



Submarine Dismantling Project

SEA Scoping Report Update

Annex D - Abbreviations and Glossary
March 2011



MINISTRY OF DEFENCE

ALARP	As Low As Reasonably Practicable
AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
BAP	Biodiversity Action Plan
BPEO	Best Practicable Environmental Option
CADMID	Concept, Assessment, Development, Manufacture, In-service Disposal
CAMS	Catchment Abstraction Management Strategies
CCL	Climate Change Levy
CIOP	Consultation on ISOLUS Outline Proposals
CLG	Department for Communities and Local Government
CoRWM	Committee on Radioactive Waste Management
DBERR	Department of Business, Enterprise and Regulatory Reform (formerly DTI)
DCLG	Department for Communities and Local Government (formerly ODPM)
DDL P	De-Equip, De-fuel and Lay-Up Preparations
DE	Defence Estates
DECC	Department of Energy and Climate Change
DE&S	Defence Equipment and Support
Defra	Department for Environment, Farming and Rural Affairs
ISM	In-Service Submarines
DfT	Department for Transport
DISM	Director In-Service Submarines
DNEB	Defence Nuclear Executive Board
DNSR	Defence Nuclear Safety Regulator
DoENI	Department of Environment Northern Ireland
DWS	Drinking Water Standards
DWSP	Drinking Water Safety Plans
EA	Environment Agency
EIA	Environmental Impact Assessment
ETS	Emission Trading Scheme
EU	European Union
FEC	Isolus Front End Consultation
GHG	Greenhouse Gas
HRA	Habitats Regulation Assessment



HSE	Health and Safety Executive
HLW	Higher-Level Waste
IAB	Investment Approval Board
IAG	Isolus Advisory Group (now the SDP Advisory Group)
IEEM	Institute of Ecology and Environmental Management
ILW	Intermediate Level Waste
IPT	Integrated Project Team
ISOLUS	Interim Storage of Laid-Up Submarines
KUR	Key User requirement
LDD	Local Development Document
LLW	Low Level Waste
LNR	Local Nature Reserve
LUSM	Laid-Up Submarine
MGBC	Main Gate Business Case
MISG	MOD Isolus Steering Group (now the SDP Steering Group)
MNR	Marine Nature Reserves
NBC	Naval Base Commander
NDA	Nuclear Decommissioning Authority
NGO	Non-Governmental Organisations
NII	Nuclear Installations Inspectorate of the Health and Safety Executive
NNR	National Nature Reserves
NPS	National Policy Statement
NVZ	Nitrate Vulnerable Zone
ODPM	Office of the Deputy Prime Minister (now CLG)
OGC	Office of Government Commerce
OGD	Other Government Departments
OJEU	Official Journal of European Union
ONS	Office of National Statistics
OSPAR	Oslo-Paris Agreement on the Protection of the North-East Atlantic
PMP	Project Management Plan
PPG	Planning Policy Guidance
PPS	Planning Policy Statement
RN	Royal Navy



RSS	Regional Spatial Strategy
SAC	Special Area of Conservation
SAM	Scheduled Ancient Monument
SDP	Submarine Dismantling Project
SE	Scottish Executive
SEA	Strategic Environmental Assessment
SEPA	Scottish Environmental Protection Agency
SOGE	Sustainable Operations on the Government Estate (govt-wide sustainable devt. targets)
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
ToR	Terms of Reference
UK	United Kingdom
UKCIP	UK Climate Impacts Programme
UNFCCC	United Nations Framework Convention on Climate Change
WCA	Wildlife and Countryside Act
WFD	Water Framework Directive

Glossary of Relevant Terms

Term	Description
Authorisation	Authorisations allow specific defence-related nuclear activity to take place at a specific site. Such 'Authorised' sites are not subject to the Nuclear Installations Act (unlike civil nuclear sites) and so activities are not formally 'Licensed.' Instead, Authorisations are granted by the Defence Nuclear Safety Regulator.
'Brownfield' land	This term refers to land which is, or has, been previously been built upon or otherwise developed.
CoRWM	Committee on Radioactive Waste Management) This independent committee provides scrutiny and advice to Government on the long term management of radioactive waste, including storage and disposal. See http://www.corwm.org.uk/default.aspx
Cut out	This term has previously been used to refer to the option of cutting out the complete Reactor Compartment, thus separating it from the rest of the submarine. The RC is then stored intact.



Cut up	This term has previously been used to refer to the option of cutting up the Reactor Compartment and the items within it to reduce their size, so that the radioactive waste can be packaged in appropriate containers for storage and transport. .
DDL P	De-fuel, de-equip and lay-up preparation - this is the process for preparing redundant submarines for storage. The high-level radioactive waste fuel is removed; security and re-usable equipment is then removed, and the submarine prepared for safe afloat storage.
GDF	Geological Disposal Facility This is the government's proposed long-term, below-ground facility for disposing of the UK's higher-level nuclear waste. The GDF has yet to be built. See http://mrws.decc.gov.uk/en/mrws/cms/home/What_is_geolog/What_is_geolog.aspx for more details.
'Greenfield' land	This term refers to land that has not previously been developed (such as farmland), or which has been used but has reverted back to a largely 'natural' state (such as disused quarries). On such land, there would be no suitable infrastructure or other resources needed to undertake submarine dismantling or store ILW.
HLW	High-Level Waste - this is radioactive waste with a radiological activity above 4 Giga Becquerels (GBq) per tonne of alpha or 12 GBq/tonne of beta-gamma decay, which generates heat and needs to be cooled. Note that this does not include spent nuclear fuel, which is stored at Sellafield but is not classified as waste. There is <u>no</u> HLW on laid-up submarines.
ILW	Intermediate Level Waste – this is radioactive waste with a radiological activity above 4 Giga Becquerels (GBq) per tonne of alpha or 12 GBq/tonne of beta-gamma decay, but which does not generate sufficient levels of heat to require it to be cooled.
ISOLUS	Interim Storage of Laid-Up Submarines. This is the former name of the Submarine Dismantling Project.
Licence	A nuclear Licence allows specific nuclear activities to take place at a specific site. Such 'Licensed' sites are subject to the Nuclear Installations Act (1965), with Authorisations being granted by the Nuclear Installations Inspectorate. Nuclear power stations and other civil activities are Licensed in this way.
LLW	Low Level Waste - defined as radioactive waste that has below 4 Gbq/ tonne of alpha activity and below 12 GBq/ tonne of beta-gamma activity. It covers a variety of materials which arise principally as lightly contaminated miscellaneous scrap and redundant equipment.
MRWS	Managing Radioactive Waste Safely This is the UK Government's published approach to managing the nation's radioactive wastes, irrespective of where they come from and their level of activity. The SDP will adhere to this approach.



NDA	<p>Nuclear Decommissioning Authority.</p> <p>This government agency is responsible for (among others) developing the UK's nuclear low-level waste strategy and plans, and managing the long-term arrangements for the UK's higher-level radioactive wastes including ILW and HLW.</p>
Ramsar Sites	<p>The Convention on Wetlands of International Importance especially as Waterfowl Habitat (the Ramsar Convention), adopted in 1971, entered into force in 1975. The Convention provides a framework for international co-operation for the conservation and wise use of wetlands. Parties are to designate suitable wetlands for inclusion in the List of Wetlands of International Importance, to formulate and implement their planning so as to promote the conservation of wetlands included in the List and the wise use of all wetlands in their territory.</p>
RC	<p>Reactor Compartment - the central 'slice' of the submarine which contains the nuclear reactor and associated pipework.</p>
RPV	<p>Reactor Pressure Vessel - this contains the nuclear reactor and is located within the Reactor Compartment.</p>
SDP	<p>Submarine Dismantling Project www.submarinedismantling.co.uk</p>
SEA	<p>Strategic Environmental Assessment.</p> <p>An assessment undertaken on certain public plans and programmes to ascertain the potential environmental effects that it may have, to identify ways in which damaging effects can be avoided and benefits can be enhanced. SEA also gives the public the opportunity to see what impacts a strategic plan might have on them and to shape the approach taken.</p>
VLLW	<p>Very low level waste - this is radioactive waste with very low levels of radioactivity, which can be disposed of to an ordinary landfill site.</p>





Submarine Dismantling Project SEA Scoping Report Update

Annex E - Quality Assurance

March 2011

FINAL

Annex D

March 2011

Defence Equipment & Support



The Government's Guidance on SEA¹ contains a quality assurance checklist to help ensure that the requirements of the SEA Directive are met. Those relevant to this stage have been highlighted below.

Quality Assurance Checklist	
Objectives and Context	
The plan's purpose and objectives are made clear.	Section 2.1.
Sustainability issues, including international and EC objectives, are considered in developing objectives and targets.	Section 3, Annex A, B and C identifies the sustainability baseline issues. Section 4 sets out the environmental protection objectives and targets and how these are linked to the emerging SEA objectives. These are also identified in Annex B and C.
SEA objectives are clearly set out and linked to indicators and targets where appropriate.	Section 6.1 presents the SEA objectives and guide questions.
Links to other related plans, programmes and policies are identified and explained.	Annex B and C identifies relevant plans and programmes.
Scoping	
The environmental consultation bodies are consulted in appropriate ways and at appropriate times on the content and scope of the Scoping Report.	This is the consultation on the scope of the SEA. It is anticipated that workshops will be held during the scoping stage, where all the consultation bodies will be invited.
The SEA focuses on significant issues.	Significant issues have been identified in this Scoping Report (see Section 5).
Technical, procedural and other difficulties encountered are discussed; assumptions and uncertainties are made explicit.	These are stated throughout the report where appropriate.
Reasons are given for eliminating issues from further consideration.	These are stated in Section 5 , as appropriate.
Baseline Information	
Relevant aspects of the current state of the environment and their likely evolution without the plan are described.	Refer to Section 3 and Annex A and C.
Characteristics of areas likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan (where practical to do so).	Refer to Annex A and C.
Difficulties such as deficiencies in information or methods are explained.	These are stated throughout the report where appropriate.

¹ ODPM, Scottish Executive, Welsh Assembly Government, DoENI (2005) *A Practical Guide to the Strategic Environmental Assessment Directive*, ODPM, London.





Submarine Dismantling Project SEA Scoping Report Update

Annex F - Stage A1 Generic Scoping Report Consultation Responses

March 2011



Feedback received from UK Statutory Bodies on the Stage 'A1' SEA Scoping Report

Ref	Consultation Response	Commentary/ action taken
1. Environment Agency		
General Comments	<p>Overall, we have found the document clear and easy to follow.</p> <p>Within the constraints of a generic scoping report, and subject to specific comments below, we are content that the MoD has identified the issues which will need to be addressed once a list of potential sites for both initial dismantling (removal of radioactive components) and for intermediate storage of Intermediate Level Waste (ILW) is notified.</p>	Noted, with thanks.
General Comments	<p>The impact of all phases of SDP will ultimately be dependent on site selection. We have previously recommended that MoD should minimise environmental impact by using an existing nuclear licensed site, with an experienced work force used to managing, storing and disposing of radioactive waste. We see this as an essential step, preferable to developing (and eventually decommissioning) a green-field or brown-field site.</p>	Noted.
General Comments	<p>Progress of the SDP will rely on a number of activities (e.g. radioactive waste discharges and disposals, conventional and hazardous waste disposals etc), which will require permits issued by an environmental regulator. We would expect MoD to demonstrate, through an SEA and subsequent permit applications, that the impact of these activities on the environment has been addressed and minimised using Best Available Techniques (BAT).</p>	<p>Noted.</p> <p>The SDP Sustainable Development and Regulatory Strategies confirm that the MOD will act in accordance with all Regulatory requirements, including the need to adopt BAT principles.</p>
General Comments	<p>MoD should address the assessment of ship-breaking alternatives and final vessel dismantling issues as part of the SEA, in particular with regards cumulative impacts with other SDP stages, and transport and location impacts. Final dismantling is a clear step in the SDP process. We appreciate MoD's view that this is an activity with which they are widely engaged, but even a hull with all the radioactivity removed may present a challenge environmentally as well as from a public relations perspective.</p>	<p>Noted.</p> <p>The potential impacts of 'ship-breaking' and management of waste streams will be assessed at a generic level, under Stage IV of the SDP process (see Figure 1.1, p6 and Section 2.2, p20). This will highlight any significant differences between ship-breaking at the initial dismantling site and a generic commercial UK site. Issues such as transport distance and the proximity principle will be included. Cumulative effects will be considered using the approach set out in Section 6.3 of the generic Scoping Report.</p> <p>The scope of the SEA does not extend to include comparative assessment of individual commercial ship-breaking sites, as these are established facilities whose activities are licensed under the same regulatory requirements, to ensure appropriate environmental standards are met. Moreover, it is proposed that the selection of the ship-breaking site(s) will be resolved by competition, and it is not possible to identify compliant bidders or conduct this competition until the strategic decisions (that are the focus of the SEA) have been taken. The assessment of site-specific environmental impacts will be undertaken during this commercial process.</p>



Ref	Consultation Response	Commentary/ action taken
General Comments	It is unclear from the Scoping Report whether the SEA will review or assess the technical options for processing the submarines, as described in Section 2.2.2. The text suggests that the decision will be based on practicability and best value criteria, suggesting environmental considerations will not be included. An explanation for this would be useful.	Accepted. The generic environmental impacts associated with the three technical options will be addressed and form part of the consultation, alongside the other factors such as practicability and safety. The MOD does intend to present a proposed technical solution, based on the results of these assessments, but will not exclude the other two options from consideration. It is to be noted that technical options will need to be presented and considered in conjunction with the site options, in effect as scenarios comprising initial dismantling site, storage site type and technical methodology. The text (and Table 2.1) will be revised accordingly.
General Comments	Statements about water quality in the baseline, plans and programmes review, and assessment portions of the Scoping Report should be in line with River Basin Management Plans issued in Dec 2009. Currently references are to earlier Defra studies and data, which are now superseded.	Accepted. The baseline data and plans/programmes review will be updated in the scoping report update.
General Comments	We welcome the inclusion of coastal change (erosion and land instability) as an issue in the report. For consistency with other national planning documentation, MoD should link this issue with flood risk, and a Section on flood and coastal change risk should be considered.	Accepted. A separate category entitled ' <i>Coastal change and flood risk</i> ' will be introduced into the Scoping Report update. Relevant information will be presented in baseline information, the plans and programmes, the scoping of potential effects and the assessment framework. Section 6.3 (cumulative effects) will be revised to make clear that effects impacting across more than one environmental category (such as the impact of sea level rise on erosion rates, and erosion on subsequent flood risk) are properly considered.
General Comments	Given the link of the SDP to the Geological Disposal Facility (GDF) programme, we recommend that reference is made to the ongoing SEA programme for the GDF, and that the information is consistent in the two SEAs.	Accepted. Explicit reference will be made to the GDF and the ongoing SEA process using information from the NDA RWMD that is in the public domain.
General Comments	Reference should be made in the plans and programmes review to the Ports National Policy Statement and to the Marine Policy Statement to be issued shortly, as these may influence location/cumulative impacts of development with other infrastructure and coastal or marine projects.	Partially Accepted. The National Policy Statements (NPS) and Marine Policy Statements (MPS) are not finalised and their content is anticipated to be subject to further amendments prior to designation. The plans and programmes review will be updated to include reference to the draft NPSs and MPSs in the Scoping Report update.
NTS	Section G on Air Quality is missing.	Accepted. This was a formatting error and will be corrected in the Scoping Report update.
3.3.1 – Biodiversity issues	The report seems to separate out biodiversity and nature conservation, as reflected in Natura 2000, from the remainder of aquatic ecology. GES/GEP under WFD require all biological elements to meet the requirements set across the aquatic landscape, this should be reflected	Accepted. Section 3.3.1 on biodiversity will be revised to include reference to all biological elements in the Scoping Report update.



Ref	Consultation Response	Commentary/ action taken
	in the discussion on biodiversity.	
3.3.6 - Water issues	The figures quoted for Water Framework Directive compliance are too high for England and Wales. We recommend a check on Scoping Report statements about water quality and the condition of water bodies, which come from earlier Defra publications. They are not in line with River Basin Management Plans issued in Dec 2009. In particular, the Plans suggest that compliance with Good Ecological Status/Good Ecological Potential (GES/GEP) (as appropriate) are lower than the 94%, 72% and 76% figures quoted, and that measures are needed for improvement. This is important in terms of scaling the true pressures prevailing today on the majority of aquatic ecosystems.	Noted, with thanks. This information will be reviewed in the Scoping Report update.
3.3.6 - Water issues	The scoping report should clarify that impacts are likely on estuary/coastal waters.	Noted A separate category entitled ' <i>Coastal change and flood risk</i> ' will be introduced into the Scoping Report update. Relevant information will be presented in baseline information, the plans and programmes, the scoping of potential effects and the assessment framework.
3.3.6 - Water issues	We would not expect radiological discharges during any dismantling phase to have any significant impact on water bodies. We expect the use of Best Available Techniques to minimise discharges to water.	Noted. Section 3.3 presents a summary of key baseline issues. This comment concerns the potential scoping of potential effects considered in Section 5. The introduction to Section 3.3 and all subsequent sub Section headings will be revised to make clear that it refers to baseline issues only. The comment is dealt with in Section 5.
3.3.6 - Water issues	The impact of climate change and in particular rising sea level for any coastal/estuarine site undertaking such work over a 60 year period will need to be assessed for the dismantling phase and for the intermediate storage of radioactive wastes pending permanent disposal.	Noted As above - The comment is dealt with in Section 5.
3.3.7 - Air issues	We would not expect to see gaseous radiological emissions figure as a significant contribution to reduced air quality. We expect the use of Best Available Techniques to minimise discharges to air.	Noted As above - The comment is dealt with in Section 5.
3.3.9 - Transport issues	Use of the Waste Management Hierarchy should address many of the issues regarding use of transport. Disposal of "lower level" (Very Low Level and Low Level) radioactive wastes should take account of the proximity principle when the SEA addresses transportation.	Noted As above - The comment is dealt with in Section 5.
3.3.10 - Waste issues	MoD, in planning for SDP, takes account of the plans to develop a national Geological Disposal Facility (GDF) for the disposal of SDP Intermediate Level Waste (ILW). In doing so, MoD understands that such a facility will not be available for several decades.	Noted. Section 3.3.10 will acknowledge the uncertainties surrounding the timeframe for delivery of the GDF. The interim storage facility will have a design life of 100 years; the SDP will however retain a working assumption that the ILW will be disposed of to the GDF after 2040.
3.3.10 - Waste issues	MoD needs to assess the impact of lengthy intermediate storage of ILW as well as the impact of temporary storage at the dismantling site.	Noted As above - The comment is dealt with in Section 5.



