

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.

The National Trust welcomes the approach to geological screening presented in this consultation document. In our response to the 2014 White Paper, we called for as clear as possible a picture of national and local geology to be presented before communities are asked to volunteer to enter the siting process. This will help to ensure that the decision of where to site a GDF is made in the national interest, taking into account geological safety and the most suitable environment. However, we do have concerns that the level of detail we and other stakeholders were hoping for will not be available before the re-siting process starts and that it will not provide the level of 'screening' to rule out unsuitable environments that many were hoping for. This will need careful communication and engagement with stakeholders to ensure that trust in the process remains as high as possible. We also support the role of the Independent Review Panel and believe this is critical to building trust in the process.

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.

Whilst we understand that the level of detailed knowledge that is required to assess geology at the depths required is generally not available, we feel this will come as a disappointment to communities that have staked their hopes on geological screening ruling in or out particular areas. Therefore we feel there is a need for constructive stakeholder engagement with communities and interest groups to ensure clarity about what the screening will and will not deliver. Linked to this, we have questions as to why has the very detailed Nirex database not been used as part of the datasource for the review? It would be helpful to know what further steps will need to be taken by a potential host in order to refine knowledge about local suitability. For example, at what point would boreholes be required, how many and are there steps that can be taken to assess suitability before this level of intrusion is required? With the geological screening likely to be ambivalent for most areas (i.e. it isn't going to make any real decisions about where to site it) then it might help if stakeholders know what will be covered by the National Policy Statement (NPS) instead. This might reduce some of the concerns/disappointments raised by the lack of answers in the screening exercise. It seems these processes go hand in hand and the NPS may help to address some of the wider concerns that communities have about environment considerations.

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?

The National Trust does not have the geological expertise to comment on the suitability of the sources of information that are presented and level of detail that is available. However, we are keen that all outputs are clear and understandable to the layperson and that they indicate where is suitable to as local degree as possible. The format of the maps needs to be accessible for those with basic technology as well as being capable of being locally specific. As there is likely to be a reasonable amount of interest in the findings of the screenings, it may be useful to hold regional workshops to explain the findings and address any questions. Whilst most stakeholders will be coming from a local viewpoint and will want the information presented at a regional level, we would be keen to have a national viewpoint too. That is, some overarching conclusions about the results. For example, is there a lot of suitable geology in the country? Which areas seem most likely to result in positive suitability? Therefore, we would like to see an additional output to be some form of ranking and

interpretation of suitability for being brought forward. For example, ranking of geographic areas in terms of more or less suitable/more promising areas and less promising areas for future detailed investigations, this element is missing from the current outputs. The Independent Review Panel should have a role in confirming these assumptions/interpretation of suitability. It will also be important to manage the aftermath of the information being available as it is likely to lead to further questions and debates. How will these debates be managed? Our experience of the previous siting process in West Cumbria indicates that information can easily be disputed and interpreted by interested parties in very different ways, eroding trust about the real situation and creating confusion and anxiety. A careful plan for managing misinterpretation and any public concern is needed.

Question 4: Do you have any other views on the matters presented in the draft Guidance?

Greater clarity and explanation is required in relation to the inventory of wastes (section 2.3) which includes both legacy wastes and waste from new generation. What assumptions are made on the inventory in terms of volumes and nature of waste?

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Do you agree to your responses to this consultation being published?
Yes