

Site Evaluation

Consultation Response



Radioactive Waste
Management

Working together to protect the future

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Preface

Radioactive Waste Management Limited (RWM) has been established as a wholly owned subsidiary to deliver geological disposal for higher activity radioactive waste and provide radioactive waste management solutions. As a pioneer of nuclear technology, the UK has accumulated a legacy of higher activity wastes and material from electricity generation, defence activities and other industrial, medical and research activities. This is being stored on an interim basis at nuclear sites across the UK. More will arise in the future from the continued operation and decommissioning of existing facilities and the operation and subsequent decommissioning of future nuclear power stations.

Geological disposal is the policy of both the UK Government and the Welsh Government for the long term management of higher activity radioactive wastes.

The principle of geological disposal is to isolate these wastes deep underground inside a suitable rock formation, to ensure that no harmful quantities of radioactivity will reach the surface environment. To achieve this, the wastes will be placed in an engineered underground facility – a geological disposal facility (GDF). The facility design will be based on a multi-barrier concept where natural and man-made barriers work together to isolate and contain the radioactive wastes.

To identify potentially suitable sites where a GDF could be located, the Government has developed a consent-based approach, based on working in partnership with communities. The siting process is on-going and no site has yet been identified for the GDF.

Executive Summary

In December 2018, the UK Government published its updated policy framework on geological disposal. The Welsh Government published its equivalent policy framework in January 2019.

The policy frameworks in both England and Wales describe RWM's role as the delivery organisation for geological disposal. RWM will be responsible for the siting, construction, operation and eventual closure of a GDF. Both policy frameworks establish a consent based approach and put communities at the heart of the siting process.

To ensure a consistent and transparent approach to evaluating areas and sites for their suitability to host a GDF, we have developed two Site Evaluation documents – one for England and one for Wales.

The Site Evaluation documents explain how we will engage with communities on matters that will arise during the siting process, and subsequently how we will structure the evaluations that are carried out. The Site Evaluation documents have been designed to summarise, in simple and understandable terms, what we will need to consider during the siting process to ensure we satisfy all relevant requirements. The Site Evaluation documents will also enable us to gather the necessary information to make applications for the consents that will be needed to investigate an area and subsequently, construct and operate a GDF.

The Site Evaluation documents identify six broad 'Siting Factors' that reflect what we believe are likely to be the key issues for discussion with communities participating in the siting process.

Each of the 'Siting Factors' have then been broken down into a series of 'Evaluation Considerations' to provide greater clarity in respect of the matters that we will be taking into account and which will frame our discussions with communities and the UK's independent nuclear and environmental regulators.

We produced two draft Site Evaluation documents that were published for consultation, and on which respondents' views were sought. In England, the consultation ran from 19 December 2018 until 31 March 2019; in Wales, the consultation ran from 16 January 2019 until 14 April 2019.

The consultation documents were made available on both the GOV.UK and RWM websites and a wide range of stakeholder groups and organisations were made aware of the consultation via mailing lists, e-bulletin lists and regional media. We also organised and delivered a programme of regional events and webinars early on in the consultation processes. These were hosted at various locations, to assist potential contributors in understanding the consultation documents and helping the production of consultation responses. These events were attended by approximately 200 participants.

The consultation documents posed 4 questions:-

- Question 1: “Are there any other sources of high level requirements, other than those identified, that you think should be reflected in the Site Evaluation and why?”
- Question 2: “Do you agree with the Siting Factors we have identified? Are there any other Siting Factors that should be included and why?”
- Question 3: “Do you agree with the Evaluation Considerations we have identified? Are there any other Evaluation Considerations that should be included and why?”
- Question 4: “Is there anything else that you think we should consider in our site evaluations and why?”

We received a total of 90 responses across the two consultations. From the response we noted around 800 individual comments or points that had been raised by respondents. These were in turn analysed to identify any common themes and then grouped together to inform a series of ‘Key Messages’ that we took from the responses.

Executive Summary

The 8 Key Messages we identified are as follows:

1. There could be more clarity on how the Requirements have informed the Site Evaluation documents, including those relating to the National Policy Statement and National Parks;
2. Matters relating to safety could be clarified and better explained and consideration given to security being given more prominence;
3. The importance of community could be highlighted and the Evaluation Considerations expanded;
4. The importance of geology to many of the Evaluation Considerations could be explained more clearly and be more prominent;
5. Specific matters were raised in relation to the Environment, Engineering Feasibility, Transport and Costs Siting Factors;
6. The purpose and scope of the Site Evaluation documents could be clearer;
7. The language and content of the Site Evaluation documentation is very technical in places and would benefit from additional clarity and explanation; and
8. Greater clarity on our approach to evaluations, in particular, comparative assessments, would be beneficial.

We have set out the 8 Key Messages against each of the original questions asked in the consultation document. For each Key Message we have produced a summary of the comments we received, our response to those comments, and how those comments have been used to inform amendments and changes to the final Site Evaluation documents.

Transparency and openness are essential in building confidence in all that we do and we are committed to engaging closely and constructively with the public and stakeholders. We welcome all of the comments received during the consultation processes, and thank all respondents for taking the time to provide us with valuable feedback.

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1. Consultation on the Site Evaluation Documents

Introduction

As a pioneer of nuclear technology, the UK has accumulated a legacy of higher activity radioactive waste and material. This is being stored on an interim basis at nuclear sites across the UK. More will be produced as existing facilities reach the end of their lifetime, are decommissioned and cleaned up, and through the operation and decommissioning of new nuclear power stations.