Ref	Consultation Response	Commentary/ action taken
3.3.10 - Waste issues	For materials which are lightly contaminated with radioactivity, MoD should fully explore the routes which are now available for recycling these materials rather than disposing of them as waste.	Noted. Section 3.3.10 will be updated to include a bullet point on the management of VLLW.
Section 4 - Plans and Programmes	We expect that all processes used to manage radioactive wastes will use the Best Available Techniques. SDP will be a permitted activity under the Environmental Permitting Regulations (EPR) 2010 and we expect discharges to air and water to be as low as reasonably achievable through application of most up to date techniques.	Noted. The SDP Sustainable Development and Regulatory Strategies confirm that the MOD will act in accordance with all Regulatory requirements, including the need to adopt BAT principles. EPR 2007/ 2010 will be included in the relevant parts of Annex B (note that we intend to remove specific references from Section 4).
Section 4 - Plans and Programmes	The SDP will manage the disposal of several types of radioactive waste, with ILW presenting the biggest challenge. We expect MoD (and their contractor(s)) to use the waste management hierarchy to minimise disposal of Low Level Waste (LLW) and Very Low Level Waste (VLLW) and to use existing facilities for recycling lightly contaminated materials such as steel.	Noted. The waste hierarchy principle is contained within the EU Thematic Strategy on Waste, which is included in Section 4. The comment regarding the application of the waste hierarchy is more relevant to Section 5. It has therefore been addressed in that Section.
Section 5 - Potential Effects	This Section outlines the key issues by which the SDP could affect the environment. Through our regulatory engagement with MoD (jointly with SEPA, Nuclear Installations Inspectorate, MoD's own regulator (Defence Nuclear Safety Regulator) and DfT we have established a strategy that identifies lead regulators for the different stages of SDP. MoD has scoped the regulatory requirements into the strategy and we are content that they are addressing these in the forthcoming SEA.	Noted, with thanks.
5.1.2 - Biodiversity	Radioactive operational discharges are expected to be low from de-fuelled submarines, although if cut-up as opposed to cut-out is selected, appropriate controls will need to be in place to minimise airborne activity. Permitting by itself does not provide these controls - the use of the best available techniques will minimise emissions at source and prevent the entry of airborne activity into the environment.	Accepted. 5.1.2 will be amended to reflect the need for BAT to be used.
5.1.3 - Biodiversity	Regardless of the type of site selected (existing nuclear licensed, green-field or brown-field), its physical status needs to be investigated before any dismantling activity. This will provide a baseline for decommissioning.	Noted. The individual site(s) finally chosen for dismantling and/or interim storage will be subject to baseline assessments for environmental; quality as part of ND(EIA) and T&CP (EIA) assessment. As a result, it is felt that no change to the current text is needed in this regard.
5.5, 5.6 and 5.7	Sections on 'soil and geology', 'water' and 'climate change' need to consider (i) whether facilities associated with the SDP process will be at risk from flooding and coastal change, and (ii) whether they will cause or exacerbate flood and coastal change risk.	Accepted. A separate category entitled ' <i>Coastal change and flood risk</i> ' will be introduced into the Scoping Report update.



Ref	Consultation Response	Commentary/ action taken
5.5, 5.6 and 5.7	Sites should be preferred where there is no increase in flood and coastal change risk. This includes the effects that works may have on flood and coastal defence infrastructure.	Noted. The SEA objectives in Table 6.1 (p68) outline the preferred sustainable outcomes based on the evaluation of the appropriate contextual information. Sites will be assessed against this framework to identify preferable locations, taking into account all aspects of sustainability.
5.6 - Water	The discussion should make it clear that the Scoping Report has already identified the type of location that may be affected, i.e. estuary or coastal etc that can accommodate submarine access.	Accepted. This will be included in the preamble to Section 5.6.
5.6 - Water (repeated from 3.3)	We would not expect radiological discharges during any dismantling phase to have any significant impact on water bodies. We expect the use of Best Available Techniques to minimise discharges to water.	Noted. The potential effects on water bodies have been scoped into the assessment due to the perceived risks and associated public anxiety about any radiological discharge (whether scheduled or accidental). BAT will be included in the text, alongside Environmental Permitting, throughout Section 5.5.
5.6 - Water (repeated from 3.3)	The impact of climate change and in particular rising sea level for any coastal/estuarine site undertaking such work over a 60 year period will need to be assessed for the dismantling phase and for the intermediate storage of radioactive wastes pending permanent disposal.	Agreed. A separate category entitled ' <i>Coastal change and flood risk</i> ' will be introduced into the Scoping Report update. Relevant information will be presented for this issue in the scoping of potential effects in a revised Section 5. This will draw on information in sections 5.5 (soil and geology), 5.6 (water) and 5.8 (climate change).
5.7 - Air (repeated from 3.3)	We would not expect to see gaseous radiological emissions figure as a significant contribution to reduced air quality. We expect the use of Best Available Techniques to minimise discharges to air.	Noted. The potential effects on air have been scoped into the assessment due to the perceived risks and associated public anxiety about any radiological discharge (whether scheduled or accidental). BAT will be included in the text, alongside Environmental Permitting, throughout Section 5.7.
5.9 - Transport (repeated from 3.3)	Disposal of "lower level" (Very Low Level and Low Level) radioactive wastes should take account of the proximity principle when the SEA addresses transportation.	Noted. The need to consider the proximity principle will be included in Section 5.9. LLW is constrained to the established disposal mechanism of the National LLW repository. The transport distance from the proposed initial dismantling facility/ies to the LLW repository will be included in the assessment.
5.10 - Waste (repeated from 3.3)	MoD needs to assess the impact of lengthy intermediate storage of ILW as well as the impact of temporary storage at the dismantling site.	Accepted. The length of interim storage will be included as a factor in the operation phase (Section 5.10.2). The potential for 'buffer' storage at the dismantling site will be included in the health Section.



Ref	Consultation Response	Commentary/ action taken
5.10 - Waste	We expect MoD (and their contractor(s)) to use the waste management hierarchy to minimise disposal of Low Level Waste (LLW) and Very Low Level Waste (VLLW) and to use existing facilities for recycling lightly contaminated materials such as steel.	Noted. The SEA objective on waste in Table 6.1 (p68) is based on the application of the waste hierarchy. Every opportunity will be taken to avoid the disposal (and maximise the recycling) of LLW and VLLW, as this makes both environmental and economic sense.
Question 1 response	<p><i>Do you have any comments on the proposed alternative options outlined for the SDP?</i></p> <p>We understand the MoD's need to consult on all options, and site specific assessment will be an important step in identifying the best location for the project. However, the selection of an existing nuclear licensed site for initial dismantling has the potential to significantly reduce the overall environmental impact of the SDP. Similarly, for interim storage of ILW, using an existing site may provide tangible benefits to MoD's longer term aim of safely disposing of ILW at the planned GDF.</p>	Noted, with thanks.
Question 1 response	Considerations of alternatives for an appropriate dismantling site could include, in addition to green/brown/existing sites: selection of alternatives between east coast and west coast; freshwater or marine; and proximity to infrastructure. Such considerations may be more important than green/brown/existing sites. The options should be revisited when site selection criteria are available.	Noted. Whilst we note the EAs earlier recommendation that the 'MoD should minimise environmental impact by using an existing nuclear licensed site', we have proposed an approach to developing the strategic alternatives that enables a balanced consideration of all three land use categories (without pre-empting the outcome). The approach also provides a framework for the more detailed assessment of identified sites. The additional alternative factors proposed for locating a dismantling site will then be captured when assessing the performance of individual candidate sites. In such circumstances, proximity to infrastructure, potential effects on the aquatic environment and coastal location can be meaningfully assessed by reference to local baseline information.
Question 1 response	With regards technical options, we have been engaged with MoD on the selection for the SDP for some time. We understand that the option of cut-out versus cut-up is under evaluation, and that MoD will have selected a preferred approach with which to progress through to an in-service date of ~ 2020. Whichever options MoD select, we will expect the highest environmental standards to be used to minimise the impact on the environment.	Noted. The publicly-stated aim of the SDP is that "we are committed to disposing of our nuclear submarines in a way that is safe, environmentally responsible, secure and cost-effective." By undertaking the SEA, the project is addressing environmental impacts at the formative stages of the project. This will be translated through to the site-specific solution(s) through (as a minimum) the Decommissioning EIA, Town and Country Planning EIA and Habitats Regulations Assessment. Activities will be subject to EPR 2007/ 2010, and BAT principles will be adopted.
Question 1 response	Detailed environmental impacts should be constructed within a reasonable timeframe to allow for discussion with the regulators. MoD needs to take account of various ship dismantling conventions and Defra's Ship Dismantling Strategy when planning this work, as well as when planning for the dismantling of the non-radiological hull.	Noted. The ship recycling conventions are referenced in the SEA; detailed environmental assessments will be undertaken once the public consultation has completed and site decisions have been made.



Ref	Consultation Response	Commentary/ action taken
Question 1 response	<p>We do however question why MoD does not propose to include any assessment of commercial ship-breaking sites as part of the SDP SEA, since this is a clearly identifiable component of SDP - Stage III and/or IV.</p>	<p>Noted.</p> <p>The potential impacts of ship-breaking will be assessed, under Stage IV of the SDP process (see Figure 1.1, p6 and Section 2.2, p20). This will include the generic effects of transporting materials from the dismantling site(s) and of ship-breaking at the initial dismantling site vs. an established UK commercial ship-breaking facility. The cumulative effects will be considered using the approach set out in Section 6.3 of the generic Scoping Report.</p> <p>The scope of the SEA does not extend to include comparative assessment of individual commercial ship-breaking facilities as these are established facilities whose activities are licensed to ensure appropriate environmental standards are achieved.</p>
Question 2 response	<p><i>Do you agree with the main environmental issues identified?</i></p> <p>Section 3.3.6 - Key Water Issues:</p> <p>We agree with the issues identified, with the additions below. However, we re-iterate that the information needs to be updated to reflect River Basin Management Plans content. For example, the statement that 72% of UK waters meet good biological quality and 76% good chemical quality is based on the 2008 General Quality Assessment (GQA) for England only. The Environment Agency would prefer that WFD classification system is used. The statement that 94% of UK coastal waters meet WFD standards is misleading as this is based on classification of Scottish coastal waters only.</p>	<p>Noted, with thanks.</p> <p>This information will be reviewed in the Scoping Report update.</p>
		<p>Note: Section 3.3 details key baseline issues. The EA comments below are relevant to Section 5, where the potentially significant environmental effects of the SDP are scoped. The MOD responses are relevant to Section 5.</p>
Question 2 response	<p>Section 3.3.6 - Key Water Issues:</p> <p>There might be the need to dredge to move the vessels, this could have serious impacts on the water environment, including on the geomorphology.</p>	<p>Partially accepted.</p> <p>The potential for dredging impacts on water quality (from accidental discharges) are noted in Section 5.6. The project assumptions are that additional dredging will not be required; however this cannot be ruled out. The potential impacts of any dredging on geomorphology and hence on biodiversity will also need to be included. Sections 5.1 and 5.6 of the Scoping Report update will be revised accordingly.</p>
Question 2 response	<p>Section 3.3.6 - Key Water Issues:</p> <p>Some clarification is needed as to exactly what constitute 'key water issues'. Specifically, in the non technical summary table of key issues, flood risk is included under 'Water' but this is not the case in this part of the scoping report.</p>	<p>Accepted</p> <p>The Scoping Report will be revised to provide clarity.</p> <p>A separate category entitled '<i>Coastal change and flood risk</i>' will be introduced into the Scoping Report update.</p>



Ref	Consultation Response	Commentary/ action taken
Question 2 response	<p>Section 3.3.6 - Key Water Issues:</p> <p>During construction, operational and decommissioning phases, the effects of flooding should be considered in relation to safety of users/workers on the site, and in relation to the environment. E.g. will site flooding cause environmental damage by disrupting processes for pollution control and management? In addition, due to the coastal location there is potential for disruption to flood/coastal defences.</p>	<p>Accepted.</p> <p>The potential impacts of flooding on worker safety are currently inferred, rather than explicit. Section 5.6 will be updated accordingly.</p> <p>Section 5.6 does already address the environmental impacts of flooding, e.g. "...this may result in flood damage to facilities, disruption of activity or the potential mobilisation of hazardous material both on and off site." The reference to interference with pollution control measures will be made explicit in the above text.</p> <p>The impacts that the SDP infrastructure may have on coastal and flood defences is already captured at paragraph 2 of Section 5.6.1 (construction phase). However, reference will be added to potential impacts on coastal flood defences for clarity.</p>
Question 2 response	<p>Section 3.3.6 - Key Water Issues:</p> <p>Increases in hard standing can create an increased potential for surface water flooding both on and off site. Flood risk elsewhere should not be made worse as a result of this development.</p>	<p>Noted.</p> <p>This is already captured in Section 5.6.1.</p>
Question 2 response	<p>Section 3.3.1 - Key Biodiversity issues:</p> <p>Non-native invasive species are also a key concern for our wildlife. We need to be careful when vessels are moved to different waters that certain species are not spread.</p>	<p>Accepted.</p> <p>The Scoping Report update will be amended to include reference, where relevant to non-native invasive species.</p>
Question 2 response	<p>Section 3.3.1 - Key Biodiversity issues: Noise impacts should also be considered as part of the Marine Strategy Framework Directive.</p>	<p>Noted.</p> <p>Noise impacts on biodiversity are already covered in Section 5.1.</p> <p>Section 4/Annex B (review of plans, programmes and environmental protection objectives) will be updated to include the objectives of the Marine Strategy Framework Directive.</p>
Question 2 response	<p>Section 3.3.1 - Key Biodiversity issues:</p> <p>With regards to biodiversity, protected habitats and designated sites should be considered as well as protected species.</p>	<p>Not accepted.</p> <p>In both Sections 5.1 and 3.3.1, reference is made to protected habitats (including sites designated at UK and EU level).</p>
Question 2 response	<p>Section 3.3.1 - Key Biodiversity issues:</p> <p>Aquatic ecosystems are under pressure from anthropogenic sources as described. Climate change compounds these pressures, particularly through rising temperatures. Changes in marine fish ecology are happening now. Migratory fish species are likely to be adversely affected in the near future.</p>	<p>Accepted.</p> <p>Section 3.1.1 of the Scoping Report update will be revised to include these additional issues identified.</p>



Ref	Consultation Response	Commentary/ action taken
Question 2 response	<p>Section 3.3.8, Key climate change and energy issues</p> <p>This section does not include any reference to increased risks from flooding and coastal change, despite the fact that these points were touched upon in the key issues table in the Non Technical Summary. The effects of climate change will include sea level rise and increased storminess, which will impact upon the risks from flooding and coastal change. The extent of the change in risk will become increasingly important when considering specific sites.</p>	<p>Accepted.</p> <p>A separate category entitled '<i>Coastal change and flood risk</i>' will be introduced into the Scoping Report update. Relevant information will be presented in baseline information, the plans and programmes, the scoping of potential effects and the assessment framework.</p>
Question 2 response	<p>Section 3.3.11 Key Land Use and Materials Issues</p> <p>The regional strategies have been revoked so there are no longer regional housing targets. We assume the 3m new houses by 2020 are also now revoked. Reference to 'green belt' is inaccurate - it should probably be 'green-field'. The new Government have given strong backing to protecting the Green Belt.</p>	<p>Accepted</p> <p>The Scoping Report update will be revised to include Coalition Government changes to the planning system.</p>
Question 2 response	<p>Section 3.3.11 Key Land Use and Materials Issues</p> <p>Construction, Operation and Decommissioning phases should consider potential secondary effects such as use of land for housing and other services as a result of an influx of workers.</p>	<p>Noted.</p> <p>Section 5.2.1 (population) already considers the impacts of worker influx. We do not expect that there will be a significant enough influx of workers in any scenario that will warrant additional land being developed for worker housing.</p>
Question 2 response	<p>Section 3.3.5 Key Soils and Geology issues</p> <p>This should consider the risk of release of sequestered carbon from organic soils such as peat. This can happen if the soil is excavated or if construction work alters the hydrology of the site.</p>	<p>Accepted.</p> <p>The Scoping Report update will include reference to the potential for sequestered carbon release from organic soils as a result of the SDP proposals in geology and soils (Section 5.5)</p>
Question 3 response	<p><i>Are there additional plans, programmes and strategies which should be considered in the SEA?</i></p> <p>Annex B Material Assets (Waste Mgmt)</p> <p>International/European: include Basel Convention on ship dismantling and possibly to the as yet un-ratified Hong Kong Convention 2008.</p> <p>Reference to Radioactive Substances Act 1993 should be replaced with Environmental Permitting Regulations 2010.</p>	<p>Noted, with thanks.</p> <p>We do not propose to include un-ratified conventions; however the other suggestions will be included in the update.</p>
Question 3 response	<p>Non-Technical Summary; Annex B p 96; and Scoping Rpt Section 4.2</p> <p>The summary of the review in the non technical summary appears only to consider plans and policies applying to England. For example on page 41 PPS 25 Development and Flood risk is cited, but there is no mention of its equivalent in Wales, TAN15. The full review in Annex B corrects this by including documents under separate headings for Wales and Scotland (but not Northern Ireland). However, many of the plans and policies listed under 'National (UK)' in fact only apply to England e.g. on Annex B, page 96 "A Strategy for England's Trees,</p>	<p>Accepted.</p> <p>The Scoping Report update will be updated to include provision of appropriate policies, plans and programmes for the devolved administrations.</p>



Ref	Consultation Response	Commentary/ action taken
	<p>Woodlands and Forests (2007)" is listed under 'UK' documents. This will need to be corrected or it may cause confusion when evaluating sites in the devolved administrations' areas.</p> <p>The table of Policies, Plans and Programmes in Section 4.2 should refer to Scottish and Welsh planning policy (in Wales - Planning Policy Wales (200))</p>	
Question 3 response	<p>Scoping Report, Section 4 - Water</p> <p>We recommend adding reference to River Basin Management Plans (RBMPs): These plans have now been issued and should be consulted.</p>	<p>Accepted.</p> <p>This will be included in the update.</p>
Question 3 response	<p>Scoping Report, Section 4 - Water</p> <p>The table should also refer to Planning Policy Statement PPS23 Pollution Control, which refers to discharges to water.</p>	<p>Accepted.</p> <p>This will be included in the update.</p>
Question 3 response	<p>Scoping Report, Section 4 - Water</p> <p>The table should include reference to the Marine and Coastal Access Act 2009, which introduces radical new measures to manage the marine environment in a more sustainable manner, including the development of Marine Spatial Plans and Marine Conservation Zones. It also includes important amendments to the Salmon and Freshwater Fisheries Act, 1975. Reference should also be made to the Eel Regulations 2010. All of these regulations may impact upon SDP proposals, depending upon location and methodologies adopted.</p>	<p>Accepted.</p> <p>This will be included in the update.</p>
Question 3 response	<p>Scoping Report, Section 4 - Water</p> <p>We welcome the inclusion of PPS 25 on development and flood risk, and its supplement on development and coastal change in the 'Water' section. However, clarity is needed between the sections on 'soils and geology', 'water' and 'climate change' as to where plans and programmes on flood and coastal erosion risk management are to be included.</p>	<p>Agreed.</p> <p>A separate category entitled '<i>Coastal change and flood risk</i>' will be introduced into the Scoping Report update. Relevant information will be presented in baseline information, the plans and programmes, the scoping of potential effects and the assessment framework.</p>
Question 3 response	<p>Scoping Report, Section 4 - Water</p> <p>Given the point above, Catchment Flood Management Plans (CFMPs) and Shoreline Management Plans (SMPs) should be included in the list of plans and programmes under 'water', as these provide information on flood and coastal erosion risk over the next 100 years, and present preferred policy options for managing those risks</p>	<p>Accepted.</p> <p>This will be included in the update.</p>
Question 3 response	<p>Scoping Report, Section 4 - Water</p> <p>Regional coastal monitoring programmes (EA and Local Authority) study a number of data streams, e.g. bathymetry and sediment transfer, which may be relevant at a site-specific level.</p>	<p>Noted.</p> <p>The Scoping Report update will be updated to include information where appropriate and in the public domain.</p>



Ref	Consultation Response	Commentary/ action taken
Question 3 response	<p>Scoping Report, Section 4 - Water</p> <p>The Marine Strategy Framework Directive will bring new descriptors and standards for underwater noise, which may be relevant to the SDP proposals, depending on location.</p>	<p>Noted.</p> <p>The Scoping Report update will be updated to include this, as appropriate.</p>
Question 4 response	<p><i>Do you know of any additional baseline evidence which will help to inform the SEA process?</i></p> <p>Annex A is weak on sources of baseline data for the environment in Wales. In particular, we would recommend you consider:</p> <p><u>Biodiversity and Nature Conservation</u></p> <p>Wales Biodiversity Action Plan (http://www.biodiversitywales.org.uk/)</p> <p><u>Human Health (Noise)</u></p> <p>See mapping prepared under the directive on Assessment and Management of Environmental Noise 2002/49/EC (http://wales.gov.uk/topics/environmentcountryside/epq/noiseandnuisance/environmentalnoise/)</p> <p><u>Water</u></p> <p>The baseline information on water quality appears to be based on a 2007 report "Recommendations on Surface Water Classification Schemes for the purposes of the Water Framework Directive".</p> <p>Since this report was written River Basin Management Plans produced under the Water Framework Directive have been published (at http://www.environment-agency.gov.uk/research/planning/33106.aspx).</p> <p>We recommend these plans are used to identify issues and to establish baseline water quality as this is the system under which monitoring and reporting will be undertaken in the future.</p> <p>The assessment needs to consider quantity as well as quality of water.</p>	<p>Noted, with thanks.</p> <p>The Scoping Report update will be updated to include appropriate Welsh information.</p>
Question 4 response	<p>Environment Agency Water Resources Strategies and Action Plans (http://www.environment-agency.gov.uk/research/library/publications/40731.aspx)</p> <p>River Basin Management Plans (http://www.environment-agency.gov.uk/research/planning/33106.aspx)</p> <p><u>Material Assets (Waste Management)</u></p> <p>Towards Zero Waste - the waste strategy for Wales (http://wales.gov.uk/topics/environmentcountryside/epq/waste_recycling/publication/towardszero/)</p> <p>WasteDataFlow (England and Wales) (http://www.wastedataflow.org/)</p> <p><u>Various</u></p>	<p>Noted, with thanks.</p> <p>The Scoping Report update will be updated to include this information, as appropriate.</p>



