

Lake District National Park Authority
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Date: 26 November 2012

Baroness Verma of Leicester
Parliamentary under Secretary of State
Department of Energy & Climate Change
3 Whitehall Place
London
SW1A 2AW

Dear Baroness Verma

MRWS: A view from the Lake District National Park

The current pause in the Managing Radioactive Waste Safely (MRWS) process offers me an opportunity to reaffirm my position with regard to the views we've expressed so far and to look to the longer term.

National Parks are recognised as landscapes of exceptional beauty, fashioned by nature and the communities which live in them. The statutory purposes of National Parks are to:

- Conserve and enhance the natural beauty, wildlife and cultural heritage (of National Parks); and
- Promote opportunities for understanding and enjoyment of the special qualities by the public.

In pursuing the statutory purposes National Park Authorities have a duty to seek to foster the economic and social well-being of local communities.

Special qualities distinguish National Parks from each other and from other parts of the country. The Lake District's special qualities, outlined in the Lake District National Park Partnership Plan, need to be protected and enhanced.

The 2030 Vision for the Lake District National Park is clear, interpreting the purposes and duty, and requires all partners to the Lake District National Park Partnership to be united in this achievement.

A repository within Cumbria has the potential to impact on our Vision, special qualities, and in turn our statutory purposes.

Richard Leafe, Chief Executive

The Authority joined the MRWS Partnership to:

- improve its understanding of the requirements of a repository;
- understand the process;
- work with partners to prepare a report for presenting to the Decision Making Bodies¹; (DMBs) and
- to help inform them about whether to participate in the next stage of the siting process (Stage 4) .

We submitted views to the MRWS Partnership as part of the public consultation in February 2012. These were based on what was known at the time, particularly in relation to surface facilities, and are attached as Annex 1. These views were incorporated into the final report.

Since that time the DMBs have decided to seek further information and clarity from DECC. I commend and support this decision, particularly with regard to the following issues:

- **The suitability of the geology.** This remains of paramount concern to me and residents of the National Park due to a lack of definitive information. The complexity of the underlying geology, the conclusions from the NIREX inquiry, the permeability of different rock systems and hydrology all create a context of great uncertainty and anxiety; and
- **The right of withdrawal.** Rightly or wrongly there is scepticism from communities and an absence of trust. Therefore I support the DMBs request that this be strengthened, making it legally binding.

I also believe that this process will take a substantial amount of time, and so support the DMBs' request that alternative radioactive waste management solutions be considered in parallel with the MRWS programme. And I ask that current storage issues are urgently addressed.

Below ground repository

So far the Authority has not taken a definitive position on a below ground repository because we do not know the facts and risks in detail and we accept that a full understanding might only emerge many years in the future.

However there are growing and increasingly widespread concerns that a repository below the National Park or indeed a perception of such a proposal would not be in the long term interests of the Lake District, its farming and resident communities and visitor economy. Evidence suggests a potential risk to the Lake District's brand image, and on communities that rely on this brand. The lengthy process, necessary for considering such a facility, could exacerbate this risk. While we do not know what precise impacts a repository under the National Park would have on its special qualities, I am concerned such a proposal could adversely affect the Lake District's brand image, its national and international standing, reputation and integrity, prejudicing the delivery of the Vision to the detriment of the Cumbrian tourism economy and our statutory responsibilities.

¹ The Decision Making Bodies (DMBs) are Cumbria County Council, Allerdale Borough Council and Copeland Borough Council

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Although we remain wholly committed to working with the DMBs and other partners to improve our collective understanding of the facts, I believe that it is important that partners and other interested organisations understand these concerns and our starting position if any decision is taken to proceed to Stage 4. I support the on-going brand management work and stress its importance. I also reiterate our support for nuclear new build at Sellafield whilst re-emphasising that attention must be given to the rapid improvement of the current storage facilities.

Yours sincerely



BILL JEFFERSON OBE
CHAIRMAN OF THE AUTHORITY

Cc: Eddie Martin –Leader, Cumbria County Council
Elaine Woodburn – Leader, Copeland Borough Council
Alan Smith – Leader, Allerdale Borough Council
Mark Higson - CEO of the Office for Nuclear Development

Richard Leafe, Chief Executive



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Annex 1: LDNPA Response to Public and Stakeholder Consultation



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Your ref:

Date: 16 February 2012

Freepost RSKT-LTXU-HAYC
West Cumbria MRWS Partnership
Copeland Borough Council
The Copeland Centre
Catherine Street
Whitehaven
CA28 7SJ

Dear Sir/Madam

RE: Consultation response to the MRWS Partnership public consultation November 2011 – March 2012

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.

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.

Question 1

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

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.

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.

Question 2

Do you agree with the Partnership's initial opinions on **safety, security, environment and planning**?

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

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boundary including for minerals and waste development as well as other types of development, for example, boreholes.

We welcome the statement in section 5.2 (p42) of the consultation document regarding the National Park which says:

‘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.’

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 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

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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 on 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.

Yours faithfully



Stephen Ratcliffe
Director of Planning and Partnerships

Richard Leafe, Chief Executive



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