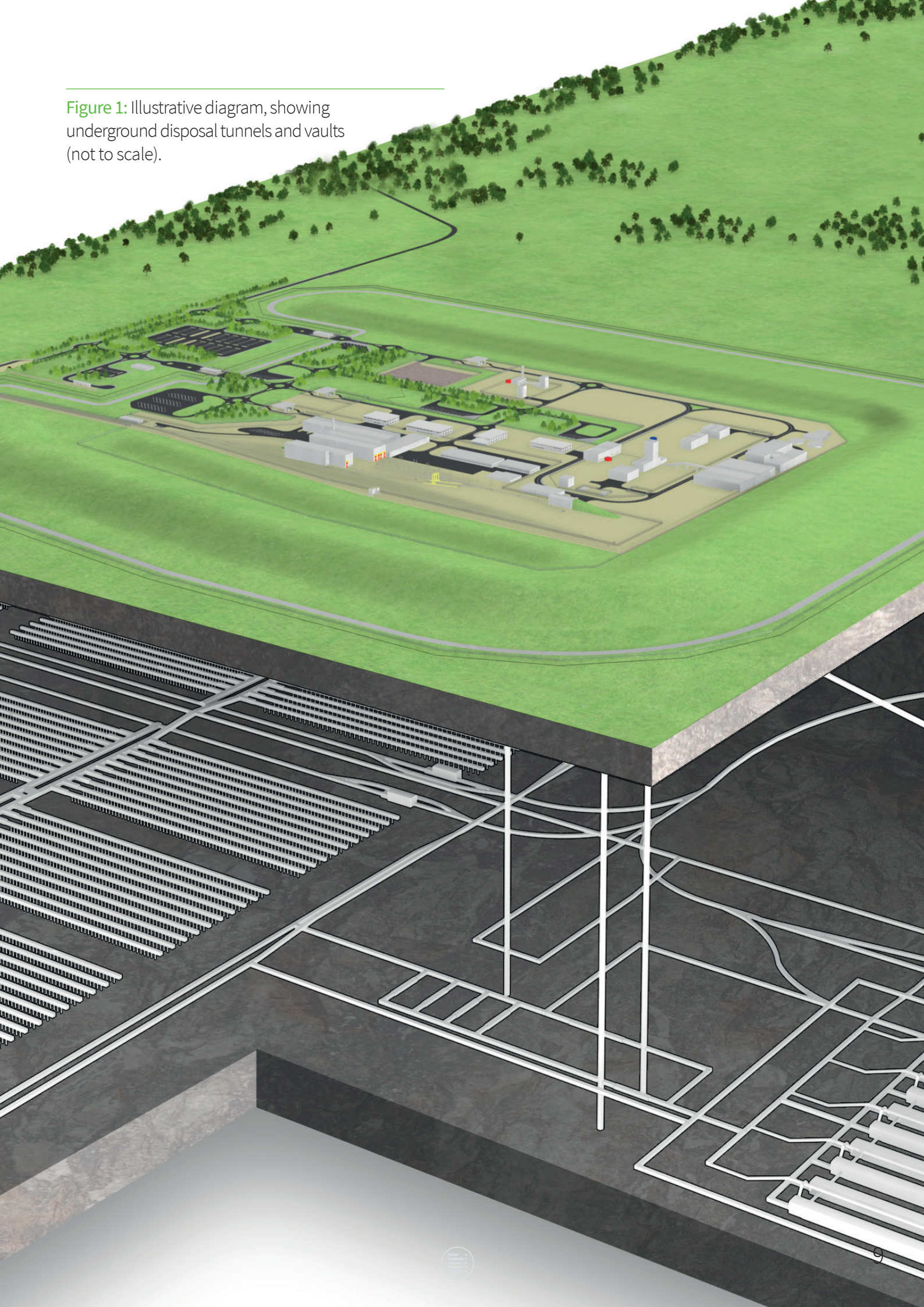
The policy of the UK Government and Welsh Government is that such higher activity radioactive waste should be managed in the long-term through geological disposal. Geological disposal involves isolating radioactive waste deep within suitable rock to ensure that no harmful quantities of radioactivity reach the surface environment.

In addition to existing wastes, there are some radioactive materials that are not currently classified as waste, but would, if it were decided at some point that they had no further use, need to be managed as wastes through geological disposal. These include spent fuel (including spent fuel from new nuclear power stations), plutonium and uranium.

Radioactive Waste Management Ltd (RWM) is a wholly-owned subsidiary of the Nuclear Decommissioning Authority (NDA), and is the body responsible for implementing geological disposal of higher activity radioactive wastes.

RWM will be responsible for ensuring that the siting, construction, operation and eventual closure of a GDF are carried out in a manner which adheres to, and complies with, the UK's high standards of safety, security and environmental protection, as well as applicable requirements which are set out in relevant policy documentation.

Figure 1: Illustrative diagram, showing underground disposal tunnels and vaults (not to scale).



1. Consultation on the Site Evaluation Documents

Our Site Evaluation documents

In December 2018, the UK Government published its updated policy framework on geological disposal, setting out a process for working in partnership with communities. The Welsh Government published its equivalent policy on working with communities in January 2019. We refer to these policy documents together as ‘Government policy’.

Government policy establishes a consent-based approach for RWM to engage and work in partnership with communities and local authorities for the purposes of identifying a suitable location for the development and operation of a GDF.

Two draft Site Evaluation documents were developed for public consultation, one for England¹ and one for Wales². These were subject to consultation to provide an opportunity for stakeholders to provide input into our proposed approach to the assessment and evaluation of potential areas and sites which may be identified through the siting process.

RWM will need to satisfy and adhere to numerous legislative, regulatory and policy requirements to successfully investigate potential areas and sites, construct, operate and close a GDF as well as requirements that are relevant to the period after a GDF is closed. These are referred to as the ‘Requirements’³. The consultation documents set out to explain how we had used these underlying Requirements to inform the development of a series of ‘Siting Factors’ and ‘Evaluation Considerations’.

These documents were prepared alongside our ‘Community Guidance’⁴ which sets out how we will work with Communities. The Community Guidance and Site Evaluation documents together describe our approach to finding a willing community and suitable site.

As the policy framework and regulatory regimes in England and Wales differ slightly, we developed and consulted upon separate draft Site Evaluation documents for England and Wales. However, the core content of these consultation documents, particularly the Siting Factors and Evaluation Considerations and many of the Requirements, were common in both documents. Hence this consultation response document covers the consultations carried out in both England and Wales.

¹ *Site Evaluation – How we will evaluate sites in England – A Public Consultation.*

² *Site Evaluation – How we will evaluate sites in Wales – A Public Consultation.*

³ *The term Requirements was defined in the Consultation documents and is defined in the final Site Evaluation Documents. For the purposes of this Consultation response document the term ‘Requirements’ is that which is defined in the final Site Evaluation Documents.*

⁴ *Community Guidance – How we will work with communities in England and Community Guidance – How we will work with communities in Wales.*

1. Consultation on the Site Evaluation Documents

The Siting Factors and Evaluation Considerations we consulted upon reflect existing requirements from a range of sources, including:

- Legislation and guidance;
- The National Policy Statement for Geological Disposal Infrastructure (NPS), which will be relevant in the context of developing certain geological disposal infrastructure in England; and
- The Department for Business, Energy and Industrial Strategy (BEIS) and Welsh Government (WG) policy documents⁵ on Working with Communities (WWC) to implement geological disposal (referred to and defined as Government policy above).

Our proposed use of Siting Factors and Evaluation Considerations, and the approach set out in our draft Site Evaluation documents, is designed to enable:

- a consistent and transparent approach to the assessment of potential areas and sites;
- an appropriate level of evaluation of each potential area against existing, relevant, Requirements; and
- support to RWM's future applications for permissions, including land use planning consents, environmental permits and a nuclear site licence.

⁵ *Implementing Geological Disposal – Working with Communities, An updated framework for the long-term management of higher activity radioactive waste, HM Department for Business, Energy and Industrial Strategy, and Geological Disposal of Higher Activity Radioactive Waste: Working with Communities, Welsh Government.*

1. Consultation on the Site Evaluation Documents

Our Public Consultations

Transparency and openness are essential in building confidence in what we do. We are committed to engaging closely and constructively with stakeholders throughout the siting process. Hence we voluntarily published our proposed Site Evaluation documents and subjected them to consultation for a period of 12 weeks.

The consultation process

In England, the consultation on our draft document: Site Evaluation – How we will evaluate sites in England ran from the 19th December 2018 to the 31st March 2019 (the 12 week period was extended to 14 weeks due to the consultation running over the holiday period).

