

# Appendix D

## Schedule of Consultation Responses

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
<b>Copeland Borough Council</b>				
CBC1	1	<p>The Council would expect topic areas to recognise that Copeland Borough Council is currently host to much of the waste which would ultimately be placed within a GDF. The issues, including 'waste and resources' and 'traffic and transport', are not currently reflected in the scope of the appraisal.</p>	<p>Comment noted. Appendix B (Section 10.3) of the AoS Scoping Report includes an analysis of the baseline in respect of radioactive waste. It highlights those sites in the UK where radioactive waste and materials are currently stored and notes that (based on the NDA (2014) 2013 UK Radioactive Waste &amp; Materials Inventory), most waste is produced at Sellafield and the nuclear power stations. Section 11 of Appendix B, meanwhile, concerns traffic and transport including the movement of radioactive waste.</p> <p>Reflecting the baseline information presented in Appendix B, the AoS objectives and guide questions include specific reference to waste management</p>	<p>Appendix B (Section 10.3, Section 11)</p>

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			<p>and transportation (see AoS Objectives 10 and 11) and which will ensure that the effects of the draft NPS on these topics are adequately considered.</p> <p>No change to the Scoping Report is considered necessary.</p>	
CBC2	2	<p>The Scoping Report fails to reflect the implications of different elements of the process of developing a GDF. There needs to be clarity around the implications for the topic areas highlighted for different parts of the development process –for example, the relationship to borehole exploration during any siting process and boreholing required to inform project design.</p>	<p>Comment noted. The purpose of the AoS Scoping Report is to provide sufficient information to consultees to enable them to comment on the proposed scope of the AoS of the draft NPS. The subsequent AoS Report will identify, describe and evaluate the likely significant effects of the different aspects of developing geological disposal infrastructure (including deep boreholes and a GDF), using the post scoping consultation revised AoS objectives which cover all of the topics contained in</p>	N/A

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			<p>Appendix B (see Section 4.3). This will reflect both deep boreholes as well as subsequent GDF facilities, consistent with the level of detail contained in the draft NPS. Within this context, it is not the role of the AoS Scoping Report to consider the implications of developing a GDF on the topic areas but to instead set out the proposed approach to undertaking the appraisal.</p> <p>No change to the Scoping Report is considered necessary.</p>	
CBC3	2	<p>Scoping would need to reflect the approach to issues relating to the precise inventory of materials to be deposited within a GDF and the approach to retrievability and monitorability. The inventory will be influenced by definitions of waste, by changes in approach to the use of by-products of nuclear process and nuclear energy production – notably</p>	<p>Comment noted.</p> <p>The NPS will be used as the primary basis for the examination by the Examining Authority, and for decisions by the Secretary of State, on development consent applications for geological disposal infrastructure that</p>	<p>Appendix B (Section 10.3)</p>

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		<p>spent fuel reprocessing and plutonium reuse. The approach of the NPS and Appraisal of Sustainability relating to the policies of the NPS would potentially change as these issues are taken into account and the approach to consideration of a GDF through a Development Consent Order adjusts.</p>	<p>falls within the definition of a nationally significant infrastructure project (NSIP) as defined in the Planning Act 2008.</p> <p>The AoS will appraise the likely environmental and socio-economic effects of the draft NPS, which will include: the overarching objectives of the draft NPS; the development principles; and the generic impacts and siting considerations, including generic mitigation measures. The appraisal will be proportionate to the level of information contained in the draft NPS.</p> <p>Appendix B (Section 10.3) of the AoS Scoping Report refers to the NDA (2014) 2013 UK Radioactive Waste and Materials Inventory and which provides comprehensive and up-to-date information on radioactive waste and materials in stock (as at 1 April 2013).</p>	

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			<p>Section 2.3.3 of the AoS Scoping Report and Section 10.5 of Appendix B refer to the 'inventory for disposal' which is the same as that referenced in the 2014 White Paper, 'Implementing Geological Disposal'. Section 10.5 has been expanded to provide a breakdown of the 'inventory for disposal' based on Geological Disposal: The 2013 Derived Inventory (RWM 2015) and which includes current estimates of waste volumes arising from the nuclear new build programme.</p> <p>No further change to the Scoping Report is considered necessary.</p>	
CBC4	2	In failing to make specific reference to the current location of legacy wastes, the Scoping Report fails to establish an appropriate context for the appraisal.	Comment noted but not agreed with. Appendix B (Section 10.3) of the AoS Scoping Report includes an analysis of the baseline in respect of radioactive	Appendix B (Section 10.3)

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			<p>waste. It highlights those sites in the UK where radioactive waste and materials are currently stored and notes that (based on the 2013 UK Radioactive Waste and Materials Inventory), the most waste is produced at Sellafield and the nuclear power stations. In consequence, it is considered that the baseline information and context is appropriate for the purposes of the AoS of the draft NPS.</p> <p>No change to the Scoping Report is considered necessary.</p>	
CBC5	3	Objectives and guide questions should be amended to reflect the points highlighted above which arise as a specific consequence of materials already being located in Copeland.	Comment noted but not agreed with. The AoS objectives and guide questions set out in the AoS Scoping Report include specific reference to waste management and transportation (see AoS Objectives 10 and 11) and which	Table 4.3 (Section 4.3), Appendix A, Appendix

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			<p>will ensure that the effects of the draft NPS on these topics are adequately considered.</p> <p>No change to the Scoping Report is considered necessary.</p>	B, Non-Technical Summary
<b>Above Derwent Parish Council</b>				
ADPC1	2	<p>There is reference to multiple plans, acts and other documents in Appendix B yet from these only a single paragraph constitutes a summary baseline. Suggests that it would be helpful to have an agreed level of baseline and to show by countries in separate tables the various directives and policies etc. guiding them. Currently there is no evidence to support the soundness of any of the summary baseline(s).</p>	<p>Comment noted but not agreed with. It is the purpose of the review of plans and programmes contained in each of the Appendix B topic chapters and summarised in section 3.2 (Table 3.2) to identify the relationship of the NPS with other relevant plans and programmes. This includes the identification of the environmental protection objectives, established at international, community and national level, which are relevant to the NPS to ensure that they can be taken into account in the appraisal.</p>	Appendix B



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			<p>Information on relevant plans and programmes is presented according to the hierarchy: international, European Community, UK and England, Scotland and Wales. In total it contains a review of more than 300 separate directives, acts, plans and programmes. It is the information in Appendix B that provides a sound evidence base for the summary contained within the main body of the AoS Scoping Report.</p> <p>It is the purpose of the scoping consultation to seek comment on the adequacy and appropriateness of this review of plans and programmes. Following responses received by other consultees, it is considered that it presents an up to date review of relevant plans and programmes that is appropriate, relevant and sound.</p>	

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			<p>As set out in Section 3.5 of the AoS Scoping Report, baseline information has generally been sourced from national bodies to enable comparison between baseline information for England, Scotland and Wales. However, in some cases baseline information collected by national bodies differs meaning that data is not directly comparable.</p> <p>The information used in the baseline analysis contained in Appendix B to the AoS Scoping Report has been sourced, so far as is possible, from the most recent datasets available utilising a wide range of authoritative and official sources. In consequence, it is considered that the baseline information is sufficiently robust to inform the appraisal of the draft NPS.</p>	

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			No change to the Scoping Report is considered necessary.	
ADPC2	2	In looking at the NPPF specifically there is a concern that the fundamental aspect of Biodiversity and Nature Conservation are not understood in the GDF, Appendix B.	Comment noted but not agreed with. Section 1.1 of Appendix B defines biodiversity through reference to the Convention on Biological Diversity (to which the UK and another 168 countries are signatories). Reference is made to ecosystem services which emphasise the importance of biodiversity and to the linkages between biodiversity and other topics within the AoS. Section 1.2 of Appendix B presents a review of plans and programmes for the topic of biodiversity and nature conservation and summarises some 36 separate directives, statutes, strategies, plans and programmes. As part of the review of plans and programmes, Section 1.2 of Appendix B reproduces paragraph 109,	Appendix B (Section 1.2)

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			<p>Section 11 of the NPPF (Conserving and enhancing the natural environment) for purposes of clarity and consistency.</p> <p>No change to the Scoping Report is considered necessary.</p>	
ADPC3	2	<p>The summary baseline appears to be the same as the Habitats Directive transposed into UK legislation through the Habitats Regulations. Is this in the correct report or should it be within the HRA of the NPS for Geological Disposal of Radioactive Waste?</p>	<p>Comment noted. The Habitats Directive and transposing UK regulations are relevant to the AoS of the draft NPS. The SEA Directive specifically requires that the AoS includes information relating to any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 2009/147/EC (the 'new wild birds directive').</p> <p>No change to the Scoping Report is</p>	<p>Appendix B (Section 1.2)</p>

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			considered necessary.	
<b>Northern Ireland Environment Agency</b>				
NIEA1	General	Anticipates that the transboundary nature of any likely significant adverse effects on the environment of England that would remain after measures envisaged to prevent, reduce and, as fully as possible, offset any significant adverse effects are incorporated into the NPS would be of particular relevance to consider in relation to Northern Ireland.	<p>Comment noted. As detailed in Section 4.2 of the AoS Scoping Report, the AoS will consider the potential effects of the draft NPS in England in addition to Scotland and Wales, given the envisaged potential for a GDF (or deep boreholes) in England to impact upon Scottish and Welsh territories (due to their common borders and geographical proximity). However, any likely significant effects with other areas and states will also be considered.</p> <p>Section 4.2 has been amended to state “<i>Any likely significant with other areas and states will also be considered.</i>”</p>	Section 4.2

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NIEA2	General	Would like the SEA Environmental Report to contain a clear statement indicating the opinion (and the reasons for it), of DECC about whether or not the implementation of the Programme, in combination with any identified measures envisaged to prevent, reduced and, as fully as possible, offset any significant adverse effects on the environment, is likely to have a significant effect on Northern Ireland.	Comment noted. No change to the Scoping Report is considered necessary.	N/A
<b>Environment Agency</b>				
EA1	1	Considers the range of main issues included in the various topic areas to be appropriate for an AoS of the NPS.	Comment noted. No change to the Scoping Report is considered necessary.	N/A
EA2	1	The Scoping Report does not address the requirements of the Groundwater Directive (Directive on the protection of groundwater against pollution and deterioration) other than a brief mention of the Directive in Appendix B.	Comment noted. Section 5.2 of Appendix B identifies the Groundwater Directive 2006/118/EC as being relevant to the appraisal. It also notes that Article 4(1) of the Water Framework Directive	Table 4.3 (Section 4.3), Appendix A,

