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19th April 21

Dear Chris and Andy,

Re: Feedback Issues and Calc Position Statement

1. Workstream 2 – Siting Process

We were pleased (reference email dated 30th March 21) to note that CDALC are now included in Work-Stream 2. Could you please provide an update on how this work is progressing? And who is covering this scope of work from CDALC?

2. Resident Public Meetings

As you are aware this Parish Council held two Public On-line Meetings in March 21. In total we had 25 local residents who took the time to join us and set their thoughts and feelings on the siting of a GDF at Ghyll Scaur Quarry. The key themes and issues can be summarised:

- **Lack of Local Support** – this was pretty well a unanimous position of the residents, who were keen to express some strong emotions as to how the site was nominated.

- **No Transparency** – The issue of site nomination process consumed a significant amount of the meeting time. Most residents expressing the lack of openness and transparency on such a significant project and the consequential life-changing impact for many generations within our local communities.
- **Community Engagement** – the concept of a “willing community” was seen as lacking credibility in light of the early siting nomination. Residents felt an immediate loss of trust in the way the front-end process had been managed, which has meant a significant dis-trust of the communications being put forward by RWM and the Copeland Working Group
- **Poor communications** – some residents spoke of there attempts to correspond with RWM, using the email via the Head Office in the early set up of the GDF communications process and getting no response. Others had made contact via the new arrangements as per the Copeland Working Group and receiving a response which was more of a “template”, without addressing their issues.

Post - Residents Meeting – the Parish Council encouraged residents to write again to the Working Group and ask specific questions – to date those residents have again reported what appears to be template answers with no attempt to get to the heart of the question or more importantly “make it a personal response and build some bridges”.

To date we have had feedback that residents feel let-down, with what appears to be a top-down communications process without any significant attempts to build relationships at the local level.

3. CDALC Position Statement

Please note the following comments / concerns which I hope CDCALC will address prior to any submission to RWM?

CDALC Principles	Comments / Concerns
1. CDALC supports, in principle, the consent-based approach of working in partnership in an open and transparent way with communities and welcome the	<ul style="list-style-type: none"> • Does this principle endorse the approach of the random site nomination process?

definition and prominence given to the “potential host community”.	<ul style="list-style-type: none"> • If so, we would have substantive reservations in supporting this principle
2 CDALC sees the parish council as the tier of local government which most closely coincides with the geography and interests of a “host community”.	<ul style="list-style-type: none"> • The principle runs contrary to the process of the “Test of Public support” which is based on a Borough Ward or Wards.
3. At this early stage, CDALC has no preconceived view about the merits or demerits of siting a Geological Disposal Facility (GDF) in West Cumbria.	<ul style="list-style-type: none"> • Maybe this should be strengthened to state the position will be kept under review with the appropriate Parish Councils which CDALC represent.
4. Parish councils should be central participants in the GDF process rather than purely consultees and be directly represented on both the initial working party and the community partnership, should one or more be formed.	<ul style="list-style-type: none"> • Has the opportunity for PC’s to be represented on the Initial working party now been and gone – this door appears to be closed?
5. CDALC will seek to test and challenge the work being undertaken in the GDF process in a constructive manner. In view of the resources that this will require, CDALC will seek financial support from the Engagement Package.	<ul style="list-style-type: none"> • To retain the integrity and independence of CDALC, we are concerned as to the optics of taking such financial support, from an organisation which funded by its members. • However what needs to be agreed is that Parish Councils will need support and access to professional guidance / expertise which sits outside its financial resources, including additional costs in engaging with residents.
6. CDALC considers the Community Investment Funding Package should be described in as much detail as possible at an early stage, given that parish councils may now be starting to spend their time on GDF issues. CDALC believes methods should be explored for delivering community benefits in advance of the formation of Community Partnership groups	<ul style="list-style-type: none"> • We remain sceptical of the idea of delivering community benefits prior to an understanding of the implications of the GDF and its wider impact on a particular community. This smacks of being “bought off” rather than building a willing community – not a bribed community.

7. In the interests of probity, consideration of matters concerning the environment and GDF safety should be kept separate from consideration of community benefits	<ul style="list-style-type: none"> • Agreed
8. Any site chosen for a GDF must fully meet all environmental and safety criteria. The criteria should not be comprised by other considerations	<ul style="list-style-type: none"> • Agreed
9. CDALC will represent the interests of parish councils in Copeland during the working party stage and should a community partnership be formed in a particular area, when individual parish councils can represent the interests of potential “host communities, it will support those/that parish council and continue to represent the interests of all other local councils in Copeland.	<ul style="list-style-type: none"> • This principle is not clear on its actual meaning and seems to run in the face of principle 4 • Can this principle be reviewed for clarity?
10 CDALC will attempt to ensure that the working group (and RWM) establishes a clear strategy for how they will both engage with and communicate to parish councils	<ul style="list-style-type: none"> • The word “attempt” is incredibly disappointing with a project of such magnitude and community impact. • The key words should be “hold to account”, noting we have raised this issue and as yet we are awaiting the commitment to such a strategy.

We also noted that this position statement relates to Copeland and can we clarify whether CALC have endorsed the position statement?

4. Webinar Feedback

A number of our Parish Councillors attended the Webinar’s and will be in touch to send their individual views on the experience.

We would welcome further dialogue and engagement on the current progress within the GDF Working Groups. We need to maintain a more regular set of conversations on the progress of the Independent Working Group. We would welcome your views?

Yours sincerely,

David Savage
Chair – Millom Without Parish Council