Ref	Consultation Response	Commentary/ action taken
	<p>The Wales State of the Environment Report and Stats Wales site http://wales.gov.uk/topics/statistics/headlines/env2009/hdw20090723/?lang=en</p>	
Question 4 response	<p>Annex A, pages 2 and 11; Annex page 76; main report 3.3.1 page 29.</p> <p>There is not much marine baseline data here, e.g. marine designations such as the marine nature reserves which are now becoming Marine Conservation Zones. The new legislation introduced by the Marine and Coastal Access Act 2009 is looking to reverse the decline in marine species and habitats.</p>	<p>Noted, with thanks.</p> <p>The Scoping Report update will be updated to include this information, as appropriate.</p>
Question 4 response	<p>Annex B, p23</p> <p>The biodiversity section should include the Water Framework Directive and the Marine Strategy Framework Directive in the international section; and the Marine Nature Reserves and Marine Conservation Zone legislation. Note that Lundy is the first Marine conservation zone to be established. The Marine Strategy Directive also amongst other things introduced noise as an element of consideration and the delivery of a network of Marine Protected Areas.</p>	<p>Noted, with thanks.</p> <p>The Scoping Report update will be updated to include this information, as appropriate.</p>
Question 4 response	<p>Annex B, p83</p> <p>We would look for more recent data than 2007. Also note that link to ONS ref 1 is broken.</p>	<p>Noted, with thanks.</p> <p>The Scoping Report update will be updated to include more recent information, where available and current hyperlinks, as appropriate.</p>
Question 4 response	<p>Annex B p92</p> <p>Link to CLG ref 4 is broken. National Target - recommend check that 2007 Housing Green Paper is still relevant.</p>	<p>Noted, with thanks.</p> <p>The Scoping Report update will be updated to include more recent information, where available and current hyperlinks, as appropriate.</p>
Question 4 response	<p>Annex B p155-158</p> <p>Given recent change in government, we recommend that all references to National policy documents are checked (apart from PPGs and PPSs which Government has confirmed are in force).</p>	<p>Accepted</p> <p>The Scoping Report update will be revised to include Coalition Government changes to the planning system.</p>
Question 4 response	<p>Annex B p159</p> <p>Recommend inserting reference to Planning Policy Wales (2010).</p>	<p>Noted, with thanks.</p> <p>The Scoping Report update will be updated to include this information, as appropriate.</p>
Question 5 response	<p><i>Do you agree that the proposed SEA objectives cover the breadth of issues appropriate for assessing the SDP?</i></p> <p>Scoping Report, Section 6, Table 6.1.</p> <p>In general we agree with the objectives (although see the comments below), as far as is possible when the Scoping Report is for generic sites. When specific sites are known for dismantling, ILW storage and (if MoD undertake) for the final ship dismantling site(s), the full breadth can be covered. As mentioned earlier, the full scope of SDP includes final dismantling of the hull, and this is not clearly</p>	<p>Noted.</p> <p>The potential impacts of ship-breaking will be assessed, under Stage IV of the SDP process (see Figure 1.1, p6 and Section 2.2, p20). This will include consideration of generic effects associated with dismantling the submarines at the initial dismantling site, as opposed to an established UK commercial ship-breaking facility. The cumulative effects will be considered using the approach set out in Section 6.3 of the generic Scoping Report.</p>



Ref	Consultation Response	Commentary/ action taken
	addressed in the Scoping Report.	The scope of the SEA does not extend to include comparative assessment of individual ship-breaking facilities as these are established facilities whose activities are licensed to ensure appropriate environmental standards are achieved.
Question 5 response	Scoping Report, Section 6, Table 6.1 In Row A, we support the objective to look to enhance the environment and at the least protect what we have.	Noted, with thanks.
Question 5 response	Scoping Report, Section 6, Table 6.1. In row E, we welcome the inclusion of the question 'will the proposals affect coastal processes and/or erosion'. The question needs to be amended to ask whether it will 'affect or be affected by'	Accepted. This wording will be updated.
Question 5 response	Scoping Report, Section 6, Table 6.1 In row F, we welcome the inclusion of the question 'will the proposals affect flood risks'. The question needs to be amended to ask whether it will 'affect or be affected by'.	Not accepted. Both are already included in F: "will the proposals affect existing flood risks?" and "will the proposals be significantly affected by flooding from any source?"
Question 5 response	Scoping Report, Section 6, Table 6.1 In row H, we need to ask whether the proposals will be safe from flood and coastal erosion risk for the duration of their life, including any decommissioning period.	Not accepted. The current question covering this is "will the proposals be significantly affected by climate change?" We intend to amend this to "will the proposals be likely to be affected by climate change" to reflect the inherent uncertainties of predicting the future.
Question 6 response	<i>When and how should we be seeking your opinions on site-specific information?</i> The Environment Agency has a programme lead officer for the SDP, with remit to cover both conventional and radiological activities and using the expertise available nationally and locally. The lead will be continuing interface with MoD, and as Agency representative will need to be informed as soon as possible of MoD's proposed sites, with as much information as possible, especially where planning and permitting activities are likely to impact on MoD's programme. Our lead will provide input to the next stage(s) of consultation as required. Early detailed local consultation is a pre-requisite of sustainable development solutions.	Noted, with thanks.
Question 6 response	With regards to site selection, sites should be thoroughly assessed for flood and coastal erosion risk for the lifetime of the project, including any decommissioning period. In particular, the choice of an existing nuclear site should not extend the life of the site beyond what is currently anticipated, without thorough checks as to flood and coastal change risk for the entirety of the proposed period of use, including any decommissioning period.	Noted. All proposed sites will be assessed for flood and erosion risks, from the SEA onwards.



Ref	Consultation Response	Commentary/ action taken
Question 6 response	The number of dismantling and storage sites expected to be operational at any time needs to be clarified - It is unclear whether MoD is considering one of each, or whether several of each will be required.	Noted. At the current time, the number of dismantling/interim storage sites has not been decided upon; the feasible options will form part of the public consultation in due course. The Scoping Report update will be amended to make this clear.
Question 7 response	<p><i>Do you have any further suggestions regarding the proposed approach to SEA?</i></p> <p>The SDP is a far-reaching and lengthy programme. Over the length of the SDP, many parameters may change. Because of this, MoD needs to maintain a proactive position regarding national and international initiatives surrounding ship dismantling, climate change and the evolution of regulation that impacts on SDP.</p>	Noted. It accepted that many parameters (particularly in terms of legislation and conventions) will change, both during the SEA time-frame, and beyond, into the operational phase. We will take account of any relevant changes during the SEA assessment - noting that any changes that significantly affect the scope or nature of the SDP may necessitate re-running of the SEA process.
2. English Heritage		
	<p>Do you agree with the main environmental issues identified?</p> <p>Yes. However, cultural heritage might also include identifying and perhaps retaining artefacts from the submarines</p>	Accepted. The potential for retaining elements of the nuclear fleet will be included in Section 5.12.2 as a potential opportunity.
	<p>Are there additional plans, programmes and strategies which should be considered in the SEA?</p> <p>PPG 15 and 16 have been replaced by PPS5 Planning for the Historic Environment and the associated Practice Guide.</p>	Noted, with thanks. The Scoping Report update will be updated to include this information, as appropriate.
	<p>Do you know of any additional baseline evidence which will help to inform the SEA process?</p> <p>Full advice on baseline evidence relating to the historic environment is set out in Strategic Environmental Assessment, Sustainability Appraisal and The Historic Environment (http://www.helm.org.uk/upload/pdf/Strat-env-ass.pdf?1279196907)</p>	Noted, with thanks. The Scoping Report update will be updated to include this information, as appropriate.
	<p>Do you agree that the proposed SEA objectives (Section 6.1) cover the breadth of issues appropriate for assessing the SDP?</p> <p>The impact on the historic environment is not included.</p>	Accepted. Cultural Heritage (theme L) is missing from Table 6.1, along with theme M (landscape and townscape) due a formatting error. This will be corrected in the Scoping Report update.



Ref	Consultation Response	Commentary/ action taken
3. Natural England		
Question 1 response	<p>Do you have any comments on the proposed alternative outlined for the SDP?</p> <p>The proposed alternative options for Stage 1 (Assessment (s) of credible sites (expected to fall within the 'existing' Licensed/Authorised site category)), does not identify why Greenfield or brownfield (or existing licensed sites) have been identified as the main location selection criteria.</p>	<p>Noted.</p> <p>The three generic site types are not, in fact, location selection criteria - they are merely the generic categories of land upon which the facilities could be developed. They evolved from the basic categorisation of using an existing licensed/authorised site vs. using a new site. The new site category intuitively divided itself into building on undeveloped land and building on previously-developed land. This will be clarified in the Scoping Report.</p>
Question 1 response	<p>Whilst the loss of Greenfield land is an important consideration (as referenced from PPS 3), the importance of the land in terms of its contribution to the natural environment should be considered in parallel. This is particularly important where the land involved is covered by a national or European designation for the importance of the habitat, biodiversity, geodiversity or landscape value. As the location is likely to be coastal, the importance of access designations, such as National Trails, and landscape designations such as Heritage Coasts should also be considered.</p>	<p>Noted.</p> <p>The Scoping Report update will include revised definitions of undeveloped and previously-developed land as relevant to the SDP, to clarify and to minimise any overlaps between them. The generic assessment of the three land types will of course need to be qualified that individual sites may have unique characteristics (such as biodiversity value) that would need to be taken into account.</p>
Question 2 response	<p><i>Do you agree with the main environmental issues identified?</i></p> <p>3.3.1 Biodiversity</p> <p>Natural England agrees with the assessment provided. We would also like to see reference made to the importance of European designations for habitat conservation, and the additional requirements for the presumption against harming the integrity of a designated site.</p>	<p>Partially accepted.</p> <p>Reference is made to European designated sites in 3.3.1. The presumption against harming the integrity of such sites will be included in the Scoping Report update.</p>
Question 2 response	<p>3.3.3 Human Health</p> <p>Natural England would welcome reference to the importance of recreation on Human Health and the recognition that coastal access provides significant recreation opportunities that can benefit human health. Of particular importance is the Government's programme for enhancing coastal access contained within the Marine and Coastal Access Act 2009, for which Natural England will be the co-ordinating body for England.</p>	<p>Noted.</p> <p>The importance of coastal access is detailed in Section 4 and Annex B.</p> <p>The potential for access to be affected will be included in revisions to Section 5, principally in Section 5.3 (health) and 5.13 (landscape and townscape).</p>
Question 2 response	<p>3.3.5 Soils and Geology</p> <p>Natural England would welcome recognition of the importance of SSSI designation for geological sites.</p> <p>Additionally, the preservation of Best and Most Versatile Land (BMVL) should be recognised, in accordance with PPS7.</p>	<p>Noted.</p> <p>Section 4 and Annex B do include reference to PPS9. Revisions will include reference to the Wildlife and Countryside Act 1981 (as amended), as this is the source of SSSI designation.</p> <p>The potential effects on geological SSSIs and RIGS is included in Section 5.5 (soil and geology). The proposed SEA objectives (Table 6.1) include the need to protect geological resources.</p>



Ref	Consultation Response	Commentary/ action taken
		BMVL is not currently included in Section 4 or Annex B; this will be included at the update.
Question 2 response	<p>3.3.9 Transport</p> <p>Natural England would welcome recognition of the importance of linking a chosen site to the transport network and the cumulative environmental impacts that this may have, should any infrastructure associated with the development need to be upgraded.</p>	<p>Noted.</p> <p>The potential effects of transport are included Section 5.9 (transport). The proposed SEA objectives (Table 6.1) also include the need to minimise the detrimental effects of transport.</p>
Question 2 response	<p>3.3.13 Landscape</p> <p>The issues identified within this section appear to be of less importance than the potential impact of a site on a designated landscape (National Park, AONB), Heritage Coast, scenic area or seascape. We would also welcome a redrafting of this section to recognise the importance of landscape character in identifying a chosen site, and identifying the protection that should be afforded to nationally-designated landscapes.</p>	<p>Noted.</p> <p>The potential effects on landscape and townscape and the importance of landscape character are included Section 5.13 (landscape and townscape). The proposed SEA objectives (Table 6.1) also include the need to protect and enhance landscape and townscape quality.</p>
Question 3 response	<p><i>Are there additional plans, programmes and strategies which should be considered in the SEA?</i></p> <p>In addition to the reference to PPS9, we would welcome specific reference to the accompanying Good Practice Guide (Annex A).</p>	<p>Noted, with thanks.</p> <p>The Scoping Report update will be updated to include this information, as appropriate.</p>
Question 3 response	<p>Biodiversity - reference should be made to Circular 06/05: Biodiversity and Geological Conservation - Statutory Obligations and their Impact Within the Planning System.</p>	<p>Noted, with thanks.</p> <p>The Scoping Report update will be updated to include this information, as appropriate.</p>
Question 3 response	<p>Climate Change - reference should be made to PPS1 Sustainable Development and Climate Change.</p>	<p>Not accepted.</p> <p>This reference is already included in Annex B.</p>
Question 3 response	<p>Transport - reference should be made to the forthcoming National Policy Statement (and accompanying Assessment of Sustainability) for National networks</p>	<p>Noted, with thanks.</p> <p>The Scoping Report update will be updated to include this information, as appropriate.</p>
Question 3 response	<p>Material Assets - reference should be made to the 'State of the Countryside Report,' published by Natural England annually.</p>	<p>Noted, with thanks.</p> <p>The Scoping Report update will be updated to include this information, as appropriate.</p>
Question 3 response	<p>Landscape - Reference should be made to the following:-</p> <p>PPS 7 - Sustainable Development in Rural Areas.</p> <p>CRoW Act 2000.</p> <p>Marine and Coastal Access Act 2009.</p> <p>Landscape Character Assessment Guidance (NE and SNH).</p>	<p>Noted, with thanks.</p> <p>The Scoping Report update will be updated to include this information, as appropriate.</p>



Ref	Consultation Response	Commentary/ action taken
Question 3 response	Where the text states that “in respect of landscape designations, reasonable measures should be undertaken to mitigate the impacts of any development proposals on landscape character,” this should be amended to reflect that development should respect the character of all landscapes, that nationally designated landscapes should be afforded the highest level of protection and that impacts on nationally designated landscapes should be avoided and only if the development is unavoidable (see tests in PPS7) should mitigation be considered.	Partially accepted. This text is taken from published MOD policy guidance, so cannot be changed. However, we note that PPS7 is not included in either Section 4 or Annex B. This reference (and its’ requirements) will be included in the update.
Question 4 response	<i>Do you know of any additional baseline evidence which will help to inform the SEA process?</i> Baseline evidence for the Natural Environment is available from the following sources: State of the Countryside Report, Natural England; MAGIC database, Defra; Countryside Quality Counts, Natural England; Natural England SSSI Condition Survey Reports.	Noted, with thanks.
Question 5 response	<i>Do you agree that the proposed SEA objectives (Section 6.1) cover the breadth of issues appropriate for assessing the SDP?</i> NE would like to see the inclusion of an SEA objective for landscape (Townscape, Historic Landscape Character) with guide questions that seek to identify the impact on landscape character and specifically on designated landscapes and Heritage Coasts.	Accepted. The omission of this section from Table 6.1 was a formatting error. It will be included in the Scoping Report update.
Question 5 response	Natural England would welcome a guide question that identified if best use was being made of existing infrastructure and resources, through the location and siting of the SDP.	Accepted. This guide question will be included in Table 6.1.
Question 6 response	<i>When and how should we be seeking your opinions on site-specific information?</i> NE is a Statutory Consultee for SEA, HRA, EIA, Nationally-significant infrastructure projects and for development management consultations where the proposal impacts on nationally designated sites or species. We are happy to engage through these processes or through pre-application discussions at all stages of the development of the strategy and implementation of the project.	Noted, with thanks.
Question 7 response	<i>Do you have any further suggestions regarding the proposed approach to SEA?</i> 5.1.1 states that “land-take effects on localised biodiversity, flora and fauna are likely to be permanent; whilst construction disturbance effects are likely to be of short duration and can be mitigated.” We believe that this text should be amended to reflect that construction disturbance effects <u>may</u> be mitigated (depending upon appropriate identification of issues through relevant surveys).	Accepted. This clarification will be included in the update.



Ref	Consultation Response	Commentary/ action taken
4. Cadw		
	Cadw welcomes the opportunity but does not have any comments to make at this stage.	Noted, with thanks.
5. Countryside Council for Wales		
NTS - Table 1:	Clarification would be welcomed as to what is understood by 'generic site category' in respect of Stage 1 (initial dismantling) and stage II (ILW storage). Given that both activities effectively require coastal/near coastal locations, CCW would welcome clarification as to whether 'generic site categories effectively comprise strategic site criteria.	Noted. The three generic site types are not location selection criteria - they are merely the generic categories of land upon which the facilities could be developed. They evolved from the basic categorisation of using an existing licensed/authorised site vs. using a new site. The new site category intuitively divided itself into building on undeveloped land and building on previously-developed land. This distinction will be clarified in the updated report.
NTS - Table 2 (Biodiversity)	Consideration should also be given to potential effects on natural processes, functions and ecological services.	Not accepted. This terminology is not appropriate to a non-technical summary, which has been designed to give the general public a clear understanding of the SDP and the issues we propose to include in the SEA.
NTS- Table 2 (Soil and Geology)	Consideration should also be given to soil function and soil processes.	Not accepted. As described above, 'extent, variety and quality' of soils is sufficient for the NTS.
NTS - Table 2 (Air)	Consideration should also be given in respect of air quality issues related to construction of facilities and transportation of waste in facility operational phases.	Accepted. The Scoping Report update will be revised to include a specific additional reference to construction and transport.
NTS - Table 3 (Geology and Soils)	CCW would suggest an additional guide question be inserted regarding effects on soil function and process.	Accepted. This guide question will be included in Table 6.1 in the Scoping Report update.
NTS - Table 3 (Water)	Guide questions on water resources need to be cross referenced to Objectives A and E to enable consideration of interrelationships between environmental topics.	Noted. Inter-relationships between potential effects are considered in Section 5; these will be consolidated in the update. The proposed approach to assessing indirect, cumulative and synergistic effects is detailed in Section 6.3.
NTS - Table 3 (Transport)	CCW would welcome clarification as to what is understood by 'sensitive receptors'. Guide questions should also be cross referenced to Objectives A, E and F to enable consideration of the interrelationships between environmental topics.	Partially accepted. The term 'sensitive receptors' will be clarified in the Scoping Report update. The interrelationships between potential effects will be considered through the assessment of cumulative effects (Section 6.3).



