



# RTPI

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To whom it may concern,

## **Response to the consultation on a draft National Policy Statement for Geological Disposal Infrastructure**

The Royal Town Planning Institute (RTPI) welcomes the opportunity to provide evidence to the Department for Business, Energy & Industrial Strategy consultation on a draft National Policy Statement (NPS) for Geological Disposal Infrastructure.

The RTPI has over 25,000 members who work in the public, private, voluntary and education sectors. It is a charity whose purpose is to develop the art and science of town planning for the benefit of the public. The RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, practice advice, training and development.

Please see our submission to the consultation below.

Yours faithfully,

James Harris

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## Overarching

1. This draft NPS provides a valuable non-site-specific policy statement for geological disposal infrastructure in England. It covers an overview of purpose and scope, sets out government policy on the management of higher activity radioactive waste, outlines the need for geological disposal infrastructure, sets out the assessment principles against which to decide the infrastructure, and examines in detail the environmental impacts of proposed infrastructure.
2. We recognise that this NPS is non-site specific, instead "*focussing on the high-level assessment principles against which development consent applications will be considered for geological disposal infrastructure in England and does not identify specific sites or areas.*" Despite this, there are certain spatial and socio-economic principles which are likely to influence the choice of location, alongside the critical question of geological suitability. These could include remoteness from populated areas, accessibility by transport infrastructure and proximity to existing reprocessing plants. It might be useful for these broad principles to be included within the NPS.

## Introduction

3. Paragraph 1.4.5. states that it would be acceptable to allow one application to cover multiple deep boreholes. This should specify an upper limit to the number of boreholes that can be considered under a single 'tranche' and/or limits to the physical area that can be covered, given the likelihood that different types of landscape will be considered for geological disposal infrastructure.

## Assessment principles

4. In paragraph 4.1.3 the NPS should be clear on the weighting that will be applied when determining the balance between benefits and costs. The benefit to society and the environment is derived from the safe management of nuclear waste over many thousands of years, ensuring that radioactive waste cannot leak into the groundwater and be brought to the surface. Such issues should not be equally weighed to traditional planning concerns, such as visual impact or job creation.
5. Given the recognition of 'significant impacts on the environment' (para. 4.1.1) and 'the significant environmental effects arising from the construction, operation and closure of the geological disposal infrastructure' (para. 4.2.2), 'environmental impact' should also be added to the principles in Table 1. However, because of the amount of material involved, there should be a separate chapter devoted to the principles of environmental impact.
6. Paragraph 4.2.7 usefully notes that the accumulation of, and interrelationship between, various impacts may affect the environment, economy or community as a whole, even if they might individually be acceptable (including with mitigation). This point is important and should be emphasised again in Section 5 as an example for applicants to follow. Again it would be helpful if the NPS clearly stated whether certain impacts will be given greater weight in the application process than others (see paragraph 14 of this response for further details).
7. Paragraphs 4.2.8 to 4.2.10 suggest that the NPS would permit the 'Rochdale Envelope' approach, which creates the flexibility for applicants to provide further information about potentially impactful elements of the scheme (within certain

parameters) following the granting of partial consent. However, given the critical safety issues which relate to geological disposal infrastructure, there is a strong argument that all elements of the scheme should be fully consented before work commences.

8. Section 4.6 should provide absolute clarity on the need to realistically consider worst case climate scenarios, including low likelihood, high risk scenarios, when ensuring that geological conditions are suitable. Any additional safety considerations that would result from hydraulic fracturing also need to be considered in more detail.
9. The operationalisation and implementation of security measures could have economic and social impacts on the area in which the disposal infrastructure is located. However, paragraph 4.11.3 implies that, following approval from relevant agencies, security measures will not be considered further during the examination process. This could mean relevant information on local impacts is not provided in a transparent manner.

### Impacts

10. Chapter 5 contains a comprehensive list of impacts and relevant issues, with useful references to ecosystem impacts (para 5.4.3), opportunities for biodiversity (para 5.4.16), climate change (para 5.5.10), demographic equality (para 5.7.3), cumulative impacts on communities (para 5.7.8), human health and the perception of health risks (para 5.9.1/2) and landscape and visual impacts (para 5.10).
11. While the wording and interlinking is welcome, the NPS should be clear that proposals *must* demonstrate clearly and unambiguously how each environmental impact has been effectively considered and acted upon, with robust measures for implementation and enforcement.
12. Regarding international sites and Habitat Regulations (para 5.4.8) it would be helpful for the NPS to clarify, as far as is possible, the position during and following the Brexit negotiations.
13. In the case of the Exception Test for flood risk, it would be helpful to clarify precisely what is meant by the 'wider sustainability benefits' to the community that outweigh flood risk (para 5.8.22)
14. A clear scale of weightings for the various planning policies should be included in the appendices to help guide the Planning Inspectorate and the Secretary of State, clarifying issues such as the following:
  - a. The reference in para 5.4.7 to the use of 'appropriate weight' being attached to designated sites of international, national and local importance, protected species and habitats and other species of principal importance. It would be useful to state just what that 'appropriate weight' is for each of the listed categories.
  - b. The advice in para. 5.6.14 for 'great weight' to be given to the conservation of heritage assets, since they are irreplaceable. It is assumed that this is the top of the weighting scale?

- c. The advice in para. 5.8.32 for 'substantial weight' to be attached to the risks of flooding and coastal erosion. In the context of this NPS should this imply less weight than to heritage assets?
- d. The advice in para. 5.10.8 that 'great weight' be given to conserving landscape and scenic beauty in nationally designated areas. National Parks and AONBs have the highest status of protection in relation to landscape and scenic beauty. However, the paragraph is unclear as to whether it applies to nationally designated areas or includes other areas. The advice is that '*conservation of the natural beauty of the landscape and countryside should be given substantial weight [less than great weight] by the Secretary of State in deciding on applications for development consent in these areas*'. An improvement in clarity is required here, since it is unclear whether the NPS is referring to nationally designated areas and the weighting is in conflict.