

Moresby Parish Council

Question	Agree	Response
1 – Geology	Not Sure/ Partly	<p>It is accepted that the BGS study was required to ensure that an area that had expressed an interest was not an area where the geology was totally unsuitable. West Yorkshire has been given as an example where coal seems proliferate. However once that test has been undertaken and areas not worth pursuing at all have been eliminated then DECC should permit the relevant organisation be it the NDA or others to provide the local authority who has expressed an interest with as much information as is available. There is much more knowledge about the geology of West Cumbria available which is being held back and will be published if the authority decides to participate. It is unfair to the residents and a potential willing host community to be denied this information. There is a view that no geology in West Cumbria exists that is suitable. That is not the universal view but it will gain ground if government refuses to release or permit to be released studies that would demolish that argument. The partnership should make clear in their report to the decision making bodies that they do not believe that authorities should move to stage 4 until information concerning geology which is now known is put in the public domain and the population are consulted. Geologists must know what type of rock they are looking for and where it might be in West Cumbria. A clear and unambiguous statement of the geological requirements for the repository would assist all parties in identifying a suitable site and would support the public justification of the site selection. If then it is clear that there is reasonable chance that further work may provide a suitable area the relevant authority could seek the consent of its residents to take the matter further. The proposed MRWS process is open to the suspicion that a site will be selected and then a pseudo-scientific justification back-fitted to support the selection. We need to know now the prospects of finding suitable site not simply that all data and knowledge can be released after a decision to participate is taken.</p>
2 – Safety, security, environment and planning	Not Sure/ Partly	<p>There is a vast amount of work to be undertaken by the regulators but there are concerns that as an arm of government it will not have the resources that are necessary to carry out the tasks. There are concerns that the developer will contract the most suitable and experienced officers and the regulators will struggle to find staff with the necessary competences. The NDA R and D programme has been criticised by a number of different organisations including CORWM and it is a step in the dark to move to stage 4 on the basis that “we are as confident as is possible at this stage” when in fact there is very little evidence to support that statement. At a more fundamental level, if our current state of knowledge on the interactions of the geology, the waste packaging and the waste are such that we require any R&D at all, it represents a significant risk to the project. Until the R&D is complete there can be no detailed design. Given the intrinsic uncertainty as to what the results of the R&D will tell us and more importantly when, there can be no confidence in the timescales of the programme.</p> <p>The opinions reached on the planning aspect are weak. There is no mention of a requirement to address the question of a formal environmental assessment pursuant to European Directive 2001/42/EC. It should be noted that those opposing H2 are looking to judicial review on this issue. It surely isn't good enough for the government to argue that there is no need at this stage to commit the repository, wherever it is located, to being a development included within the scope of the major infrastructure planning unit or its successor in title. It is quite clear that no application of this magnitude could be considered locally especially when the DMB's would be the planning authority. This raises the question of whether a national policy statement will be in place before the final right of withdrawal has passed and if so as a statutory document whether the principle of “voluntarism” will be enshrined in the NPS. These are clearly issues of great importance and until adequate</p>

		responses are given by the sponsoring government department no decision to participate should be taken.
3 – Impacts	Not Sure/ Partly	<p>No mention is made in the document of the application pending by a commercial organisation to site and store large volumes very low level waste at a site formerly open cast close to the village of Pica some 18 miles from Sellafield. The parish council raise this issue because all the DMBs who have expressed an interest in entering stage 4 have objected to the low level application on the grounds of proximity, adverse perceptions by the general public and fears that other commercial developments would not proceed in an area where nuclear waste was stored. It is difficult to accept that the same grounds do not apply when considering a GDF.</p> <p>The section refers to brand perception work but it does appear from the CORWM observers report to their 7th March 2012 meeting that a major proposal from the consultants that an overarching Cumbria Brand organisation should be developed was not accepted. This rather suggests that the partnership does not want to take the issue seriously.</p> <p>The sponsoring department have been clear from the outset that jobs created by a move towards a GDF in the district cannot be reserved for local people and it is not note that those involved in preparation work for a new nuclear power station in another part of the country have plans for a contractor's village. The partnership in its final report to the DMBs should not seek to overlay the benefits new jobs would bring to the area when it is more likely that as with the THORP construction the overwhelming majority of workers will be from away.</p> <p>Whilst Copeland may be wedded to a nuclear future the same cannot be said of Allerdale who are really hoping to diversify their industrial base. A GDF may not help this aspiration especially in the more tourist orientated areas of the district. It has to be accepted that the Western Lakes and the hopes to improve the tourist footfall in the area cannot benefit from a GDF and consultation document is correct when it suggests that the rural economy needs to be looked at quite separately from the urban economy.</p> <p>It does not appear that the partnership has seen any independent views on the subject of spoil and simply skates over the problem of vast amounts of rock to be moved and the consequent traffic movements by repeating the assumptions of the NDA. This unacceptable and before moving to stage 4 the local population should have a much clearer idea of what is involved.</p>
4 – Community benefits	Not Sure/ Partly	<p>There is much local cynicism about the delivery of community benefits packages because local experience is not good. In one case, the local community cannot trace where the money which was promised went, and in another case the money is tied up in a community fund which has backfitted rules which prevent the local community accessing the funds in the way they understood would be accessible. There is clearly a lack of confidence that central government would deliver a suitable benefit package but equally worries abound that communities in their broadest sense would not be involved to the degree that many feel necessary. It is difficult to believe that individual government departments will simply hand over some part of their budget to satisfy some agreement between say the county council and DECC. By way of illustration should an improvement to local roads be agreed this would surely require the sanction of the Department for Transport who may have in their view more important/urgent plans within their forward plan? We understand that it has been difficult enough to obtain the funding that has been necessary to properly consult during stage 3. How much more difficult will it be to persuade central government that genuine additionality requires substantial funds. This is another area where to accept a decision to participate is to take a step into the dark with no certainty that any government now or in future will deliver on promises. It is bound to be a concern that</p>

