

**Ponsonby Parish Council**

Question	Agree	Response
<b>1 – Geology</b>	No	<p>Safety is the overriding criterion in determining the construction of a Geological Disposal Facility and in turn the suitability of the geology of the proposed location.</p> <p>The 1890km<sup>2</sup> area of land declared as not ruled out as clearly unsuitable by the BGS survey, is misleading.</p> <p>The NIREX explorations previously undertaken using generic geological settings concluded that only 1 area within West Cumbria was potentially suitable. This, after investigation and incurred costs exceeding £M400, was abandoned. An agreement to move forward into the next stage must not be given before further unsuitable areas have been eliminated (and shared with the general public). Without this there is an unacceptable risk of ongoing significant abortive expenditure and delay, and of sustaining an over-optimistic representation of the suitability of the area in the eyes of the general public.</p> <p>The public and stakeholder concerns have not been fully and adequately answered (Ref Box4 and in Prof David Smythe's public presentations). 2 Professors of Geology have stated that the complex and fractured geology of West Cumbria makes it one of the worst places in the UK for a long timescale disposal site.</p>
<b>2 – Safety, security, environment and planning</b>	Partly	<p>Little mention is made of any international regulatory framework with regard to HLW and ILW.</p> <p>The Safety, Security and Environmental concerns are dealt with by the various Regulators and being site-specific will involve the local communities as stakeholders. We have confidence in the independence and integrity of the Regulatory Bodies and their ability to ensure an acceptable safety outcome. However we are disappointed that the Regulators' view of the generic disposal system Safety Case, which should have been published before the end of 2011 for consultation, is not included within this consultation process. Until this document is made available and has been subject to public consultation no decision to move forward should be taken.</p> <p>No reference is made to the inferior infrastructure which is unable to cope with a traffic incident on the A595 south of Calderbridge, never mind an emergency at Sellafield.</p>
<b>3 – Impacts</b>	No	<p>The location of a Repository in West Cumbria will further discourage the investment of non-nuclear enterprises, not only within the proximity of the proposed site, but also throughout Lakeland.</p> <p>The decline of the diversified industries in West Cumbria has much to do with the presence of a large nuclear site and the loss of enterprises in the area of multi Queen's Award success is deplored.</p> <p>It is regrettable that the Brand Protection strategy together with the Government's response on how the impacts will be addressed is not forthcoming. This leads to a loss of confidence. Whilst all the detail cannot yet be provided, a positive binding commitment to sustain a diversified wealth generating base, to both Borough and Host Community, must be given before any</p>

		<p>decision to move forward is taken.</p> <p>The proposal by NDA for spoil to be kept on site by building 12 metres high embankments for an indeterminate number of years is not acceptable.</p> <p>Concern is raised over the market value of domestic and business properties and how the blight problem would be dealt with.</p>
<b>4 – Community benefits</b>	No	<p>The Partnership's Community Benefits principles should incorporate the requirements that Parish Councils are involved in the allocation and use of community benefits. It is essential they have protection in the interpretation of Principles &amp; Flexibility, and Principles &amp; Distribution.</p> <p>This Parish Council has received 'nowt' from the nuclear industry over the years from the establishment of UKAEA at Windscale; rather it has suffered the loss of its local School, Post Office and pub. It has also experienced the drain of local youngsters unable to afford the rents and house prices which can be afforded by incoming contracted employees. The village community has lost its heart!</p> <p>Any commencement of preliminary work on a Repository should be preceded by a benefits package and consideration given to the recompense or compensation for the ongoing disruption to local communities.</p> <p>A binding specific commitment to a large scale benefits to West Cumbria e.g. massive infrastructure improvements, should be sought and obtained before any onward decision is taken and these should be delivered in parallel with the construction of any facility.</p>
<b>5 – Design and engineering</b>	Partly	<p>Generally the opinions on design are acceptable but detailed design issues are largely site-specific. Whilst retrievability is explicitly included within generic designs, it begs the questions 'When does a Storage Facility become a Disposal facility?' and 'Will the Host Community be fully consulted in the making of that decision?'</p>
<b>6 – Inventory</b>	Partly	<p>The Safety, Design and Engineering Safety Cases for a GDF will determine the various levels of inventory for disposal.</p> <p>Box 24 illustrates the imponderables in determining the volumes of inventory to be dealt with and raises concern that some radioactive materials such as spent fuel, plutonium, and uranium, should be treated as waste, when they could be used for reprocessing and fuel manufacture. The large quantity existing of these materials are of deep concern to communities with close proximity to Sellafield. Any change to a new-build programme illustrates the necessity to govern the disposal of new wastes and the logistics covering new reactors within the UK.</p> <p>Within Principle 2 of Box 25, a Host Community must have, along with DMB's, a veto on any changes to the inventory.</p> <p>The report implies strongly that only UK wastes will be placed in the facility; this is just not true. Relatively large volumes of ILW derived from the reprocessing of overseas fuel will inevitably be incorporated. This is misleading to the public and should be corrected; failure to do so will reduce confidence in any factual data subsequently presented.</p>

<p><b>7 – Siting process</b></p>	<p>No</p>	<p>The White Paper of June 2008 devotes much of its volume to the principle of voluntarism and partnership working and in Chapter 7 clearly sets out the staged process to determine site selection. It is regrettable that the consultation document deviates from this site selection process. Para 6.8 of the White Paper defines the concept of community under the headings of Host Community, Decision Making Body and Wider Local Interests, all of whom should be participants in the formal Community Siting Partnership prior to the Stage 4 assessment. The report is lacking in a timescale for such a new partnership and whilst its suggested steps for organisational arrangements (Box 32) are outlined, it does not record the strong feeling that any Host Community would require Government commitment to immediate infrastructure improvements prior to construction of a GDF. Appendix C9 of the White Paper envisages that potential partners would begin to work together in the next steps leading up to a local Decision to Participate, and if that decision is affirmative the formal Community Siting Partnership would then be established. This is ignored in the consultation document.</p> <p>Under Para 6.40 of the White Paper which refers to the Right of Withdrawal – an objective to obtain a Community Benefits Package to reflect the needs of local communities and their future generations, is stated. However no process is formulated should a Host Community disagree with such a package negotiated by the Community Siting Partnership</p>
<p><b>8 – Overall views on participation</b></p>		<p>Should the 3 Principal Authorities move forward</p> <p>The health, safety and well-being of the current and future generational inhabitants of West Cumbria are of fundamental importance as we are all stewards of the West Cumbrian environment with an obligation to protect it from harm.</p> <p>The location of a Repository, no matter where it is to be built, must be demonstrated to be SAFE and the associated impacts managed accordingly.</p> <p>The response to the previous questions reflects the views of the Parish Council and the lack of understanding in the conduct of the Partnership controlled by the 3 Principal Authorities.</p> <p>Until the Partnership/Decision Making Bodies have addressed the points we have raised we do not believe that a decision to move forward should be taken.</p>
<p><b>9 – Additional comments</b></p>		<p>The White Paper (Para 6.31, Table 2) – Indicative Steps to a Decision to Participate – in Step 13 suggests that the Decision Making Bodies will make a formal Decision to Participate probably through a full meeting of the councils. It is reprehensible that only 1 of the 3 Principal Authorities has stated that a decision would be made by the full council, hardly encouraging the demonstration of credible support.</p> <p>The policy of not having had an independent chairman for the MRWS Partnership calls into question the stance of the leaders of the Decision Making Bodies within the Partnership and their respective authorities.</p>