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		<p>Compliance with the Directive requirements to 'prevent' and 'limit' impacts on groundwater will be important and so we suggest that the AoS considers effects relevant to the Groundwater Directive.</p>	<p>(2000/60/EC) sets out that the objectives for surface water, groundwater, transitional and coastal water bodies.</p> <p>The AoS Objective 5 relates specifically to water quality (including surface and ground water quality and availability) and the achievement of Water Framework Directive (WFD) objectives (and which are taken to include groundwater quality). It also contains a specific appraisal guide question: '<i>Will the Geological Disposal NPS protect and enhance the quality of surface, groundwater, estuarine and coastal water quality?</i>'. In completing the subsequent appraisal, the requirements of the Groundwater Directive to 'prevent' and 'limit' impacts on groundwater will be considered as part of the response to the guide question which requires</p>	<p>Appendix B, Non-Technical Summary</p>

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			<p>consideration of the effects of the draft NPS to 'protect and enhance the quality of groundwater'.</p> <p>No change to the Scoping Report is considered necessary.</p>	
EA3	1	<p>The Scoping Report does not mention the wider Water Framework Directive objectives for groundwater, such as the trend objective and that of 'no deterioration'. Suggested that these objectives are addressed in the Appraisal of Sustainability.</p>	<p>Comment noted. The objectives of the Water Framework Directive as they relate to groundwater have been set out in Section 5.2 of Appendix B. Effects on groundwater will be considered in the AoS of the draft NPS as part of the assessment against AoS Objective 5.</p> <p>No change to the Scoping Report is considered necessary.</p>	<p>Appendix B (Section 5.2)</p>
EA4	1	<p>The Scoping Report does not include consideration of the effects arising from supporting infrastructure such as packaging and encapsulation plant(s) for spent nuclear fuel or interim storage facilities for higher activity radioactive wastes. Suggested that</p>	<p>Comment noted. Section 2.2 of the AoS Scoping Report sets out the definitions for nationally significant infrastructure related to the geological disposal of higher activity radioactive waste, as per</p>	<p>Section 2.2</p>



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		<p>these impacts need to be considered because such developments will likely be essential components of infrastructure necessary to support geological disposal. Alternatively, the Scoping Report should make clear what infrastructure is included for consideration in the AoS and what is out of scope.</p>	<p>section of 30A of the Planning Act 2008. Section 2.3.2 of the AoS Scoping Report sets out the infrastructure covered by the NPS. Reflecting this definition and the scope of the NPS, the AoS will consider effects related to the construction of a GDF and associated deep boreholes. It will not however, duplicate or anticipate the detailed assessment and appraisal of specific infrastructure elements that will come forward as part of the developers' application for a Development Consent Order for GDF facilities.</p> <p>No change to the Scoping Report is considered necessary.</p>	
EA5	1	<p>The baseline information in the Scoping Report for other plans and programmes does not mention the nuclear new build programme. This is an important consideration for the Appraisal because of its</p>	<p>Comment noted. Reference is made to the nuclear new build programme in Section 10.5 of Appendix B (as it relates to radioactive waste arisings). This</p>	<p>Appendix B, Section 10.5, Section</p>

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		<p>impact on the eventual inventory of radioactive wastes requiring geological disposal. Suggested that the Scoping Report should recognise the wider programmes for management of higher activity waste (particularly those managed by the Nuclear Decommissioning Authority and Radioactive Waste Management Ltd) which again will have an impact on the eventual inventory of wastes requiring geological disposal. This should deliver improved transparency and confidence in the inventory requiring disposal.</p>	<p>reflects the White Paper which (at paragraph 7.41) states:  <i>“With specific regard to waste from the UK’s new build programme, the inventory for disposal will include a defined amount of spent fuel and ILW from a new nuclear build programme to be covered by the GDF siting process that any interested community will begin engaging with. This is in order to provide communities considering hosting a GDF as complete a picture as possible of the waste planned for a GDF in their local area, to allow them to take a fully informed decision on whether to host a facility. The current stated industry ambition for new nuclear development is 16 gigawatt electrical. This is not a Government target and the UK Government is supportive of industry</i></p>	2.4

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			<p><i>bringing forward plans for further development in future. In that event, the UK Government would need to discuss and agree the disposal of this additional spent fuel and ILW with any communities participating in the GDF siting process, with a view to either expanding any existing facility development or seeking alternative facilities.”</i></p> <p>Section 2.3.3 has been revised to state that the inventory for disposal will include a defined amount of spent fuel and ILW from a new nuclear build programme.</p> <p>Section 10.5 has been expanded to provide a breakdown of the inventory for disposal based on Geological Disposal: The 2013 Derived Inventory (RWM 2015) and which includes current estimates of waste volumes arising from the nuclear new build programme. This</p>	

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			breakdown is absent from the earlier NDA (2014) 2013 UK Radioactive Waste also referenced in the AoS Report.	
EA6	1	Suggested that lessons might be learnt from experience in Sweden and Finland. These countries will have had to address the requirements of the SEA Directive for their geological disposal programmes.	Comment noted. The experience of Sweden and Finland in the application of the SEA Directive to proposed geological disposal programmes will be reviewed for any relevance to the UK context and the AoS of the draft NPS in particular. Where appropriate, reference will be included in the AoS Report.  No change to the Scoping Report is considered necessary.	N/A
EA7	2	The disposal inventory identified in the Scoping Report seems to be based on currently defined radioactive wastes (intermediate and high level wastes with some low level waste not suitable for near-surface disposal). Suggested that it needs to be clear as to how it considers other materials such	Comment noted. Appendix B (Section 10.3) notes that the UK Radioactive Waste and Materials Inventory does not include nuclear material that is not currently classified as waste but could be at some point in the future, if it is	Appendix B (Section 10.3)

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		<p>as spent fuel and separated plutonium and uranium that might be declared as wastes in the future.</p>	<p>deemed to have no further use.</p> <p>In Section 10.5, it is noted that the specific types of higher activity radioactive waste (and nuclear materials that could be declared as waste) which would comprise the inventory for disposal in a GDF may include plutonium stocks and uranium stocks. Section 10.5 has been expanded to provide a breakdown of the inventory for disposal based on Geological Disposal: The 2013 Derived Inventory (RWM 2015) and which includes current estimates of waste volumes arising from the nuclear new build programme.</p> <p>Baseline information that is presented in the AoS Report that will accompany the publication of the consultation draft NPS will be reviewed to ensure it reflects an up to date understanding of the inventory</p>	

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			<p>for disposal. Any relevance to the NPS will be considered within the appraisal of the draft NPS presented in the AoS Report.</p> <p>No further change to the Scoping Report is considered necessary.</p>	
EA8	2	<p>References to the inventory for disposal are both inconsistent within the document and in relation to other key documents. For example, the inventory discussed in 2.2.3 (and elsewhere in the report) differs to the inventory for disposal set out in the White Paper 'Implementing Geological Disposal'.</p> <p>Similarly, a reference to 'management of higher activity wastes' in Table 4.3 of the Scoping Report is undefined and inconsistent with previous references to the wastes for disposal. A consistent definition of the inventory is important in order to avoid confusion over what might be sent for disposal to any future geological disposal facility in</p>	<p>Comment noted.</p> <p>The AoS Scoping Report refers to the NDA (2014) 2013 UK Radioactive Waste and Materials Inventory and which provides comprehensive and up-to-date information on radioactive waste and materials in stock (as at 1 April 2013).</p> <p>Section 2.3.3 of the Final AoS Scoping Report and Section 10.5 of Appendix B refer to the 'inventory for disposal' which is the same as that referenced in the 2014 White Paper, 'Implementing Geological Disposal'.</p>	<p>Appendix B (Section 10.3), Section 2.2, Table 4.3 (Section 4.3), Appendix A, Appendix B, Non-</p>

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		<p>England as well as providing a clear basis for Appraisal.</p>	<p>Section 10.5 of Appendix B of the Final AoS Scoping Report has been expanded to provide a breakdown of the ‘inventory for disposal’ based on Geological Disposal: The 2013 Derived Inventory (RWM 2015) and which includes current estimates of waste volumes arising from the nuclear new build programme.</p> <p>Table 4.3 of the AoS Scoping Report presents the AoS appraisal objectives and guide questions. The wording referred to in the submission concerns one guide question under AoS Objective 9:</p> <p><i>“Will the Geological Disposal NPS help to ensure a low carbon design solution to the management of higher activity wastes, at both construction and operation phases?”</i></p>	<p>Technical Summary</p>

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
			<p>This has been amended to read:  <i>“Will the Geological Disposal NPS help to ensure a low carbon design solution to the disposal of higher activity radioactive wastes, at both construction and operation phases?”</i></p>	
EA9	2	<p>In places, the Scoping Report appears to lose focus on higher activity radioactive waste issues. For example, the summary objectives for Waste and Resources relate more to non-hazardous and hazardous waste management. Similarly, Section 10.2 of Appendix B (which provides the context for issues relating to Waste and Resource Use) provides considerable information on plans and legislation which are not relevant to higher activity radioactive wastes. It omits mention of the UK government’s White Paper, Implementing Geological Disposal (2014), which is a key reference.</p>	<p>Comment noted. Whilst the geological disposal of higher activity radioactive waste is clearly a key consideration of the AoS, it is important that the assessment also considers the effects of the draft NPS on other waste types and streams. For example, grant of a DCO allows construction of geological disposal infrastructure, which itself will generate waste. It is therefore appropriate that these hazardous and non-hazardous waste streams are considered. Nonetheless, the summary</p>	<p>Appendix B (Section 10.2, Section 10.3)</p>



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		<p>It is suggested that the Scoping Report should make clear that the AoS and NPS are about geological disposal of higher activity radioactive wastes and that issues pertinent to these wastes are the focus of consideration.</p>	<p>of key issues presented in Table 3.3 of the AoS Scoping Report includes specific reference to higher activity wastes and which reflects the baseline analysis of radioactive waste management presented in Appendix B (Section 10.3).</p> <p>The White Paper is included within the review of plans and programmes in Appendix B (Section 10.2) as well as a number of other plans and programmes relevant to radioactive waste.</p> <p>No change to the Scoping Report is considered necessary.</p>	
EA10	2	<p>Suggests that the Scoping Report should include some consideration of seismic activity.</p>	<p>Agreed. Section 4.6 (Appendix B) of the AoS Scoping Report has been updated to include reference to seismicity. Additionally, the following guide question has been included under AoS Objective</p>	<p>Appendix B (Section 4.6), Table 4.7</p>