		<p>until the right of withdrawal has passed no meaningful benefits will be forthcoming. Furthermore, the partnership's opinion on this criterion lacks required information as to who would negotiate with central government. Principal 10 suggests that it would be between two levels of government with a community siting partnership standing to one side. If this is the case, there is a concern that the DMB may not represent the views of the host community. In any event, Principal 6 appears to indicate that the scale necessary would preclude a host community from making a really meaningful input. There is a view that leaders of the DMB's would see a community benefits package as being an area where they and they alone hold sway.</p>
5 – Design and engineering	Not Sure/ Partly	<p>It is difficult to accept that the design concepts being developed are appropriate at this stage when the information provided so far is almost non-existent. The generic design image shown in the consultation document is of little help to a respondent to this consultation. More could be said about monitoring and how that might be undertaken and over what period. More could be said about engineering of tunnels and how they could affect the countryside between the surface site and the underground repository especially so far as they would relate to river/stream flows. More could be said about the barriers introduced in the packaging and any additional barriers built into the repository as well as the barrier of the rock to illustrate the reliability of the assessment for the safety case. The potential for a leak of radioactive material from the repository is a critical concern for parishioners and the feeble response that this will be looked at as part of the engineering design is not very convincing. There is little mention of studies carried out and design concepts developed elsewhere in the world which might inform the design of a UK repository. There is not mention of the possibility of a rock characterisation chamber being built as part of the validation of the design to fill in any gaps and to ensure that the concepts work under UK geological conditions. Retrievability is a big issue for people who are concerned about what happens in the future if the safety case is incorrect, and also for people who look to the future and see a valuable energy resource in the uranium, plutonium and spent fuel that the present government plan to categorise as waste. The consultation document says that how a repository might be designed and engineered is important because it helps people to visualise what a repository might look like and appreciate the scale of the project. The final report to the DMBs should therefore be illustrated with possible plans and contain responses to the type of question posed here which are only given to illustrate the many and varied issues that would help people visualise and appreciate the scale of the project and allay fears.</p>
6 – Inventory	No	<p>The inventory statements would appear to be designed to confuse and from press reports would appear to have been successful in confusing the MRWS partnership. This is unfortunate, as this section is one which generates a great deal of unease. One of the concerns of the parishioners is that the repository will be justified with a modest inventory and then there will be a series of incremental additions which make the repository substantially larger. The introduction of a lower inventory and an upper inventory would appear to support the cynics, particularly as the upper inventory is not an upper limit. The lower inventory is based upon a publicly available document which we are told represents the current and future arisings from a list of sites which comprise the majority of the nuclear establishments in the UK. The upper inventory we are told comprises three parts – additional material from projected new build and NPP lifetime extensions, some “additional material owned by the MOD” and “uncertainties” in the baseline.</p> <ul style="list-style-type: none"> • The uncertainties would appear to be very large. The new build inventory assumes not reprocessing which would generate additional HLW. It is therefore surprising that the packaged volume rises from 7000m3 to 12000m3 (a rise of 71%) between the lower and upper inventories (these figures are in the consultation document). The NDA technical note 12877243 quoted in the consultation document gives a figure of 23000m3 for the upper inventory which is over three times the lower inventory.

