

The logo consists of a dark grey shape on the left that resembles a stylized 'R' or a container, with a light green wave-like top edge and a purple square at the bottom left. To its right, the text 'Radioactive Waste Management' is written in a dark grey, sans-serif font, with 'Radioactive Waste' on the top line and 'Management' on the bottom line.

Radioactive Waste Management

Site Evaluation update
NuLeAF March 2020 meeting

11 March 2020

Structure of Presentation

1. Consultation
2. Analysis
3. Action taken
4. Publication
5. Questions

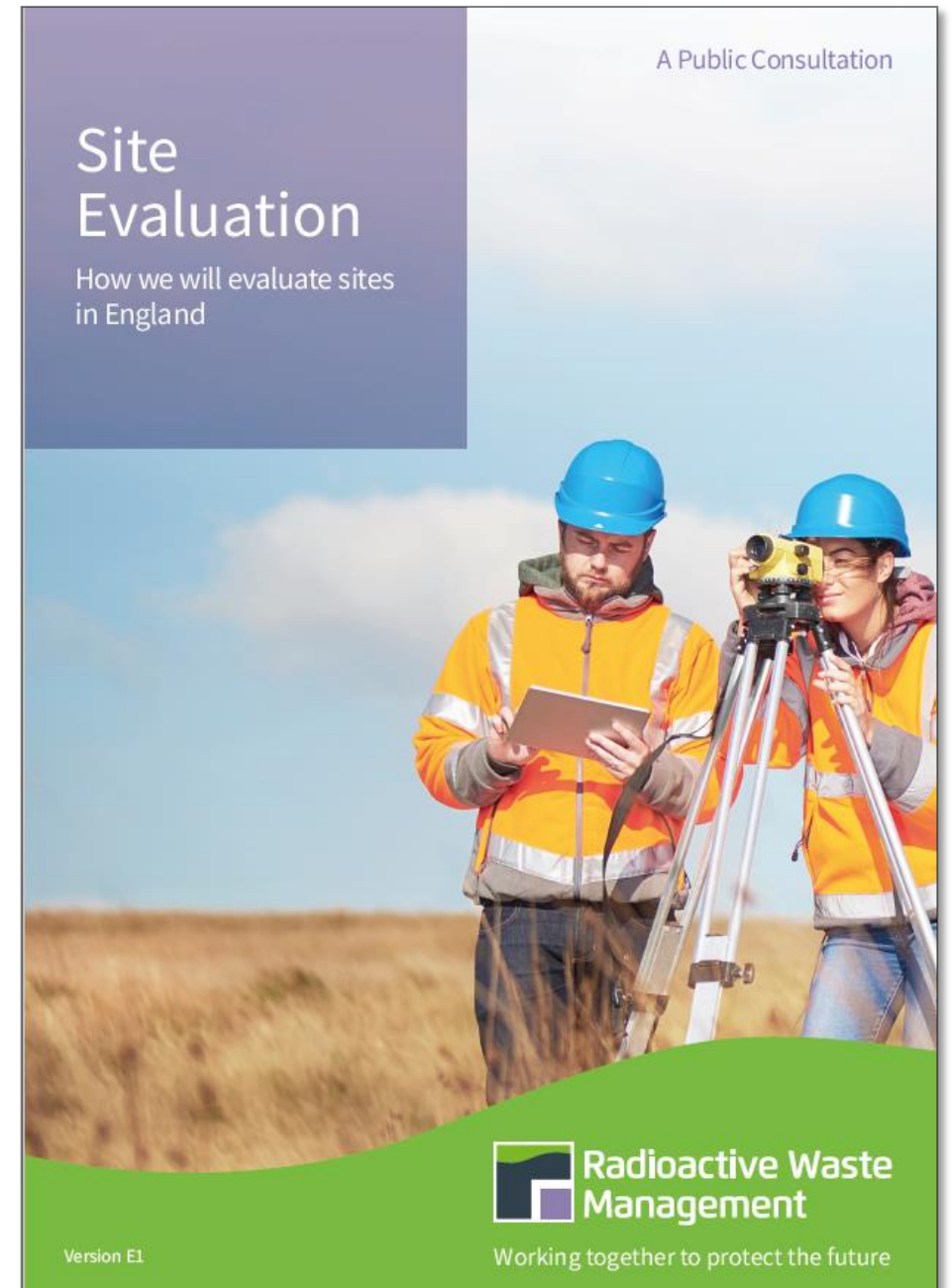
The logo consists of a dark grey shape on the left that resembles a stylized 'R' or a container, with a green wave-like top edge. To its right is a small purple square.

