

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.

		<ul style="list-style-type: none"> • 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. • 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>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</p>

	<p>Council input.</p> <p>The 7 principles set out are reasonable, but they are very vague, and their interpretation could be questioned</p> <ol style="list-style-type: none"> 1. How are you going to show that there is “confidence and ownership on the part of the host community”? (Principle 1)) 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>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.

		<ul style="list-style-type: none"> • 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. • 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>