In Wales, the consultation on our draft document: Site Evaluation – How we will evaluate sites in Wales commenced on the 16th January 2019 and closed on the 14th April 2019.

We directly contacted a wide range of stakeholder groups at the start of the consultation period to alert them and their members to the consultation. RWM also used its mailing lists, e-bulletin and lists of stakeholder organisations together with regional media to make people aware of the consultations.

The consultation documents were made available on the GOV.UK website as well as on RWM's website together with a response form that could be downloaded and completed. This approach gave participants the option of e-mailing their response or providing comments via post should they wish to do so.

The consultation documents posed 4 questions:-

- **Question 1:** “Are there any other sources of high level requirements, other than those identified, that you think should be reflected in the Site Evaluation and why?”⁶
- **Question 2:** “Do you agree with the Siting Factors we have identified? Are there any other Siting Factors that should be included and why?”
- **Question 3:** “Do you agree with the Evaluation Considerations we have identified? Are there any other Evaluation Considerations that should be included and why?”
- **Question 4:** “Is there anything else that you think we should consider in our site evaluations and why?”

⁶ Question 1 in the consultation documents differed slightly between the Wales and England consultation documents due to the NPS so an abridged version has been used here. In England the question posed was; “Are there any other sources of high level Requirements, other than siting process, National Policy Statement and Legal Requirements identified, that you think should be reflected in the Site Evaluation and why?” In Wales the question posed was: “Are there any other sources of high level Requirements, other than the siting process Requirements and the Legal Requirements identified, that you think should be reflected in the Site Evaluation and why?”

1. Consultation on the Site Evaluation Documents

The enabling events

A programme of regional events was organised, at various locations across England and Wales. The events were hosted early in the consultation process in order to give participants sufficient time to respond to the consultation after the events had taken place.

The events in England ran from 7th February to 7th March, and the events in Wales took place on the 12th and 14th March.

The locations for the events were chosen to give a wide geographical coverage with ease of access by public transport and suitable venues to host the events. In order to reach as many stakeholders as possible, the schedule of events included lunchtime and evening events in six locations - Cambridge, Birmingham, Penrith, Cheltenham, Exeter and Darlington. Events were arranged in London and Manchester that were delivered as more in depth 'technical' events. In Wales, lunchtime and evening events were planned for Swansea and Llandudno.

The format of all the events in England was the same with the RWM team providing a brief introductory presentation on the background and purpose of the documents, before breaking out into groups with the participants being requested to pose questions or raise points of clarification. The RWM team responded to the questions and points of clarification raised by participants.

After listening to a range of stakeholders, a decision was made to hold webinars for North and South Wales instead of events. The webinars were an interactive experience. Participants were encouraged to submit questions both before and during the events so that they could be addressed during the webinar session. The webinars were then made available via the RWM website as an additional resource for those who wished to have access.

It was made clear to participants at all events that the points discussed and questions posed in the enabling events were not being recorded as part of the consultation itself and participants were encouraged to include their views in their formal response to the consultation.

2. Our Response to the Consultations

The Responses we received

We received a total of 90 responses across the two consultations. The full set of responses we received, and which we have permission to make available, can be made available upon request.

Responses were received from a variety of stakeholders, including academics, local authorities, parish councils, environmental regulators, non-governmental organisations and interested individuals.

Over 70% of respondents submitted comments in relation to consultation questions 1, 2 and 3, and over 90% of respondents provided comments on question 4. We also received several responses which did not strictly fall within the scope of the four consultation questions, but which nonetheless raised issues of interest and importance to the wider geological disposal programme. Many of the responses that we received made comments related to more than one of the consultation questions that we posed. Other respondents repeated the same point against each of the questions posed.

Having analysed the 90 separate contributions, we noted around 800 individual comments or points that had been raised by respondents. Our analysis allowed us to identify any common themes and a list of what we deemed to be the 'Key Messages' raised during the consultation processes in both England and Wales. We took from the responses 8 Key Messages.

Figure 2: Where the 8 Key Messages came from



2. Our Response to the Consultations

The 8 Key Messages we identified are as follows:

1. There could be more clarity on how the Requirements have informed the Site Evaluation documents, including those relating to the National Policy Statement and National Parks;
2. Matters relating to safety could be clarified and better explained and consideration given to security being given more prominence;
3. The importance of community could be highlighted and the Evaluation Considerations expanded;
4. The importance of geology to many of the Evaluation Considerations could be explained more clearly and be more prominent;
5. Specific matters were raised in relation to the Environment, Engineering Feasibility, Transport and Costs Siting Factors;
6. The purpose and scope of the Site Evaluation documents could be clearer;
7. The language and content of the Site Evaluation documentation is very technical in places and would benefit from additional clarity and explanation; and
8. Greater clarity on our approach to evaluations, in particular, comparative assessments, would be beneficial.

2. Our Response to the Consultations

How we have responded

The key messages can be mapped to the consultation questions as follows.

Consultation Question 1:

“Are there any other sources of high level requirements, other than those identified, that you think should be reflected in the Site Evaluation and why?”

No other specific sources of high level requirements were identified by respondents via the consultation responses. However the responses indicated that there could be more clarity in respect of which Requirements we have relied upon and how these have informed the Site Evaluation documents. This is discussed in Key Message 1: *There could be more clarity on how the Requirements have informed the Site Evaluation documents, including those relating to the National Policy Statement and National Parks.*

Consultation Question 2:

“Do you agree with the Siting Factors we have identified? Are there any other Siting Factors that should be included and why?”

Respondents provided a range of views on the Siting Factors that we proposed.

One of the Key Messages that we took from the responses to this consultation question was Key Message 2: *Matters relating to safety could be clarified and better explained and consideration given to security being given more prominence.*

A further Key Message that we took was Key Message 3: *The importance of community could be highlighted and the Evaluation Considerations expanded.*

As a consequence of this consultation we have changed the ‘Safety’ Siting Factor to ‘Safety and Security’ and we have also provided more explanation by adding a number of new Evaluation Considerations to the Community Siting Factor.

2. Our Response to the Consultations

Consultation Question 3:

“Do you agree with the Evaluation Considerations we have identified? Are there any other Evaluation Considerations that should be included and why?”

Respondents provided a range of views on the Evaluation Considerations that we proposed. Many of these views expressed overlapped with the responses provided to the second question about Siting Factors.

One of Key Message we took from the third consultation question was Key Message 4: *The importance of geology to many of the Evaluation Considerations could be explained more clearly and be more prominent.* We have explained the key role that geology has into many of the Siting Factors and Evaluation Considerations in both this response document and our final Site Evaluation documents.

There were also a range of other matters relating to specific Siting Factors and Evaluation Considerations that are discussed in Key Message 5: *Specific matters relating to the Environment, Engineering Feasibility, Transport and Cost Siting Factors.*

As a result of this consultation we have changed the ‘Cost’ Siting Factor to ‘Value for Money’. We have also re-worded some of the Evaluation Considerations that relate to the Safety and Engineering Siting Factors.