**Radioactive Waste
Management**

Consultation

Consultation Design

- At July 2018 GDPB it was agreed that RWM would undertake a non-statutory public consultation on the Site Evaluation documents.
- Consultation similar to the process used for the National Geological Screening Guidance consultation.
- 12 week consultation period.
- Engaged 3KQ to provide advice on the design of the overall consultation and more specifically the public events.



Consultation - Aims and Objectives

Aim:

- To consult on the site evaluation proposals by inviting question, observation and challenge, to help ensure that the resulting approach is robust and enduring.

Objectives:

- Maximise opportunities for stakeholders to understand the approach to site evaluation set out in the consultation document.
- Clearly communicate these opportunities through a range of channels and ensure opportunities for responses, contributions and submissions.
- Support consultees wishing to build their understanding of the document and the issues therein before making a submission.
- Process submissions and make a timely response to all.
- Consider all submissions and undertake analysis of issues emerging.

The consultation

- ***Site Evaluation – How we will evaluate sites in England*** ran from the 19th December 2018 to the 31st March 2019.
- ***Site Evaluation – How we will evaluate sites in Wales*** commenced on the 16th January 2019 and closed on the 14th April 2019.
- Consultation hosted on the GOV.UK website supported by a series of regional enabling events.
- Used normal communication channels (mailing lists, e-bulletin list, and lists of stakeholder organisations) together with regional media to make people aware of the consultation and the programme of regional events.

The Respondents

- 90 responses received across the 2 consultations.
- Jurisdiction split;
 - 61 responses related to the England Consultation
 - 24 responses related to the Wales Consultation
 - 5 responses were not submitted on the response forms so it is not completely clear which consultation they relate to.
- Level of response in line with other similar consultations (BEIS policy, National Geological Screening etc.)
- Wide range of respondents: including academics, local authorities, parish councils, environmental groups, regulators, non-governmental organisations and interested individuals.

The Response

- Over 70% of respondents submitted comments in relation to consultation questions 1, 2 and 3,
- Over 90% of respondents provided comments on question 4.
- 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.



Radioactive Waste Management

Analysis

Analysis

- Analysed the 90 separate contributions
- Noted around 800 individual comments or points that had been raised by respondents.
- Analysis allowed us to identify any common themes and a list of what we deemed to be the 'Key Messages'.
- We took from the responses 8 Key Messages.



Key Messages

- 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;
- Matters relating to safety could be clarified and better explained and consideration given to security being given more prominence;
- The importance of community could be highlighted and the Evaluation Considerations expanded;
- The importance of geology to many of the Evaluation Considerations could be explained more clearly and be more prominent;
- Specific matters relating to the Environment, Engineering Feasibility, Transport and Cost Siting Factors;
- The purpose and scope of the Site Evaluation documents could be clearer;
- The language and content of the Site Evaluation documentation is very technical in places and would benefit from additional clarity and explanation; and
- Greater clarity on our approach to evaluations, in particular comparative assessments, would be beneficial.



Radioactive Waste Management

Action taken

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?

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.*

Action taken

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.

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?

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.*

Action taken

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.

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?

Around 73% of respondents provided comments on this question.