Ref	Consultation Response	Commentary/ action taken
NTS - Table 3 (Cultural Heritage)	An additional guide question should be inserted in respect of culturally significant and historical landscapes.	Not accepted. The current guide questions in both L and M are considered sufficiently comprehensive to include both culturally significant and historical landscapes.
NTS - Table 3 (Landscape and Townscape)	Consideration should also be given to Areas of Outstanding Natural Beauty.	Not accepted. SEA objective M (landscape and townscape) will enable the assessment of potential effects of the SDP on 'protected/ designated landscapes' which will include, where relevant, AONBs.
NTS	Consideration should be given within this non-technical summary to the assessment of cumulative effects.	Not accepted. The description of Stage B of the SEA process in (Section 1, p2) highlights the types of impacts that will be assessed; this specifically includes cumulative impacts. The Generic Scoping Report and its update include specific reference to cumulative effects (Section 6.3).
Section 1.1	Clarification is required as to whether Stages 1 and II of the SDP will be subject to assessment under Article 6 of the Habitats Directive and, if so, how such a process will inform decisions on existing SDP sites and spatial selection of identified (potential) SDP sites.	Noted. A separate screening of the SDP proposals will be undertaken against the requirements of Article 6 of the Habitats Directive. The MOD will contact all relevant statutory bodies in due course.
Table 1.1 (4)	See comments above. Whilst this section makes reference to the Habitats and Birds Directive (although reference to the Birds Directive should be amended to reflect the 2009 version 2009/147/EC), no reference has been made to Ramsar Sites. As a matter of policy in the UK, Ramsar Sites are afforded the same degree of protection as designated European Sites (SACs, SPAs, cSACs, pSPAs).	Noted. Although already covered by SPAs and SACs, Ramsar sites will be specifically referenced in the Scoping Report update.
Section 2.1.2	CCW notes that, at present, the only licensed site for fuel removal is Devonport and that high level waste is removed for storage at Sellafield. Clarification would be welcomed as to whether transport routes between these sites and between any new proposed sites and Sellafield, will be considered as part of this assessment process.	Noted. Transport between the defueling facility at Devonport Royal Dockyard and the Repository at Sellafield will not be included in the assessment, as the scope of the SDP is limited to defueled boats and so does not extend to any nuclear fuel (see Section 2.1.2 for details). The scoping report will be updated to make this clear.
Section 2	CCW notes the requirement for a suitable dockyard, appropriately dismantling licensed site and the creation of new ILW facilities within this Plan.	Noted.
Section 2.2.1	Reference should be made not only to relevant planning policies in England but also those in devolved administration e.g. the Welsh Assembly Government's Planning Policy Wales 2010.	Accepted. The Scoping Report update will be updated to include this information, as appropriate.
Section 2	CCW welcomes and supports the intention to provide a list of 'credible' sites. However, it would be useful for relevant consultation bodies to have the opportunity to comment on the credible site selection criteria before the production of the indicative list.	Noted. A site selection report will be published for consultation at the same time as the Scoping Report update to show how the indicative site list was generated (and why certain existing licensed or authorised sites are not being considered further). The selection criteria used are



Ref	Consultation Response	Commentary/ action taken
		based on operational factors such as practicality and availability. This report will also be open to comment.
Section 2	CCW notes that this assessment process will not consider assessment of commercial ship breaking sites however, Section 2.1.2 of this scoping report suggests that the waste hierarchy would apply. Clarification would be welcomed that distance and transport related issues and effects between dismantling and potential breaking yards will be considered within this assessment process.	Noted. Section 5.9 (potential transport effects) confirms that transport from the initial dismantling site(s) to a ship breaking facility/ies will be considered. This will include consideration of the proximity principle.
Section 2.2.3	Stage V. CCW notes and, in principle, supports the decision to consider feasible transport links within this assessment process however, in respect to transport from dismantling to braking yards, see comments above	Noted. See comments above.
Section 2 - Table 2.1	Clarification would be welcomed as to what is understood by 'generic site category' in this instance and whether these criteria effectively comprise strategic site criteria.	Noted. The three generic site types are not location selection criteria - they are merely the generic categories of land upon which the facilities could be developed. They evolved from the basic categorisation of using an existing licensed/authorised site vs. using a new site. The new site category intuitively divided itself into building on undeveloped land and building on previously-developed land. This distinction will be clarified in the updated report.
Section 3.2	CCW has no record of data being sought from our own sources for this assessment processes. Clarification would be welcomed as to whether this assessment intends to consider any sites within Wales or whether the lack of baseline information from Wales is an oversight.	Noted. The Scoping Report update will be updated to include this information, as appropriate.
Section 3.3.1	Clarification is required as to whether Ramsar Sites have been included within this assessment and whether consideration has been given to offshore protected sites and areas. Consideration should also be given to potential effects on ecological processes, goods and services.	Noted. Ramsar sites and offshore protected habitats and species will be specifically referenced in the Scoping Report update. The potential effects on ecological processes, goods and services will also be noted.
Section 4.2 (Biodiversity and Nature Conservation)	Reference to the Birds Directive should be amended to reflect the 2009 version (2009/147/EC). The reference to the Habitats Regulations should be amended to refer to the Conservation of Habitats and Species Regulations 2010. Reference should be made to the following key plans and programmes, including: Bern Convention of European Wildlife and Natural Habitats 1979. European Union (2005) European Community Biodiversity Strategy. United Nations- Bonn Convention on Migratory Species 1979. Environmental Protection Act 1990. Natural Environment and Rural Communities Act 2006.	Accepted. The Scoping Report update will be updated to include this information, as appropriate.



Ref	Consultation Response	Commentary/ action taken
	<p>The UK Biodiversity Action Plan 1994.</p> <p>Water Framework Directive 2000.</p> <p>Freshwater Fish Directive.</p> <p>In addition, in the event that proposed or potential sites affect areas within Wales, consideration should be given to relevant Welsh Assembly Government key plans, programmes and strategies including TAN 5 (2009), the Wales Environment Strategy etc.</p>	
Section 4.2 (Soil)	<p>In the event that proposed or potential sites affect areas within Wales, consideration should be given to relevant Welsh Assembly Government key plans, programmes and strategies including TAN 5 (2009), the Wales Environment Strategy etc</p>	<p>Accepted.</p> <p>The Scoping Report update will be updated to include this information, as appropriate.</p>
Section 4.2 (Water)	<p>Plans and policies relating to water issues should also be considered in conjunction with those identified in respect of biodiversity and natural heritage.</p>	<p>Noted.</p> <p>The interrelationships between potential effects will be considered through the assessment of cumulative effects (Section 6.3).</p>
Section 4.2 (Water)	<p>In the event that proposed or potential sites affect areas within Wales, consideration should be given to relevant Welsh Assembly Government key plans, programmes and strategies including TAN 15 (2009), the Wales Environment Strategy etc.</p>	<p>Accepted.</p> <p>The Scoping Report update will be updated to include this information, as appropriate.</p>
Section 4.2 (Material Assets);	<p>In the event that proposed or potential sites affect areas within Wales, consideration should be given to relevant Welsh Assembly Government key plans, programmes and strategies including the Wales Transport Plan and Wales Transport Strategy, the Wales Spatial Plan, the Wales Environment Strategy, the Wales Waste Plan etc.</p>	<p>Accepted.</p> <p>The Scoping Report update will be updated to include this information, as appropriate.</p>
Section 4.2 (Cultural Heritage and Landscape/ Townscape)	<p>In the event that proposed or potential sites affect areas within Wales, consideration should be given to relevant Welsh Assembly Government key plans, programmes and strategies.</p>	<p>Accepted.</p> <p>The Scoping Report update will be updated to include this information, as appropriate.</p>
Section 5.1.	<p>Clarification is required as to what is meant by the first statement of the first bullet point namely '...sites are only likely to be significantly affected if there are adverse effects to conservation features that underpin the reasons for the designation'. Significant adverse effects may be indirect and/or 'in combination' effects and consideration must also be given to impacts on 'mobile' species' i.e. where species features of European Sites move out with designated sites..</p>	<p>Accepted.</p> <p>The Scoping Report update will be revised to clarify Section 5.1.</p>
Section 5.1	<p>Clarification is required as to whether this plan will be subject to assessment under Regulation 102 of the Conservation of Habitats and Species Regulations 2010.</p>	<p>Noted.</p> <p>A separate screening of the SDP proposals will be undertaken against the requirements of Article 6 of the Habitats Directive. The MOD will contact all relevant statutory bodies in due course.</p>



Ref	Consultation Response	Commentary/ action taken
Section 5.1	Consideration should be given to potential adverse effects on biodiversity from construction transport needs, sourcing of natural resources and ancillary developments e.g. water resource needs.	Noted. The potential effects of the SDP on the issues identified are already outlined in Section 5.
Section 5.6	This section appears to only consider effect on water in terms of water quality and discharges. Additional consideration should be given (at all phases) on potential effects on water resources and should also be considered in the context of other environmental topics including biodiversity.	Noted. The scope of the potential effects of the SDP on the issues identified is outlined throughout Section 5. The Scoping Report update will be revised to ensure that the consideration of the potential interrelationships is also clear.
Section 5.9 and 5.11.2	Consideration needs to be given to potential effects on natural resources used in the construction phase (including those with spatially distant source).	Noted. Section 5 of the generic Scoping Report scopes the potential effects to be included in the assessment. The potential effects on natural resources are included in this section; e.g. Section 5.11 (land use and materials), the impacts on material resources are highlighted in the construction phase (5.11.1).
Section 5.9 and 5.11.2	CCW is disappointed to note that no specific reference has been made to the need to consider not only effects on identified environmental topics, but also the interrelationships between those environmental topics and interrelationships in effects. Although topic based assessment is a tried and tested methodology, there is a risk that the assessment process could become over 'compartmentalised' and the interrelationships between environmental topics could be lost.	Noted. The interrelationships between potential effects will be considered through the assessment of cumulative effects (Section 6.3). The Scoping Report update will be revised to ensure that the consideration of potential interrelationships is made clear.
Table 6.1	Clarification is required as to what is meant by 'important conservation sites' and 'fishery resources'.	Accepted. Both terms will be clarified in the Scoping Report update.
6. Scottish Environmental Protection Agency		
General Comments	<p>Generally, the scoping report provides clear and detailed information on the proposed scope and level of detail of the assessment and covers most of the aspects that we would wish to see addressed at this stage.</p> <p>The scoping report understandably focuses on radioactive waste issues. However, we consider that environmental issues relevant to the management of other controlled wastes arising from the Submarine Dismantling Project (SDP) have been downplayed and potentially excluded from the assessment. We feel that there are also potentially significant environmental effects arising from management of these wastes and that these should also be considered. We comment in more detail on this below.</p> <p>Subject to this and to the other detailed comments below, we are generally content with the scope and level of detail proposed for the Environmental Report.</p>	<p>Noted, with thanks.</p> <p>Noted and agreed.</p>
Question 1 response	<p><i>Do you have any comments on the proposed alternative options outlined for the SDP?</i></p> <p>Figure 1.1 very clearly sets out the key stages and activities of the SDP, while Section 2.2 goes on to set out</p>	Noted, with thanks.



Ref	Consultation Response	Commentary/ action taken
	<p>the technical and locational options that will be considered in the assessment. We also note that the proposed site level assessment is expected to fall within the existing licensed site category. The project and the extent to which it will be subject to assessment is all very clear and logical and we do not have any comments to add.</p>	
Question 2 response	<p><i>Do you agree with the main environmental issues identified?</i></p> <p>Chapter 5 helpfully sets out the potentially significant environmental effects in relation to construction, operation and decommissioning of facilities. We note that the summary is indicative so as to explain the prospective scope of the assessment and that more detailed consideration will be provided in the Environmental Report. Generally, we find this covers the key issues, but we do have the following comments:</p>	Noted, with thanks.
Question 2 response	<p>Climate Change and Energy</p> <p>Given the very long term nature of the facilities that will be developed under the SDP, it is very important that full cognisance of projected climate change is factored into site choice and site design. Potential factors such as flood risk, coastal erosion, drought and increased storm intensity will all require to be considered as part of the site selection and design process in order to ensure that the facilities are resilient throughout their operational period. We note and welcome that the section on water scopes flood risk into the assessment and that the proposed SEA objective for climate change explicitly incorporates resilience.</p>	<p>Agreed.</p> <p>A separate category entitled 'Coastal change and flood risk' will be introduced into the Scoping Report update. Relevant information will be presented for this issue in the scoping of potential effects in a revised Section 5.</p>
Question 2 response	<p>Material Assets (Waste Management)</p> <p>The scoping report focuses almost entirely on radioactive waste, but makes no reference to management of controlled wastes more generally. Dismantling of the non radiological sections of the boats will generate significant waste streams and may also include contaminants and hazardous substances typically associated with ship-breaking that have the potential to have significant environmental effects.</p>	<p>Noted.</p> <p>The scoping document does make substantial reference to the management of non-RA wastes throughout, especially regarding hazardous waste streams and their management.</p>
Question 2 response	<p>Material Assets (Waste Management)</p> <p>We note from the paragraph at the bottom of page 23 that it is intended to scope such effects out of the assessment. We consider that assessment of non radiological waste should form part of the assessment as these aspects of the work also have potential to have significant environmental effects. We would also suggest that this includes some evaluation of the facilities/capacity available in the UK (or elsewhere if trans-frontier shipment is being considered as an option) to deal with the waste streams that are likely to arise. It is our view that these should be factored into the assessment.</p>	<p>Noted.</p> <p>The proposed scope of the assessment will include consideration of the generic issues associated with managing controlled wastes arising from dismantling (Section 5.10). The Scoping Report will be updated revised to ensure clarity.</p> <p>Stage IV of the SDP process (see Figure 1.1, p6 and Section 2.2, p20) covers the potential impacts of ship-breaking. The cumulative effects will be considered using the approach set out in Section 6.3.</p> <p>We do not propose to extend the scope of the SEA to include comparative assessment of individual commercial ship-breaking facilities, as these are established facilities whose activities are licensed to ensure appropriate environmental standards are met. Moreover, it is proposed that the selection of the ship-</p>



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		<p>breaking site(s) will be resolved by competition and it is not possible to identify compliant bidders or conduct this competition until the strategic decisions (that are the focus of the SEA) have been taken. It will be more appropriate for the assessment and comparison of site specific environmental impacts to be considered during this commercial process.</p>
Question 3 response	<p><i>Are there additional plans, programmes and strategies which should be considered in the SEA?</i></p> <p>From a Scottish perspective, the list of relevant plans and programmes is rather out of date and, in many places, incomplete or English focused. Some of the key documents in SEPA's areas of competence are described below:</p>	<p>Accepted.</p> <p>The Scoping Report update will be updated to include this information, as appropriate.</p>
Question 3 response	<p>Water - River Basin Management Plans</p> <p>The Scotland and Solway Tweed River Basin Management Plans were published in December 2009. These set out a framework for the protection and enhancement of Scotland's water bodies. The RBMPs contain information about the current quality of water bodies and the objectives that have been set for them and any measures that apply in order to meet these objectives. This information may be particularly useful when undertaking assessments of potential sites in Scotland.</p> <p><i>RBMP homepage - www.sepa.org.uk/water/river_basin_planning.aspx</i></p> <p><i>Interactive Map - http://213.120.228.231/rbmp/ (allows information about the status, pressures and objectives for every water body to be searched. Includes operating instructions).</i></p>	<p>Noted, with thanks.</p> <p>The Scoping Report update will be updated to include this information, as appropriate.</p>
Question 3 response	<p>Climatic Factors</p> <p>The Climate Change (Scotland) Act 2009 sets ambitious targets for reducing greenhouse gas emissions and establishes a statutory framework for adapting to future climate change. The Act is the key driver for climate change policy in Scotland and is supported by the Climate Change Delivery Plan, a range of public sector duties and the Scottish Climate Change Adaptation Framework. All of these documents are important in helping you understand how the SDP needs to be taken forward in a way that helps Scotland to achieve the targets set and in a way that takes full cognisance of the need to make decisions that are resilient in the context of projected future climate change. The need for resilience is particularly relevant given the long term nature of the project.</p> <p>These documents are available at:</p> <p>Climate Change (Scotland) Act 2009 - www.scotland.gov.uk/Topics/Environment/climatechange/scotlands-action/climatechangeact</p> <p>Climate Change Delivery Plan - www.scotland.gov.uk/Topics/Environment/climatechange/scotlands-action/EmissionsReductions</p>	<p>Noted, with thanks.</p> <p>The Scoping Report update will be updated to include this information, as appropriate. .</p>



Ref	Consultation Response	Commentary/ action taken
	<p>Public Bodies Duties - www.scotland.gov.uk/Topics/Environment/climatechange/scotlands-action/climatechangeact/publicsector</p> <p>Climate Change Adaptation Framework - www.scotland.gov.uk/Topics/Environment/climatechange/scotlands-action/adaptation/AdaptaitonFramework</p> <p>Land Use Strategy - draft available soon on Scottish Government climate change website: http://www.scotland.gov.uk/Topics/Environment/climatechange/scotlands-action/climatechangeact/other</p> <p>Further advice on relevant Scottish plans and programmes for climatic factors and advice on how to consider climate change in SEA is available in recently published Scottish Government guidance on this topic: www.scotland.gov.uk/Publications/2010/03/18102927/0</p>	
Question 3 response	<p>Soils</p> <p>The Scottish Soils Framework sets out the Scottish Government's policy for the protection and enhancement of Scotland's soil resource.</p> <p>www.scotland.gov.uk/Publications/2009/05/20145602/0</p> <p>Further advice on relevant Scottish plans and programmes for soils can be found at www.seaguidance.org.uk.</p>	<p>Noted, with thanks.</p> <p>The Scoping Report update will be updated to include this information, as appropriate.</p>
Question 3 response	<p>Material Assets (Waste).</p> <p>The 2010 Zero Waste Plan replaces the previous National Waste Strategy (1999) and National Waste Plan (2003). This sets out the Scottish Government's ambitious targets for sustainable waste management and is directly relevant for consideration of wastes generated by the SDP.</p> <p>http://www.scotland.gov.uk/Topics/Environment/waste-and-pollution/Waste-1/wastestrategy</p>	<p>Noted, with thanks.</p> <p>The Scoping Report update will be updated to include this information, as appropriate.</p>
Question 3 response	<p>Radioactive Waste</p> <p>You should be aware that the Scottish Government's policy on managing higher activity radioactive wastes is not to support disposal in a deep geological repository, but rather to "support long-term "near surface, near site" storage facilities so that the waste is monitorable and retrievable and the need for transporting it over long distances is minimal". This policy is directly relevant for your consideration of long term options for the SDP, which assumes ultimate disposal to a geological disposal facility. Further details are available on the Scottish Government's website at: www.scotland.gov.uk/Topics/Environment/waste-and-pollution/Waste-1/16293/higheractivitywastepolicy</p>	<p>Noted, with thanks.</p> <p>The Scoping Report update will be updated to include this information, as appropriate.</p>
Question 4 response	<p>Do you know of any additional baseline evidence which will help to inform the SEA process?</p> <p>The environmental baseline as set out in Appendix A and summarised in the scoping report provides a very strategic overview of trends across the SEA topics being</p>	<p>Agreed.</p> <p>The Scoping Report update will include baseline data for those existing nuclear Licensed or Authorised sites which have been assessed (for operational and other reasons of practicality) as being potentially suitable for</p>



Ref	Consultation Response	Commentary/ action taken
	<p>considered. There are very few Scottish data, but this reflects the fact that the project covers the UK as a whole and accordingly, we are broadly content that the baseline information is adequate.</p> <p>However, as the project moves to the site identification and assessment stage we would anticipate that the data needs for the environmental baseline will significantly change to require more detailed, local information about environmental trends and constraints relevant to each potential site.</p> <p>SEPA may hold information about some of the sites you may identify in Scotland. Please contact us at that stage and we will advise.</p> <p>When considering the summary baseline information you may wish to refer to the data collected by the NDA in its SEA work which may contain useful baseline information that can be readily referred to.</p> <p>Potential information sources to help you with your more detailed consideration of Scottish sites includes:</p> <p>Flood Risk Maps - www.sepa.org.uk/flooding/flood_map.aspx</p> <p>Waterbody Classification - www.sepa.org.uk/water/monitoring_and_classification.aspx</p> <p>Climate Change Projections / Adaptation for Scotland - www.sccip.org.uk</p> <p>Handbook of Recorded Climate Trends in Scotland - http://climatetrendshandbook.sccip.org.uk/</p> <p>Waste Data - www.sepa.org.uk/waste/waste_data/waste_data_digest.aspx</p> <p>Baseline data for air, water and soil - http://www.seaguidance.org.uk/4/Baseline-Information.aspx</p> <p>Bathing Waters - www.sepa.org.uk/water/bathing_waters.aspx</p> <p>State of the Environment Scotland Report - www.sepa.org.uk/science_and_research/data_and_reports/state_of_the_environment.aspx</p>	<p>initial dismantling (note that, at this stage, the ILW storage sites will be considered on a generic basis).</p> <p>The NDA work and the accompanying SEA will be referenced and reported on in the Scoping Report update.</p>
Question 5 response	<p><i>Do you agree that the proposed SEA objectives (Section 6.1) cover the breadth of issues appropriate for assessing the SDP?</i></p> <p>We are content that the SEA objectives cover all of the issues. We welcome the inclusion of objectives to consider wider controlled wastes as well as radioactive waste.</p>	Noted, with thanks.
Question 6 response	<p><i>When and how should we be seeking your opinions on site-specific information?</i></p>	Noted, with thanks.