2. Our Response to the Consultations

Consultation Question 4:

“Is there anything else that you think we should consider in our site evaluations and why?”

The responses to this consultation question were wide ranging in their coverage and included a number of helpful suggestions that we have acted upon. We took a number of Key Messages from the responses to this question, namely:

Key Message 6 The purpose and scope of the Site Evaluation documents could be clearer;

Key Message 7: The language and content of the Site Evaluation documentation is very technical in places and would benefit from additional clarity and explanation; and

Key Message 8: Greater clarity on our approach to evaluations, in particular comparative assessments, would be beneficial.

These have resulted in a number of changes within our Site Evaluation documents. We have provided greater content on the purpose and scope of the documents. We have taken steps to provide clarity and sought to avoid technical language where possible. We have included additional cross referencing to existing contextual information about geological disposal that is available in other RWM publications.

The Evaluation Consideration tables now rely less on links to the RWM Disposal system specification, and we have added an annex that includes examples of typical matters that will be considered under each of the Evaluation Considerations. The section on comparative assessment has been expanded to include more about the overall approach to our evaluations and is now called comparative evaluation.

This document

This document summarises the comments we received as part of both consultations and sets out our response to those comments. We have also explained how the comments received have been used to inform our final approach in our Site Evaluation documents and highlight where we have introduced changes to our Site Evaluation documents in response to the consultation feedback.

Under each of the Key Messages, we have used the following sub-headings to summarise the comments raised, and how we have responded:

What you said
Our response
Actions

2. Our Response to the Consultations

Getting in touch

If any respondent to either of our consultations would like to enter into more detailed discussions then we would strongly encourage them to engage with us so that we can seek to answer any further questions.

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A number of respondents submitted comments that, whilst relevant to the geological disposal programme, were outside the scope of our consultation on how we will evaluate sites. For example some respondents expressed an opposition to all aspects of the nuclear industry; others queried why nuclear policy is a devolved matter.

We also received comments and questions about the Working with Communities policies that have been published by Welsh Government (WG) and the Department for Business, Energy and Industrial Strategy (BEIS) as well as comments relating to the Government needing to actively pursue alternatives to geological disposal. Government policy identifies us as the delivery organisation to deliver a GDF. We are; an arm's length body separate from BEIS and WG, who are responsible for developing the policy framework within which we must operate. As such, it is not appropriate for us to respond on matters of policy and these comments are not included in this consultation response document.

Our Site Evaluation documents are focused on the evaluation of potential areas and sites, which is just one strand of our work. Therefore, as explained in the consultation documents, our final Site Evaluation documents should be read in conjunction with our Community Guidance documents which explains how we will work with communities.

We received a number of comments requesting further information on the background and context for geological disposal. In order to keep the Site Evaluation documents focused on the issue of evaluating sites we will, where appropriate, make reference to other information available. There is a significant body of additional information and resources available from RWM through various sources such as publication, research reports and our website www.geologicaldisposal.campaign.gov.uk. The website also includes links to other useful sources of information such as the Government Policy and guidance published by the independent regulators.



3. Question 1:

Are there any other sources of high level Requirements, other than those identified, that you think should be reflected in the Site Evaluation and why?

Around 74% of respondents provided comments on this question.

Key Message 1 – There could be more clarity on how the Requirements have informed the Site Evaluation documents, including those relating to the National Policy Statement and National Parks

What you said

Several responses made reference to the draft National Policy Statement for Geological Disposal Infrastructure (NPS)⁷, particularly in the context of consultation question 1. Some respondents provided comments on possible additional requirements, in particular whether policy documentation relating to National Parks and other areas which benefit from enhanced environmental status or protections should be more clearly reflected in the Site Evaluation documents.

Largely in the context of consultation question 1, several respondents noted that the Site Evaluation documents could more clearly reflect the importance of other Requirements. Specific reference was made to the need to include reference to European Directives, a number of additional domestic Acts (such as the Health and Social Care Act) and regulations, as well as planning policies and national and international designations. In response to the Wales consultation, specific reference was made to the Well-being of Future Generations (Wales) Act.

There was also suggestion by some respondents that community and governance be included as a requirement. It was suggested that this should not be prescriptive as to how such matters are addressed, since it would be up to those involved to agree them, but instead to begin with a statement of values which could subsequently be developed by communities.

Some respondents went further and instead suggested specific locations that they considered would (or would not) be suitable to locate a GDF. In some instances this was due to specific reasons, such as geological or historical matters. There was also a view expressed that RWM should not 'target' previously considered areas and should instead focus elsewhere, with offshore solutions proposed as potentially more acceptable areas.

⁷ At the time the consultations on the draft Site Evaluation document relating to England took place the NPS was still in draft form, having been consulted upon but not yet finalised or designated.

Our response

Changes in policy and legislation, including the NPS, will be carefully managed through our Requirements Management System. If there are significant changes to underlying policy and legislation we will discuss any proposed changes to the documents with communities engaged in the siting process.

The consent-based siting process set out in Government policy is unique in the context of UK major infrastructure projects in the sense that the local community must support the development of a GDF before it can proceed in any given geographical location. For this reason, any development could only take place in an area if the relevant community supports such an approach, and only if we secure the necessary consents, permits and licences. Consideration of protected areas, such as National Parks and Areas of Outstanding Natural Beauty, would be matters discussed with local communities and would form an integral part of any land use planning application. For this reason, it remains our view that the Site Evaluation documents adequately cover consideration of protected areas.

Local planning policies will, of course, be significant considerations when discussing potential options with local communities. The Siting Factors are generic and do not contain reference to documents or issues which are relevant to any specific geographical location. Local issues will be matters to discuss with communities who decide to enter the siting process.

We recognise that there are a wide range of requirements that we will need to satisfy to investigate, construct, operate and close a GDF as well as Requirements that are relevant to the period after a GDF is closed (or post closure period). The Site Evaluation documents are not intended to identify every single requirement that may need to be satisfied.

3. Question 1

Actions

In response to Key Message 1, in the updated Site Evaluation documents we have:

1.1 Updated the Site Evaluation documents to include a new sub-section within the “Responding to Requirements” section called “land-use planning”. For England, this will cover matters within the NPS and local land-use planning requirements and how they will be taken into account. In the updated Site Evaluation document for Wales, we have included reference to the appropriate land-use planning regulatory framework; and

1.2 Included further clarifications which explain how the Siting Factors and Evaluation Considerations have the breadth and flexibility to accommodate future changes to the underlying Requirements.

4. Question 2:

Do you agree with the Siting Factors we have identified?
Are there any other Siting Factors that should be included and why?

Around 73% of respondents provided comments on this question.

Key Message 2 – Matters relating to safety could be clarified and better explained and consideration given to security being given more prominence

What you said

Many of the responses related broadly to the safety cases that RWM will need to prepare and submit as part of its application for a nuclear site licence including the public perception of safety.

The issue of environmental and other hazards was also raised by several respondents who suggested that more visibility was needed of consideration given to sea level changes, acidification, weather extremes and other impacts of global warming and unexpected events, both natural and manmade.

