



Direct dial:

Email:

Date: 9th December 2015

By email to: NGSconsultation@nda.gov.uk

Dear Sir/Madam

National Geological Screening Guidance: A public consultation

Further to my response of 4th December 2015, I am pleased to confirm that the response below to the public consultation of the Draft National Geological Screening Guidance has now been through the required Member scrutiny process at Shepway District Council and so can now be considered as also being the response of Shepway District Council Members.

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?

We welcome the intention to bring together all existing geological information available at the start of this new process to identify a GDF site. From our own earlier experience of consulting with our community over the potential siting of a GDF, having this information available in an accessible form would have been very helpful and we welcome that the NDA has learned from this lesson and is intending to commission this work.

We agree with the general approach proposed and welcome the inclusion of the Independent Review Panel (IRP) in helping to shape this Draft NGS Guidance and their proposed role in the issuing of technical instructions on how to capture information about the attributes of the geology. The use of this independent group will give further confidence to the public that the advice of independent experts without any vested interest is being sought and considered.

In the narrative we would recommend that explicit reference is made in the Guidance that the geological screening process will also consider international evidence from work undertaken in other countries that would be relevant to the siting of a GDF.

We are pleased to note that a range of suitable geology, including sedimentary rocks and evaporites has been identified internationally as suitable for geological disposal.

We welcome that seismicity will be addressed in the screening process and that work previously undertaken by BGS will be included as a source. This is an issue that was raised in the earlier consultation in the Romney Marsh area.

We also welcome the proposal that while the UK Government has a strong preference to manage the inventory for disposal in one GDF, this is not a requirement, and that volumes of rock that would be suitable for only a part of the inventory will also be included at screening.

Question 2: To what extent do you think that these sources (of information) are appropriate and sufficient for this exercise?

We do not feel able to comment as to the appropriateness of the data and information sources that are being proposed for this exercise. However, we are confident that through the use of the IRP of experts and indeed, this consultation process itself, that appropriate sources will be used.

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 recognise the logic of making available the geological evidence from this screening process for the BGS regions, which in our case is 'Wealden'. However, we also believe that it is important that as much information as possible is made available for specific areas where there has been previous debate on the potential siting of a GDF. It is important that this exercise helps to take forward the debate in these areas and results in at least as much information as was available about the geology of an area, as was previously available. We believe that communities with existing nuclear power stations are ultimately likely to be the places most likely to want to progress the debate about their potential suitability for a GDF. Therefore it is important that the outputs from this stage of the process result in a sense of progress being made and some of the questions previously posed able to be answered. For example, one of the key questions posed by our community last time round was "how will this affect my house?" We would therefore like this process to provide as much information on the geology as is possible to help answer such questions.

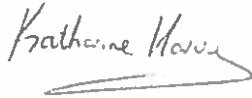
The output from this screening process will be considered by people with a range of understanding and ability to grasp what is likely to be quite complex information. It is therefore important that the narratives are as clear and easy to understand as possible, but that more detailed information relevant to those with a greater understanding is also available too.

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

We recognise that this exercise is about drawing together all the existing geological information available for the siting of a GDF. However, there will invariably be more information and greater certainty about the suitability of the geology for some parts of the country in comparison to others. We would therefore request that the process includes an indication of the relative veracity or confidence in the level of information provided in one

area versus that available in another place. This could be indicated by means of a scale for different areas to reflect this, or as part of the narrative. We believe that this would enable a community to better understand the relative confidence that can be ascribed to the geological information available for one community compared to another. It would also help communities to better understand the amount of further preliminary investigations of the geology might be required in the early further stages of the consultation process.

Yours faithfully

A handwritten signature in cursive script, reading "Katharine Harvey". The signature is written in dark ink and is positioned above a horizontal line.

Dr. Katharine Harvey
Head of Economic Development