Key Message 3: *The importance of community could be highlighted and the Evaluation Considerations expanded.*

Action taken

- 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 new Social considerations Evaluation Consideration and Economic considerations Evaluation Consideration.

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?

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.*

Action taken

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 our description of the renamed Safety after Closure Evaluation Consideration

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?

Around 71% of respondents made comments on this question.

Key Message 5: *Specific matters relating to the **Environment**, Engineering Feasibility, Transport and Cost Siting Factors.*

Action taken

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.

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?

Around 71% of respondents made comments on this question.

Key Message 5: *Specific matters relating to the Environment, **Engineering Feasibility**, Transport and Cost Siting Factors.*

Action taken

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.

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?

Around 71% of respondents made comments on this question.

Key Message 5: *Specific matters relating to the Environment, Engineering Feasibility, **Transport** and Cost Siting Factors.*

Action taken

5.6 Added clarity on the scope of our Siting Factors and Evaluation Consideration including reference to the transportation of waste and proximity issues; and

5.7 Made it clearer that our evaluations will need to consider all transport movements.

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?

Around 71% of respondents made comments on this question.

Key Message 5: *Specific matters relating to the Environment, Engineering Feasibility, Transport and **Cost** Siting Factors.*

Action taken

5.8 Renamed the ‘Cost’ Siting Factor as Value for Money;

5.9 Provided additional explanation on cost uncertainties and how 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.

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?

Around 71% of respondents made comments on this question.

Key Message 5: *Specific matters relating to the Environment, Engineering Feasibility, Transport and Cost Siting Factors.*

Cross cutting actions

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 where practicable and that these will be taken into account as part of our evaluations.

Consultation 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.

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

Action taken

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;

6.3 Included greater clarity on the linkage between the Requirements, the DSS and the Site Evaluation documents;

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.

Consultation 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.

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*

Action taken

7.1 Updated the documents to make them more accessible to a wider audience and carried out a Plain English review of the text;

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.

Consultation 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.

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

Action taken

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 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.



Radioactive Waste Management

Publication

Alignment with National Policy Statement

The National Policy Statement for Geological Disposal Infrastructure sets out the framework for planning decisions for the deep boreholes and for a GDF, both of which are classed as Nationally Significant Infrastructure in England.

The National Policy Statement is a key source of requirements for the Site Evaluation document (in England) and therefore it is essential to ensure the Site Evaluation documents are fully aligned to the National Policy Statement.

The National Policy Statement was designated by Government on 17th October 2019

England and Wales Site Evaluation documents

We developed a **Consultation Response Document (CRD)** covering the consultation in England and Wales. The CRD will be published in English and Welsh language.

There are separate **Site Evaluation** documents for England and Wales, reflecting the different policy and regulatory framework.

The updated suite will comprise

Site Evaluation – How we will evaluate sites in England

Site Evaluation – How we will evaluate sites in Wales (English language version)

Site Evaluation – How we will evaluate sites in Wales (Welsh language version)

Pre-publication engagement

- RWM engaged with the following Stakeholders in advance of publication
 - BEIS
 - Welsh Government
 - CoRWM
 - Regulators
 - Advisory Council
- NWMO undertook a sister organisation review
- Final documents presented to RWM Board
- Handling plan for publication developed

- **a General Election & Brexit!!!**

Published Documents

Site Evaluation
Consultation Response

Geological Disposal

Gwerthuso Safleoedd
Ymatebion i'r Ymgynoriadau

Gwaredu Daearegol

Site Evaluation
How we will evaluate sites in England

Geological Disposal

Gwerthuso Safleoedd
Sut byddwn yn gwerthuso safleoedd yng Nghymru

Ymgynghoriad Cyhoeddus

Site Evaluation
How we will evaluate sites in Wales

Geological Disposal

Ffordwn C1

Radioactive Waste Management
Working together to protect the future



Radioactive Waste Management

Questions