Several respondents raised the issue of how to, signpost or mark a GDF so that future generations are aware of the presence of a sub-surface installation.

A number of respondents made reference to the need to maintain and/or monitor a GDF in the longer term after it is closed. Some respondents suggested that the ability to monitor a site should be added as an Evaluation Consideration. Respondents queried how monitoring would take place as the approach to geological disposal seems to be ‘out of sight, out of mind’.

Many respondents referred to the importance of security, making reference to potential security concerns that communities may have relating to the storage and transportation of radioactive materials, including the risks from attack (in a variety of forms) and references to international assessments of risk to transportation casks. It was suggested that the status and visibility of security within the Site Evaluation documents should be enhanced given its importance as a regulatory requirement.

4. Question 2

Our response

Resilience to surface events such as coastal erosion or rising sea levels is one of the reasons why geological disposal is favoured internationally as a long-term management solution for higher activity radioactive wastes. The risk and prevention of accidents is heavily regulated and we will need to comply with all such relevant Requirements. It is worth noting that major accidents and disasters is a topic which must be assessed as part of Environmental Impact Assessment (EIA), which will be required to support our applications for land use planning consent. Such matters would need to be considered at the site-specific level to understand whether they are likely to be significant to the safety case. Issues related to climate change, including vulnerability to climate change and major accidents and disasters caused by climate change; have to be considered as part of the planning and EIA process.

We will need to consider the implications of external hazards, such as tsunamis, earthquakes and extreme tidal surges, as part of our safety during construction and safety during operations Evaluation Considerations, and again this is required as part of the planning and EIA process.

There are a number of challenges involved with marking the location of a GDF, not least to ensure that all markings can stand the test of time and can be properly understood by future generations, potentially a long time into the future. We will work closely with the UK's independent nuclear and environmental regulators and the Potential Host Community to agree the most appropriate way to mark the facility. This is a topic that is also under consideration through our international work, as other countries with geological disposal facilities are also considering this important issue.

A GDF will be monitored while waste is being emplaced and checks undertaken to confirm that the safety features are operating as we would expect. The closure of a GDF will only take place following further confirmatory checks and the submission and agreement of a final safety case with the regulators. Our safety cases will be made on the basis that human intervention and monitoring will not be required long term to maintain safety after the decision has been made to close and seal a GDF. We would not progress to the closure stage, and the regulators would not agree to this step, if there was any question over a GDF's long-term safety.

We agree that security is, and will be, a key issue for communities. Indeed, one of the reasons that geological disposal is considered internationally to be preferable to surface storage is the enhanced levels of security which come with isolating wastes deep underground. Security will therefore necessarily be of fundamental importance throughout the siting process.

Actions

In response to Key Message 2, in the updated Site Evaluation documents we have:

- 2.1** Changed the 'Safety' Siting Factor to 'Safety and Security', and aligned the underlying Evaluation Considerations where necessary;
- 2.2** Included greater explanation of the considerations under the renamed Safety and Security Siting Factor; and
- 2.3** Included greater explanation in respect of how environmental and other hazards will be considered.

4. Question 2

Key Message 3 – The importance of Community should be highlighted and the Evaluation Considerations expanded

We received many responses which highlighted the importance of Evaluation Considerations relating to the community. These responses were broadly made in respect of consultation questions 2 and 3. There was also a request for more information on how the Site Evaluation document interacts with the approach to working with communities set out in Government policy, such comments were generally made in respect of consultation question 4.

What you said

Respondents who emphasised the importance of community suggested that the impacts on a community will be long term and intergenerational. It was also suggested that it would be important to consider the implications of a GDF on neighbouring communities, which may be outside the identified Search Area or Potential Host Community that are defined by Government policy. It was suggested that some negative impacts, such as impacts on tourism or agriculture, may be felt well outside these defined areas.

Several respondents provided comments on the definition of community, and in particular noted that this needed to be flexible to allow the ‘community’ to change throughout the siting process as the Potential Host Community, and eventual host site is identified.

Largely in response to consultation question 3, some respondents commented on the Community Evaluation Considerations proposed in the draft Site Evaluation documents and suggested that additional Evaluation Considerations are required within the Community Siting Factor to cover the full range of community issues.

It was suggested that workforce should be a new Evaluation Consideration, on the basis that consideration should be given to the development of skills and training and how this will be provided.

Respondents also made reference to the importance of health and equalities and the need for communities to be involved in the development of the Evaluation Considerations.

Respondents to the consultation in Wales suggested that assessment frameworks being developed by the Future Generations Commissioner may be helpful to assess community wellbeing. We received several responses which suggested that the impacts of a GDF on the communities that currently host the waste for disposal (commonly referred to by respondents as ‘existing host communities’) should also be included as an Evaluation Consideration.

Our Response

We recognise that community considerations will be wide ranging and very much influenced by the specific needs of the communities engaged in the siting process.

We recognise that the communities engaging in the siting process may have specific preferences that need to be satisfied for the community to be willing to host a GDF. We will capture such requirements as part of the renamed Local Community Vision Evaluation Consideration, to ensure that community preferences form an integral part of our evaluations.

The assessments and evaluations that we will need to carry out to understand the implications for the community in terms of site investigations, constructing, operating and closing a GDF will focus primarily on the areas under consideration. However our assessments and evaluations will also involve us considering implications that extend beyond the boundaries of the Search Area and the Potential Host Community⁸. For example where boreholes may need to be drilled or where waste and construction materials need to be transported.

Government policy establishes definitions of 'Potential Host Community', and we will apply these definitions throughout the siting process. We do recognise, however, that defining a community is not a simple process. The identification of a community is particularly challenging due to the long-term nature of the siting process, but this is why there is flexibility built into the policy definitions to enable the concept of 'community' to evolve and develop as necessary as the siting process progresses.

We recognise that there may be a need for development on or near sites where waste is currently stored so that it can be exported to a GDF. The planning and consenting routes for such additional development will be determined when the nature of development required is clear.

⁸ The Search Area is the geographical area encompassing all the electoral wards within which RWM will be able to search for potential sites. For areas which include potential for development under the seabed, the Search Area will comprise only that area on land.

The Potential Host Community is the community within a geographical area that could potentially host a GDF. The Potential Host Community would include all of the wards in which the following would be located:

- proposed surface and underground elements of a GDF;
- any associated development (as defined in the Planning Act 2008 in England) and any land required to mitigate impacts;
- transport links/routes from the GDF site to the nearest port, railhead or primary road network (i.e. out to where minor roads meet the nearest A roads);
- direct physical impacts associated with underground investigations, construction and operation of the GDF (identified through environmental impact assessment work carried out to support RWM's engagement with communities and its development consent applications).

4. Question 2

We acknowledge that whilst the development of a GDF will generate new employment opportunities, it may also have implications for existing businesses and industries. One of the advantages of a GDF is the long operational period that will result in the generation of employment opportunities for a very long period. This should allow us to work with local business and education providers to support the provision of training and skills development. We will do so through the Community Partnership.