Ref	Consultation Response	Commentary/ action taken
	<p>We welcome your proposal to conduct a two stage scoping process where this "national level" scoping report is amended, when the credible sites have been identified, to include further baseline information, other plans and programmes and a more specific scope of assessment. We also welcome the proposal to undertake further consultation on the revised scoping report. We are content with the planned period of five weeks for this.</p> <p>Please note, at the next scoping stage, we will comment on the environmental aspects of the SDP and specific sites that have been identified, however we will not provide a view on whether we favour one site over another.</p>	
Question 6 response	As noted elsewhere in this response, we consider that the site selection process should also take account of the location, suitability and licensing of treatment/disposal facilities for controlled waste and not just radioactive waste.	<p>Noted.</p> <p>The proposed scope of the assessment will include consideration of the generic issues associated with the management of controlled wastes arising from dismantling (Section 5.10). However, the scope of the SEA does not extend to include comparative assessment of individual ship-breaking facilities as these are established facilities whose activities are licensed to ensure appropriate environmental standards are met.</p>
Question 7 response	<p><i>Do you have any further suggestions regarding the proposed approach to SEA?</i></p> <p>Section 2.2.1 - Stages I and II</p> <p>The first bullet point makes reference to Planning Policy Statement 3. Please note that this does not apply in Scotland, where the Scottish Planning Policy provides policy direction. www.scotland.gov.uk/Publications/2010/02/03132605/0 .</p>	<p>Noted.</p> <p>The Scoping Report update will be amended accordingly.</p>
Question 7 response	<p>Section 2.2.1 - Stages I and II</p> <p>The final paragraph notes that the environmental impacts associated with depositing LLW or ILW in national repositories will not be assessed as this has or will be subject to SEA by the NDA. We are content that you scope this element out of the SEA of the SDP, but please refer to our previous comments about taking the NDA SEA work into account in your assessment.</p>	Noted.
Question 7 response	<p>Section 2.2.2 - Stage III</p> <p>This section usefully sets out the three main alternatives for processing the submarines, although we recognise that these options are largely ones of timing as ultimately complete dismantling of the reactor compartment is required.</p>	Noted.
Question 7 response	<p>Section 2.2.2 - Stage III</p> <p>We note the intention to scope out any assessment of options for dismantling the non radiological sections via commercial ship breaking sites. As noted above, we are of the view that there are potentially significant issues relating to the management, treatment and disposal of hazardous materials that may be present in these sections</p>	<p>Noted.</p> <p>The proposed scope of the assessment will include consideration of the generic issues associated with the management of controlled wastes arising from dismantling (Section 5.10). The Scoping Report update will be revised to ensure clarity.</p>



Ref	Consultation Response	Commentary/ action taken
	and that these should be factored in to the assessment.	Under Stage IV of the SDP process (see Figure 1.1, p6 and Section 2.2, p20) the potential impacts of ship-breaking will be assessed. This will include the generic effects of transporting materials from the initial dismantling site(s). The cumulative effects will be considered using the approach set out in Section 6.3 of the generic Scoping Report. However, the scope of the SEA does not extend to include comparative assessment of individual ship-breaking facilities as these are established facilities whose activities are licensed to ensure appropriate environmental standards are met.
Question 7 response	<p>Sections 2.2.1 - 2.2.3</p> <p>Generally, the stages do not refer to the preference for waste avoidance in the waste hierarchy.</p>	<p>Not accepted.</p> <p>The SDP is a project which will necessarily create waste where none existed before, since the submarines are beyond practical use and must be safely dismantled. Therefore, unfortunately, there is little opportunity to avoid the creation of this waste. However, the principles of following the waste hierarchy and reusing or at least recycling as much of the boats as possible will be adopted to minimise the environmental impacts of the project.</p> <p>The principle of waste avoidance and waste hierarchy are reflected within the SEA objectives (Table 6.1).</p>
Question 7 response	<p>Main Report - Table 2.1 and Section 6.2 (Assessment Method).</p> <p>As we understand, Stages I and II will be assessed at two levels, a generic assessment based on the three locational choices and a site level assessment of credible option sites. We understand that impacts will be considered in relation to construction, operation and decommissioning phases. This level of assessment is broadly welcomed.</p>	Noted, with thanks.
Question 7 response	With respect to Stages III - VII, these will be considered only in respect of generic impacts and again we are content with such an approach as the impacts from these stages are non site specific.	Noted, with thanks.
Question 7 response	Section 6.2 sets out the assessment frameworks to be used for both the generic and site specific assessments. We are content with your intended approach to identifying potential significant effects. Box 6.1 is especially helpful in clarifying how significance will be determined.	Noted, with thanks.
Question 7 response	We welcome the early inclusion of consideration of mitigation options. We generally support all of the types of measures described, in box 6.2, but we would suggest that in the Environmental Report, a clear framework for implementing the mitigation measures is put into place. We would suggest that this should set out (1) the measures required, (2) when they would be required and (3) who will be required to implement them. A summary table could be included as part of the preparation of the ER.	<p>Noted.</p> <p>A clear plan for mitigations will be included in the Environmental Report.</p>



Ref	Consultation Response	Commentary/ action taken
7. Historic Scotland		
Question 1 response	<p><i>Do you have any comments on the proposed alternative options outlined for the SDP?</i></p> <p>No, the alternatives presented in Section 2 are clear and reasonable.</p>	Noted, with thanks.
Question 2 response	<p><i>Do you agree with the main environmental issues identified?</i></p> <p>I agree with the environmental issues identified for the historic environment. As you have noted elsewhere in the report, the assessment should focus on the implications on features such as scheduled monuments, listed buildings and archaeological sites. This will be particularly important when considering the candidate locations for dismantling and storage facilities.</p>	Noted, with thanks.
Question 3 response	<p><i>Are there additional plans, programmes and strategies which should be considered in the SEA?</i></p> <p>While the environmental objectives for the English plans provided in this section are broadly very similar to those in Scotland, it would be useful to consider Scottish environmental plans and programmes, including:</p> <p>The Scottish Historic Environmental Policy (SHEP)</p> <p>The SHEP outlines Scottish Minister's policies on the historic environment.</p> <p>Scottish Planning Policy</p> <p>Sets out National policy for the historic environment, and indicates how the planning system will contribute towards the delivery of Scottish Ministers' policies as set out in the current SHEP.</p> <p>PAN 42 Archaeology - The Planning Process and Scheduled Monuments Procedures</p> <p>This note provides advice on the handling of archaeological matters within the planning process and on the separate controls over scheduled monuments under the Ancient Monuments and Archaeological Areas Act 1979 which may be of relevance if any candidate locations are likely to affect archaeological remains.</p>	<p>Noted, with thanks.</p> <p>The Scoping Report update will be updated to include this information, as appropriate.</p>
Question 4 response	<p><i>Do you know of any additional baseline evidence which will help to inform the SEA process?</i></p> <p>Historic Scotland can provide GIS datasets under license for scheduled monuments, listed buildings, and gardens and designated landscapes. This information can be downloaded from Historic Scotland's spatial data warehouse.</p>	Noted, with thanks.
Question 5 response	<p><i>Do you agree that the proposed SEA objectives (Section 6.1) cover the breadth of issues appropriate for assessing the SDP?</i></p> <p>The methodology to be used for the assessment is clear</p>	Noted, with thanks.



Ref	Consultation Response	Commentary/ action taken
	<p>and easy to follow. While specific SEA objectives are not included in section 6 of the scoping report, I understand that this is an error and that the historic environment topic will be scoped into the assessment. Given the potential for significant effects on the historic environment, particularly through any proposals for new facilities in brown or green-field sites, I agree that any implications for heritage assets should be considered through the assessment. As you have highlighted, impacts may relate both to direct impacts as well as indirect effects upon their setting. I am content with the SEA objective and proposed assessment questions for the historic environment, as outlined in the non-technical summary.</p>	
Question 6 response	<p><i>When and how should we be seeking your opinions on site-specific information?</i></p> <p>I agree with the proposed approach of further consideration once the generic proposals/options have been considered and candidate sites have been identified. At this point you will be able to focus on more detailed baseline information and environmental issues for each area. A five-week consultation period for this is fine. We would also be happy to provide a view on locations identified within Scotland at any point during the assessment process.</p>	Noted, with thanks.
8. Scottish Natural Heritage		
Question 1 response	<p><i>Do you have any comments on the proposed alternative options outlined for the SDP?</i></p> <p>The methodology for the assessment of the proposed alternatives is a reasonable approach. In particular, your identification of a list of specific credible sites as a follow-up on the assessment of the more generic alternatives of undeveloped, developed or existing sites is very much welcomed. This will allow for a more meaningful assessment of the environmental impacts arising from the Project. We note that the references in Section 2.2.1 relate to Planning Policy Statement. It might be helpful to ensure that the definitions are the same in related Scottish Planning Policy.</p>	<p>Noted, with thanks.</p> <p>The Scoping Report update will be updated to include this information, as appropriate.</p>
Question 2 response	<p><i>Do you agree with the main environmental issues identified?</i></p> <p>We agree with the main issues identified in Section 3 at a UK level. Given the nature of the plan, it is understandable that these are very strategic and general references. However, in Annex A, the main environmental issues are very much focussed on national baseline data for England. It would be helpful in respect of those potential impacts in Scotland; that Scottish data sources are also identified and issues relevant to Scotland are explored more fully, particularly in respect of Biodiversity and Nature Conservation and Landscape and Townscape topics. Please see question 4 below.</p>	<p>Response as above.</p> <p>The Scoping Report update will be updated to include this information, as appropriate.</p>
Question 3 response	<p><i>Are there additional plans, programmes and strategies which should be considered in the SEA?</i></p>	<p>Noted, with thanks.</p> <p>The Scoping Report update will be updated to include</p>



Ref	Consultation Response	Commentary/ action taken
	<p>In Section 4, to improve the consideration of Scottish environmental data, it would also be useful to consider the following:</p> <p>Natural Heritage Futures (Scottish Natural Heritage (SNH)) - An overview - this considers a suite of publications aimed to guide the future management of the natural heritage towards 2025, within the wider context of sustainable development.</p> <p>Scottish Soils Framework - describes key pressures on soils, particularly climate change, relevant policies to combat those threats, and identifies the future focus for soil protection, key soil outcomes, and actions across a range of sectors.</p> <p>Climate Change (Scotland) Act 2009 including the Climate Change Delivery Plan: meeting Scotland's climate change targets, 2009.</p> <p>SNH's National Landscape Assessment which provides an overview of Scotland's landscape resource: http://www.snh.gov.uk/docs/B464892.pdf</p> <p>Marine (Scotland) Act 2010.</p>	<p>this information, as appropriate. .</p>
Question 4 response	<p><i>Do you know of any additional baseline evidence which will help to inform the SEA process?</i></p> <p>As mentioned in question 2 above, there is little reference in Annex A to Scottish baseline data sources. This is particularly important in respect of marine and coastal environmental data. The links below will hopefully help address the gaps in the Scottish environmental issues.</p> <p>SNH's web page on environmental data and research (including Natural Spaces) can be found at: http://www.snh.org.uk/snh/</p> <p>Natural Heritage Futures which can be found at: http://www.snh.gov.uk/about-snh/what-we-do/nhf/nhf-downloads/ in particular the prospectus for coasts and seas can be found at: http://www.snh.gov.uk/docs/A306270.pdf</p> <p>Scottish Soils Framework - http://www.scotland.gov.uk/Publications/2009/05/20145602/0</p> <p>Landscape Character Network - http://www.landscapecharacter.org.uk/</p> <p>A review of marine and coastal recreation in Scotland. Commissioned Report No 247 (2007): http://www.snh.org.uk/pubs/detail.asp?id=930</p>	<p>Noted, with thanks.</p> <p>The Scoping Report update will be updated to include this information, as appropriate.</p>
Question 4 response	<p>In Annex A the section on Landscape refers to Natural Heritage Areas (Scotland). There are no Natural Heritage Areas in Scotland and the legislation which allowed for their designation has subsequently been repealed. Instead, the legislative basis for National Scenic Areas has been strengthened. There is a number of Local Landscape Designation of which Areas of Great</p>	<p>Noted, with thanks.</p> <p>The Scoping Report update will be updated to include this information, as appropriate.</p>



Ref	Consultation Response	Commentary/ action taken
	Landscape Value are included.	
Question 5 response	<p><i>Do you agree that the proposed SEA objectives cover the breadth of issues appropriate for assessing the SDP?</i></p> <p>Table 6.1 seems to have omitted sections on Cultural Heritage and Landscape and Townscape. This is presumably an error as both topics are clearly scoped in, in Section 5.</p>	<p>Accepted.</p> <p>The omissions of themes L and M were due to a formatting error. They will be included in the Scoping Report update.</p>
Question 5 response	A possible SEA objective relating to landscape might be: 'to protect and enhance the landscape and particularly in designated sites.'	<p>Not accepted.</p> <p>The current objective for landscape and townscape is to "protect and enhance landscape and townscape quality and visual amenity." Given comments from other consultees on the wider need to protect not just protected/designated features in the environment, it not proposed to include specific reference to designated sites in the overall objective.</p>
Question 5 response	The proposed assessment question in Table 1 A, Biodiversity, relating to the potential for the Project to affect public access to areas of wildlife interest, is very welcome and we recommend that a similar question be asked in respect of the Landscape and Townscape questions, i.e. will the proposals affect public access to important landscape areas.	<p>Not accepted.</p> <p>Note that Table 1 in the NTS is included in the main report as Table 6.1 (p69).</p> <p>Public access is already included as an assessment question in Section M - Landscape and townscape: "Will the SDP proposals affect public access to open spaces or the countryside?" The potential impacts on any sensitive environments will be considered under the category during the assessment, on a site-by-site basis as required.</p>
Question 5 response	<p>Other possible questions might include:</p> <p>Will the proposals affect the landscape character and scenic value of the area?</p> <p>Will the proposals affect landscape diversity and local distinctiveness?</p> <p>Will the proposals affect the quantity and quality of publicly accessible open space, coastal areas or other important recreational resources?</p>	<p>Not accepted.</p> <p>The current suite of questions under SEA objective M - Landscape and townscape provide an adequate basis to assess the potential effects of the SDP proposals on landscape. e.g. public access is already included as an assessment question in Section M - Landscape and townscape: "Will the SDP proposals affect public access to open spaces or the countryside?" The potential impacts on any sensitive environments will be considered under the category during the assessment, on a site-by-site basis as required.</p>
Question 5 response	With the exception of A, B and C, many of the overall objectives are aimed at minimising the impacts from the proposal. Can you consider options to enhance the effects on geology and soils, water and landscape, for example, to enhance landscapes/soils/watercourses degraded as a consequence of past industrial action? This is particularly pertinent in considering brown-field sites.	<p>Noted. The majority of objectives do include the potential for enhancement. It is accepted that the objectives for D (noise) and E (geology and soils), which are taken from the MOD's published approach to SEA, are targeted solely at minimising negative impacts.</p> <p>The assessment questions are generally couched intentionally to allow for both positive <i>and</i> negative effects. The potential for such enhancements (including remediation) will be assessed in the SEA.</p>
Question 5 response	The omission of the Sections on cultural heritage and landscape/townscape could be addressed when consulting on the specific sites scoping report.	<p>Accepted.</p> <p>This was a formatting error; the full question set will be included in the Scoping Report update.</p>



Ref	Consultation Response	Commentary/ action taken
Question 6 response	<p><i>When and how should we be seeking your opinions on site-specific information?</i></p> <p>Your proposal for a further five week consultation period following the selection of credible 'existing' Licensed or authorised sites is acceptable. This will allow for more targeted comments on the baseline information to inform a more rigorous assessment at this more detailed level.</p>	Noted, with thanks.
Question 6 response	<p>It would be helpful if the scoping report indicated the proposed consultation period for comments on the Environmental report stage. We would recommend a minimum of 10 weeks for this.</p>	<p>Accepted.</p> <p>The consultation on the Environmental Report will form part of the wider public consultation on the SDP proposals. MOD will follow the Cabinet Office Code of Conduct on public consultations, and will be at least 12 weeks long. This will be stated in the updated scoping report and NTS.</p>
Question 7 response	<p><i>Do you have any further suggestions regarding the proposed approach to SEA?</i></p> <p>It would be helpful if you would clarify in Section 5.5.2, (first bullet point) why the issue of impacts on soils from operational discharges of radioactive and no-radioactive liquids, gases and or solid waste have been scoped out. This issue has been scoped in, in the case of biodiversity and water issues on precautionary grounds and it is not entirely clear why this is not the case in respect of soils.</p>	<p>Accepted.</p> <p>The Scoping Report update will include the potential effects on soils from operational discharges of radioactive and no-radioactive liquids, gases and or solid waste.</p>

9. Scottish Government

General comments	<p>We have no specific comments on the report. However, you should be aware that the Scottish Government's policy for higher activity radioactive waste is to support long-term, near site storage or disposal facilities so that the waste is monitorable and retrievable and the need for transporting it over long distances is minimal.</p> <p>In January 2010 the Scottish Government consulted on a Detailed Statement of Policy and a copy of the consultation can be found on the Scottish Government's website at: http://www.scotland.gov.uk/Publications/2010/01/14151207/0. Section 6.04 sets out the scope of the Policy and you should note that it does not cover waste arising from the decommissioning and dismantling of redundant nuclear submarines including those berthed at the former Defence Establishment at Rosyth.</p> <p>You might find it useful to refer to the Environmental Report which was published to accompany the consultation and it can be found at:- http://www.scotland.gov.uk/Publications/2010/01/14151255/0. A copy of the Scoping Report for the policy that was prepared in accordance with the Environmental Assessment (Scotland) Act 2005 can also be found at:- http://www.scotland.gov.uk/Topics/Environment/waste-and-pollution/Waste-1/16293/higheractivitywastepolicy/SEA</p>	<p>Noted, with thanks.</p> <p>The Scoping Report update will be updated to include this information, as appropriate.</p>
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Ref	Consultation Response	Commentary/ action taken
10. Northern Ireland Environment Agency		
General comment	We note that the Scoping Document at this stage covers the whole of the UK. However, many of the baseline data sets in Annex 1 do not include data from Northern Ireland. If it is likely that specific sites are likely to be considered in Northern Ireland, and further information about Northern Ireland is required, we would be happy to advise regarding the potential scope and source of the information.	Noted.
General comment	Generic environmental baseline data and information are also available from 'Our Environment, Our Heritage, Our Future - State of the Environment Report for Northern Ireland' published in March 2008. Updated information is available from the Northern Ireland Statistics Report, published in January 2010. Both documents are available on the NIEA website www.ni-environment.gov.uk	Noted, with thanks. The Scoping Report update will be updated to include this information, as appropriate.
Question 2 response	Do you agree with the main environmental issues identified? In relation to potential environmental effects of the SDP it may be worthwhile considering the likely potential for the spread of invasive species due to the movement of submarines which are currently stored afloat (Biodiversity and Nature Conservation topic). If invasive species are present on the hulls of submarines which are currently stored afloat and the submarines are subsequently moved to another dock for dismantling this may facilitate the spread of the invasive species and affect the structure and function of natural systems.	Accepted. The Scoping Report update will be amended to include reference, where relevant to non-native invasive species.
Question 2 response	We agree that the main environmental issues have been identified, although at a site specific level the issue of previously unknown or recorded archaeological features may become relevant.	Noted. Section 5.12 (cultural heritage) of the generic Scoping Report notes that potential effects are likely to be localised, depending on the size of the land take, the historic context of the site the density of the previous finds. The Scoping Report update will be amended to include reference to previously unrecorded archaeological features.
Question 3 response	Are there additional plans, programmes and strategies which should be considered in the SEA? We note that in Annex B 'Relevant Plans, Programmes and Environmental Protection Objectives' there is no national Northern Ireland section. If further information about Northern Ireland is required we would be happy to advise regarding the potential scope and source of the information. It is likely that the Northern Ireland national objectives would be captured by other plans, programmes and strategies already reviewed. No additional plans, programmes or strategies to note if the focus of the document is on Great Britain and therefore does not involve Northern Ireland.	Accepted. The Scoping Report update will be updated to include this information, as appropriate.