		<ul style="list-style-type: none"> • The future inventory from New Build has a huge impact on the footprint of the repository because of the spent fuel which is presumed to be of a high burn-up. It is surprising that the inventory only takes an allowance for the next generation of nuclear power plants for a repository which is planned for such a long lifetime. It is also surprising that there is no sensitivity analysis on the effect of reprocessing on the footprint of the repository. • The “additional materials from the MOD” presumably include the radioactive materials listed in the public consultation document for the submarine decommissioning programme which uses the same image of a geological repository for the final destination of the material. It is not clear from the inventory statement whether the additional plutonium inventory is military origin or another “uncertainty”. <p>In the circumstances we do not consider the government response to principle two acceptable in that the principle suggests that the DMB would have the right of veto and not the Host Community or the siting partnership and in any event the government does not sign up to a veto arrangement and further the Minister of Energy does not commit other government departments. The consultation document and the partnerships opinions do not give us the confidence that any local community could influence the inventory. As a minimum we would need to see a better undertaking by government departments that there would be a genuine veto and it can be wielded by the community siting partnership with the DMB being simply the method of delivering the message.</p>
7 – Siting process	No	<p>The first matter to acknowledge is that any decision making body moving forward to stage 4 need not take any notice of the “suggested steps” outlined in this section and DECC requires in the framework it has published only that “decision making body/ies must agree a mechanism with which they are comfortable”. It is not clear who “they” are. Is it the community at large or the DMB’s? The framework at page 11 shows at figure 3 seven steps to identification of potential candidate sites. Host communities in areas such as West Cumbria where no decision to participate will be made in respect of specific locations are not brought into the process until step 5 and at paragraph 5.3 the decision making process is outlined. All this indicates that the potential host community will be volunteered rather than genuinely stepping forward. That must be taken together with the DECC statement at 2.13 that partners would be expected to work together to avoid the need to exercise the right of withdrawal at a late stage. The question must be posed. How much easier for DMB’s to follow a nationally laid down process where they dominate and host communities are sidelined rather than a “suggested” scheme which may give potential host communities an actual voice. There is bound to be concerns with a suggested scheme when (excluding the county council) the consultation required by a DMB in the White paper at 6.18 was very limited in one case and non-existent in the other. It is hardly surprising that cynicism is wide spread and many believe that DMB’s will only agree to a process where they dominate, and rather than taking advice from a wide ranging community partnership will seek to go their own way. Given that the stage three partnership has been chaired by leading members of the three DMB’s and other partnership members may well have been seen by the public as add ons it does not bode well for the future. Whilst the facilitators have been seen to provide an excellent service they are not process managers and have to bow to the wishes of the steering group which is totally dominated by members and officers of the DMBs. The consultation document says that some people are sceptical that the government will honour commitments to a right of withdrawal. It might be said that many are sceptical that DMB’s would follow the advice and recommendations of the Community siting partnership. It ought to be remembered that a CSP may well be lead by the local MP. The present member for Copeland has made his position quite clear and he would be undoubtedly reluctant to withdraw from the process. We do not believe that sufficient weight is given in the consultation document to paragraph 7.25 of the whitepaper nor to one stated aim of the process that the procedure will only go forward with the consent of a willing host</p>

		community.
8 – Overall views on participation		<p>It is clear that the partnership has undertaken a vast amount of work and the consultation process throughout have been exemplary. However, it is very difficult to see whether there can be any clear outcome at this stage when there has been very little hard information presented. Even with the few details which are revealed many issues have arisen which need to be tackled. Whilst it can be said that the right of withdrawal remains until much later in the process, it is only at this stage that those local authorities who expressed an interest in finding out more about the process can walk away without any comeback. To agree to participate means that the area is committed to making it work and therefore the decision at this stage is of utmost importance. It has to be made with the full consent of the residents of the two areas and whilst it can be argued that a representative opinion poll will give a really good indication of the views of those residents it will not satisfy those who say “I want my vote to count”. It is trite to say that “it is too early in a process that may last many years and there will be plenty of opportunities at a later stage” but this is the one time when a referendum will not be coloured by views on locations. At this point all the areas covered by the two district councils are in the frame either for an underground repository or the surface facilities or both. Once decisions have been taken about potential site areas then a full referendum is bound to attract shouts of foul because those in the south of the area may be quite happy to see a location in the north chosen (or urban voters a rural location) and vote accordingly. If a poll is limited to the potential site area(s) then those outside who believe in principle that the county should not be involved are disenfranchised. The DMB’s may not want to see a very local referendum knowing that it is likely to be against moving forward. It does seem that credible support has to be at two levels both area wide and local to the particular potential host(s) communities. Is now the time to satisfy the first requirement? Should the borough councils together with the county council take part in a search? No. Not at this point with what we know.</p>