We appreciate that community wellbeing can be difficult to assess. We will work closely with communities and experts to ensure that our understanding of a community's needs is transparent and robust. We also recognise the importance of assessments related to health and equality, such as Health Impact Assessments and Equality Impact Assessments. Such assessments may be required at various points during the siting process and we will undertake them as appropriate.

Actions

In response to Key Message 3, in the updated Site Evaluation documents we have:

- 3.1** Expanded the list of considerations under this Siting Factor from two to five by separating social considerations, economic considerations and health considerations from community wellbeing; such that these are now stand alone Evaluation Considerations under the Community Siting Factor;
- 3.2** Added further content to clarify the importance and role of communities within the siting process, and the scope of our evaluations;
- 3.3** Included more detailed explanation about what is meant by the host community vision and re-named this the Local Community Vision Evaluation Consideration; and
- 3.4** Made clear that workforce related matters will be considered under the Community Siting Factor Evaluation Considerations, through the introduction of examples of the typical matters that we are likely to need to assess in Annex B of the Site Evaluation documents.

5. Question 3:

Do you agree with the Evaluation Considerations we have identified? Are there any other Evaluation Considerations that should be included and why?

Around 71% of respondents made comments on this question.

Key Message 4 – The importance of geology to many of the Evaluation Considerations could be explained more clearly and be more prominent

What you said

Many respondents noted the importance of geology and several respondents suggested more specifically that geological suitability should be used as a way of carrying out geological screening to remove certain areas at an early stage.

Some respondents suggested a personal preference for certain rock types and some also suggested that certain rock types would be unsuitable for hosting a GDF.

Our response

We recognise that geology will be a significant input in the context of several of the Siting Factors and Evaluation Considerations – not least, Safety (i.e. how we can demonstrate to the UK's independent nuclear regulators that a GDF can be safely constructed, operated and closed in a given geological environment); and Engineering Feasibility (i.e. how a GDF can be engineered in a given geological environment). Geology also influences things like the type and nature of spoil generated and consequential transport implications and may have an impact on value for money assessments.

Within this context, geology is an issue which is fundamentally important in determining whether we can satisfy the relevant Requirements.

5. Question 3

The screening out of areas at the outset of the siting process using geological information is difficult due to the very limited information that is currently available at depth. No national exercise would be able to definitively rule all areas as either ‘suitable’ or ‘unsuitable’ for the development of a GDF. To address this we carried out a National Geological Screening (NGS) exercise that was published in December 2018 and is available on our website.

Our NGS outputs⁸ provide a high level summary of the geological information which is of relevance to the safety of a GDF, to inform discussions with communities who may wish to be involved in the siting process. We have found the NGS to be extremely useful in engaging with communities and have received positive feedback on its accessibility following launch.

Actions

In response to Key Message 4, in the updated Site Evaluation documents we have:

- 4.1** Explained more explicitly how geology will influence many of the other Evaluation Considerations and added text to this effect;
- 4.2** Set out more clearly the importance of geology in the context of the renamed Safety and Security Siting Factor; and
- 4.3** Included the attributes used in the NGS geological attributes in the Site Evaluation documents and in Annex B, where we provide examples of the typical matters we are likely to need to assess.

⁸ <https://www.gov.uk/guidance/about-national-geological-screening-ngs>

Key Message 5 - Specific matters were raised in relation to the Environment, Engineering Feasibility, Transport and Costs Siting Factors

What you said about Environment

Respondents made comments in respect of the Evaluation Considerations within the Environment Siting Factor making reference to the need to clearly identify the matters that will be considered. Reference was made to the need for RWM to produce an environmental safety case and the need for RWM to consider long-term environmental implications of a GDF and the implications of site characterisation.

It was suggested that recognition be given to the local environmental impacts of a GDF. Specific reference was made as to how RWM will evaluate matters relating to spoil generated through construction and operation. Respondents also emphasised that RWM should be looking to enhance the environment where possible and practical.

Our Response

We recognise that environmental impacts, including long term environmental impacts and changes to the environment in the long term are necessarily something that we will be required to consider in significant detail as part of the planning and environmental permitting processes.

The land-use planning and environmental regulatory processes will require us to consider in detail local and wider environmental impacts, including impacts that are direct, indirect, secondary, cumulative, short-term, medium-term, long-term and transboundary. All of these impacts, including the long-term impacts highlighted by respondents such as climate change, geological change and hydrogeological change, will form a key part of the environmental assessments that we will carry out, and will thereby be discussed with communities via the Community Partnership.

5. Question 3

Actions

In response to matters relating to the Environment Siting Factor and Evaluation Considerations, in the updated Site Evaluation documents we have:

- 5.1** Included additional explanation of the environmental matters that we will need to take into account under the Environment Siting Factor;
- 5.2** Included further content to provide explanation of the various Safety Cases, including the environmental safety case, that RWM will need to make;
- 5.3** Confirmed that the long term implications of delivering a GDF, including matters such as climate change, geological change, hydrogeological change, long term environmental change as well as the changing human environment will be included in our assessments and evaluations; and
- 5.4** Confirmed that our evaluations will include taking into account the implications relating to spoil by introducing Annex B, which provides examples of the typical matters that we are likely to be assessing.

What you said about Engineering Feasibility

Some respondents commented on the terminology around Engineering Feasibility suggesting that it could be renamed to make it easier to understand.

Several respondents noted that the consultation documents lacked reference to the potential need for associated development. Respondents also made reference to the inventory for disposal and the topic of retrievability seeking clarity on the need to discuss these matters with communities.

Our response

We recognise that matters such as the inventory for disposal and retrievability are important to communities and we expect that discussions with the Community Partnership about these topics will take place through the siting process.

We will work in partnership with communities to identify a suitable site for a GDF. Government policy confirms⁹ that the current assumption is that only one GDF will be necessary. However, it is acknowledged that there is no guarantee that a community willing to host a GDF would have a large enough volume of suitable rock to take the entire inventory for disposal, or that we would be able to make a safety case for the entire inventory.

Actions

In response to matters relating to the Engineering Feasibility Siting Factor and Evaluation Considerations, in the updated Site Evaluation documents we have:

- 5.5** Updated the Evaluation Considerations within the Engineering Feasibility Siting Factor to make the scope of our evaluations more clear, including adding more explanation and replacing the 'Constructability' Evaluation Consideration with the Ability to characterise Evaluation Consideration and the Ability to design and construct Evaluation Consideration.

⁹ Paragraph 2.17 of *Implementing Geological Disposal – Working with Communities (BEIS)* and Paragraph 8 of *Geological Disposal of Higher Activity Radioactive Waste: Working with Communities (WG)*

5. Question 3

What you said about Transport

Several respondents suggested that transport does not need to be a separate Siting Factor because of the overlap with other Siting Factors and Evaluation Considerations. Respondents also made reference to wider transport issues and the questioned whether the proximity to sources of waste was a matter RWM would be considering.

Our response

We recognise the importance of transport issues for communities – that is why we included Transport as a standalone Siting Factor.

