

**Borrowdale Parish Council**

Question	Agree	Response
<p><b>Covering letter to response form</b></p>		<p>SHOULD WEST CUMBRIA CONTINUE WITH MRWS?</p> <p>Adopted position of the Borrowdale Parish Council (Adopted &amp; 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 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 siting investigations (Allerdale Borough Council, Copeland Borough Council &amp; 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 &amp; 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 &amp; 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 &amp; 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</p>

material would be contaminated by radioactivity. Therefore the geology is key, to ensure that as little contamination as possible ever reaches the surface.

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.

Professor David Smythe has said that nowhere in Cumbria has suitable geology, because of two observations:

- Cumbria is very mountainous
- There is a lot of faulting, folding & other geological issues

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.

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. 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.

Right of Withdrawal:

Throughtout 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).

Q1. Does this mean that if 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 an nuclear waste underground repository beneath their homes and so withdraw?

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 withdrawl, pages 93-94 of the partnership's report stage 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 is made clear within this document that once expensive boreholes have been drilled a community would find it very difficult to withdraw.

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.

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.

#### Planning & the National Park

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.

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.

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).

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?

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.

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.

#### Impacts & Benefits

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.

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'.

Safety

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.

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.

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.

Conclusions:

Borrowdale Parish Council feels that 'West Cumbria' should withdraw from the MRWS process now because:

- 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.

		<p>Adopted by Borrowdale Parish Council by unanimous resolution.</p> <p>12th March 2012</p>
<b>1 – Geology</b>	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"> <li>- Cumbria is very mountainous</li> <li>- There is a lot of faulting, folding &amp; other geological issues</li> </ul> <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 &amp; 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 &amp; studies if this type of geology exists in Cumbria.</p>
<b>2 – Safety, security, environment and planning</b>	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> <ul style="list-style-type: none"> <li>- 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</li> <li>-What impact on safety will the governments request to bring the opening date forward by 20 years have?</li> <li>-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</li> </ul>

		proposed to be done with this waste?
<b>3 – Impacts</b>	No	- Insufficient research has been done into the potential impacts on the tourism & agricultural industries in Cumbria  -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...
<b>4 – Community benefits</b>	Not Sure/ Partly	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.
<b>5 – Design and engineering</b>	Not Sure/ Partly	Not sure on this issue.
<b>6 – Inventory</b>	Not Sure/ Partly	Not sure on this issue.
<b>7 – Siting process</b>	No	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.
<b>8 – Overall views on participation</b>		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):  - 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.
<b>9 – Additional comments</b>		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