Holme St Cuthbert Parish Council	
Question	**Response**
Letter	Adopted Position of Holme St. Cuthbert Parish Council At the present time 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. 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. Right of Withdrawal The Government says that a repository will only be put somewhere where there is a community that has 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. 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. The government reserves the right to ignore a community's wishes if they mean that the repository project would have to be abandoned. 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. All present at the meeting expressed a desire that the parish council request Allerdale and Cumbria County Council to withdraw from the process now.

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.

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.

Holme St. Cuthbert Parish Council therefore has no faith in the Right of Withdrawal

Geology

Geology is important because the Government admits that the repository will eventually leak. Water 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 coming to the area. Any thoughts of the nearby LDNP achieving World Heritage status to boost our tourist industry will be finished. 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? 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. Impacts and Benefits 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. 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. 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. Safety 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. The original planned date to bring an underground waste disposal facility into service was 2040 and was 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 Participate. Holme St. Cuthbert Parish Council request that the 3 councils concerned withdraw from this process