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			4 (see Table 4.7) : <i>“Will the Geological Disposal NPS affect induced seismicity?”</i>	(Section 4.3), Appendix A, Appendix B, Non-Technical Summary
EA11	3	Considers the AoS objectives and guide questions to be broadly appropriate for appraising the effects of the draft National Policy Statement.	Comment noted. No change to the Scoping Report is considered necessary.	Appendix B (Section 4.3), Table 4.3 (Section 4.3), Appendix A, Appendix B, Non-Technical

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				Summary
EA12	3	<p>The following detailed comments are provided in respect of the AoS guide questions:</p> <p><b>‘Will the Geological Disposal National Policy Statement affect the amount of hazardous and non-hazardous wastes produced?’</b></p> <p>The activities which generate the quantities of higher activity radioactive wastes requiring disposal, in particular the decommissioning and clean-up of the UK’s legacy nuclear facilities, will also generate quantities of non-radioactive wastes (both hazardous and non-hazardous). However, whilst geological disposal activities themselves will generate some non-radioactive wastes as a result of both the development, operation and decommissioning of facilities, the non-hazardous wastes, such as mining wastes, associated with the development of any such facility may be significant.</p>	<p>Comments noted.</p> <p>The responses provided to the guide questions will be considered during the appraisal of the draft NPS as appropriate. However, it should be noted that the AoS is of the draft NPS itself and therefore decommissioning activities are outside the scope of the AoS.</p> <p>No change to the Scoping Report is considered necessary.</p>	N/A

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
		<p><b>‘Will the Geological Disposal National Policy Statement affect the capacity of existing waste management systems, both nationally and locally?’</b></p> <p>We do not consider that geological disposal itself will affect the capacity. Geological disposal itself should take place within a well-defined process and would, therefore, be an activity quite separate from other forms of waste disposal. It is likely that any processing infrastructure connected with geological disposal would be a bespoke operation. In such circumstances, it would be expected that any waste processing would be carried out, either on or close to the site(s) of production, or alternatively at the point of disposal (although this may increase transportation risks).</p> <p><b>‘Will the Geological Disposal National Policy Statement maximise re-use and recycling of recovered components and materials?’</b></p>		

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
		Segregation of radioactive and non-radioactive wastes will be an essential part of the process for maximising re-use and recycling of wastes. Each location should have a plan for managing waste to identify the risks and opportunities.		
EA13	General	The Non-Technical Summary and the Introduction to the Scoping Report refer to 'geological disposal facilities and the deep boreholes required to investigate potential sites for these facilities'. In subsequent text, this is truncated to 'geological disposal facilities and related deep boreholes' or similar. We suggest a short footnote to make clear that throughout the document 'deep boreholes' are for site investigation only and do not refer to any proposals for deep borehole disposal of radioactive waste. It would be clearer if the same terminology regarding geological disposal facilities and deep boreholes were used throughout the document.	Agreed. A footnote has been included in Non-Technical Summary and Section 1.1 of the AoS Scoping Report clarifying the nature of deep borehole development that would be covered by the NPS.	Non-Technical Summary, Section 1.1
EA14	General	Section 2.3 of the Scoping Report discusses	Comment noted. Section 2.4 of the AoS	Section

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		<p>reasonable alternatives but the arguments about why the suggested alternatives are considered 'reasonable' are not clear. The proposed alternatives seem to be variations on the National Policy Statement that partially address the question of 'where should it go?' We suggest a clearer explanation of the suggested alternatives would be helpful. In addition, we suggest that it would be more transparent to present a clear summary of CoRWM's work to show that reasonable alternative disposal options have been considered at an appropriate level of detail.</p>	<p>Scoping Report sets out the requirements of the SEA Directive with regard to reasonable alternatives to the NPS. A number of example reasonable alternatives are presented and the text also outlined briefly those aspects that were not proposed to be considered within the subsequent AoS, which included the policy decision with regard to disposal, reaffirmed in the 2014 White Paper. This was presented in anticipation of the more detailed review of alternatives to be contained in the subsequent AoS Report. This section of the AoS Report will include reference to the work carried out by the independent Committee on Radioactive Waste Management (CoRWM). Section 2.4 of this Final Scoping Report includes reference and a link to the work of the</p>	2.4

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			CoRWM. No change.	
EA15	2	The review of the List of Wastes noted in Section 10.2 of Appendix B has been completed. The environment agencies have published their technical guidance WM3: Waste Classification, which provides guidance on classification and assessment of waste.	Comment noted. Reference to the List of Wastes having been reviewed has been included in Appendix B.	Appendix B (Section 10.2)
EA16	2	There are no summary objectives set out for biodiversity and nature conservation in Table 3.2 of the Scoping Report (page 48) – the wording is the same as in Table 3.3 (page 60), which sets out a summary of key issues.	Agreed. Table 3.2 has been amended to include a summary of key objectives identified from the review of plans and programmes for biodiversity and nature conservation contained in Appendix B.	Table 3.2 (Section 3.2)
EA17	2	Suggested that the list of Environment Impact Assessment specific measures listed in Box 4.1 of the Scoping Report could include minimisation of radioactive discharges to air and water and disposal of secondary solid waste to land.	Comment noted. The mitigation measures identified in Box 4.1 of the AoS Scoping Report are indicative only. However, the proposed measure “minimisation of radioactive discharges	Box 4.1 (Section 4.4)

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			to air and water and disposal of secondary solid waste to land” has now been included.	
EA18	2	Table 4.6 mentions ‘Examples of a secondary effect of the draft Geological Disposal National Policy Statement would include the materials (and embedded carbon) used in the development of the storage facility (italics added), or health effects of changes to air quality associated with transport.’ If the text is referring to a geological disposal facility, it should refer to a disposal facility. If not, it should make clear what storage facility is being addressed.	Comment noted. The term ‘storage facility’ has been amended to read ‘geological disposal facility’.	Table 4.6 (Section 4.4).
EA19	General	The first sentence of ‘Geological Disposal – An Overview’ refers to ‘a legacy of higher activity radioactive waste and material’ but does not define what is meant by material. This is the only reference to radioactive material in the Scoping Report other than a reference to transport of	Comment noted. The reference to ‘material’ has been removed from the revised AoS Scoping Report.	Section 1.3.



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		radioactive material (Scoping Report, Table 3.3, page 68). It should be made clear what the radioactive material is and whether it constitutes part of the inventory for disposal in a geological disposal facility.		
EA20	2	<p>In Table 3.3 of the Scoping Report, the statement under Waste and Resources that “The total amount of waste produced each year is likely to decrease in coming years” is potentially misleading. The rate at which radioactive waste will arise will depend on progress with decommissioning of redundant facilities and on decisions on the scale of the new nuclear reactor programme.</p> <p>In the same section of the table, it is unclear how the reference to the capacity of the Low Level Waste Repository relates to geological disposal or management of higher activity radioactive waste.</p>	<p>Agreed. To avoid confusion, the statement “The total amount of waste produced each year is likely to decrease in coming years” has been amended so that it refers specifically to municipal and commercial and industrial waste streams (and not radioactive waste).</p> <p>The reference to the capacity of the Low Level Waste Repository in Appendix B has been removed.</p>	Table 3.3 (Section 3.4), Appendix B (Section 10.3)
EA21	General	The meaning of the first sentence of the final paragraph on page 85 of the Scoping Report is	Agreed. Section 4.4 has been amended to clarify what is meant by the appraisal	Section 4.4.

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
		very unclear. It reads 'Through the Appraisal of Sustainability of the constitute elements of the draft National Policy Statement, the appraisal of the cumulative effects of the collective implementation of the draft National Policy Statement will be completed.' This text needs to be better explained.	of the cumulative effects of the draft NPS.	
EA22	3	The term 'severance of communities' is used in Table NTS 2 (Scoping Report, page 22) and elsewhere without any explanation of what this means.	Comment noted. Severance refers to the separation of communities by development such as roads. This has been highlighted in Table 4.3.	Table 4.3 (Section 4.3), Appendix A, Appendix B, Non-Technical Summary
<b>Historic England</b>				
HE1	1	We note that 'Cultural Heritage' is identified as an AoS topic being described as 'Consideration will need to be given to the potential effects on the	Agreed. Table NTS 1 has been amended to refer to the setting of cultural	Table NTS 1 (Non-

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
		historic environment, including cultural heritage resources, historic buildings and archaeological features'. We recommend this should be further strengthened by also making a specific reference to the potential effect on their setting as set out in the NPPF (2012).	heritage assets.	Technical Summary)
HE2	1	Similarly, the importance of setting should be included under the 'Landscape and Townscape' topic which is described as 'Consideration will need to be given to the potential effects on the quality and attractiveness of landscapes and townscapes, as well as on visual amenity and public access to open spaces'.	Agreed. Table NTS 1 has been amended to refer to the setting of assets.	Table NTS 1 (Non-Technical Summary)
HE3	2	It is not clear how the AoS links have been identified. For example, the topics/objectives relating to flood risk and coastal change, noise, climatic factors, and traffic and transport are also likely to be of relevance to both cultural heritage, and landscapes and townscapes. This could be	Comment noted. It is agreed that there are linkages between the topics to be considered as part of the AoS of the draft NPS and Appendix B has sought to identify these where appropriate, although this is not intended to be	Appendix B, Section 3.1

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
		<p>further considered under the appropriate headings in Appendix B 'Baseline and Contextual Information' where our guidance on 'Climate Change and the Historic Environment' is referenced.</p>	<p>exhaustive.</p> <p>Whilst the baseline information and AoS objectives are presented by topic, the appraisal of the draft NPS will consider linkages between the topics as appropriate (for example, the potential impacts of vehicle movements on heritage assets and landscape character). This has been reflected in Section 3.1 of this Final Scoping Report.</p>	
HE4	2	<p>Similarly in Appendix B 'Cultural Heritage', the recently published Historic England Good Practice Advice Notes on 'Managing Significance in Decision-Taking in the Historic Environment' and 'The Setting of Heritage Assets' could be usefully included.</p> <p>Although the 'National Planning Policy Framework' is considered under 'Landscape and Townscape',</p>	<p>Comment noted. The plans and programmes referred to in this response have now been included in the review of plans and programmes contained in Appendix B (Section 12.2).</p> <p>Reference to National Planning Practice Guidance in respect of landscape and townscape has been included in</p>	<p>Appendix B (Section 12.2, Section 12.3, Section 13.2)</p>

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
		the 'National Planning Policy Guidance' has been omitted together with registered battlefields when considering registered landscapes in England.	Appendix B (Section 13.2). Registered battlefields are already identified in Section 12.3 of Appendix B.	
HE5	3	The AoS objectives and guide questions should make specific reference to setting. We also suggest combining the second and third rows under 'Reasoning' so the content reflects all aspects of the historic environment.	<p>Agreed. AoS Objective 12 has been amended to read:</p> <p><i>“To protect and where appropriate enhance the historic environment including cultural heritage resources, historic buildings and archaeological features and their settings.”</i></p> <p>The guide question “Will the Geological Disposal NPS affect designated or locally-important archaeological features?” has been amended to read:</p> <p><i>“Will the Geological Disposal NPS affect designated or locally-important archaeological features or their settings?”</i></p>	Table 4.3 (Section 4.3), Appendix A, Appendix B, Non-Technical Summary.

