|  |  |  |
| --- | --- | --- |
| **Theme** | **NPS Questions** | NPS Answers |
| Need case for GDF | NPS – should it accept the possibility of long term storage? | The need case in Section 3 of the draft NPS lays out why long term storage is not a permanent solution for higher-activity radioactive waste. |
| Need case for GDF | How do you demonstrate the need for a GDF? | The need case for geological disposal infrastructure, which covers a GDF itself and deep investigative boreholes, is covered in Section 3 of the draft NPS. |
| Impacts | How are impacts considered for:  Construction traffic?  Transport of waste?  Wider landscape impacts?  Impact on local community?  Noise?  Groundwater/drainage? | All these impacts such as transport and noise (and their proposed mitigation) are covered in Section 5 of the draft NPS. |
| Impacts | Should there be more on mitigation re ‘socio-economics’ – looks light? | Section 5.7 of the draft NPS sets out examples of possible mitigations for socio-economic impacts. If you consider this could be improved then please respond to the consultation questions, providing evidence if possible. |
| Impacts | What about weighting criteria in the assessment? | The proposed weighting of factors for individual impacts by the Secretary of State is given in Section 5 of the draft NPS. |
| Impacts | Will developer be expected to have DCO-ready plans by time of Test of Public Support – or all that after?  Environmental impact | The application for a Development Consent Order (DCO) for deep boreholes will come before the Test of Public Support. The application for a DCO for a GDF will come after the Test of Public Support. The planning process (i.e. applications for and grants of DCOs) is separate from the process of working with communities to identify a suitable site. The licensing process (operated by the Office for Nuclear Regulation (ONR)) and the permitting process (operated by the Environment Agency (EA)) are further separate processes. The applications for a licence from the ONR to install and operate a disposal facility and for an environmental permit from the EA for the disposal of radioactive waste will also come after the Test of Public Support. Following feedback from these workshops, BEIS will produce and publish a diagram showing the expected relative timings of planning, permitting and licensing activities |
| Impacts | How are impacts considered as part of the examination of the DCO application? What will NPS mean in terms of impact of siting? | Section 5 of the NPS states the impacts that should be considered (and how) during the examination of the DCO application |
| Assessment principles (Chapter 4 of NPS) | What about security planning to completion?  Security considerations of GDF location? | Section 4.11 of the draft NPS sets out how security considerations should be dealt with. |
| Development of NPS | Why has HMG not learned from the fatal flaw in pre-determination in an NPS from the Nuclear Power NPS? | We are not pre-determining what the final NPS will contain. The draft NPS (and its supporting assessments) is subject to public consultation and parliamentary scrutiny. The final decision on the NPS will take into account the views we receive as part of those processes. |
| Development of NPS | How is MHCLG (Ministry of Housing, Communities and Local Government) involved in the NPS process? | MHCLG is the lead Government department for National Policy Statements (in general) and has provided advice to BEIS in the preparation of the draft NPS. |
| Development of NPS | Expected adoption date for NPS – 30 weeks from now? | The expected timeline from launch of public consultation to designation of the NPS, assuming no unexpected delays, is approximately 12 months. The outcome of the public consultation and parliamentary scrutiny may affect the exact timings. |
| Development of NPS | What practical difference is an NPS meant to make? | NPSs are frameworks for planning decisions for major infrastructure projects (known as Nationally Significant Infrastructure Projects). They provide greater certainty and transparency in the planning process. The draft NPS sets out the need for GDF and deep investigative boreholes, as well as the impacts and benefits which the developer must take into account in its application. The draft NPS also guides the planning inspectorate in making its recommendation and the Secretary of State in making his/her decision on whether to grant consent for the proposed development. |
| GDF - general | What about alternatives to GDF or more robust consideration of alternatives? | The alternatives that have been considered by BEIS are alternatives to the NPS, as geological disposal is already settled policy on higher activity radioactive waste management. Nevertheless, for completeness, BEIS has also set out why we consider there to be no alternatives to geological disposal.  RWM and NDA continue to keep alternatives to geological disposal under review. Further details are given in Section 2.1 of NPS. The latest RWM report is available online at: <https://rwm.nda.gov.uk/publication/geological-disposal-review-of-alternative-radioactive-waste-management-options/>. |
| GDF - general | Is there ongoing construction during GDF operations? | The construction of the underground vaults and tunnels for the disposal of the waste is likely to continue during the operational period of the facility, i.e. in parallel with waste emplacement operations. This operational period is estimated to be approximately 125 years. |
| GDF (general) | What does the construction process look like? | Both consultation documents have schematics of what a GDF will look like. If you require any further information on construction of a GDF then contact Radioactive Waste Management.  [Radioactive Waste Management - GOV.UK](https://www.gov.uk/government/organisations/radioactive-waste-management)  [Geological Disposal – A Geological Disposal Facility is a world-class solution for the UK's radioactive waste. Find out how it could create new jobs and infrastructure in your area.](https://geologicaldisposal.campaign.gov.uk/) |
| GDF (general) | How do we know how materials will perform over time? | Decades of research underpin the understanding of material performance. RWM can be contacted for further technical information if required. |
| Misc | What about infrastructure connectivity? | Certain connectivity may be permitted as associated development as part of a DCO (Development Consent Order). Otherwise, other consents for infrastructure will need to be applied for separately and considered under the relevant planning regime. |
| Misc | What about Infrastructure integration – local, regional and national? | The integration of infrastructure will be considered and discussed with a community when it comes forward and as part of the engagement process. |
| Misc | Skills for future? | Construction and operation of a GDF will be a multi-billion pound project that will provide skilled employment for hundreds of people over many decades.  RWM have published documents which cover the number of local jobs. Further details are in Section 3 of this document: [Geological Disposal: Generic Socio-economic Assessment | RWM Tools](https://rwm.nda.gov.uk/publication/geological-disposal-generic-socio-economic-assessment/)  With such a long-term programme there will be time for local communities to prepare to take advantage of the jobs that will come on stream in future and RWM will help the community to do this as part of the process of working in Partnership. |