Transportation of nuclear materials, including radioactive waste, is subject to strict regulatory controls and is robustly and independently regulated in order to protect people, property and the environment. In addition, any proposed transport activities, including during site characterisation and operation, will be subjected to rigorous assessment during the planning and EIA processes.

Actions

In response to matters relating to the Transport Siting Factor and Evaluation Considerations, in the updated Site Evaluation documents we have:

- 5.6** Added clarity on the scope of our Siting Factors and Evaluation Consideration including reference to the transportation of waste issues; and
- 5.7** Made it clearer that our evaluations will need to consider all transport movements.

What you said about Cost

Some respondents suggested that there would be considerable uncertainties in cost evaluations as it is very difficult to quantify the costs early on in the siting process.

Respondents questioned which costs will be evaluated and respondents questioned the relationship with, and potential cross-over between, cost and other Siting Factors.

Some respondents suggested that the Cost Siting Factor should be renamed 'value for money' while others felt that this Siting Factor should be retitled 'economics'. Others felt cost should not be a Siting Factor. Programme and timing were also raised by respondents in the context of costs.

Our response

We recognise that costs considerations will also inevitably overlap and feed into other aspects of our evaluations, under other Siting Factors and Evaluation Considerations. Given our statutory duty to ensure value for money, we agree that re-naming the Siting Factor as 'Value for Money' would better reflect the holistic approach that we will be required to take to cost considerations. Uncertainties about costs are present in every major infrastructure project, and are not unique to geological disposal.

Actions

In response to matters relating to the Cost Siting Factor and Evaluation Considerations, in the updated Site Evaluation documents we have:

- 5.8 Renamed the 'Cost' Siting Factor as 'Value for Money';
- 5.9 Provided additional explanation on cost uncertainties and acknowledge that these uncertainties will be managed in our evaluations;
- 5.10 Included more content around cost, explaining why it is included as a Siting Factor and the complex and interrelated aspects of it; and
- 5.11 Added greater explanation on the Schedule of Waste Receipt Evaluation Consideration and why it is important.

5. Question 3

Cross cutting matters related to Evaluation Considerations

There were also comments made that related to all the Evaluation Considerations as opposed to relating to a specific Evaluation Consideration, in the updated Site Evaluation documents we have:

- 5.12** Used consistent language relating to the "post-closure safety case";
- 5.13** Included additional information on how we will seek input from communities in our evaluations;
- 5.14** Updated, where relevant, the Siting Factors and Evaluation Considerations to make clear that all evaluations will consider the implications of the investigation, construction, operation, closure and post closure phases of a GDF;
- 5.15** Added confirmation that we will consider, as appropriate, direct effects and indirect effects of investigating, constructing, operating and closing a GDF (including secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects); and
- 5.16** Clarified that we will be seeking to deliver enhancements and add value to the local community and local places, where this is deliverable, and that these enhancements will be taken into account as part of our evaluations.

6. Question 4:

Is there anything else that you think we should consider in our site evaluations and why?

Around 91% of respondents made comments on this question.

Many consultation responses requested more clarity and detail on the fundamental purpose and scope of the Site Evaluation documents. In particular, how the Siting Factors and Evaluation Considerations link back to the existing Requirements, and how the Site Evaluation documents will be used to guide and inform our discussions with communities and shape our evaluations.

Key Message 6 – The purpose and scope of the Site Evaluation documents could be clearer

What you said

Many respondents suggested that greater clarity is required on the purpose and scope of the Site Evaluation documents, for example, will RWM be evaluating a "site" or all aspects of the development beyond the "site" (e.g. including transport routes and areas to where spoil maybe exported) and will the Siting Factors and Evaluation Considerations be used to evaluate areas for site characterisation i.e. when and how the Siting Factors and Evaluation Considerations will be applied in the siting process?

Other respondents requested clarity on our requirements approach; how the Site Evaluation documents link back to the existing Requirements and how the Site Evaluation documents will be used to guide and inform our discussions with communities and shape our site evaluations. Some respondents questioned the definition of the Siting Factors and how they will be used, suggesting that all the Siting Factors (and Evaluation Considerations) could be considered as requirements in their own right, others suggested that the interrelationships between the Siting Factors should be made clearer.

Some respondents suggested that the Disposal System Specification (DSS) contains various requirements not found in the consultation documents. Others questioned whether the Siting Factors and Evaluation Considerations were complete. There were also questions regarding whether updates to our Site Evaluation documents would be undertaken during the siting process.

Respondents also raised the issue of environmental assessments, questioning when and whether RWM would be completing the various assessments throughout the siting process.



6. Question 4

Our response

The Site Evaluation documents are fundamentally about how we will seek to engage with communities on issues that will necessarily arise during the siting process, and subsequently how we structure our evaluation of potential sites.

The Site Evaluation documents have been designed to summarise, in plain and accessible terms, the broad types of issues that will need to be considered by us during the siting process. This is to ensure that we consider whether we can satisfy all relevant Requirements and enable us to gather the necessary information for the purposes of making applications for all the consents that will be needed to investigate, construct, operate and close a GDF.

The Site Evaluation documents do not set out how we should or will apply the Requirements in practice. The purpose of the documents is to summarise the existing Requirements in an evolving manner, rather than establish a static and binding evaluation system or approach. We have voluntarily prepared the Site Evaluation documents as a tool to aid and assist discussions with communities, and to ensure that we approach the siting process in a transparent and consistent manner.

We will need to have close regard to the requirements of the Habitats Directive and Habitats Regulations throughout the siting process, in order to determine whether the proposed development of a GDF at a given geographical location would be likely to impact on a European site(s). We will engage closely with Natural England / Natural Resources Wales and the Marine Management Organisation in this regard. Where appropriate, a Habitats Regulation Assessment (HRA) will be prepared to support our applications for land use planning consent. Our planning applications will also be supported by an Environmental Statement prepared in accordance with the EIA framework.

If the Requirements change in the future, for example, following a change in the legislative or policy framework relating to geological disposal and or the siting process for a GDF, the Site Evaluation documents may need to be revisited and updated in order to properly reflect those changes. We will discuss any proposed changes to the Site Evaluation documents with communities engaged in the siting process. To ensure an open and transparent siting process, any updates to the documents will be published.

Actions

In response to Key Message 6, in the updated Site Evaluation documents we have:

- 6.1** Included additional clarity on the purpose, structure and intention of the Site Evaluation documents;
- 6.2** Provided additional explanation as to the likely range of matters that will be considered under each of the Siting Factors and Evaluation Considerations by adding Annex B;
- 6.3** Included greater clarity on the linkage between the Requirements and the Site Evaluation documents and the role of the DSS;
- 6.4** Included additional explanation and content on the interrelationship between the Siting Factors; and
- 6.5** Included additional content to make it clear that the Site Evaluation documents will be used throughout the siting process.

6. Question 4

Key Message 7 –The language and content of the Site Evaluation documentation is very technical in places and would benefit from additional clarity and explanation

Many respondents who responded to consultation question 4 provided comments on the language and content of the draft Site Evaluation documents. In particular it was suggested that the documents, which are designed to simplify important issues, must be accessible and presented, as far as possible, in a non-technical manner.