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
			Appendix A and Appendix B have been amended to combine the 'reasoning' as suggested in this response.	
HE6	3	The 'Illustrative Guidance for the Assessment of Significance for Cultural Heritage' requires careful review – 'Positive' should include locally important cultural heritage features, 'Neutral' should mention setting and 'Negative' should include locally important cultural heritage features.	Agreed. The illustrative guidance set out in Appendix A and Appendix B has been revised in accordance with this response.	Appendix A, Appendix B
HE7	3	Under 'Landscape and Townscape the objectives/guide questions should reference setting when considering protected/designated landscapes and landscapes/townscapes.	Agreed. The guide questions 'Will the Geological Disposal NPS affect protected/designated landscapes?' and 'Will the Geological Disposal NPS affect the intrinsic character of local landscapes or townscapes?' have been amended to refer to setting.	Table 4.3 (Section 4.3), Appendix A, Appendix B, Non-Technical Summary

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
HE8	3	The 'Illustrative Guidance for the Assessment of Significance for Landscape and Townscape' requires careful review – 'Significant Positive', bullet one includes setting, bullet two only refers setting and not direct impacts, 'Positive' bullet one include setting, bullet two only refers to setting and not direct impacts, 'Neutral' could state the option would not have any effect on statutorily-designated landscapes, local landscapes, townscapes and their setting, 'Negative' bullet one and two include setting and 'Significant Negative' bullet one and two include setting.	Agreed. The illustrative guidance set out in Appendix A and Appendix B has been revised in accordance with this response.	Appendix A, Appendix B
<b>Historic Environment Scotland</b>				
HS1	General	Agrees that there is potential for significant effects on Scotland's historic environment, and welcomes that this has been scoped this into the assessment.	Comment noted. No change required.	N/A
HS2	General	Is content with the scope of assessment, level of detail and approach to assessment that is outlined	Comment noted. No change required.	N/A

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
		in the Scoping Report in relation to the historic environment.		
HS3	2	<p>The following comments are made in respect of the review of plans and programmes:</p> <ul style="list-style-type: none"> <li>• The Department for Culture, Media and Sport White Paper, Heritage Protection for the 21st Century (2007) and Planning (Listed Buildings and Conservation Areas) Act 1990 are not relevant to Scotland.</li> <li>• Section 1 of the Protection of Wrecks Act 1973 was repealed in Scotland on 1 November 2013.</li> <li>• Historic Marine Protected Areas have replaced use of section 1 of the Protection of Wrecks Act 1973 for designation of historic shipwrecks in Scottish territorial waters.</li> <li>• The Ancient Monuments and Archaeological Areas Act 1979 is the key piece of legislation relating to scheduled monuments in Scotland, rather than the Planning (Listed Buildings and</li> </ul>	Comment noted. The review of plans and programmes contained in Appendix B (Section 12.2) has been revised to reflect the amendments suggested in the consultation response.	Appendix B (Section 12.2)



Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
		<p>Conservation Areas) (Scotland) Act 1997.</p> <ul style="list-style-type: none"> <li>• Scottish Historic Environment Policy (2009) was superseded in 2011 by a revised version which takes account of: <ul style="list-style-type: none"> <li>• the marine historic environment policy (which was subject to a full public consultation in 2008);</li> <li>• the provisions of the Marine Scotland Act 2010; and</li> <li>• the provisions of the 2011 Act.</li> </ul> </li> </ul>		
HS4	General	A new lead body for the historic environment- known as Historic Environment Scotland (HES) for the purposes of legislation- has been created.	Comment noted. Reference to Historic Scotland has been amended as per this response.	All sections.
HS5	2	In addition to the national designations listed, Scotland also has 7 Historic Marine Protected Areas and 39 Inventory Battlefields. The number of World Heritage Sites has increased to 6 with the recent inscription of the Forth Rail Bridge.	Comment noted, Appendix B (Section 12.3) has been amended as per this response.	Appendix B (Section 12.3)

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
<b>Department of Environment, Food and Agriculture (Isle of Man Government)</b>				
DEFA1	1	<p>Given the uncertainty on the geographical limitations (of the NPS), the Department would welcome some clarification as to the geographic scope of the AoS. The Department of Environmental, Food and Agriculture (DEFA) considers that the draft AoS document does not provide sufficient information to allow us to judge how or if a potential impact on the Isle of Man and its maritime area and fisheries resources, would be included in any process to assess potential deleterious effects from GDF development activities in the Irish Sea area.</p>	<p>Comment noted. It is considered that the information contained in the AoS Scoping Report is sufficient for the purpose of providing statutory consultees (as per requirements of SEA regulation 12 (5) and (6)) with sufficient information on the proposed scope of the appraisal. The AoS will consider the potential effects of the draft NPS in England in addition to Scotland and Wales, given the envisaged potential for a GDF (or deep boreholes) in England to impact upon Scottish and Welsh territories (due to their common borders and geographical proximity). However, if any likely significant effects with other areas and states are determined, these will also be identified, described and</p>	

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
			<p>evaluated.</p> <p>Section 4.2 has been amended to state “<i>Any likely significant with other areas and states will also be considered.</i>”</p> <p>No change.</p>	
<b>Natural England</b>				
NE1	General	<p>We consider that the legibility of the document could be improved. For instance at 16 pages the Non-Technical summary is overly long and simply repeats much of what is included in the introductory section of the document.</p>	<p>Comment noted. The Non-Technical Summary (NTS) provides an overview of the main contents of the AoS Scoping Report, in accordance with the requirements of the SEA Regulations. It is intended to provide sufficient information to be read as standalone document. In this context, it is unclear how the NTS could be condensed.</p> <p>However, the need for brevity is recognised and the AoS Report will be accompanied by a short synopsis.</p>	Non-Technical Summary

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
NE2	General	Sections 3 and 4 of the report which contain the bulk of the documentation are laid out in tabular form, with little explanation or justification provided for the topics / sources / options chosen. We would welcome further explanation in these sections.	<p>Comment noted but not agreed with. Section 3.1 of the AoS Scoping Report sets out that the topics detailed in the SEA Directive have formed the basis for the topics considered in the AoS Scoping Report. In Section 4.3, meanwhile, the justification for the selection of the AoS objectives and guide questions is provided.</p> <p>No change to the Scoping Report is considered necessary.</p>	Section 3.1, Section 4.3
NE3	General	The main assessment contains little cross referencing to the Government's 2014 White Paper on Geological Disposal of Nuclear Waste, which makes it unclear why certain options have been selected and alternative means of disposal have been rejected.	<p>Comment noted but not agreed with. At Section 1.3 and Section 2.3, the AoS Scoping Report sets out that the Government's policy is for the long-term management of higher activity waste by way of geological disposal, as set out in the White Paper and include clear cross reference and links to the White Paper.</p>	Section 1.3, Section 2.4

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
			<p>In consequence, the AoS will not revisit alternatives to geological disposal itself (and which have already been considered in the work carried out by the independent Committee on Radioactive Waste Management (CoRWM)).</p> <p>No change to the Scoping Report is considered necessary.</p>	
NE4	1	Natural England supports the identified topic areas and the justification provided for the inclusion of each area of assessment.	Comment noted.	Section 3.1
NE5	1	The current wording on the assessment of effects on biodiversity (Table NTS3) “A description of effects of the Geological Disposal NPS principle of assessment under consideration will be provided here, with reasoning and justification included.” is unclear. This sentence should be reworded, to make clear that it is the effects of the NPS on the environmental topics (e.g. biodiversity) that are	<p>Comment noted but not agreed with. The wording in Table NTS3 and Table 4.4 is illustrative only and is intended to provide an example of how a component of the draft NPS (in this case the principles of assessment) would be appraised.</p> <p>No change to the Scoping Report is</p>	Table NTS3 (Non-Technical Summary) and Table 4.4 (Section

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		being assessed and not the 'principle of assessment' (to make clear that this relates to the policy document, not the subsequent individual applications).	considered necessary.	4.4)
NE6	2	The Scoping Report sets out a wide range of baseline and context information for the environmental objectives, however Natural England believes that a few of these sources could be improved or updated. Baseline data for Biodiversity and Landscape could be improved by referencing data contained with the National Character Areas (NCAs).	Comment noted. The NCAs are referenced in (including a weblink) in a revised Section 1.3 (Appendix B) of the Final AoS Scoping Report.	Appendix B (Section 1.3)
NE7	3	The summary objectives for Biodiversity and Landscape and Townscape identified in Table 3.2, are not actual objectives, but are trends identified from various review sources. We consider that the objectives for Biodiversity and Landscape need to be rewritten in line with Governments stated national and international objectives for Biodiversity	Agreed. Table 3.2 has been revised to include a summary of key objectives identified from the review of plans and programmes for biodiversity and nature conservation contained in Appendix B.	Table 3.2 (Section 3.2)