| Misc | How will this impact political process? | Although the Secretary of State will make the final development consent decision for a GDF, no application for development consent will be made until a test of public support has taken place which demonstrates a community is willing to proceed. |
| Misc | How will consenting for associated infrastructure work e.g. roads? | Application for development consent for associated development (e.g. road, rail improvements) may be included in the application for the principal development (i.e. GDF and/or deep boreholes) |
| Working with Communities | What support is there for a local community? | Community investment funding is covered in the Working with Communities policy. |
| Working with Communities | Is the concept of an NPS in conflict with the concept of local voluntarism? | No. A test of Public Support will be taken by the Host Community prior to any application for development consent for a GDF. |
| Working with Communities | Direct impact on communities – £ compensation? | Funding for communities is covered in the proposed Working with Communities policy. |
| Working with Communities | The NPS is different from most due to test of support but this doesn’t feature in the consultation on AoS/HRA – why? | The AoS and HRA are supporting appraisals of the draft National Policy Statement (NPS); the AoS considers likely significant environmental and socio-economic effects of the draft NPS; the HRA considers likely significant effects of the draft NPS on European nature conservation sites. The test of public support does not feature in the NPS, AoS or HRA. The concept was originally set out in the 2014 White Paper, *Implementing Geological Disposal*;the proposed Working With Communities (WWC) policy that is subject to a separate consultation provides more detail on the test of public support. However, the processes described in the WWC proposals are separate from the planning process (to which the NPS relates). |
| Geology | What about geological suitability?  NPS demonstrate need for more clarity on potential geology?  How will geological evidence/information inform NPS? | Geological suitability will be considered in the safety case submitted by RWM to regulators. Although the regulatory framework for safety is separate to the planning framework set out in the NPS, details of the relationship between the two frameworks can be found in Section 2.4 of the draft NPS. |
| Licensing | Explain how NPS addresses site boundaries at surface and below ground | The draft NPS does not consider site boundaries. |
| Scotland policy | What about Scotland? | The Scottish Government is not a sponsor of the programme for implementing geological disposal, but does remain committed to dealing responsibly with radioactive waste arising in Scotland. Scottish policy is that waste should be managed in near surface facilities as close as possible to where the waste is produced. |
| Plutonium | What about interplay with plutonium disposition? | A type of higher activity radioactive waste which would comprise part of the inventory for disposal in a GDF is plutonium stocks. Plutonium stocks would be in a form suitable for long-term disposal (this may be following re-use and subsequently contained in spent nuclear fuel, immobilised, or a combination of both). |
| Retrievability | Why not accessible disposal?  How do we know future needs? | The UK Government and regulators agree that the purpose of a GDF is to dispose of waste not store it. Permanently closing a GDF at the earliest possible opportunity when operations have ceased provides greater safety, greater security and minimises the burden on future generations. During the operational stage of the GDF, waste that has been placed in a GDF could be retrieved if there was compelling reason to do so. Retrieving placed waste once a GDF has been closed would be more difficult, and would require careful consideration in particular of safety and security. |
| Need case for GDF | Why no reference to the benefit of reduced over ground facilities? | The need case in Section 3 of the draft NPS states that legacy waste is at present temporarily stored at over 30 sites in the UK, and that a GDF will dispose of this waste deep underground [the draft NPS therefore infers reduction of over ground storage facilities, rather than stating benefits directly]. |
| AoS/HRA | Why does the AoS/HRA not appraise a non GDF option? E.g. assess the Scottish policy approach? | Section 2 of the AoS report considers the “hierarchy” of alternatives. GDF is settled policy following the Government’s acceptance of CoRWM recommendations. The primary objective of the NPS is the: “implementation of government policy on geological disposal for higher activity radioactive waste and to set out the need for such infrastructure” (paragraph 1.10 of the NPS). Any alternative policy on the long-term management of radioactive waste that does not involve geological disposal (i.e. a ‘no GDF policy’) cannot therefore fulfil the primary objective of the NPS. Nevertheless, for completeness, the AoS also sets out why we consider there to be no reasonable alternatives to geological disposal. |
| AoS/HRA | Why no reference to best practical alternative? | The AoS and HRA assessments consider whether there are any reasonable alternatives and alternative solutions to the NPS respectively. Section 4.4 of the draft NPS also gives an overview of alternatives. |
| AoS/HRA | Why was option ruled out to have an NPS which excluded certain sites with high levels of environmental protection? | (i) Existing legislation already provides a high level of protection and ensures development is appropriate and proportionate.  (ii) We ultimately need to find a site for the Geological Disposal Facility which is safe **and** where the local community is willing to host the facility.  (iii) Our consent-based siting policy (Working with Communities) provides a further layer of protection to these areas as a decision to develop a site will only be made if there is support from the people directly affected by the development.  (iv) It may be possible to develop to develop geological disposal infrastructure in designated areas without an unacceptable impact on people or the environment. |
| AoS/HRA | What happens if all the answer to the key AOS questions is NO! | The Appraisal of Sustainability of the draft NPS has determined that it will have a positive effect on environmental and socioeconomic topics. See section 5. |
| Siting process | How and why are we where we are? | The policy in the 2014 White Paper and in these consultation documents has been built on extensive lessons learned from previous processes, from CoRWM’s work (in reviewing options for managing our higher activity waste) and from other overseas geological disposal facility programmes. A history of Government policy and recent siting attempts is given in Section 2 of the NPS consultation and Section 3 of the Working with Communities consultation. |