Ref	Consultation Response	Commentary/ action taken
Question 4 response	<p>Do you know of any additional baseline evidence which will help to inform the SEA process?</p> <p>We note that there are requests in Annex A 'Review of National Baseline Conditions' for additional baseline data relating to Scotland and Wales. We also note that, under several topic areas, there is sparse baseline data for Northern Ireland. If further information about Northern Ireland is required we would be happy to advise regarding the potential scope and source of the information.</p> <p>It is also possible some other categories such as archaeological or industrial sites, not listed or scheduled but recorded, are on databases held by the relevant heritage bodies.</p>	<p>Noted, with thanks.</p> <p>The Scoping Report update will be updated to include this information, as appropriate.</p>
Question 6 response	<p>When and how should we be seeking your opinions on site-specific information?</p> <p>Similar to our responses to questions 4 and 5, if additional information relevant to individual areas/sites is required for the scoping report update we would be happy to advise further regarding the potential scope and source of the information.</p> <p>We are content with the proposed approach relating to an updated scoping report with relevant information relating to individual sites/areas.</p>	<p>Noted, with thanks.</p>
Question 7 response	<p>Do you have any further suggestions regarding the proposed approach to SEA?.</p> <p>As the report makes clear, cultural heritage factors will become more relevant when specific sites are being considered, but it does outline both potential direct impacts and those on setting. We assume that the reason cultural heritage is not included in 6.1 is for similar reasons and that it will be included when this is reviewed when site specifics are added.</p> <p>Should it be decided to include NI in the data list on p24, then we can provide figures for listed buildings, scheduled monuments etc.</p> <p>Northern Ireland's particular environmental protection legislative framework and River Basin Management Plans should be fully considered if Northern Ireland is considered as a location for a dismantling site.</p> <p>If this is the case, the report therefore should as a minimum list the relevant legislation that transposes the 11 EC Directives as listed in Annex VI of The Water Framework Directive (2000/60/EC) into Northern Ireland statute. It is recommended that the Report should also list all relevant legislation which transposes all EC Directives relevant to water quality protection. Once all water quality legislation has been identified it should be assessed for relevance and applicability to the plan in question. Those pieces of legislation identified as relevant should be assessed in relation to how they may impact upon the project.</p>	<p>Noted, with thanks.</p> <p>The omission of theme L (cultural heritage) and theme M (landscape and townscape) in Table 6.1 is due to a formatting error.</p> <p>The Scoping Report update will be updated to include this information, as appropriate.</p>



Feedback received from UK Government Departments/ Agencies on the Stage 'A1' SEA Scoping Report

Ref	Consultation Response	Commentary/ action taken
1a. DEFRA Air Quality Team		
General comment	We have nothing further to add to the scoping report, which adequately addresses air quality issues that are essentially the same for any construction/deconstruction scenario.	Noted, with thanks.
1b. DEFRA Hazardous Waste Team		
General comment	<p>My initial thoughts had been to wonder how much my team could usefully input to this Scoping exercise on the basis that the focus of the work seemed to be on a facility that could deal with the radioactive parts of the submarines. Indeed you are not proposing to look at the impacts of sending the non-radioactive parts of submarines to commercially operated ship recycling facilities. This makes sense because, where those commercially operated facilities are already in place, the impacts of their ship recycling work should have assessed at the time the facility was established. However, having finally found a small amount of time to think about this a bit more carefully, I think that we may well want to offer comment on the Scoping work.</p> <p>I note that an alternative proposal for the non-radioactive parts of the submarine is to dismantle these at the same facility that handles the radioactive elements. Since this facility is almost certainly not going to be a ship recycling facility now, I think that some assessment would be needed of the impacts of dismantling the non-radioactive part.</p> <p>In addition, the facility will produce waste, some of which may be hazardous, during the other stages of its life right through from construction, to operation and finally to the decommissioning of the facility.</p>	No response required.



Ref	Consultation Response	Commentary/ action taken
Question 1 response	<p><i>Do you have any comments on the proposed alternatives outlined for the SDP?</i></p> <p>As far as alternatives are concerned, the alternatives from our perspective are that the non-radioactive part of the submarine is dismantled:</p> <p>At the site that dismantles the radioactive element;</p> <p>Is sent to a commercial ship recycling facility.</p> <p>While it is reasonable for this SEA not to look at specific alternative commercial sites, the impacts of dismantling at the site dealing with the radioactive element versus the impacts of moving the vessel to a commercial site do need some sort of assessment. For example would the submarine only then contain similar material to that found on a ship or would there be additional risks? Would these be better managed at a specialist submarine facility? Are there any additional risks posed by physically moving the non-radioactive part of the submarine to another location?</p>	<p>Noted.</p> <p>The potential impacts of 'ship-breaking' and management of the resulting waste streams will be assessed at a generic level, under Stage IV of the SDP process (see Figure 1.1, p6 and Section 2.2, p20). This will highlight any significant differences between ship-breaking at the initial dismantling site and a generic commercial UK site. Issues such as transport distance and the proximity principle will be included. Cumulative effects will be considered using the approach set out in Section 6.3 of the generic Scoping Report.</p> <p>The scope of the SEA does not extend to include comparative assessment of individual commercial ship-breaking sites, as these are established facilities whose activities are licensed under the same regulatory requirements, to ensure appropriate environmental standards are met. Moreover, it is proposed that the selection of the ship-breaking site(s) will be resolved by competition, and it is not possible to identify compliant bidders or conduct this competition until the strategic decisions (that are the focus of the SEA) have been taken. The assessment of</p>
		<p>site-specific environmental impacts will be undertaken during this commercial process.</p>
Question 2 response	<p><i>Do you agree with the environmental issues identified?</i></p> <p>In Section 3 the text under the heading "Key Material Assets (Waste Management) does make reference to options for waste such as reuse and recycling and suggests that most hazardous waste is still sent for disposal rather than recycling/reuse. This is fine in so far as it goes. However, I think that there needs to be some sort of consideration to the types of non-radioactive waste that will arise from this process and whether or not these are suitable for re-use and recycling. Also, while hazardous waste is mentioned, some of the waste produced will not be hazardous and while that waste will generally pose less risk than hazardous waste, it will still have associated environmental issues that will need consideration. It is not clear from the wording in the scoping report to what extent non-hazardous waste is being considered.</p>	<p>Noted.</p> <p>Section 3 presents a summary of key baseline issues; however, this comment concerns the potential scoping of potential effects considered in Section 5. The introduction to Section 3.3 and all subsequent sub section headings will be revised to make clear that it refers to baseline issues only.</p> <p>Non-radiological waste arisings (both hazardous and controlled) are already scoped into the SEA for assessment in Section 5.10.</p> <p>The relevant text in Section 5 will be revised to include reference to different non-hazardous waste arisings and the potential for reuse and recycling.</p>
Question 3 response	<p><i>Are there additional plans, programmes and strategies which should be considered in the SEA?</i></p> <p>The following should also be considered:</p> <p>Waste Strategy for England 2007 (published by Defra); (Please note, however, that Defra is currently starting a wide review of waste policies. This is not expected to cover hazardous waste, but will have implications for non-hazardous waste.)</p> <p>UK Ship Recycling Strategy 2007 (published by Defra).</p> <p>Strategy for Hazardous Waste Management in England (published by Defra, March 2010).</p>	<p>Partially accepted.</p> <p>The Waste Strategy for England 2007 is already included in Annex B (p149); the forthcoming review will be noted in the text.</p> <p>The other two suggestions are not currently included; they will be added to the Scoping Report update.</p>
Question 5 response	<p><i>Do you agree that the proposed SEA objectives (Section 6.1) cover the breadth of issues appropriate for assessing the SDP?</i></p>	<p>Noted, with thanks.</p>



Ref	Consultation Response	Commentary/ action taken
	<p>The assessment category and overall objective for Material Assets (Waste Management) currently refers to minimizing waste arisings, promoting reuse, recovery and recycling and minimizing the impact of wastes on the environment and on communities. I am happy with this since it reflects the waste hierarchy.</p>	
Question 5 response	<p>In column two (proposed guide questions), to the questions that ask whether the SDP will affect the amounts of hazardous and non-hazardous waste produced, I think the answer must be "yes". The SEA should be looking at the likely amounts, the waste materials involved and assessing whether the programme will encourage the environmentally sound management of waste arisings in accordance with the waste hierarchy and so drive towards prevention, reduction, reuse and recycling, with disposal only being used where there is no alternative for the waste.</p>	<p>Noted.</p> <p>The guide questions (table 6.1) are used to provide the framework against which the SDP proposals can be assessed. However, the proposals will also be assessed against the SEA objectives, which require the SDP to minimise waste arisings. The assessment questions are worded such that the relative amounts and nature of the radioactive, hazardous and controlled wastes likely to be created with each option can be compared. The SEA objective J (material assets - waste) reflects the need to apply the waste hierarchy and has been developed to address the points made.</p>
Question 6 response	<p>When and how should we be seeking your opinions on all site-specific information?</p> <p>If you decide to go ahead with the option of dismantling the non-radioactive elements at the same site used for the radioactive elements, we would like to know as soon as possible. While the site would be authorised to manage the activity involving the radioactive material, an environmental permit to carry out the rest of the dismantling is likely to be needed. The relevant competent authority would need to be involved (so Environment Agency for England and Wales and SEPA for Scotland). If the facility is in Scotland, you would need to consult Scottish Government.</p> <p>Even if you decide to go for the commercial ship recycling facility option, we would still like to know.</p>	<p>Noted.</p> <p>Defra and other relevant government departments will be kept informed of progress and have the opportunity to feed into both the SEA and wider SDP process as it develops.</p>
1c. DEFRA Biodiversity Team		
General comment	<p>References to the Conservation (Natural Habitats, &c.) Regulations 1994 as amended need to be updated to the Conservation of Habitats and Species Regulations 2010.</p>	<p>Accepted.</p> <p>The Scoping Report update will be updated to include this reference.</p>
General comment	<p>In order to comply with the requirements of Article 6 of the Habitats Directive on the assessment of plans and projects, a high level Habitats Regulation Assessment of the strategic plan for the submarine dismantling 'project' will be needed as well as the site specific project HRA mentioned on page 6. This would be able to draw on the information gathered for the SEA and could form a part of that assessment.</p> <p>I would envisage the plan level HRA would be along the lines of:</p> <p>Generic impacts on biodiversity interests have been identified but given that it's not possible at this high level to be more specific given that the plan is has, as yet, no location specific proposals, thus significant impacts, either alone or in combination with other plans or projects, on Natura 2000 sites cannot be ruled out.</p>	<p>Noted.</p> <p>A separate screening of the SDP proposals will be undertaken against the requirements of Article 6 of the Habitats Directive. The MOD will contact all relevant statutory bodies in due course.</p>



Ref	Consultation Response	Commentary/ action taken
	<p>Similarly, at this high level, adverse impacts on the integrity of one or more Natura 2000 sites cannot be ruled out therefore the plan assessment needs to consider alternatives and Imperative Reasons for Overriding Public Interest (IROPI) before the plan can proceed.</p> <p>Alternatives, including the do nothing option are not feasible or do not adequately deal with the risks associated with the decommissioning of redundant nuclear submarines.</p> <p>That the plan can be justified on IROPI grounds of human health and public safety in that it provides the most practical and suitable means of negating risk or pollution from irradiated material in the redundant vessels.</p>	
General comment	The need to do an HRA at the Plan level would not negate the need to do project level HRAs as site specific proposals came forward for authorisation at a later date.	Noted.
1d. DEFRA Noise Team		
Table 3.1	Categories considered by SDP Scoping heading has just one reference to noise under human health, noise and vibration would also have an impact on Nature Conservation and vibration as well as architectural and archaeological heritage.	<p>Noted.</p> <p>Noise and vibration are not included in the potential effects identified in Annex I of the SEA Directive. However, as acknowledged in the Scoping Report (Section 5.4), there is potential for noise to have a significant effect on human health depending on the site location, background noise levels and the frequency, duration and timing of activities. The potential effects on biodiversity are noted in Section 5.1.1 and on archaeology in Section 5.12.1. Both are scoped in for further consideration in the assessment.</p>
Section 3.3.4	I think the wording should be amended as Noise nuisance i.e. to become a statutory nuisance is measured against objective qualitative measures and is not highly subjective, the following sentence could be amended as; <i>"The cumulative impacts of noise on sensitive groups in local communities may create or exacerbate existing health issues."</i>	<p>Partially accepted.</p> <p>The Scoping Report update will be updated to include this amendment.</p>
Section 3.3.4	The sentence could be strengthened to include the Noise Policy Statement for England (NPSE) 2010.	<p>Noted.</p> <p>The Scoping Report update will be updated to include this reference in Annex B.</p>
Section 4.2 – Noise	<p>You should include under the International/European heading the WHO Night noise guidelines for Europe 2009 which is the latest report produced by WHO on this subject matter, this is also relevant if operation activity occurs during night.</p> <p>Under the National heading please include the NPSE, we can provide some text if you prefer?</p>	<p>Accepted.</p> <p>The Scoping Report update will be updated to include this reference in Annex B.</p>
Section 5.1.2 - Biodiversity	<p>Regarding the statement below:</p> <p><i>"Operational activities resulting in elevated disturbance levels (such as noise or vibration) are likely to be sustained throughout the submarine dismantling process, but are unlikely to have a large radius of effect. Such disturbance is likely to be associated with the operation of plant and power"</i></p>	<p>Noted.</p> <p>Section 5.1 states that the significance of any local construction effects to biodiversity, flora and fauna will depend on site location relative to site receptors. No amendments are proposed.</p>



Ref	Consultation Response	Commentary/ action taken
	<p><i>tools, and will be similar in nature to current refit and repair activities. Although environmental measures would necessarily be in place to manage disturbance, potentially significant effects are scoped in on a precautionary basis."</i></p> <p>We think this statement is highly dependent on the location and surroundings of the dismantling facility, have there been any qualification of the noise/vibration radius? I have the same question for statements made on Page 53. 5.2.2 Operation Phase (4th bullet point) and 5.2.3 Decommissioning Phase (2nd bullet point).</p>	
Section 5.9.2 (Transport)	<p>Regarding the statement below:</p> <p><i>"Increased traffic during the operational phase may affect noise levels felt by communities and wildlife close to the affected transport networks. Such noise effects are likely to be small in magnitude relative to existing traffic noise levels, but sustained throughout the operational phase. In consequence, noise effects on the local community are unlikely to be significant, but are scoped in on a precautionary basis."</i></p> <p>Could you also include what is going to be done about noise affects on wildlife in the second sentence as it has been mentioned in the first sentence just like communities?</p>	<p>Noted.</p> <p>The Scoping Report update will be updated to include this reference to wildlife within the scope of the assessment.</p>
Section 6.3	<p>Page 74. Table 6.5 Example of a Cumulative Assessment Matrix (illustrative purposes only).</p> <p>I know it states illustrative purposes only but could you include Noise and Vibration to be included in stage 3 as well?</p>	<p>Accepted.</p> <p>The Scoping Report update will be updated to ensure Stage III issues match those in Stages I and II.</p>
<u>Annex A</u>	<p>p87 - National trends reference does not specify the source, we would be able to provide more information on this.</p>	<p>Noted, with thanks.</p> <p>The Scoping Report update will be updated to include this information in Annex A.</p>
<u>Annex B</u>	<p>P113 to 115 - please include WHO Night Noise Guidelines and the NPSE.</p>	<p>Accepted.</p> <p>The Scoping Report update will be updated to include this reference in Annex B.</p>
1e. DEFRA Soils Team		
General comment	<p>We strongly support the commitment to further scope the impacts of the development of dismantling and storage sites on geological features, and would seek to ensure that this includes the impacts on soil functions as required under the SEA Directive, and also ensure that in individual development proposals the impacts on Best and Most Versatile agricultural land are appropriately considered.</p>	<p>Accepted.</p> <p>The Scoping Report update will be updated to include soil function within the SEA objective E. Any potential effects on Best and Most Versatile agricultural land will include the assessment, if required.</p> <p>The Scoping Report update will be updated to include this reference to BMVL will be included in Annex B.</p>
General comment	<p>The document refers in several places to "Planning Policy Statement: Planning for a Natural and Healthy Environment". It should be noted that it has been confirmed</p>	<p>Accepted</p> <p>The Scoping Report update will be revised to include Coalition</p>



Ref	Consultation Response	Commentary/ action taken
	that this will not now be implemented, and that under the new Coalition Government there will be a whole-scale review of national planning policy, and that the Environmental Impact Assessment should reflect the latest position on the Government's plans for planning policy.	Government changes to the planning system.
General comment	In several places in the Scoping Report refers to the EU Soil Framework Directive. It should however be noted that the EU Soil Framework Directive has not yet come into existence as legislation, and is still under negotiation in Europe (Defra leads on behalf of the Government). The UK has significant concerns about the content of the Directive, and is concerned that until/if it is agreed there should be no reference to the EU Soil Framework Directive as an element in the current policy framework. It is recommended that these references are removed, and that where a reference is needed to EU policy/legislation this is based on the EU Thematic Strategy on Soil Protection which was published in 2006.	Accepted. The Scoping Report update will be updated to include this information in Annex B.
General comment	A useful reference guide to soil management during construction and development is the "Code of Practice on the Sustainable Management of Soils in Construction and Development (Defra, 2009) - any construction and development should be carried out in line with the guidance which this offers on sustainable management of soils.	Noted. The Scoping Report update will be updated to include this information in Annex B.
General comment	(We) want to be assured that Devolved Administrations have been involved and consulted over the Scoping Report, as there is DA specific material which they will need to have the opportunity to comment upon.	Noted. Regulation 4 of the SEA regulations 2004 (SI 1633) require that the devolved administrations are consulted over the proposed scope of an assessment where the proposed plan relates to the relevant country. The Generic Scoping Report has complied with these requirements and the UK's Devolved Administrations have been invited to take part in this scoping exercise, through their representative Statutory Bodies and (for Wales and Scotland), directly.
2. Department for Transport		
General comment	When ship recycling facilities are mentioned, it should also be mentioned that they should hold the relevant legal permits to carry out this work.	Noted. The Scoping Report update will be updated to include this information, where appropriate.
3. Health Protection Agency		
General comment	The SEA should consider existing best practice guidance and should identify and assess all of the potential public health impacts of the activities that it covers (and their associated emissions). The HPA strongly recommends that a separate section be included in the SEA summarising the impact of the proposed development on public health: summarising risk assessments, proposed mitigation measures, and residual impacts. This section should include any information relating to health contained in other sections of the application (e.g. air quality, emissions to water, etc). Compliance with relevant guidance and standards should be highlighted.	Noted. Human health is included in Section 3 (baseline information), Section 4 (plans and programmes) and Section 5 (potential effects), with additional information contained in Annex A and B. The potential effects on human health to be included in the scope of the assessment are included in Section 5.3. The potential effects on community infrastructure are included in Section 5.2. The importance of this issue is then included in the SEA objective C.



