

National Trust (North West Region)

Question	Response
Letter	<p>GEOLOGICAL DISPOSAL OF RADIOACTIVE WASTE IN WEST CUMBRIA</p> <p>The National Trust is the UK's largest conservation and access charity and a significant owner and manager of land in Cumbria, including parts of West Cumbria that may be affected by the issues addressed in this consultation. For this reason, we are keen to understand the options to be considered and their implications for future management, conservation value and access in relation to the land that we look after on behalf of the nation in accordance with our statutory purposes.</p> <p>Accordingly our comments are concerned with feasibility and impact rather than appropriateness and suitability.</p> <p>Overall our comments relate to the amount of information and knowledge available at this time to enable stakeholders to take fully informed decisions in relation to this proposal.</p> <p>Geology</p> <p>It is our understanding that geological investigations undertaken so far have been on the basis of Government White Paper criteria specifically potential impact on mineral reserves and principle aquifers.</p> <p>In light of previous studies and the well known and studied geology of Cumbria we believe that further geological investigations and analysis needs to be undertaken on the basis of risks posed by the complex geology, to the type of development proposed.</p> <p>This appears to be the key feasibility information required to enable such a significant decision to be taken with clarity at this stage. Accordingly, we do not feel that the correct geological questions have been asked as yet to enable this proposal to be considered from a basis of clear knowledge.</p> <p>Safety, security, environment and planning</p> <p>We do not have any specific comments at this stage, however our understanding is that the surface level infrastructure and related facilities would be on a significant scale and in particular would raise a number of planning policy concerns if located within the National Park or impacting upon its wider setting (whether in visual or other respects).</p> <p>Impacts</p> <p>The summary of impact areas set out in Box 15 of the Consultation document (page 57) clearly describe the wide range of physical impact areas that</p>

most concern the Trust as a major land owner and Conservation & Access charity. It is a major concern to us that this decision is being considered with Environmental Impact Assessments only being undertaken by NDA later in any process. This implies that EIAs would relate to a specific site whereas the Trust's view is that this is a key area of work required at an early stage to enable stakeholders to make informed decisions and fully understand the physical implications associated with the type of development proposed.

This work should be undertaken independently.

Whilst there are economic benefits from the construction and infrastructure requirements of the proposal we do not feel that the physical impacts of construction and treatment of spoil generated have been adequately considered.

The impact on the transportation system associated with this proposal does not appear to have been considered as yet

A key concern for the Trust is that the high quality environment and image of West Cumbria and the Lake District as an outdoor destination could be damaged by these developments and whilst we understand a brand protection study is currently being prepared it is not in the public domain at this time. As a major tourism provider in the area, we request to see this study so that we can assess the risks to our operations. We do not believe that there is enough information available at this time to correctly assess the impact on the Cumbria brand and its implications for economic activities outside the nuclear industry.

A Community Benefits Package

We do not have any specific comments

Design and Engineering

We do not have any specific comments

Inventory

We do not have any specific comments

The process for siting a repository

As set out above we feel that certain key pieces of information (especially in relation to geology and impacts) need to be available for consideration before the process for siting a repository can move forward.

Other Comments

Clearly the proposal could bring community benefits and economic growth through the nuclear industry. However we do not feel that this proposal can be considered in isolation and should be assessed in the context of key strategic drivers in the area.

We believe that the costs and benefits of the proposal should be considered in light of The Energy Coast Master Plan and Economic Blueprint for West Cumbria (the latter of which we understand will not be in the public domain until May 2012). These key work areas appear to be significant tools to help contextualise the economic benefits of the proposal within the overall economic development of West Cumbria

This, again, suggests that more key information and context is required before the decision to consider this proposal further can be taken.