What you said

Many respondents made comments about the accessibility of the documents, and the language that we had used. Respondents firmly recognised that transparency and trust are key for the successful delivery of geological disposal in any given location or community.

Several respondents suggested that additional content could perhaps be included in the Site Evaluation documents to give further information on a wide range of issues.

Our response

We recognise that we must present our information in an accessible manner and in formats that meet the needs of a variety of different user groups. We have carried out a ‘Plain English’ review of the Site Evaluation documents to improve clarity of the documents.

Much of the supporting information that respondents referred to is available via our website. Nonetheless, the fact that respondents were not aware of this suggests that we need to do more to ensure that those who need this information can find it easily. This comment will be fed through to our work on communications so that consideration can be given as to how we can make our information more accessible and easier to locate.

One of the key challenges that we have to face is communicating detailed information in a way that is accessible to all. We will also work with communities to ensure that the outputs we produce take into account, and are tailored to, the needs of the intended audiences.

Actions

In response to Key Message 7, in the updated Site Evaluation documents we have:

- 7.1** Updated the documents to make them more accessible to a wider audience, improved the navigation of the documents and carried out a 'Plain English' review of the documents;
- 7.2** Included additional content, or referenced other materials where appropriate, to address matters that respondents felt needed to be addressed; and
- 7.3** Included additional explanation of the Siting Factors and Evaluation Considerations with the intention of making them clear to a wide variety of stakeholders.

6. Question 4

Key Message 8 – Greater clarity on our approach to evaluations, in particular, comparative assessment would be beneficial

Many of the responses made in respect of consultation question 4 that we received sought greater clarity on how we will approach site evaluations, and raised questions in particular about data gaps and uncertainties, overlaps between Siting Factors, and roles and responsibilities.

What you said

Respondents suggested that we should provide further clarity on our approach to evaluations. Respondents generally agreed with our proposed qualitative, evidence-based and iterative approach to site evaluation, recognising that there will be too many uncertainties to make meaningful quantitative evaluations, particularly early in the siting process when the information available will be limited. Respondents generally confirmed that they supported the use of qualitative measures to compare and evaluate sites and recommended avoiding the use of relative scoring.

Several respondents raised general questions about progression of the siting process and the idea that information levels will increase as the siting process progresses.

It was also commented that although the consultation documents made reference to the potential need for comparative assessments to be carried out, more information could be provided on how the objective comparative assessment would be undertaken in practice.

There were also questions about decision-making, suggesting that RWM needs to be more explicit about how certain decisions will be made during the siting process, specifically:

- the decision to continue investigating and developing a site; and
- the decision to choose a site – if there is more than one site.

It was suggested that these decisions should be based on the likelihood of being able to safely construct, operate and close a GDF within available funds and time constraints, and on the likelihood of public acceptance of the GDF at a potential location.

A number of respondents queried how RWM will determine community willingness throughout the siting process, and over long periods of time.

Many respondents responding to question 4 also raised questions or made comments about the roles of various organisations in the siting process. It was suggested that clarity be included on the role that local authorities play, the importance of independent regulators and how RWM's decisions will be subject to independent scrutiny and oversight. Respondents also made reference to the need for RWM to draw upon the expertise of the supply chain and external organisations to support the siting process.

Our Response

Government policy is based on dialogue and flexibility, so that we can work flexibly with communities to respond to the views and preferences of the community in question, and in light of the environmental, physical and socio-economic attributes of the area. Setting out a quantitative approach to site evaluation would in many ways conflict with the intention of the framework established by Government policy.

We recognise that some of the evidence and assessments that will inform our evaluations will be quantitative in nature. As such, we agree with comments made by respondents that both qualitative and quantitative information will be used as part of the evidence that underpins our site evaluations.

The uncertainty in the early stage site evaluations will be used to inform and direct our future work and studies. As potential communities progress through the siting process, the level of information, knowledge and data about the characteristics of a given area will increase. As we acquire new information, uncertainty should decrease, and our site evaluations should get more detailed and comprehensive – although we do note that information levels may differ according to each individual geographical area that we evaluate. Ultimately, we will progress our evaluations to the point where we are able to make a decision, which will require approval from the Secretary of State, as to whether a site should progress firstly to site characterisation, and then to underground investigation and construction/operation. Where required, this approach will also enable us to make comparative assessments of sites.

Within this decision-making framework, circumstances may arise where we are required to ‘compare’ more than one site. As with all site evaluations, we will use the Siting Factors and Evaluation Considerations as the broad structure for making such comparisons.

Respondents highlighted the need for us to rely on a wide range of experts and draw in expertise from the supply chain. We will draw upon a wide range of experts from various sources in order to help carry out our investigations and analyse the information and data.

We will also engage closely and regularly with other bodies during the siting process, including local authorities and the UK’s regulatory bodies (notably the Office for Nuclear Regulation, Natural Resources Wales and the Environment Agency). We very much recognise that local authorities have a key role to play in the siting process, and indeed their participation in the siting process is a key component of Government policy.

6. Question 4

Actions

In response to Key Message 8, in the updated Site Evaluation documents we have:

- 8.1** Added additional content to explain how the site evaluation process will work in practice and how our evaluations will evolve over time. We have clarified our proposed qualitative evaluation approach and included more content on decision-making;
- 8.2** Included greater clarity on the roles and responsibilities of communities local authorities and the role of the independent regulators including the provision of links to our community guidance and Government policy; and
- 8.3** Expanded the section on scrutiny to provide more explanation of the role of the regulators in the siting process.

7. Conclusions

We welcomed and have listened to the feedback that we received in response to our consultations. Our learning will be used in the continued development of our programme of raising awareness of the need for the disposal of higher activity wastes via geological disposal and in the planning and delivery of future events.

This feedback has also been used to inform the development of our final Site Evaluation documents. In response to the consultation we have made the following key changes:

- The Safety Siting Factor has become Safety and Security and the importance of geology to many of the evaluation considerations has been emphasised;
- The Cost Siting Factor has changed to Value for Money;
- The Community Siting Factor and Environment Siting Factor have more detailed explanation in respect of the range of matters we will be considering;
- The section on comparative assessment has been expanded to include more about the overall approach to our evaluations and is now called comparative evaluation;
- There is more cross referencing to contextual information about a GDF available in other RWM publications; and
- The Evaluation Consideration tables rely less on links to the RWM Disposal system specification, and we have added an annex which includes examples of typical matters likely to be assessed.

We welcome all of the comments that we have received during the consultation processes, and thank all respondents for taking the time to provide us with valuable feedback.



Notes





Getting in touch

To learn more about the UK's mission to deal with radioactive waste

Email gdfenquiries@nda.gov.uk

Telephone **0300 0660 100**

Follow us on Twitter

[@rwm_gdf_uk](https://twitter.com/rwm_gdf_uk)

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or visit the campaign website

geologicaldisposal.campaign.gov.uk