a repository or over ground facilities. If the decision is taken to proceed to the next stage we would like our parish to be taken out of the areas being investigated as being suitable.
Organisation / Group	Question	Agree	Response
Whitehaven School Eco Group	1 – Geology	Not Sure/ Partly	As the Sellafield facility is close by, we believe that for the security of the raw materials, these options would be most suitable.
Whitehaven School Eco Group	2 – Safety, security, environment and planning	Yes	<ul style="list-style-type: none"> • Because there's a risk of radiation leaks, but it could be good for the environment. • The repository site in America is already facing problems after decades of construction.
Whitehaven School Eco Group	3 – Impacts	Yes	<ul style="list-style-type: none"> • Because it's going to create jobs for 10000 years. • Thousands of jobs will be created once this is constructed, Cumbria would have to rely on the next generation for thousands of years to keep the facility safe.
Whitehaven School Eco Group	4 – Community benefits	Yes	Because the package will supply Cumbria with the security to protect us
Whitehaven School	5 – Design and	Yes	• Because it's so far are underground so it's unaccessible for terrorists to use

Eco Group	engineering		• The area is very well and catered for the waste at Sellafield.
Whitehaven School Eco Group	7 – Siting process	Yes	It will show the communities what the geology is like underground. The method will give us a better understanding about our natural landscape. The process is very time consuming.
Whitehaven School Eco Group	8 – Overall views on participation		We believe that the councils should be committed towards this because this project will change the way Cumbria functions in the future.
Whitehaven School Eco Group	9 – Additional comments		We at the eco group feel very compassionate about this project and hope for the possible success of its future.
Organisation / Group	Question	Agree	Response
Winscales Parish Council	Letter		<p>Geological Disposal of Radioactive Waste</p> <p>At the meeting held on 16 March 2012, this subject was discussed at length and we wish to inform you that we strongly object to these proposals proceeding to the next stage, i.e. identification of a suitable site.</p> <p>Every single member of the parish council feels that Cumbria already has its quota of waste facilities. It may be acceptable to process its own waste rather than transport it elsewhere, but not to become a dumping ground for the rest of the world. There has already been an earthquake in the county – disposal of radioactive waste in the area could further jeopardise the area geologically and have a devastating impact on future generations. Such a facility would not be welcome.</p>