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
		and Landscape (e.g. to protect and enhance biodiversity Para's 109 & 118 of the NPPF). We would recommend the following source materials. For Biodiversity, Biodiversity 2020, for Landscape, the European Landscape Convention and statements of opportunity contained within individual National Character Area Statements.		
NE8	3	Under the Objective for Water, we would request that water quality is assessed in terms of its impact on aquatic habitats and the biodiversity that it supports.	<p>Comment noted. It is assumed that this response relates to the summary of objectives arising from the review of plans and programmes contained in Table 3.2 (Section 3.2). This table already identifies the following objective:</p> <p><i>“To improve quality of the UK water environment and the ecology which it supports.”</i></p> <p>No change to the Scoping Report is considered necessary.</p>	Table 3.2 (Section 3.2)

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
NE9	3	Topic 7, Air, identifies an objective “To improve air quality by reducing the impact of air pollution on human health and ecosystems”. In regard to air quality, we consider that there should be a specific objective for the reduction of air pollution and its impact on biodiversity (Natural England’s research papers on ‘Air Quality’ should help to identify where air pollution is having specific impacts on protected habitats).	Agreed. This comment concerns the summary of objectives arising from the review of plans and programmes contained in Table 3.2 (Section 3.2). The following additional objective under ‘Air’ has now been included (and the existing objective amended as appropriate):  <i>“To improve air quality and reduce the impact of air pollution on biodiversity.”</i>	Table 3.2 (Section 3.2)
NE10	3	Topic 13, Objectives for Landscape and Townscape does not identify the UK’s responsibilities for the protection of Landscapes under the European Landscape Convention, nor does it identify an objective for the protection of nationally designated landscapes (National Parks, the Broads and Areas of Outstanding Natural Beauty), or for the protection of Heritage Coasts. We believe that this should be included in the	Agreed. Table 3.2 has been amended to include a summary of key objectives identified from the review of plans and programmes for landscape and townscape contained in Appendix B.	Table 3.2 (Section 3.2)



Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
		objectives to reflect the importance of these designations as set out in the National Planning Policy Framework and other National Policy Statements.		
NE11	3	<p>Table 3.3 sets out “Key Issues Relevant to the NPS”, which for issues such as “2. Population, Economics and Skills”, identifies the direct impacts that the implementation of the NPS will have on the topic area, e.g. <i>“In relation to economic development, a GDF is estimated to generate an additional £50-£200 million indirect and induced expenditure in the economy in an average year. This equates to a present value benefit of £1.8 to £6.7 billion over the lifetime of the project.”</i></p> <p>For the issues of Biodiversity, Water Quality, Noise and ‘Landscape and Townscape’, the ‘Key Issues’ identified, are simply national trends that bear no relation to the direct impacts of the implementation of the NPS for Geological Disposal. The NPS will</p>	<p>Comment noted but not agreed with. Table 3.3 sets out “Key Issues Relevant to the NPS”, which contains a summary of relevant trend information that will provide the context for the subsequent appraisal.</p> <p>At the time of writing, further quantifiable information relating to the potential effects of a GDF was not available. The appraisal of the draft NPS will reflect quantitative information where this becomes available. Where numerical information is not available, the appraisal will be based on professional judgement and with reference to relevant legislation,</p>	Table 3.3 (Section 3.4)

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
		<p>have a range of direct impacts in terms of disturbance impacts from construction and transport movements, use of extracted materials, etc. that are quantifiable and should be presented in relation to the assessment. The current summary of key issues presents an uneven treatment of the environment, compared to the socio-economic impacts identified.</p>	<p>regulations and policy. No change to the Scoping Report is considered necessary.</p>	
NE12	3	<p>Table 4.2 sets out the range of timescales that the impacts of the NPS will need to be assessed over. It is clear from this table that in the short term, that impacts will only occur in relation to site identification and the creation of boreholes. It would seem necessary therefore, that the AoS should look at the specific impacts of borehole creation and pre-construction investigation, in order to identify short term impacts (as separate from those in the medium and long term). The creation of boreholes is not currently addressed in the</p>	<p>Comment noted. It is fully intended for the AoS to consider the short term effects of the draft NPS including generic impacts associated with borehole development (being part of the infrastructure to be covered by the NPS). This is detailed in Table 4.2. No change to the Scoping Report is considered necessary.</p>	Table 4.2 (Section 4.2)

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
		assessment topics.		
NE13	3	Table 4.3 sets out the Proposed Guide Questions for each of the objectives. In relation to Biodiversity, the NPPF contains a commitment to protect and/or enhance species and habitats identified in lists prepared in relation to S.41 of the Natural Environment and Rural Communities (NERC) Act. We would therefore welcome a guide question that seeks to assess this impact (as the current guide question does for European sites).	Agreed. The following additional guide question has been included in Table 4.3 under AoS Objective 1: <i>“Will the Geological Disposal NPS protect and/or enhance priority species and habitats?”</i>	Table 4.3 (Section 4.3), Non-Technical Summary, Appendix A, Appendix B
NE14	3	Suggested that guide question 1 is extended to address not just internationally designated habitats, but also species to which the UK Government has identified a commitment to protect and enhance.	Comment noted but not agreed with. The AoS Objective 1 guide questions are: <ul style="list-style-type: none"> <li>• Will the Geological Disposal NPS protect and/or enhance internationally designated nature conservation sites e.g. SACs, SPAs and Ramsar Sites?</li> </ul>	Table 4.3 (Section 4.3), Non-Technical Summary, Appendix A, Appendix B

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
			<ul style="list-style-type: none"> <li>• Will the Geological Disposal NPS protect and/or enhance nationally designated nature conservation sites e.g. SSSIs?</li> <li>• Will the Geological Disposal NPS affect animals or plants including protected species?</li> </ul> <p>These are considered sufficiently comprehensive to identify and address any effects on and internationally and nationally important conservation sites and species.</p> <p>No change to the Scoping Report is considered necessary.</p>	B
NE15	3	For the topics of air, water and noise we would request that guide questions specifically identify the effects of the NPS on these receptors and the habitats and species that are vulnerable to change (which can be at very different thresholds to	Comment noted but not agreed with. The guide questions for air, water and noise are intentionally inclusive in their current wording to ensure that the likely significant effects on all sensitive	Table 4.3 (Section 4.3), Non-Technical Summary,

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		acceptable change for impacts on human receptors).	receptors, whether human or flora or fauna are identified, described and evaluated.  No change to the Scoping Report is considered necessary.	Appendix A, Appendix B
NE16	3	Table 4.5 identifies the scoring that will be used to respond to the guide questions, and where an issue can be classified as “uncertain”. We would welcome further clarification on where “uncertain” will be used to respond to a guide question, the current text states that “From the level of information available the effect that the option would have on this objective is uncertain”. For a number of topic indicators it may be necessary to aggregate data information sources and we would welcome a commitment that the assessment questions will not rely solely on primary data sources published on the individual topic. We consider that where it is found that an outcome in	Comment noted. The SEA Directive requires that the AoS is based on information that can reasonably be required, taking into account current knowledge and methods of assessment (Article 5(2) of the SEA Directive). The AoS Scoping Report uses information from a variety of sources including, amongst others, the Department for Environment, Food and Rural Affairs (Defra), DECC, the Environment Agency, Natural England, Historic England, the Office of National Statistics, Welsh Government, Natural Resources Wales	Table 4.5 (Section 4.4), Non-Technical Summary

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
		<p>“uncertain”, that the objective and guide question, should be revisited, in order to enable the responsible authority to make final decisions on the NPS, based on the best available information and the clearest identification of trends that can be made, we would welcome revision to the wording to reflect this commitment.</p>	<p>and the Scottish Environment Protection Agency. This information is publicly available, credible, accurate, current and verifiable. It is considered sound and appropriate for the purpose of completing the AoS.</p> <p>There may be instances where, based on the information available, the AoS concludes an uncertain effect. This is particularly pertinent given the extended timescales for considering the potential effects of the draft NPS, as detailed in Table 4.2 of the AoS Scoping Report. In such cases, the AoS Report will record the effect as being uncertain.</p> <p>It is not the intention to revisit the AoS where uncertainties have been identified. Instead, measures will be proposed to mitigate the uncertainties identified where possible or to monitor them during</p>	

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			<p>the implementation of the NPS. This approach is consistent with UK Government guidance on SEA</p> <p>No change to the Scoping Report is considered necessary.</p>	
NE17	3	<p>In the example provided within Table 4.5 Biodiversity and Nature Conservation, a significant positive addresses potential impacts to international, national and local biodiversity, however a significant negative only relates to international and national sites and species (and specifically their interest features or long term condition). We consider that this is a disparity and that a significant negative could result from the loss of a local interest feature (and not just a notified interest feature). We would welcome further clarification in regard to the assessment status.</p>	<p>Comment noted but not agreed with. The AoS will identify the likely significant effects of the draft NPS, which is a national level planning policy document. The definition of what constitutes a likely significant effect, whilst illustrative, reflects this national level. Reference to international and national sites is considered appropriate and proportionate to this scope and level of appraisal. In accordance with the illustrative guidance, any local effects on biodiversity will be assessed as minor.</p> <p>To ensure balance in the appraisal of</p>	Table 4.5, Appendix A, Appendix B

Ref	Consultation Question / Consultation Response		Commentary / Action Taken	Relevant Location in Final Scoping Report
			positive and negative effects, the guidance on significance has been revised.	
<b>Nuclear Decommissioning Authority (NDA) &amp; Radioactive Waste Management Ltd (RWM)</b>				
NDA1	1	<p>The AoS, as a national-scale appraisal, should consider a broad range of topics and issues as is proposed. However, it is not obvious that an NPS which sets out the policy for deep boreholes for site characterisation and a GDF has the potential to have significant effects on a number of the key issues identified in the AoS Scoping Report.</p> <p>If the AoS Report had a particular focus on the issues relevant to the nature and scale of the development that the NPS is providing policy and guidance for, it would more effectively influence and then assess the proposed NPS as well as assist members of the public and consultees in commenting on the NPS. It would therefore be useful if there was greater clarity in the AoS Report</p>	<p>Comment noted. As set out in Section 3.1 of the AoS Scoping Report, Annex I of the SEA Directive requires that an appraisal should include information on the likely significant effects on the environment, including on issues such as: biodiversity; population; human health; fauna; flora; soil; water; air; climatic factors; material assets; cultural heritage, including architectural and archaeological heritage; and landscape. This requirement has informed the identification of topics to be considered as part of the AoS.</p> <p>The range of topics included in the AoS</p>	Section 3.1



Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
		as to why issues have been identified as key to the appraisal of the NPS and reasonable alternatives.	<p>of the draft NPS does not mean that the appraisal will become 'diluted' or less effective. It is important that each topic is given appropriate consideration in the assessment and in accordance with the SEA Directive, the AoS will seek to identify the likely significant effects of the draft NPS in the context of all of the topics identified.</p> <p>No change to the Scoping Report is considered necessary.</p>	
NDA2	1	The AoS Report would benefit from further clarification of the assumptions that are being made in the NPS as to what a deep borehole project or GDF would comprise. For example, will the NPS apply to any local transport links that may have to be developed to support implementation of a GDF? Whether such development is part of the Nationally Significant Infrastructure Project itself or	Comment noted. The AoS Scoping Report reflects the information that is currently available on the scope of the NPS, as set out in the Planning Act. However, this contextual information will be refined as part of the preparation of the AoS Report once further detail in respect of the content of the draft NPS is	Section 2.2

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		<p>associated development, the NPS may still be able to set policy for all such development (we note that this is the approach taken in certain of the Energy NPSs). Such decisions on the scope of the NPS could potentially influence a number of the assessment questions set out in Appendix A.</p>	<p>available. No change to the Scoping Report is considered necessary.</p>	
NDA3	1	<p>As part of the effects arising from implementing geological disposal, we suggest that the appraisal should explicitly consider the inherent sustainability benefits of geological disposal, for example it being assessed as: ‘the best available approach for the long-term management of the UK’s legacy of higher activity radioactive wastes’; as well as an enabler for the decommissioning and clean-up of existing nuclear sites. The appraisal could also consider the sustainability benefits of an approach to siting a GDF that is based on the willingness of local communities to participate in the siting process. These factors could then also be considered in the context of reasonable</p>	<p>Comment noted. However, it is considered that the inclusion of specific objectives or guide questions relating to the sustainability benefits of geological disposal would reflect the policy objective of the NPS and would, therefore, not be appropriate for inclusion in the AoS appraisal framework. No change to the Scoping Report is considered necessary.</p>	N/A

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
		alternatives.		
NDA4	1	<p>It would be of benefit if the issues relevant to the following were clearly distinguished:</p> <ol style="list-style-type: none"> <li>1) deep boreholes only;</li> <li>2) GDF only; and</li> <li>3) both deep boreholes and GDF.</li> </ol> <p>The two categories of Nationally Significant Infrastructure Project that the NPS (and therefore the AoS) will cover are different in nature, scale, timescales and potential effects. It is not obvious that the key issues for these types of development would be the same. For example, it is not clear that climate change adaptation and coastal change would be key issues in the consideration of deep boreholes. Therefore we suggest that the AoS Report should distinguish more clearly between the different categories of Nationally Significant Infrastructure Project set out above.</p>	<p>Comment noted. As highlighted in Table 4.2 of the AoS Scoping Report, the appraisal will consider the short term effects of the draft NPS (including site identification, boreholes and initial construction of GDFs), medium term effects (GDF operation (including ongoing construction of further underground waste vaults) and long term effects (closure and monitoring). This reflects the requirements of the SEA Directive.</p> <p>Whilst it is not the intention to appraise separately deep borehole and GDF construction, the effects of both types of development will be fully considered and where there are likely to be significant effects on the AoS objectives this will be</p>	Table 4.2 (Section 4.2)

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
			recorded in the AoS Report. No change to the Scoping Report is considered necessary.	
NDA5	1	We would suggest there is a need for a more general consideration of how radiological protection and radioactive waste management issues are addressed in the AoS Report. As described in our response to Question 2, these areas do not appear to be as clearly described in the AoS Scoping Report as non-radioactive sustainability issues are.	Comment noted. However, it is considered that the inclusion of specific objectives or guide questions relating to the sustainability benefits of geological disposal would reflect the policy objective of the NPS and would, therefore, not be appropriate for inclusion in the AoS appraisal framework.  No change to the Scoping Report is considered necessary.	
NDA6	2	The following suggestions could be considered to further clarify the context of the appraisal: Making it clear at the beginning of the AoS Report	Agreed. Whilst the AoS Scoping Report identifies those elements of the draft NPS that are to be appraised (see	Section 1.1, Non-Technical

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
		and in the Non-Technical Summary that the AoS relates to the NPS, rather than specific deep boreholes or GDF proposals.	Section 4.4), the Non-Technical Summary and Section 1.1 could make explicit that the AoS will not consider specific proposals. The Non-Technical Summary and Section 1.1 have therefore been revised accordingly.	Summary
NDA7	2	Including a fuller explanation in the AoS Report of the relationship between the Appraisal of Sustainability and the National Policy Statement; and the Appraisal of Sustainability and Habitats Regulations Assessment document. This could build on the description in Figure 1.2. This could also usefully explain the role of the NPS in guiding the examination of future Development Consent Order applications under the Planning Act 2008.	<p>Comment noted. Section 1.4 of the AoS Scoping Report describes the relationship between the AoS process and development of the NPS. Section 1.1, meanwhile, sets out the purposes of the AoS in the context of the NPS. It is not considered that further information is needed in this regard.</p> <p>Section 1.1, Section 1.3 and Section 2.2 of the AoS Scoping Report make clear that the purpose of the NPS will be to guide the Secretary of State, Planning Inspectorate and developer of the site in</p>	Section 1.1, Section 1.3, Section 1.4, Section 1.5, Section 2.2

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
			<p>the consideration of any applications for development consent in relation to GDF-related NSIPs, including deep boreholes. However, further (general) information relating to role of NPSs has been provided in Section 2.1, reflecting this response.</p> <p>Further information regarding the relationship between the AoS and HRA processes has been included in Section 1.5.</p>	
NDA8	2	<p>The AoS Report could provide more contextual information on the relationship between the planning process for Nationally Significant Infrastructure Projects and environmental and nuclear regulatory permitting processes. This could include contextual information on national and international consultation as part of permitting processes, for example, Article 37 submissions to</p>	<p>Agreed. Further information relating to the relationship between the planning process for Nationally Significant Infrastructure Projects and environmental and nuclear regulatory permitting processes has been included in Section 2.2.</p>	Section 2.2

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
		the European Commission.		
NDA9	2	<p>Providing further background information on geological disposal and the role of deep boreholes in site characterisation and selection, in the AoS Report itself would be useful. This could include more information from the Implementing Geological Disposal White Paper explaining the framework for implementing geological disposal. In describing the role of CoRWM in informing the development of Government Policy, the AoS Report could refer explicitly to CoRWM's position with respect to waste from new nuclear power stations and further consideration of this by DECC and CoRWM following CoRWM's 2006 advice on legacy waste.</p>	<p>Agreed. Further information relating to geological disposal and the role of deep boreholes has been provided in Section 2.2.</p> <p>At Section 1.3 and Section 2.3, the AoS Scoping Report currently sets out that the Government's policy is for the long-term management of higher activity waste by way of geological disposal, as set out in the White Paper and to which reference is made. Section 2.4 of this Final Scoping Report includes reference and link to the work of the CoRWM. In this context, it is not considered necessary for the AoS to revisit (or summarise further) the work carried out by CoRWM.</p> <p>No change to the Scoping Report is</p>	<p>Section 1.3, Section 2.2, Section 2.3</p>

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
NDA10	2	<p>The baseline information on radioactive waste within the Scoping Report is based upon the UK Radioactive Waste Inventory and provides information on all categories of radioactive waste, including low level waste. In a number of areas, trends are identified which relate primarily to low level waste that is not intended for geological disposal. We would suggest that the AoS Report focusses specifically on the inventory intended for geological disposal that is set out in the Implementing Geological Disposal White Paper. The wider inventory information that is currently presented could result in readers misunderstanding the scale of a GDF and also the relevance of the baseline information to the appraisal of the NPS.</p>	<p>considered necessary.</p> <p>Comment noted. The NDA (2014) 2013 UK Radioactive Waste and Materials Inventory has been used in the AoS Scoping Report for the purposes of the baseline analysis contained at Appendix B. This is consistent with the White Paper, Implementing Geological Disposal which states at paragraph 2.21: <i>“Based on the 2013 UK RWI and other supporting information, the current estimated volume of all the waste and materials listed at paragraph 2.17 is around 650,000 cubic metres. This volume would fill just over half of Wembley stadium (57%).”</i></p> <p>However, not all of the waste that comprises the 2013 UK Radioactive Waste and Materials Inventory will be</p>	Appendix B (Section 10.5)



Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
			disposed of in a GDF. Section 10.5 has therefore been revised to provide a breakdown of the inventory for disposal based on Geological Disposal: The 2013 Derived Inventory (RWM 2015).	
NDA10	2	In addition to the general comment on baseline information on radioactive waste we would note that the statement relating to inadequate capacity at LLWR is inaccurate, and given its limited relevance to the appraisal of the NPS could be removed.	Agreed. This statement has been removed from Appendix B.	Appendix B (Section 10.4)
NDA12	2	Given the timescales involved in implementing geological disposal, much of the baseline data presented relates primarily to the short term timeframe and does not extend to the proposed medium and long term phases. The challenges in establishing a long term baseline, and the inherent challenges associated with a generic assessment of a long term programme, could be explored more	Comment noted. The difficulty in establishing long term baseline trends is recognised in the AoS Scoping Report. At Section 3.5 it states: " <i>In some instances, data concerning predicted future trends does not cover the expected period of a GDF. Notwithstanding, the appraisal contained</i>	Section 3.5

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		<p>fully in the AoS Report. It is important that the appraisal itself and the methodology and guide questions recognise this uncertainty.</p>	<p><i>in the AoS Report will consider effects over the long term, informed by existing and new information on future trends as well as professional judgement.</i></p> <p>Challenges encountered during the appraisal of the draft NPS will be recorded in the AoS Report and in accordance with the requirements of the SEA Directive.</p> <p>No change to the Scoping Report is considered necessary.</p>	
NDA13	2	<p>As a result of the NPS being non-site specific, it would be beneficial to clearly explain in the AoS Report that the questions presented and upon which the appraisal will have been based, can only be addressed at the national and non-site specific level. Some of the detailed data within Appendix B could unintentionally give the impression that the appraisal will be conducted with a high degree of</p>	<p>Agreed. Section 4.2 of the AoS Scoping Report (concerning the geographic scope of the appraisal) has been revised to include specific reference to the fact that the appraisal will not be site-specific.</p>	<p>Section 1.1, Section 4.2</p>

