

## Lake District National Park Authority

Question	Response
<b>Letter</b>	<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> <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.</p> <p>Question 1 Do you agree with the Partnership's initial opinions on geology?</p> <p>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.</p> <p>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.</p> <p>Question 2 Do you agree with the Partnership's initial opinions on safety, security, environment and planning?</p> <p>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</p> <p>We welcome the statement in section 5.2 (p42) of the consultation document regarding the National Park which says:</p> <p>'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.'</p> <p>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</p>

accommodate a surface facility in the region of 100 hectares in the National Park, and which may or may not include construction material and spoil from the underground element. There would inevitably be adverse impacts upon the character of the National Park and its special qualities.

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.

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.

#### Question 3

Do you agree with the Partnership's initial opinions on the impacts, both positive and negative, of a repository in West Cumbria?

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.

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.

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.

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.

#### Question 4

Do you agree with the Partnership's initial opinions on a community benefits package?

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.

Question 5

Do you agree with the Partnership's initial opinions on design and engineering?

We agree with the Partnerships initial opinion on design and engineering.

Question 6

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

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.

Question 7

Do you agree with the Partnership's initial opinions on the process for siting a repository?

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.

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?

No further comments to make at this stage.

Question 9

Please use this section to make any additional comments

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.

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.