



## National Geological Screening

### Public consultation response

When complete, please email to [NGSconsultation@nda.gov.uk](mailto:NGSconsultation@nda.gov.uk) or send by post to: National Geological Screening Consultation, Radioactive Waste Management, Building 587, Curie Avenue, Harwell, Didcot OX11 0RH.

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#### Question 1:

To what extent do you think our proposed approach to providing national-scale existing information about geology relevant to long-term safety is appropriate? Please give your reasons.

We have seen the NuLeAF draft response and agree with NuLeAF comments on this question.

#### Question 2:

To what extent do you think that the proposed national information sources are appropriate and sufficient for this exercise? Please give your reasons.

We have seen the NuLeAF draft response and agree with NuLeAF comments on this question.

#### Question 3:

To what extent do you agree or disagree with the proposed form of the outputs from geological screening? What additional outputs would you find useful?

We have seen the NuLeAF draft response and agree with NuLeAF comments on this question, but would respond further on additional information that we consider would be useful.

Communities, and in particular Local Authorities, will not be looking at the geological information in isolation. They will want to look at it in a wider context and indeed, may not look at it at all unless there is more clarity about the wider context. They will also need basic information about the likely surface facilities and, crucially, about the business rates position. Following the comprehensive spending review, business rates are vital for local authority finances. What would the rateable value of a GDF be if it was under land or if it was offshore?

The situation vertically above suitable underground rock bodies will be of more interest to communities than the geology (sorry to the geologists for that!):-

1. How close to urban areas can a GDF be placed?
  - a. What restrictions will regulators such as ONR put in place?
  - b. What will the National Policy Statement, associated with the Nationally Strategic Infrastructure Project say about locations near urban areas
  - c. How large will the Detailed Emergency Planning Zone be for a) the headworks and b) the encapsulation facility?
2. What restrictions will be imposed on exploring or siting in sensitive areas. A GDF might be operable below sensitive sites but an intensive vertical borehole programme will presumably be necessary to establish the extent of the underground rock body and any fracturing, before construction and operation. Will this be allowed in:-
  - a. National Trust land
  - b. National Parks
  - c. Land covered by EU level environmental protection regimes

There is currently insufficient information about the above ground works. Figure 3 on page 7 of the consultation paper has been knocking around for ages and was used in the West Cumbria Process. It is scarcely sufficient for explaining the relationship between the surface facilities and the repository beneath, as it only covers the most basic case where the surface facilities are vertically above the underground element. It is completely inadequate as an illustration of what the surface facilities will be and the space they will need.

The final report of the West Cumbria MRWS Partnership said that the surface facilities would "include....**possibly** a spent fuel encapsulation plant....." (my emphasis) In view of the amount of inventory at Sellafield and the expertise there, it may be that an encapsulation plant will not be sited with the GDF, or at least not in the short to medium term. The implications of this in terms of employment, size of site and business rates would need to be set out.

The construction will generate large amounts of spoil. Depending on the nature of the rock, some of that may be of economic value. An indication of this in the outputs would be helpful, especially if it

could be the basis of an ancillary industry, generating extra jobs. Equally communities would want to know if they were going to end up large amounts of valueless spoil for disposal.

**Question 4:**

Do you have any other views on the matters presented in the draft Guidance?

We agree with the NuLeAF comments on this question and in particular about avoiding making assumptions and using plain english. You are aiming at a much wider audience than the West Cumbria MRWS project and need to engage with communities with no nuclear experience, in sharp contrast with West Cumbria, where there is probably the most nuclear literate community in the world.

A table would be useful, setting out likely figures for:-

- Land Requirement
- Employment, split between construction and operational
- Business Rates

for scenarios of onshore and offshore and with and without encapsulation facilities

The fundamental questions that will be asked are 1) What is it? and 2) What is in this for us as a community?