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
		certainty regarding impacts and benefits.		
NDA14	2	<p>Given that the NPS is not intended to be site specific, the baseline information presented in Appendix B covers the whole of England, Wales and Scotland. While the information is generally comprehensive, given the generic nature of the NPS, in some areas the information may be more detailed than is necessary to inform the appraisal. We would therefore suggest that in undertaking the AoS, further consideration is given to how the baseline information will actually inform the appraisal and that this explanation is then captured in the AoS Report itself. This may also provide an opportunity to simplify the information presented and thus help with the accessibility of the appraisal and facilitate its clear presentation in the AoS Report.</p>	<p>Comment noted but not agreed with. Reflecting the geographic scope of the NPS but also the potential for trans-boundary effects, the baseline information in Appendix B is presented at the UK and national (England, Scotland and Wales) level. The baseline information is considered to be proportionate to the nature and geographic scope of the appraisal and it is unclear from this response which elements are considered to be too detailed.</p> <p>No change.</p>	Appendix B
NDA15	2	The AoS Report could more clearly draw out the relationship between the AoS and the	Agreed. Reference to EIA and HRA at the project level has been provided in	Section 2.2

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
		<p>Environmental Impact Assessment ("EIA") and HRA that will need to be undertaken in relation to any deep boreholes or a GDF at the project level. This should reassure readers that the uncertainties inherent in the AoS for a non-site specific NPS will be resolved in many instances by project specific EIA and HRA.</p>	<p>Section 2.2 of the AoS Scoping Report and as part of wider commentary relating to consenting process. It is also fully expected that reference will be made, where appropriate, to requirements for EIA and HRA as part of the appraisal of the draft NPS.</p>	
NDA16	2	<p>Given that the ambit of the NPS is geological disposal within England, further consideration could be given to the level of information required to describe the Welsh and Scottish environment. While Scotland and Wales border England, it is not obvious that the level of baseline information in the AoS Scoping Report is necessary to assess a generic NPS in England that provides for deep boreholes and a GDF.</p>	<p>Comment noted but not agreed with. As stated in Section 3.1 of the AoS Scoping Report, baseline information and relevant plans and programmes have been considered for England, Wales and Scotland. The geographical scope of the context and baseline has been arrived at through consideration of the fact that, although the NPS specifically concerns GDF (and deep borehole) projects in England only, there is the potential for cross-boundary effects in Scotland and Wales given their common borders with,</p>	Section 3.1

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
			<p>and geographical proximity to, England. Given then potential for cross-boundary effects, it is considered wholly appropriate and necessary to include within the AoS Scoping Report baseline information for Scotland and Wales.</p> <p>No change.</p>	
NDA17	2	<p>Further consideration could be given to the level of baseline information required for the appraisal with respect to Scottish radioactive waste management plans and programmes, given that Scottish Higher Activity Waste policy is for near surface management, and geological disposal is therefore not being pursued in Scotland.</p>	<p>Comment noted but not agreed with. As noted above, the geographical scope of the context and baseline has been arrived at through consideration of the fact that, although the NPS specifically concerns GDF (and deep borehole) projects in England only, there is the potential for cross-boundary effects in Scotland given its common border with, and geographical proximity to, England.</p> <p>Given then potential for transboundary effects, it is considered wholly</p>	<p>Appendix B (Section 10.2, Section 10.3)</p>

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
			<p>appropriate and necessary to include within the AoS Scoping Report baseline information for Scotland.</p> <p>No change to the Scoping Report is considered necessary.</p>	
NDA18	2	The recent Welsh Government Higher Activity Waste Policy and the supporting consultation should be recognised in the AoS Report.	Agreed. Reference to Welsh Government Policy on the Management and Disposal of Higher Activity Radioactive Waste (2015) has been included in Appendix B (Section 10.2 and Section 10.5).	Appendix B (Section 10.2, Section 10.5)
NDA19	3	In a number of areas there is potential to clarify the flow through from relevant policies to the selection of objectives and the expression of the objectives themselves. In particular, further consideration could be given to improving the clarity with which radioactive waste management and radiological protection objectives are reflected in the high level objectives and guide questions. It could also be	<p>Comment noted. Table 3.2 highlights how the key environmental protection and socio-economic objectives from the review of plans and programmes contained in Appendix B have been reflected in the AoS objectives.</p> <p>No change to the Scoping Report is</p>	Table 3.2 (Section 3.2)

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
		clarified how the benefits of geological disposal, as an enabler for the decommissioning and clean-up of nuclear facilities, can be taken account of in the appraisal.	considered necessary.	
NDA20	3	The AoS Report needs to provide context with respect to the expected timescales for implementation of geological disposal. The appraisal itself would be clearer and more straightforward if the timescales used were linked to activities associated with GDF implementation rather than to time periods. Short term could be defined as site selection and characterisation (including deep boreholes), medium term could be defined as GDF construction and operation and long term could be defined as closure and post closure monitoring.	Agreed. Table 4.2 of the AoS Scoping Report defines the timescales for the appraisal where short term includes site identification, boreholes and initial construction of GDFs, medium term includes GDF operation and long term includes closure and monitoring. The reference to short, medium and long term is in compliance with the SEA Directive Annex I (f).  This has been revised to reflect the timeframe outlined in Section 4 'Making it Happen' of the 2014 White Paper, Implementing Geological Disposal.	Table 4.2 (Section 4.2)
NDA21	3	Certain appraisal questions have been phrased in	Comment noted but not agreed with.	Table 4.3

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		<p>terms of whether the NPS would protect and/or enhance a particular attribute, but this approach is not applied consistently throughout. We would recommend re-phrasing the assessment guide questions in Appendix A in a more consistent manner to avoid the possible risk of unfairly prejudicing the scoring.</p>	<p>The guide questions identified in the AoS Scoping Report are intended to guide the appraisal process only and their wording broadly reflects the baseline analysis and review of plans and programmes contained in Appendix B. The phrasing also reflects legislative requirements where appropriate. It is not considered that the wording of the guide questions would lead to unfair scoring.</p> <p>No change to the Scoping Report is considered necessary.</p>	(Section 4.3)
NDA22	3	<p>The relevance of the proposed guidance on significance to a national scale appraisal could be reviewed. In a number of areas, the proposed guidance may be more relevant to site specific development, rather than a national scale appraisal of an NPS and reasonable alternatives.</p>	<p>Comment noted but not agreed with. The illustrative guidance on significance contained in Appendix A is intended to guide the appraisal process only.</p> <p>No change to the Scoping Report is considered necessary.</p>	Appendix A, Appendix B.



Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
NDA23	3	Certain guide questions could also more explicitly address the inherent sustainability benefits of geological disposal and its role as an enabler for the decommissioning and clean-up of nuclear sites.	Comment noted but not agreed with. The illustrative guidance on significance contained in Appendix A is intended to guide the appraisal process only. The AoS will appraise the likely significant effects of the draft NPS rather than the inherent benefits of the GDF itself.  No change to the Scoping Report is considered necessary.	Appendix A, Appendix B.
NDA24	3	The proposed numerical scoring criteria relating to the creation of employment would benefit from being explicit as to whether they relate to total or direct employment, and whether they relate to employment at local, regional or national scales.	Agreed. The illustrative guidance has been revised to refer to direct FTE jobs. The guidance as currently worded refers to benefits at the local community scale and therefore additional clarification is not deemed to be necessary.	Appendix A, Appendix B
NDA25	3	The illustrative guidance for Assessment of Waste and Resource Use appears to use the same description - 'option would ensure the safe	Agreed. The illustrative guidance "Option would ensure the safe handling of hazardous wastes" has been removed	Appendix A, Appendix

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		handling of hazardous wastes' - for both positive (+) and very positive (++) scores. Different descriptors would appear to be appropriate, since they relate to different scores.	against the positive effect threshold in order to differentiate between the scoring.	B
NDA26	3	Within Table 3.2, several of the entries in the column headed Objectives for the Biodiversity and Cultural Heritage and Landscape / Townscape themes read as statements rather than as objectives.	Agreed. Table 3.2 has been amended to include a summary of key objectives identified from the review of plans and programmes for biodiversity and nature conservation.	Table 3.2 (Section 3.2)
<b>Nuclear Legacy Advisory Forum</b>				
NLAF1	1	We are content that all the main issues have been addressed and do not feel that any issue should be removed. Certain issues e.g. around energy and carbon, link across a number of topic areas and it is important that the inter-dependencies and cross-cutting nature of such issues is properly addressed in the appraisal.	Comment noted. No change required.	N/A.
NLAF1	2	Yes.	Comment noted.	N/A.

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			No change required.	
NLAF1	3	Yes.	Comment noted. No change required.	N/A.
<b>Public Health England</b>				
PHE1	1	In terms of human health, given the long timescales of the potential radiological impact of waste (possibly in excess of 10,000 years), explicit consideration of the post operational phase of the facility and the impact on future population should be made. For example, Table NTS 1 states that “Consideration will need to be given to the potential effects on public and worker health and safety arising from the construction and operation of the GDF” but no mention is made of the possible effects on the public once institutional control has ceased.	Comment noted. Table 4.2 sets out the timescales for the AoS of the draft NPS. This clarifies that the AoS will consider the long term effects of the draft NPS which is defined as being 120 years and beyond and as including closure and monitoring.  No change to the Scoping Report is considered necessary.	Table 4.2 (Section 4.2)
PHE2	3	Additionally, the proposed guide question in Table 4.3 states “Will the Geological Disposal NPS	Agreed. The following additional guide question has been included in Table 4.3:	Table 4.3 (Section

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
		protect and/or enhance the health, safety and well-being of local communities and specific groups within those communities?" It is important that the health of the wider community is also considered.	<i>"Will the Geological Disposal NPS protect and/or enhance the health, safety and well-being of wider communities (i.e. those communities that are not host to a GDF or deep boreholes)?"</i>	4.3), Appendix A, Appendix B, Non-Technical Summary
<b>Scottish Environment Protection Agency</b>				
SEPA1	General	We note that the policy statement relates solely to England and as such our interest in the Appraisal of Sustainability is limited to ensuring adequate consideration of any significant effects of a cross-border nature which may be identified during the appraisal. We have reviewed the documents submitted and are generally content that the scope and level of detail proposed in the scoping report for the assessment will adequately address these issues.	Comment noted. No change required.	N/A

