

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.

Not particularly appropriate, since the nature of the material presented already assumes a base level understanding of the subject matter, and is likely to be overly complex for most lay audiences. Give that much of the consultation programme to date seems to have been targeted at technical specialists, this is not a good benchmark for assessing the basic level of understanding and engagement in the general public. Furthermore, the information provided is very broad, and does not give detailed information about specific regions, which concerned parties in those regions would likely wish to see. Nor is there any interpretation of the information as provided. e.g. which areas by virtue of unsuitable geology would be rejected. This is important information since it will effectively reduce the number of potential candidate areas, restricting feasible options.

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.

They are sufficient for a broad, high level assessment only. Given the proposals, much more detailed, region and site specific local information sources will be required to supplement this information and enable candidate areas to be identified. Furthermore, the principal information sources are based on data which will be dated, contain uncertainties and assumptions which may not be representative of the areas. 'Uncertainty criteria' are required to be assessed, which will be difficult, if not impossible, to indicate on map sources alone. These uncertainties will vary by geographic area, and depth. The source list as provided is not exhaustive (e.g. seismicity data are missing). There is a wide diversity of quality and quantity and coverage of source information across the country which will not be apparent in the outputs as described. The principal sources appear to focus solely on BGS supplied information, when a variety of other sources also exist that should be consulted (University Earth Science and Mining departments, Health and Safety Executive, Inspectorate of Mines information, and regional specialist geology groups e.g. SW geolsoc, Peak District Mines historical society etc. Furthermore, all the source information presented is 2 D mapping, with little reference to sections or geology at depth. Similarly, the 3D model source information is useful on a broad scale, but is misleading in its extrapolation of data, and depiction of certainty of data between rock types, where such certainty does not exist, since interpolation may be between widely spaced data points which are also restricted in depth, and spatial coverage, with variable quality.

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?

Maps and descriptive text, which are the main programme outputs, are of limited use. The maps are at too small a scale (1:625000), and rely on a basic ability in map reading and comprehension, which many lay people may not possess. Furthermore, since there is no screening, ranking, or interpretation of the data, it is hard to see how this can help in identifying candidate sites, or in assisting non specialists in screening out areas, and making value judgements based on the findings.

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

It was not clear what the option is if no sites are identified, or if no communities volunteered to host the project? How would this be resolved? Similarly, if a community volunteers, but is in an unsuitable geology, what happens? What is the definition of a community within the exercise? What specialist support will be provided to assist communities in making an informed decision, and/or in providing independent guidance externally from RWM, to ensure balanced, non partisan, fair and transparent engagement? How, without undertaking any screening or ranking based on geological suitability, will a more realistic candidate site list be produced? It would seem logical to provide a short list of feasible areas, and potential host strata, from a geological point of view, upon which further decisions can be made. What happens now? How will the feedback be processed, analysed, and taken into account in the decision making process? If no agreement on an area can be reached, is there a Plan B for compulsory development? The tone of the consultation workshop was somewhat patronising, whilst not providing concrete information. Given the wide range of participants at the workshop, it would have been sensible to collect formal consultation responses at the time, rather than relying on subsequent online feedback. There has been no follow up since the workshop, and no further information on what happens next. Hopefully a cost benefit analysis has or will be undertaken on this consultation process.

Names: Kim-Marie Clothier and John Eyre

Email address: [REDACTED]

Telephone number: [REDACTED]

Organisation/affiliation **North Coast Consulting Ltd.**

Q6: Do you agree to your responses to this consultation being published? Yes