

GDF Siting Process Consultation
Department for Energy and Climate Change
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MRWS Consultation
Radioactivity and Pollution Prevention Branch
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Review of the Siting Process for a Geological Disposal Facility

The Campaign for National Parks is the charity campaigning to protect and promote the National Parks in England and Wales, as beautiful and inspirational places enjoyed and valued by all. The charity has been in existence for over 75 years.

We welcome the opportunity to comment on the proposals outlined by the Department of Energy and Climate Change (DECC) in the consultation *Review of the Siting Process for a Geological Disposal Facility*. We are responding as an organisation. The Campaign for National Parks is a membership organisation with a number of different categories of membership. Our core membership consists of local voluntary organisations that work with us in support of National Parks, a range of non-governmental organisations and public sector bodies that make up our Council and individual supporters of National Parks. We also have a corporate membership of organisations who operate or have a commercial interest in one or more National Parks. Our consultation response has been finalised through email consultation with our main constituent members, associations and societies working locally in support of National Parks in England and Wales.

We have limited our response to our specific areas of interest of democratic accountability, opportunities to access National Parks and the protection and enhancement of our nationally important landscapes, the National Parks of England and Wales.

Question 1 – Do you agree that a test of public support should be taken before the representative authority loses the Right of Withdrawal? If so, what do you think would be the most appropriate means of testing public support, and when should it take place? If you do not agree with the need for such a test, please explain why.

Yes. The most suitable and democratic way for a community to express its willingness to proceed would be via a local referendum; this should be completed at the end of the “focusing phase” and before the Right of Withdrawal is removed. However, we believe that the “suitably defined area” should not be limited to the boundaries of the District Council (England) (as suggested by p.2.74), but cover a much wider area i.e. where a second tier of local government exists (e.g. non-metropolitan counties), the boundaries for the second tier should be used as the “suitably defined area” (p.2.41).

While the proposals state that the Geological Disposal Facility (GDF) will be “situated in a comparatively small geographical area” and that “the impacts of the implementation and operation of a GDF will, therefore, be experienced by a specific community in a specific area” (p.2.24), we do not believe that this is the only consideration in relation to democratic accountability to the local community or region.

We are concerned that proposals outlined in the consultation document subordinate the role of County Councils and remove the voice of the wider community. While the main issues presented by the siting of the GDF are very specific to the local area, wider issues and their implications will also need to be considered by county residents and their political representatives. These issues include those relating to reputation, particularly in relation to environmental stewardship and tourism, and should not be downplayed. We do not believe that simply a role for the County Council within the “consultative partnership” (p.2.34) is sufficient for these concerns to be addressed and does not sufficiently allow the wider community to engage in the decision making process.

The need for wider democratic accountability is further supported by the proposal to remove local planning authorities from the siting and the intrusive investigation processes, as DECC seeks to bring the development of the GDF within the “nationally significant infrastructure planning regime, as set out in the Planning Act 2008” (p.3.32).

Question 2 – Do you agree with the proposed amendments to decision making within the MRWS siting process? If not, how would you modify the proposed phased approach, or, alternatively, what different approach would you propose? Please explain your reasoning.

In the main. Paragraph 2.50 outlines the reports to be produced by RWMD during the “learning phase”, which raises some concerns. Our apprehension relates to the purpose of the socio-economic report, specifically, the lack of reference to any *negative* impacts on the socio-economic welfare of the area.

The extremely lengthy siting process and construction timetable for the GDP mean that these impacts could be considerable. Impacts in the short-term may include noise, transport and the road network, while there may also be longer-term considerations such as security, reputation and contamination to be considered. We believe that local communities should be aware of all the potential impacts, good and bad, before any agreement to move to the “focusing” phase.

With reference to the “Steering Group” (p.2.53), if any part of the land within the authority is National Park, then the National Park Authority should also be a formal member of the Steering Group.

Question 3 – Do you agree with this approach to revising roles in the siting process set out in the White Paper? In not, what alternative approach would you propose and why?

In the main. In line with our response to question 2, if all or part of a National Park falls within the boundaries of a County Council or Unitary Authority (i.e. they are not already a member of the

Steering Group by way of the part of the National Park being within a District Council boundary), then the National Park Authority should be part of the “Consultative Partnership” (p2.79).

We welcome and support the proposal to examine a new external stakeholder group within the structure of the Geological Disposal Implementation Board (GDIB), in order to provide a role for non-governmental organisations for the GDF project (p.2.83).

Question 4 – Do you agree with this proposed approach to assessing geological suitability as part of the MRWS siting process? In not, what alternative approach would you propose and why?

No. Our comments here relate specifically to “unsuitability screening” (p.3.9). We believe that it *is possible* to exclude areas at a national level, not based on the fact that the geology is unsuitable, but based on statutory duties to protect and open access. We are of course referencing National Parks, and other protected landscapes and reserves. We note the comment that “although higher level ‘unsuitability’ screening than this could be applied, it would risk excluding areas with suitable geology by oversimplifying the process”, but strongly disagree.

The purpose of National Park designation, as set out in the National Parks and Access to the Countryside Act 1949 (as amended), is to: conserve and enhance the natural beauty, wildlife and culture heritage of the area; and to promote opportunities for the understanding and enjoyment of the special qualities of National Parks.

We believe that the siting of the GDF in a National Park would be in direct conflict with the purposes for which National Parks are designated. For this reason, we believe that the National Parks of England and Wales should be excluded from the GDF siting process. This is not just an issue of environmental conservation, but also opportunities to access and understand what makes these landscapes special. The siting of the GDF in a National Park would impact on the access and enjoyment of the National Park, as it will cover a considerable surface area and will be tightly secured. The impacts of an extremely lengthy construction phase also need consideration.

National Parks are internationally recognised landscapes, and contain over 480 conservation or protection areas, designated by European Directives. The UK’s environmental reputation is risked by proposing to dispose of nuclear waste on these sites.

It is also worth noting that there are a number of local authority areas that are completely within the boundaries of National Parks in England and Wales. We feel that this would simplify the process, by immediately excluding some areas and local authorities, without oversimplifying it. It is our view that the exclusion of National Parks from the GDF siting position is now more important, as the DECC moves to a nationally significant infrastructure planning regime for the GDF. Our concern is that the National Park Authorities’ (the local planning authority) role in the GDF siting process will be limited to the Consultative Partnership or Steering Group under the current DECC proposals

Question 8 – Do you agree with the proposed approach to addressing potential socio-economic and environmental effects that might come from hosting a GDF? If not, what alternative approach would you propose and why?

In part. We welcome the RWMD plans to undertake further generic assessment work, with focussed studies on socio-economic, health and transport issues. However, we also believe that the National Policy Statement which will set out “assessment principles against which applications would be considered” (p.4.32) should explicitly exclude National Parks from the siting process (as noted in p.4.27), for the reasons outlined in response to Question 4.

Contact information

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