Ref	Consultation Response	Commentary/ action taken
General comment	The SEA should give consideration to best practice guidance such as the ODPM Good Practice Guide for SEA and Local Development Framework Monitoring: Good Practice Guide. The Health Impact Assessment (HIA) gateway, which is administered by the West Midlands Public Health Observatory is also a good source of SEA information. Draft guidance on health in Strategic Environmental Assessment has been issued by the Department of health and is currently being updated.	Noted, with thanks. Our approach to SEA is in line with published MOD guidance which itself is based on the ODPM document, the ODPM approach itself, and good practice gained from experience of SEA in the UK.
General comment	When considering chemicals or radiation, the HPA recommends monitoring of environmental exposures. This allows comparison of environmental levels with health-based standards. The HPA does not support the use of health indicators in SEA monitoring, where these are based on surveillance of multi-factoral health endpoints, where causality cannot be established. That is, where it is not possible to definitely link health endpoints to the plan or programme subject to SEA, or to separate the impacts arising from the plan or programme from the impacts arising external to the plan or programme.	Noted.
General comment	It is good practice to explain abbreviations or acronyms at first use and this has not always been done, for example in Figure 1 on page 6, and again on page 19, 'RC' and 'RPV' are mentioned without explanation of what they mean.	Noted. The Scoping Report update will be amended to address this point.
NTS	This is a useful and clearly-written document.	Noted, with thanks.
Section 2.2	It is stated that "continued access [to Drigg Low Level Waste (LLW) Site] for SDP materials via the National Decommissioning Authority (NDA) is assumed." How well founded is this assumption? The House of Lords Select Committee Report states that it is expected that Drigg LLW site will be full by 2050. Will all the LLW be able to go to the Drigg repository before it is full, especially if the Reactor Compartment is stored intact until it is dismantled when the Geological Disposal Facility is available, and is this not expected to happen until at least 2040?	The project scope does not include the identification or development of future Low Level Waste disposal facilities which is a matter for the NDA. As there will be an enduring and much wider requirement for such facilities across the nuclear industry beyond 2050, the project must assume that alternative facilities will be made available.
Section 3.3.5	Bullet 1, sentence 1 and 2 suggested alternative: "A significant number of sites in the UK are burdened by contaminated land, from our industrial past. Whilst contamination is remediated during redevelopment, the process can be expensive."	Accepted. The Scoping Report update will be updated to include this amendment.
Section 3.3.7	Contains several errors. Suggested amendment to sentence 1: " Air quality has improved in the UK over the last sixty years as a result of the switch from coal to gas and electricity for heating of domestic and industrial premises, stricter controls on industrial emissions, higher standards for the composition of fuel and tighter regulations on emissions from motor vehicles."	Accepted. The Scoping Report update will be updated to include this amendment.
Section 3.3.7	Suggested amendment to sentence 3: "Air pollution continues to damage health in the UK; levels of air pollution tend to be higher in urban areas than in rural areas and effects are thus greater in the former rather than the latter."	Accepted. The Scoping Report update will be updated to include this amendment.
Section 3.3.7	The statement "Air pollution is a significant cause of decline in the condition of 55 of the UK SSSIs" should be checked	Accepted.



Ref	Consultation Response	Commentary/ action taken
	(by Defra).	This figure will be double-checked.
Section 5.3.2 (Dismantling)	The first paragraph states that the doses received by workers will be less than those received in day-to-day operations on in-service submarines. This is attributed to radioactive decay in the laid-up submarines. Although radioactive decay will have reduced the levels of radioactivity in the reactor compartment, a greater reduction will have occurred due to the fact that the nuclear fuel has been removed from the laid-up submarines; this should be mentioned.	Accepted. The Scoping Report update will be updated to include this revision.
Section 5.3.2, 5.6.2 and 5.7.2	There is no reference to the need to optimise doses, or to make doses or discharges ALAPR, etc. While doses may well be lower than in day-to-day operations, and discharges may be controlled by legislation, etc. there is still a need to reduce doses and discharges where practicable. This should be remembered when completing the (assessment) tables such as 6.2 and 6.3.	Noted.
Section 5.5.1, 5.5.2, 5.6.1, 5.7.1 and 5.7.2	Mention of specific contaminants should be provided (in all the above). 5.7.1 - 1 st bullet- typographical error: "previously developed sites where contamination could <u>be</u> expected." 5.7.1 3 rd bullet - discharges to air should be specified.	Partially accepted. At this generic scoping stage, it would be premature to provide specific contaminant or discharge information at this stage, as the likely contaminants have yet to be scoped. Missing word noted.
5.7.2	We note the frequently recurring phrase "However, the potential for significant effects is scoped in for further consideration on a precautionary basis." Please provide details of this "scoping."	Noted. Regulation 12 (5) the SEA Regulations 2004 (SI 1633) requires that the responsible authority shall consult when deciding on the scope and level of detail of the information that must be included in the Environmental Report. Section 5 of the Scoping Report sets out the anticipated scope of these potential effects. The Scoping Report and process of scoping consultation allows the Statutory SEA Bodies to comment and provide advice on this provisional view. Further details can be found at http://www.communities.gov.uk/documents/plannin/gandbuilding/pdf/practicalguidesea.pdf .
Table 6.1	Questions about potential flooding of waste stores, coastal erosion or terrorist activity should be added.	Partially accepted. The SEA objectives and guide questions are considered adequate to cover the points raised regarding flooding and the potential risks to local communities and the environment from potential deliberate action. A separate objective and guide question will be introduced for coastal change.
Section 6.2	Reference timescales - to avoid misunderstandings it is important to explain that "long-term" can mean VERY long term when considering radioactive materials.	Noted. The Scoping Report update will be updated to include this revision.
Annex A	The final paragraph on p79 describes protected water features and refers to the HPA 2005 Population Exposure Review. This is obviously an error.	Accepted. The Scoping Report update will be updated to include this revision.
Annex A	The second para on p80 also references the HPA review. Whilst this is true for the first part of the paragraph...the final part, "in the UK between 1985 and 2005 radioactive	Accepted. The Scoping Report update will be updated to include



Ref	Consultation Response	Commentary/ action taken
	emissions to water fell by 87%" does not come from this review. The equivalent phrase in the Air section is referenced to Defra, so perhaps (this) should also be referenced to Defra?	consideration of this revision.
Annex A	When per-capita doses are quoted from the Population Exposure Review in the Water and Air sections, no indication is given of the year for which these doses apply.	Accepted. The Scoping Report update will be updated to include consideration of this revision..
Annex B	p150 - the Carriage of Dangerous Goods Regulations 2009 should be the relevant legislation for transport, not the Radioactive Materials (Road Transport) Regulations.	Accepted. The Scoping Report update will be updated to include this revision.
Annex B	The Ionising Radiation Regulations (IRR99) should be listed under the human health section, as they limit the exposure of workers to ionising radiation in order to protect their health.	Accepted. The Scoping Report update will be updated to include this revision.
Annex B	p80 - how particles are monitored should be specified. Do the authors mean particles monitored as PM10?	Noted. The Scoping Report update will be updated to include this clarification.
Annex B	Ozone concentrations are unlikely to be relevant, but concentrations of nitrogen dioxide might be. No reference to NO ₂ is made. Meeting the European Commission Limit Value for nitrogen dioxide is providing very difficult at road-side sites in the UK.	Not accepted. It is too early to exclude consideration of ozone concentrations from the dismantling process. Reference to NO ₂ as a significant air pollutant is made throughout this section.
Annex B	p80 - the statement about days of moderate (given as moderator) and high air pollution shows that conditions are worse in rural than in urban areas. This is driven by ozone concentrations: these are unlikely to be relevant to decommissioning processes.	Partially accepted. The Scoping Report update will be updated to include this clarification.
Annex B	p80 - We are surprised that any mention of 'deprived' and 'average' communities appear in the Air Quality Archives. We suggest that this reference is checked.	Accepted. The reference will be checked and the Scoping Report updated , as necessary
Annex B	p89 (Air) - This should be referenced to Defra for checking. There is a danger here in taking material from official sources and quoting it (if the text represents quotations) out of context.	Noted. The Defra Air Quality Team has commented upon the document and their recommendations are included in this document.

4. Nuclear Decommissioning Authority

Question 1 response	<p><i>Do you have any comments on the proposed alternative options outlined for the SDP?</i></p> <p>The NDA would like to see the MOD make a firm statement indicating that they will ensure that the waste generated by</p>	<p>Accepted.</p> <p>The Scoping Report update will be updated to include this</p>
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Ref	Consultation Response	Commentary/ action taken
	the submarine dismantling project will be packaged in containers that comply with the acceptance criteria for interim storage site(s) and the ultimate waste disposal facility/facilities.	revision. Note that the option to store the Reactor Compartments intact will be taken forward alongside that of fully-packaged waste.
Question 2 response	<p><i>Do you agree with the main environmental issues identified?</i></p> <p>p32 - top bullet point. Please use the term 'Geological Disposal Facility'. The NDA point out that the choice of location for the future Geological Disposal Facility is subject to extensive current and future consideration.</p>	<p>Accepted.</p> <p>This bullet will be annotated accordingly. Reference will also be added to the potential for the GDF not to be delivered in 2040.</p> <p>Note that we also intend to include reference to the Scottish Government position in the update.</p>
Question 3 response	<p><i>Do you agree that the proposed SEA objectives cover the breadth of issues appropriate for assessing the SDP?</i></p> <p>Section J on Table 6.1. A good question would be "will the SDP proposals increase the likelihood that all waste streams arising from submarine dismantling will be managed in a controlled manner." The key issue here is integrated waste management and the necessity to discharge the duty of care that MOD has in respect of waste management. The better the management arrangements, the lower the impact upon the environment and communities is likely to be.</p>	<p>Partially accepted.</p> <p>The duty of care regarding both radiological and conventional waste management is Statutory and non-negotiable. The Environment Agency has clearly signalled that it expects BAT to be applied throughout the project, in addition to the need to obtain appropriate Environmental Permits.</p> <p>Given that they are mandatory, we have not included any assessment questions about whether the SDP will be able to meet statutory standards.</p> <p>The suggested question is in fact more suited as an SEA objective (e.g. what we want to achieve). We feel that the current wording of the objective ('minimising the impact of wastes on the environment and communities') addresses this point.</p>
Question 6 response	<p><i>When and how should we be seeking your opinions on site-specific information?</i></p> <p>NDA sites could not be deemed credible for either dismantling or interim storage of ILW without the agreement of DECC and Scottish Government (for sites located in Scotland). The NDA suggests that this agreement is reached prior to the update of the generic scoping report.</p>	<p>Not directly relevant to SEA</p> <p>MOD agrees that the update will not include named NDA sites., but will discuss the generic options of adopting a pan-government solution with DECC and the NDA.</p>
Question 7 response	<p><i>Do you have any further suggestions regarding the proposed approach to SEA?</i></p> <p>The NDA suggests that the MOD continues the current working arrangements between the two organisations as the development of the SEA continues.</p> <p>The NDA also suggests that the Other Government Department meetings are continued to support the development and delivery of the SDP across government.</p>	<p>Not directly relevant to SEA.</p> <p>The MOD does intends to continue with the current working arrangements.</p>



Feedback received from UK Statutory Bodies on the Stage 'A2' SEA Scoping Report

Ref	Consultation Response	Commentary/ action taken
1. Environment Agency		
General Comment	<p>We welcome the opportunity to provide comments on the updated Strategic Environmental Assessment (SEA) Scoping Report for the submarine dismantling project.</p> <p>We are pleased to note that many of the comments we made on the first Scoping Report issued for consultation in June 2010 have been taken into account in this updated report.</p> <p>We have a number of recommendations to ensure that the SEA process achieves the objective of creating a sustainable outcome for the Submarine Dismantling Project.</p>	Noted, with thanks.
General Comment	<p>We recommend that better use is made of referencing the Waste Management Hierarchy for radioactive wastes throughout the document. For example there is more to Low Level Waste (LLW) disposal than consignment to the Low Level Waste Repository (LLWR) in Cumbria; the use of Material Recycling Facilities (MRFs) enables higher levels of re-use as opposed to disposal.</p>	<p>Noted.</p> <p>Under the material assets (waste management) section in Table 4.1, the importance of the waste hierarchy is highlighted as one of the key policy messages. This is then reflected in the assessment objective K. Material Assets (Waste Management) ' Minimise waste arisings, promote reuse, recovery and recycling and minimise the impact of wastes on the environment and communities'. We expect this to then be reflected in the approach to assessing the potential effects associated with submarine dismantling and in particular to considering the options to reduce the volumes of LLW and ILW arising.</p>
General Comment	<p>We support the use of shared Intermediate Level Waste (ILW) storage facilities where practically possible rather than the development of a bespoke MoD facility.</p>	Noted, with thanks.
General Comment	<p>We are pleased that our points raised during the previous consultation on non-radioactive dismantling are being addressed, and that the SEA will consider the impacts of ship-breaking in general terms.</p>	Noted, with thanks.
General Comment	<p>Please note in England and Wales all references to water impacts should be in regard to impacts on water bodies in River Basin Management Plans (RBMPs), in accordance with the duty to 'have regard to RBMPs' in the Water Environment (WFD) (England and Wales) Regulations 2003.</p>	Noted, with thanks.
General Comment	<p>We agree that it is appropriate to scope in the potential impact on flora and fauna from dredging. We recommend the Environmental Report include reference to the need for dredging activities to comply with the Water Framework Directive. We have produced guidance for marine waters to help operators establish what that might mean for a particular dredging operation.</p> <p>www.environment-agency.gov.uk/marinedredging</p>	<p>Noted, with thanks.</p> <p>We will ensure that the requirements of the WFD with regard to dredging are included in relevant section concerning water in Annex B, the review of national plans and programmes.</p> <p>The Environmental report will include reference to the requirement in due course.</p>
General Comment	<p>We welcome the inclusion of a section on coastal change and flood risk. We also welcome the reference to the fact that facilities may affect coastal processes and flood risks in the future. However we would recommend that this applies to the development and operational phases as well as the</p>	<p>Accepted.</p> <p>Whilst Section 5.7 (and subsequent sub-sections) provides implicit reference throughout that flood risk and coastal processes may affect or be affected by SDP infrastructure; however, this is only explicit in the indicative potential effects</p>



Ref	Consultation Response	Commentary/ action taken
	decommissioning phase. We would like to see acknowledgement that influences may be two-way; coastal processes may affect the site or be affected by it, and vice versa.	identified under 5.7.3 Decommissioning Phase. Reference to the potential effects on coastal processes will be included under Section 5.7.1 and 5.7.2.
General Comment	With regards the potential for scoping out issues during this phase of the SEA, we would like to see the issues of most significance to us – namely water quality, water resources, flood risk management, climate change and waste management – included in the SEA, given their character and their potential for being affected by the proposed programme.	Noted. These issues are all scoped into the assessment and specifically reflected in the topics covered and the assessment objectives and guide questions proposed.
General Comment	Please be aware that the licensing authority for marine works in England is the Marine Management Organisation (MMO) as such you may wish to inform them of the current SEA scoping process.	Noted.
General Comment	We recommend the appraisal consider any significant additional water supply demand on the public supply system from the Submarine Dismantling Project and confirm that supply is available or can be provided within the planning period to meet this demand. Similarly any additional need for further private licensed sources should be assessed and potential constraints considered within the Environmental Report.	Noted. Table 6,1 contains the proposed assessment objectives. Under Objective F Water, the first guide question is ' <i>Will the SDP affect the demand for water resources?</i> '. Consistent application of this guide question to the 7 stages of the SDP will ensure that such effects on public water resource supply will be considered. Section 5.6 presents some indicative effects associated with water resources and includes commentary on water resource demand during facility construction and operation. Reference to the potential effects on water resource demand will be included in Section 5.6.3.
Devonport	Please be aware that the facilities at Devonport Dockyard are protected by a 1 mile long Napoleonic breakwater (Plymouth Breakwater) in Plymouth Sound. Ownership of this breakwater is not clear; therefore, there is no authority identified as being responsible for its maintenance. It would be prudent to take steps to identify the owner/responsible authority for this breakwater and to put in place plans for its maintenance in order to protect Devonport from tidal flooding and coastal erosion.	Noted, but not accepted. Plymouth Breakwater (constructed between 1812 and 1864) is Admiralty property; the Duchy of Cornwall raises no claim to the Fundus upon which it is constructed. The Admiralty have been maintaining the Breakwater since it was built and the Naval Base Commander, Devonport currently has this responsibility.
Devonport and Rosyth	Baseline comparisons have been made between Fife, a large county, and Plymouth, a much smaller land area, which could skew the assessment outcomes. An example of where this could cause an anomaly is that the much larger area of Fife contains 48 SSSIs compared to 9 in Plymouth. It would clearly be misleading to imply from this that Plymouth was less sensitive in terms of biodiversity. We recommend that a radius approach would be 'fairer' to assess the impacts of the proposals on the two sites.	Noted. The SEA baseline data necessarily references the smallest-scale dataset for which there is comprehensive information across environmental topics. This is usually the Local Authority area, and this approach has been adopted for the SDP. The Local Authority for Rosyth is Fife Country Council, as it has no Unitary or District council. EU-designated wildlife sites will be subject to a Plan-level Habitats Regulations Assessment, which will assess effects in a fixed radius from the sites, taking into account sensitive areas outside this boundary where effects might be expected (such as migration pathways). In consequence, the assessment of potential effects will take into account proximity to actual designated sites, features or species or other sensitive receptors and draw on information gathered from the sub-regional area. The assessment will not provide some relative commentary on the sensitivity of the sub-regional environment in the manner suggested – we agree that such an approach would be misleading and would



Ref	Consultation Response	Commentary/ action taken
		draw erroneous conclusions.
Section 2.1.2, p 15-17	Please be aware that the date stated for defueling to start may need to be amended in light of the delay to construction and commissioning of the Low Level refuel/defuel facility at Devonport.	Noted.
Section 2.3.3 (para 3), p 23	We recommend that reference to the 'Policy for the Long-Term Management of Solid Low-Level Radioactive Waste in the United Kingdom' be reviewed in light of the issue of the Nuclear Decommissioning Authority's 'United Kingdom Strategy for the Management of Solid Low Level Radioactive Waste from the Nuclear Industry' (August 2010). This document covers the wider use of the Waste Management Hierarchy in managing solid ILW and diverting as much LLW from the LLWR as possible, thus maintaining the facility for essential disposals. The strategy provides details of alternatives to the LLWR e.g. metals recycling, decontamination and use of Exemption Orders.	Accepted. Annex B will be updated to include the Nuclear Decommissioning Authority's 'United Kingdom Strategy for the Management of Solid Low Level Radioactive Waste from the Nuclear Industry' (August 2010).
Q1	<i>Do you have any further comments on the revised approach to undertaking the SEA?</i> No. We agree with the proposed topics-led approach, which will facilitate review and accessibility.	Noted, with thanks.
Q2 Section 3.3.1, p29	<i>Do you agree with the revised National baseline information?</i> Please note that there is baseline information within the River Basin Management Plans on the water bodies that these sites fall into and surround the site. These contain ecological information.	Noted The relevant RBMPs have been referenced within the summary of sub-regional plans and policies (e.g. p32 of Annex C) as well as in the presentation of baseline and evolution of the baseline information for the sites. Ecological status information of water bodies is also presented.
Annex A	We recommend that 'Charting Progress 2' a report on UK seas would be a useful document for the environmental baseline section. The report is published by the UK Marine Monitoring and Assessment community. http://chartingprogress.defra.gov.uk/	Noted. This reference will be reviewed and added to Annex A, if appropriate.
Q3 Annex C – Plymouth	<i>Do you agree with the additional sub-regional baseline information?</i> Please be aware that preliminary work identifying Marine Conservation Zones and Marine Protected Area candidate sites has highlighted the value of Plymouth Sound and waters immediately offshore. This initiative is called 'Finding Sanctuary' in the south west. http://www.finding-sanctuary.org/	Noted. These findings will be referenced in Annex C.
Annex C – Plymouth Water (p63)	We recommend referencing the water company's Water Resource Management Plan and the section that considers Plymouth (the Roadford supply zone) for the public water supply context for Plymouth and Devonport. http://www.southwestwater.co.uk/media/pdf/q/a/WRP_Final.pdf	Noted. This will be referenced in Annex C.
Annex C – Plymouth Coastal Change and Flood Risk	We recommend reviewing the South Devon and Dorset Draft Shoreline Management Plan which provides good context for Plymouth http://www.sdadcag.org/publications.html as well as the Catchment Flood Management Plan which provides the Environment Agency's long term flood risk management objectives for the locality http://www.environment-	Noted Shoreline Management Plans (Lyme Bay, South Devon and Darelston Head to Rame Head) and Catchment Flood Management Plans (Tamar) are already reviewed and the relevant objectives summarised in Annex C Table C1.4 (Coastal Change and Flood Risk section). The additional



