



Historic England

## Response to Geological Disposal Facility (GDF) site evaluation – public consultation

### *Introduction*

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Digital, Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

We welcome the opportunity to submit a response on the following issues:

#### **Question 1**

**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?**

No comment.

#### **Question 2**

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

Historic England agree with the proposed siting factors, including 'environment' as one of the factors.

There will be links between siting factors, as RWM will be aware; for example there will be transport impacts that are environmental, including potential effects on the historic environment.

#### **Question 3**

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

It feels light on detail, notwithstanding this is an early stage of the process, and not entirely accurate for the evaluation considerations under the environment site factor to be limited to two categories – specifically environmental impact and protected Habitats and Species, noting also that impacts on Habitats and Species surely form part of environmental impacts.

When considering what is meant by environmental impact, the matters listed in footnote 19 include the historic environment which of course is good to see. Historic England look forward to further engagement as the project is developed to unpack what this means.

As stated in [Historic England's consultation response to DECC](#) on the site selection process for a GDF in 2013, we recommend that particular attention is given to the assessment of the likely off-site and cumulative impacts on the setting of heritage assets, and thereby the likely impacts on their significance.

Clearly emphasis is placed on the EIA process for assessing environmental effects. It will be important to ensure clarity in the approach to identifying environment effects; for example, where no significant effect is reported it should be clear from the methodology whether this is because the heritage asset has a low significance, the magnitude of the impact is considered low, or the asset in question has been simply overlooked. On other large-scale projects we have noted this can be a challenge with respect to the impact of noise. It is noted that a low impact on a heritage asset of the highest significance should still be regarded a significant.

Presumably the list of factors in footnote 19 is not intended to be comprehensive eg it does not mention vibration or lighting.

#### **Question 4**

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

Does the process provide a sufficiently flexible framework to accommodate any lessons learned from the Managing Radioactive Waste Safely programme in Cumbria? Clearly this programme of work was focused on one particular area, it closed some years ago and is separate from the current process; however, there may still be some general lessons about siting that could be learned from work already undertaken.