

**Friends of the Lake District**

Question	Agree	Response
<b>Introduction to emailed letter answering consultation questions</b>		<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>
<b>1 – Geology</b>	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"> <li>- The complexity of the underlying geology beneath West Cumbria and the Lake District;</li> <li>- The faulting in the Borrowdale volcanics;</li> <li>- The conclusions from the previous NIREX inquiry;</li> <li>- The related uncertainties in the permeability of the different rock systems;</li> <li>- High rainfall, high topography and hydrological water flow questions;</li> </ul> <p>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>
<b>2 – Safety, security, environment and planning</b>	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>
<b>3 – Impacts</b>	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, 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 &amp; 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>
<b>4 – Community benefits</b>	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>
<b>5 – Design and engineering</b>	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>
<b>6 – Inventory</b>	Not answered	<p>No comments at this stage.</p>
<b>7 – Siting process</b>	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 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 is proven one way or the other.</p>
<p><b>8 &amp; 9 – Additional comments</b></p>		<p>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.</p>