

## Managing Radioactive Waste Safely: Desk-based Identification and Assessment of Potential Candidate Sites for Geological Disposal - A Public Consultation

### Response form

You may respond to this consultation by email or by post.

Please note that if you accessing this document electronically you will only be able to enter text in the response fields.

Respondent Details	
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Tick this box if you are requesting non-disclosure of your response.

#### Please return by 30 September 2011 to:

Consultation on Managing Radioactive Waste Safely  
 Department of Energy and Climate Change  
 Area 3D  
 3 Whitehall Place  
 London  
 SW1A 2AW

You can also submit this form by email:  
[radioactivewaste@decc.gsi.gov.uk](mailto:radioactivewaste@decc.gsi.gov.uk)

## Consultation questions

Consultation question	
<b>1</b>	<b>Do you agree with the proposed process to identify Potential Candidate Sites? If not, why not?</b>
<b>Response</b>	We would advise that the potential environmental impacts, both natural and historic, of any facility is considered at the earliest possible phase of consideration. Paragraph 5.3 suggests that such factors will be considered during the later desk based assessment stage. Such an approach would lead to unnecessary work being undertaken (in cases where sites would be deemed unsuitable due to highly significant environmental impacts).

Consultation question	
<b>2</b>	<b>Is there anything that could be included to improve the proposed process to identify Potential Candidate Sites, bearing in mind that physical site investigations will not start until later in the process?</b>
<b>Response</b>	

Consultation question	
<b>3</b>	<b>Do you agree with the proposal to use local and national criteria to identify Potential Candidate Sites? If not, why not?</b>
<b>Response</b>	The division of criteria into national and local seems logical. However, the success of such approach will be dependent on being able to adequately differentiate between impacts that are considered national and local (please see our response to questions 4).

Consultation question	
<b>4</b>	<b>Do you agree with the proposed criteria for identifying Potential Candidate Sites? If not, why not?</b>
<b>Response</b>	The currently proposed criteria appears confused as to how to adequately protect the historic environment. In particular paragraph 5.18 which categorises Ancient Monuments and World Heritage Sites as being of 'national or international context', yet records listed buildings and conservation areas as being of 'a more local context'. To clarify categories of nationally designated heritage assets in England are: World Heritage Sites; Scheduled Monuments; Listed Buildings; Protected Wreck Sites; Protected Military Remains; Registered Parks and Gardens; Registered Battlefields; and Conservation Areas. Any criteria used should reflect that each has been

	<p>designated has being of, at least, national importance.</p> <p>It will also be important to reflect the need to protect those elements of the historic environment which, whilst not being designated, are 'demonstrably of equivalent significance' to Scheduled Monuments. See paragraph HE9.6 of Planning Policy Statement 5: Planning for the Historic Environment.</p>
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Consultation question	
<b>5</b>	<b>Do you feel a multi-criteria decision analysis (MCDA) should be used to assess Potential Candidate Sites? If not, why not, and what approach do you think should be used?</b>
<b>Response</b>	

Consultation question	
<b>6</b>	<b>Are there any additional criteria that could realistically be considered at this stage in the process to assess potential candidate sites?</b>
<b>Response</b>	<p>The criteria included in the consultation require further development. Impact on the historic environment is split between the Potential Impact on People and the Potential Impact on the Natural Environment and Landscape. Dividing the potential impact on the historic environment between these two criteria is logical in itself, but the way in which it is worded in paragraphs 6.17 and 6.18 implies the impact architectural and archaeological heritage is locally focussed where as it implies buildings and monuments are 'nationally important'. Obviously importance of a heritage asset is based on its historic, architectural, archaeological or artistic significance and not on what category of asset it is. It might be helpful to list the types of designated heritage assets within the criteria within 6.18, whilst making reference to local lists of heritage assets in 6.17. This would also help clarify the overlaps identified in paragraph 6.21.</p>

Consultation question	
<b>7</b>	<b>Do you have any comments on the way we propose to use MCDA to assist in structured, evidence based decision making?</b>
<b>Response</b>	<p>Our only comment would be to highlight the evidence available from both English Heritage, as the government statutory adviser for the historic environment, and local Historic Environment Registers.</p>

Please select the category below which best describes who you are responding on behalf of.

- Business representative organisation/trade body
- Central Government
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- Individual
- Large business ( over 250 staff)
- Legal representative
- Local Government
- Medium business (50 to 250 staff)
- Small business (10 to 49 staff)
- Micro business (up to 9 staff)
- Trade union or staff association
- Other (please describe):

Thank you for taking the time to let us have your views.

The Government does not intend to acknowledge receipt of individual responses unless you tick the box.

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our Customer Services department:  
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