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
SEPA2	1	We are content with the proposed scope of the appraisal.	Comment noted. No change required.	N/A
SEPA3	1	We are generally content with the issues set out in the Appraisal of Sustainability Scoping Report but would highlight the following:  The links between traffic and transport, air quality, and human health could be more consistently made i.e. Topic 7 Air Quality (p.66) makes the link between air quality, health and transport, but this is not continued through into Topic 3 or 11. For example Topic 3 Human Health (p.62) identifies respiratory illness as an issue resulting from air pollution, but does not make the link with traffic / transport systems. Similarly, Topic 11 Traffic and Transport (p.66-67) makes no link to health or air quality.	Comment noted. It is agreed that there are linkages between the topics to be considered as part of the AoS of the draft NPS and Appendix B has sought to identify these where appropriate, although this is not intended to be exhaustive.  Whilst the baseline information and AoS objectives are presented by topic, the appraisal of the draft NPS will consider linkages between the topics as appropriate (for example, the potential impacts of vehicle movements on human health). This has been noted in Section 4.2 of the Final Scoping Report.	Appendix B, Section 4.2
SEPA4	1	Given the need to transport waste to the GDFs it	Comment noted. The AoS of the draft	N/A

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
		<p>would be beneficial for these links to be consistently drawn out in the assessment. To give an example, the assessment may consider whether transport requirements will result in potential congestion of the network and / or increased use of certain routes which could result in effects on air quality and subsequently the health (physical and mental) of the communities through which these routes pass.</p>	<p>NPS will identify the linkages between, for example, vehicle movements, emissions to air and health impacts. No change to the Scoping Report is considered necessary.</p>	
SEPA5	2	<p>The Scottish context set out on pages 65-66 would also benefit from consideration of the environmental determinants of health. The following references will help to provide additional background information in this respect:</p> <ul style="list-style-type: none"> <li>Public Health etc. (Scotland) Act 2008 - legislation for public health enabling Scottish Ministers, health boards and local authorities to better protect public health in Scotland. Defines “protecting public health”</li> </ul>	<p>Comment noted. The Public Health etc. (Scotland) Act 2008 and guidance has been included in Appendix B. The SIMD and ScotPHO Online Profiles Tool are not considered to be plans and programmes in the context of the SEA Directive and have therefore not been included in Appendix B. Further, the information provided by these sources is unlikely to be appropriate in the context</p>	Appendix B (Section 3.2)

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
		<p>to mean protecting the community or any part of it from (i) infectious diseases, (ii) contamination, or (iii) other such hazards which constitute a danger to human health.</p> <ul style="list-style-type: none"> <li>• Guidance to accompany the Statutory Nuisance Provisions of the Public Health etc. (Scotland) Act 2008 – to be read in conjunction with the Environmental Protection Act 1990 and Part 9 of the Public Health etc. (Scotland) Act 2008.</li> <li>• The Scottish Index of Multiple Deprivation (SIMD) incorporates several different aspects of deprivation and combines them into a single index in order to provide a relative ranking for 6,505 data zones which cover the whole of Scotland. The SIMD can be used as a means to identify “vulnerable populations” within the plan area.</li> <li>• ScotPHO Online Profiles Tool – contains</li> </ul>	<p>of a national level assessment.</p>	

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
		profiles for all Scottish local authority areas using a range of measures including a health and wellbeing profile which highlights the variation in health between areas and helps identify priorities for health improvement.		
SEPA6	2	The effects noted in bullet point four under the title Land Use and Soils (page 90) also apply to Scottish soils.	Comment noted. Reference to Scotland (and Wales) has been included as per this response.	Appendix B (Section 4.4)
SEPA7	2	Page 114 refers only to the Scotland River Basin District; it should be noted that there are two River Basin Districts in Scotland - the other being the Solway Tweed River Basin District (which is referred to on page 119). The latter will be of particular relevance for cross-border considerations in the assessment. The second plans for both districts will be published in December 2015. For further information see:	Comment noted. Reference has been made to the Solway Tweed River Basin District in Appendix B as per this response.	Appendix B (Section 5.2)



Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
		<a href="http://www.sepa.org.uk/environment/water/river-basin-management-planning/">www.sepa.org.uk/environment/water/river-basin-management-planning/</a> .		
SEPA8	2	The Water Environment (Controlled Activities) (Scotland) Regulations 2011 and amendments (see <a href="http://www.sepa.org.uk/regulations/water/">www.sepa.org.uk/regulations/water/</a> for details) are the current regulations which should be referred to in Table 5.3.	Comment noted. The Water Environment (Controlled Activities) (Scotland) Regulations 2011 and amendments have been referred to in Table 5.3.	Table 5.3 (Appendix B), Appendix A
SEPA9	2	We would highlight the forthcoming Flood Risk Management Strategies for Scotland as a potentially useful source of contextual information. The public consultation on these strategies has recently been completed with the final documents due to be published in December 2015. Further information is available from our website: <a href="http://www.sepa.org.uk/environment/water/flooding/flood-risk-management/">www.sepa.org.uk/environment/water/flooding/flood-risk-management/</a> .	Comment noted. Reference to the Flood Risk Management Strategies for Scotland has been included in Appendix B.	Appendix B (Section 6.2)
SEPA10	2	With regard to Safeguarding Scotland's Resources (bottom of page 191) the consultation paper Making Things Last (Circular Economy) is currently	Comment noted. Reference to Making Things Last (Circular Economy) has	Appendix B (Section

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		out for consultation until 30 October 2015 – <a href="https://consult.scotland.gov.uk/zero-waste-delivery/making-things-last">https://consult.scotland.gov.uk/zero-waste-delivery/making-things-last</a>	been included in Appendix B.	10.2)
SEPA11	2	For information, PAN 63 (referred to at the bottom of page 193) has been replaced by the Scottish Government’s on-line Planning and Waste Management Advice (July 2015) which is available from: <a href="http://www.gov.scot/Resource/0048/00481407.pdf">http://www.gov.scot/Resource/0048/00481407.pdf</a> .	Comment noted. Reference to PAN 63 has been deleted and replaced by reference to Scottish Government’s on-line Planning and Waste Management Advice (July 2015).	Appendix B (Section 10.2)
SEPA12	3	We are generally content with the proposed objectives; we suggest some minor additions to the proposed guide questions below: Human health (page 76) It would be useful to include an additional question in relation to already vulnerable communities e.g. Will the Geological Disposal NPS disproportionately affect communities already identified as vulnerable / at risk – including those who are already exposed to high natural	Agreed. The following guide question has been included under AoS Objective 3: <i>“Will the Geological Disposal NPS disproportionately affect communities already identified as vulnerable / at risk?”</i>	Table 4.3 (Section 4.3), Appendix A, Appendix B, Non-Technical Summary

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
		background levels of radiation?		
SEPA13	3	<p>Air (page 77)</p> <p>Suggest adding reference to light as a potential source of nuisance.</p>	<p>Comment noted. It is not considered appropriate for reference to light to be included under AoS Objective 7 (which relates to air quality). However, the following additional guide question has been included under AoS Objective 13 (Landscape and Townscape):</p> <p><i>“Will the Geological Disposal NPS help to minimise light pollution from construction and operational activities on residential amenity and on sensitive locations and receptors?”</i></p>	<p>Table 4.3 (Section 4.3), Appendix A, Appendix B, Non-Technical Summary</p>
SEPA14	3	<p>Noise (page 78)</p> <p>These questions could be expanded to include specific reference to transport related noise / vibration of construction and / or operational activities.</p>	<p>Comment noted. It is considered that the existing guide question “Will the Geological Disposal NPS help to minimise noise and vibration effects from construction and operational activities on residential amenity and effects on</p>	<p>Table 4.3 (Section 4.3), Appendix A, Appendix</p>

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
			<p>sensitive locations and receptors?" will enable noise/vibration from construction and operational activities as well as vehicle movements to be considered as part of the AoS of the draft NPS.</p> <p>No change to the Scoping Report is considered necessary.</p>	B, Non-Technical Summary
<b>Scottish Natural Heritage</b>				
SNH1	General	Agrees that there is potential for significant effects on Scotland's natural heritage interests and welcomes that this has been scoped this into the assessment.	<p>Comment noted.</p> <p>No change required.</p>	N/A
SNH2	General	We are content with the scope and level of detail proposed for the environmental report.	<p>Comment noted.</p> <p>No change required.</p>	N/A
SNH1	3	In terms of recording scores in the proposed appraisal matrix, Table 4.4, it is noted that where scores are both positive and negative, that this is recorded as no overall effect. It does not	Agreed. The wording of Table 4.4 is unclear and has been revised. Where both positive and negatives effects are identified during the appraisal of the draft	Table 4.4 (Section 4.4)

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
		necessarily follow that a positive effect will always cancel out a negative effect and it would be useful if there was some narrative in the Commentary column to clarify the nature of the impacts. This will also be the case in the Cumulative Assessment Matrix.	NPS, this will be indicated through the award of two scores (i.e. mixed positive and negative effects). Neutral effects will only be identified where no effects are anticipated.	
<b>EDF Energy</b>				
EDF1	1	EDF Energy believes that the topic areas listed in Section 4.2, "Proposed Scope of the Appraisal" are appropriate. We would expect that the Appraisal of Sustainability will be carried out alongside the Habitats Regulations Assessment of the National Policy Statement, and will share information fully to expedite the delivery of a high quality National Policy Statement.	Comment noted. The Habitats Regulations Assessment will be undertaken alongside the AoS and the findings used to inform the appraisal, particularly in respect of effects of the draft NPS on biodiversity. No change.	N/A.
EDF2	2	EDF Energy believes that the AoS Scoping Report is thorough and has set out sufficient information to establish the context for the appraisal.	Comment noted. No change required.	N/A.

Ref	Consultation Question	Consultation Response	Commentary / Action Taken	Relevant Location in Final Scoping Report
EDF3	3	EDF Energy agrees that the AoS objectives are suitably broad and we believe that the guide questions are relevant. We have no further guide questions or objectives to add.	Comment noted. No change required.	N/A.
<b>United Utilities</b>				
UU1	General	UU have no comment to make at this stage, but wish to be included in further consultations.	Comment noted. No change required.	N/A.