Ref	Consultation Response	Commentary/ action taken
(p9)	agency.gov.uk/research/planning/114342.aspx	plans suggested will be reviewed and added to the contextual information presented for Plymouth.
Q4 Annex B. Water (p41-42) EU Water Framework Directive 2000/60/EC	<p><i>Are there additional plans, programmes and strategies which should be considered in the SEA?</i></p> <p>In accordance with Art 4(1), the WFD objectives for surface water, groundwater, transitional and coastal water bodies are to:</p> <p>prevent deterioration, reduce pollution, protect, enhance and restore condition</p> <p>achieve 'good status' by 2015, or an alternative objective where allowed, and</p> <p>comply with requirements for protected areas (WFD Annex IV: abstraction of drinking water, protection of economically significant aquatic species, water bodies designated for recreation, nutrient sensitive areas and designated habitat that depends on water)</p> <p>These objectives are included in RBMPs which have the following targets:</p> <p>the implementation of the first River Basin Management Plans is due to be completed by December 2015.</p> <p>the implementation of the second River Basin Management Plans will be due to be completed by December 2021.</p> <p>the implementation of the third River Basin Management Plans will be due to be completed by December 2027</p>	<p>Noted.</p> <p>The Water Framework Directive is referenced in Annex B under 'Water' (p41). The summary information presented will be expanded to include the points raised.</p>
Annex B - Coastal Change and Flood Risk (p 67-70)	<p>We recommend that the Floods and Water Management Act is added to the Plans and Programmes review.</p> <p>We would also recommend referencing Shoreline Management Plans (SMPs). There are 22 individual plans covering the coasts of England and Wales under a national programme and Defra Guidance. Other legislation listed in this section, e.g. PPS25 and its supplement, rely on SMPs, and the marine planning programme arising from the Marine and Coastal Access Act must 'have regard to' SMPs.</p>	<p>Accepted.</p> <p>The Floods and Water Management Act 2010 will be added to the review of national plans and programmes contained in Annex B.</p> <p>We note the reference to SMPs; however, in preference to outlining generic requirements have included specific SMPs for each sub-regional area within Annex C.</p>



Ref	Consultation Response	Commentary/ action taken
Q5 Assessment of Water, Section 6.2 (p72-76) (Also applies to Section 5.6, p 57-59)	<p><i>Do you agree that the revised SEA objectives (Section 6) cover the breadth of issues appropriate for assessing the SDP?</i></p> <p>Please be aware that in England or Wales, assessment of water bodies should be against the objectives of the relevant River Basin Management Plan:</p> <p>Where there is a risk of polluting any water body in a RBMP then the further assessment that is identified as being necessary (5.6) should be a detailed assessment. If the activity was subject to an Environmental Permit or other licence or consent for an activity that the Environment Agency regulated then we would carry out that detailed assessment as part of the regulatory process.</p>	<p>Noted.</p> <p>We do not propose to change the questions in Section 6.2, which are couched in deliberately generic terms.</p>
Section 6.1 (p71)	We welcome the objectives listed in the 'coastal change and flood risk' heading.	Noted, with thanks.
Q6	<p><i>Do you have any further suggestions regarding the proposed approach to SEA?</i></p> <p>No, we are content that the approach is sound, although we warn against the excessive use of matrices.</p>	<p>Noted.</p> <p>We will seek to minimise the number of matrices we use in the report, whilst still maintaining integrity.</p>
2. Natural England		
	No written response received.	
3. English Heritage		
Q1	<p>Do you have any further comments on the revised approach to undertaking the SEA?</p> <p>No</p>	Noted, with thanks.
Q2	<p>Do you agree with the revised national baseline information?</p> <p>Yes</p>	Noted, with thanks.
Q3	<p>Do you agree with the additional sub-regional baseline information?</p> <p>No. English Heritage does not agree. There are inaccuracies and omissions as follows:</p>	
Annex C (Plymouth) – Cultural Heritage	<p>'Sites currently at risk' is inaccurate. There are 22 (not 10) sites at risk within Plymouth Unitary Authority on the 2010 English Heritage Register, of which 11 are buildings at risk and 11 scheduled monuments at risk (although some of the 'buildings at risk' are scheduled):</p> <p>http://risk.english-heritage.org.uk/2010.aspx?rs=1&rt=0&pn=1&st=a&ua=Plymouth%2c+City+of+(UA)&ctype=all&crit=</p> <p>Of the buildings at risk, one is grade I and six are grade II*. Two of the buildings at risk in Plymouth (South Smithery and South Sawmills, both grade II*) are owned by the MOD and are sited in HMNB Devonport in South Yard.</p> <p>In addition, the GHEU Biennial Conservation Report The Government Historic Estate 2007-2009 (English Heritage, 2010) also identifies the</p>	<p>Accepted.</p> <p>The figures for Plymouth will be amended in the finalised report to reflect the points raised.</p> <p>The schedule of Buildings at Risk may change with new Government Historic Estate Unit Biennial report, due later in this year. If this new data is released before the Environmental Report is produced, the Environmental Report will be updated.</p>



Ref	Consultation Response	Commentary/ action taken																																														
	<p>Master Ropemaker's House (grade II) in South Yard as being at risk. All three of these buildings in the dockyard are unoccupied. Under-use of many of the MOD's designated dockyard buildings (not only those formally identified as being at risk) is a significant cultural issue for the area.</p>																																															
<p>Section 3.3.13, Key Cultural Heritage Baseline Issues</p>	<p>The MOD's responsibility for designated cultural heritage sites is referred to. However, citing the numbers of scheduled monuments listed buildings and conservation areas in Plymouth and Fife is not particularly meaningful even in a high-level document.</p> <p>At stage B: Assessment it will be necessary to focus more tightly on the heritage assets in the localities concerned, especially those managed by the MOD. There are 85 listed buildings within Devonport Naval Base (embracing all MOD and Babcock landholdings) which is over 11% of the total number of 750 listed buildings within Plymouth. Of the 85 listed buildings, 2 are grade I and 23 are grade II*. The naval base also contains 5 scheduled monuments. The incidence of designated assets is not consistent throughout the naval base as the following table demonstrates:</p> <table border="1" data-bbox="260 1003 948 1473"> <thead> <tr> <th rowspan="2">DEVONPORT DOCKYARD</th> <th rowspan="2">Scheduled Monuments</th> <th colspan="4">Listed buildings</th> </tr> <tr> <th>I</th> <th>II*</th> <th>II</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>SOUTH YARD</td> <td>4</td> <td>1</td> <td>13</td> <td>19</td> <td>33</td> </tr> <tr> <td>MORICE YARD</td> <td></td> <td>0</td> <td>7</td> <td>7</td> <td>14</td> </tr> <tr> <td>NORTH YARD</td> <td></td> <td>1</td> <td>1</td> <td>2</td> <td>4</td> </tr> <tr> <td>HMS DRAKE</td> <td></td> <td>0</td> <td>1</td> <td>13</td> <td>14</td> </tr> <tr> <td>BULL POINT</td> <td>1</td> <td>0</td> <td>1</td> <td>19</td> <td>20</td> </tr> <tr> <td>TOTAL</td> <td>5</td> <td>2</td> <td>23</td> <td>60</td> <td>85</td> </tr> </tbody> </table> <p>Consequently, the impact of the facility on the cultural heritage of Devonport dockyard would vary greatly depending on the precise location within the naval base.</p> <p>The cultural significance (both locally and regionally) of Devonport naval base should certainly be amplified, as this cannot be gleaned solely from a list of designated assets. Devonport as a whole has major significance as one of the most important historic dockyards in Europe</p>	DEVONPORT DOCKYARD	Scheduled Monuments	Listed buildings				I	II*	II	Total	SOUTH YARD	4	1	13	19	33	MORICE YARD		0	7	7	14	NORTH YARD		1	1	2	4	HMS DRAKE		0	1	13	14	BULL POINT	1	0	1	19	20	TOTAL	5	2	23	60	85	<p>Accepted.</p> <p>The cultural heritage significance of Devonport naval base will be highlighted in Section 3.3.13.</p> <p>The detailed baseline information provided will be used to update the sub-regional information in Annex C for Plymouth. Corresponding levels of heritage asset information will be sought for Rosyth.</p> <p>The relative significance of the location of the facility on the heritage assets within Devonport will be captured within the Stage B Assessment.</p> <p>However, it should be noted that SEA is not designed to provide a detailed assessment of the impacts of the SDP proposals on the historic environment at either initial dismantling site. This will be undertaken at a later stage at the chosen site(s), as part of the Planning process.</p>
DEVONPORT DOCKYARD	Scheduled Monuments			Listed buildings																																												
		I	II*	II	Total																																											
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<p>Section 5.13 - Cultural Heritage</p>	<p>The need to assess the effects of the proposed facility on cultural heritage is covered here, but as there is currently no information on size of the proposed development it is not possible to comment in any detail. The current licensed site at Devonport lies within North Yard which contains four designated heritage assets. The proposed area identified for further consideration would require a conservation management plan or at least a conservation statement to identify the significance of key elements of the</p>	<p>Noted.</p> <p>The Stage B assessment of the differing land use categories will present and use a set of assumptions that include an illustrative footprint of a dismantling facility and an interim ILW storage facility; however, no assumptions will be made</p>																																														



Ref	Consultation Response	Commentary/ action taken
	<p>cultural heritage (i.e. heritage assets in term of both building and below-ground archaeology) and their capacity for change.</p> <p>The fact that the land use may be effectively sterilised for a long time after the dismantling process is complete around 2046 would suggest that utilising heritage assets or creating the facility in their vicinity could effectively blight their re-use which might be detrimental to their long-term protection. However, without further information on size or location it is impossible to tell whether any associated benefits of reuse of any of the heritage buildings might offset any of the inherent concerns.</p>	<p>about precise siting locations.</p> <p>However, SEA is, by its nature, a strategic assessment. It is important, therefore, not to undertake a detailed environmental assessment for each site at this stage. Given the many uncertainties regarding options at this stage such a detailed assessment may also suggest a spurious degree of accuracy and definition that the proposals do not actually warrant. Such an assessment at this stage could also duplicate that contained in an Environmental Impact Assessment, which must be undertaken once the proposed site or sites have been chosen.</p> <p>It is acknowledged that the amount of change to any historic fabric (whether buildings or archaeology) will be a key determining factor in the scale and nature of any site management required. However, it is too early to determine whether a Conservation Management Plan would be required.</p> <p>It should be noted that SDP sites will not be 'effectively sterilised' in any sense. Unlike in the civil sector, reactors are afloat in the submarines, and will be dismantled in their entirety. The dismantling and interim storage facilities can (and indeed must) be developed in a way which protects the surrounding area from contamination. Once the submarines have been dismantled, the scope of the SDP includes provision for decommissioning of facilities and reinstatement of the land.</p>
Q4	<p>Are there additional plans, programmes and strategies which should be considered in the SEA?</p> <p>No.</p>	Noted, with thanks.
Q5	<p>Do you agree that the revised SEA objectives (Section 6) cover the breadth of issues appropriate for assessing the SDP?</p> <p>Yes.</p>	Noted, with thanks.
Q6	<p>Do you have any further suggestions regarding the proposed approach to SEA?</p> <p>No</p>	Noted, with thanks.
4. Countryside Council for Wales		
General comment	<p>CCW notes that this scoping stage of the SEA process has been undertaken in two stages, in order to fully account for comments received. This approach is welcomed and supported and will, in CCW's opinion strengthen the SEA process.</p>	Noted, with thanks.



General comment	CCW notes the statement that, by law, defueling work cannot be undertaken at a non-licensed site. Clarification would be welcomed as to whether there are any such licensed sites in Wales.	There are no such Licensed or Authorised sites currently in operation in, or bordering, Wales.
General comment	CCW notes that decommissioning 'should be carried out as soon as reasonably practicable.' Given that afloat storage has already been undertaken for 30 years, clarification would be welcomed as to what might constitute 'as soon as reasonably practicable'.	Government policy on nuclear decommissioning (as described in the 'Managing Radioactive Waste Safely' framework) requires that facilities be decommissioned 'as soon as reasonably practicable.' This allows factors such as safety, practicability and cost to be balanced. In the past, MOD has undertaken afloat storage as the best and most cost-effective solution, while technical solutions and UK national policy were being developed. . Since then, the technical work undertaken by the MOD, coupled with the progress of other countries in decommissioning nuclear submarines of similar design and age suggests that decommissioning activities, beyond afloat storage, are now reasonably practicable. . The SDP is the MOD's project to progress this.

Ref	Consultation Response	Commentary/ action taken
General comment	CCW notes that non-radiological dismantling has, by law, to take place on a suitable licensed ship-breaking facility. CCW would welcome clarification as to whether such a licensed facility exists in Wales.	At this stage, SDP is not aware whether there are any Licensed ship recycling facilities in Wales. Any proposals regarding the specific location(s) for ship recycling in the UK will be developed after the strategic stage of the project has completed.
General comment	CCW notes that existing (ILW storage) sites are owned by the MOD, NDA or commercial operators. Clarification would be welcomed as to whether any additional licensed sites for ILW exist within Wales. The status of Oldbury, Wylfa and Trawsfynydd power stations as UK licensed and Authorised sites is noted in Annex A of the proposed site criteria and screening paper.	The list of Licensed and Authorised sites provided in SDP Site Selection Criteria paper is published by the HSE. Full details (including all commercial sites) can be found at http://www.hse.gov.uk/nuclear/licensees/pubregister .
General comment	CCW also notes that the NDA have challenged the lack of precedent for movement of ILW between stores, and are seeking opportunities to share current/ planned ILW facilities. Given that there are Licensed (civil) sites within Wales, CCW would wish to be kept informed of the NDA's challenge on this issue.	CCW, as a Statutory stakeholder, will be kept informed of the SDP through the SEA process and public consultation. Regarding development of the NDA strategy, CCW should engage directly with the NDA on this issue.
General comment	CCW notes this project (and assessment) will be restricted to consideration of existing ILW storage on MOD, NDA and commercial ownership sites. However, clarification would be welcomed as to what constitutes 'commercial ownership.'	Sites under commercial ownership are those operated by private companies, as opposed to government entities.
General comment	Clarification would be welcomed as to whether this SEA process will consider the potential environmental effects of transportation of waste and any ancillary/ induced development associated with potential sites on existing, previously-developed and undeveloped land.	Confirmed. The transportation of waste from the development of facilities - and the effects this may have on the environment - will indeed be assessed in the SEA.
Habitats Regulations	With regard to any future 'project' level assessment processes, dependant on the nature, scale and location of development, consideration will also have to given to Habitats Regulations Assessment.	Noted. A Plan-level Habitats Regulations Assessment (screening and scoping document) has been produced and is available from www.submarinedismantling.co.uk . CCW has responded to the consultation on this draft document.



Ref	Consultation Response	Commentary/ action taken
NTS Table 2	<p>Biodiversity: Consideration should be given to potential effects on natural processes, functions and ecological services.</p> <p>Soils and Geology: Consideration should also be given to soil functions and soil processes.</p>	<p>Noted; not accepted.</p> <p>The non-technical summary is designed to be easily understandable to the general public, and so covers a broad types of issue that the SEA will consider. The issues requested by CCW are not appropriate for inclusion within the NTS, as they are not generally understandable principles. Although Table 2 is not repeated in the main scoping report, the issues raised by CCW are already scoped into the the SEA, as described in Chapter 5 and Table 6.1.</p>
NTS Table 2	<p>Air Quality: CCW notes and welcomes the inclusion of construction and transport issues within this assessment process.</p>	<p>Noted, with thanks.</p>
NTS Table 2	<p>Landscape and Townscape: Consideration should be given to distinctiveness of landscapes. Seascapes should also be included within this assessment process.</p>	<p>Partially accepted.</p> <p>Reference to the 'quality and attractiveness' of landscapes and townscapes are not exclusive concepts – therefore there is no need to include 'distinctiveness' as a separate consideration – this concept is covered in the original wording.</p> <p>Given the coastal nature of the initial dismantling site, explicit reference to seascapes will be included in the assessment and Environmental Report.</p>
NTS Table 3	<p>Geology and Soils: CCW welcomes the inclusion of a guide question on soil function.</p> <p>Material Assets: CCW welcomes the clarification as to what might be meant by 'sensitive receptor.'</p>	<p>Noted, with thanks.</p>
NTS Table 3	<p>Cultural Heritage: CCW would suggest an additional guide question to be added in respect of culturally—significant and historical landscapes.</p> <p>Consideration should also be given within this assessment to inter-relationships between environmental topics, and to cumulative and synergistic effects in the short, medium and long term.</p>	<p>Noted.</p> <p>Culturally significant and historical landscapes are already intrinsically included within the guide questions which have been deliberately couched in the widest possible terms to encompass all culturally-significant features, whether protected or not.</p> <p>Inter-relationships are indeed being assessed in the SEA. Including references within the guide questions to all the potential indirect, cumulative and synergistic effects of SDP would over-complicate Table 3. Section 10 explains how these issues will be included.</p>
Section 1.7	<p>CCW notes and welcomes the intention to undertake the Habitats Regulations Assessment (at plan level) for the SDP proposals, although the use of an arbitrary 20km buffer may not be appropriate in all cases. The requirement for HRA is dependant on the potential significance of effects on European Sites. The type and significance of effects is not necessarily determined by spatial factors, but also by causal pathways.</p>	<p>Noted.</p> <p>This comment will considered by the HRA authors.</p> <p>It has been recognised that causal pathways can affect Protected habitats and/ or species beyond any fixed geographical limit.</p>
Section 2.3.1	<p>Interim ILW Storage: CCW notes that the NDA have challenged the lack of precedent for movement of ILW between stores, and are seeking opportunities to share current/ planned ILW facilities. Given that there are Licensed sites within Wales associated with the civil nuclear sector, CCW would wish to be kept informed of the NDA's challenge on this issue. CCW notes this project (and assessment) will</p>	<p>Noted.</p> <p>This comment repeats CCW comments already made (see above). Please see responses to those comments in the 'general comments' above.</p>



Ref	Consultation Response	Commentary/ action taken
	be restricted to consideration of existing ILW storage on MOD, NDA and commercial ownership; however, clarification would be welcomed as to what constitutes 'commercial ownership.'	
Section 2.3.2	Clarification would be welcomed as to whether this SEA process will consider the potential environmental effects of transportation of waste and any ancillary / induced development associated with potential sites.	As described in the assessment of potential effects (Chapter 5), the potential effects of transporting materials during development and operation of SDP facilities will indeed be considered.
Section 3.3.1	Clarification would be welcomed as to whether the status of ecological processes, services and functions has been included/ considered within this baseline.	Whilst Section 3.3.1 predominately concerns the number, characteristics and condition of designated conservation sites, the assessment will include consideration of any potential effects of the SDP on the function and structure of ecosystems. This is highlighted by Assessment objective A in Table 6.1.
Section 3.3.5	Clarification would be welcomed as to whether the status of soil processes, services and functions have been included/ considered within this baseline. As written, the baseline only appears to consider issues relating to contamination.	Section 3.3.5, along with Annex A and Annex C of the Updated Scoping Report, presents baseline information for soils and geology. This information predominately concerns contamination, topography, designated geological sites and geomorphological features. No substantive baseline information is provided on soil processes, services and functions. Assessment objective E includes the following guide question ' <i>Will the SDP proposals have an effect on soil function and processes?</i> '. As a consequence, the assessment will include consideration of any potential effects of the SDP on these issues.
Section 3.3.7	Consideration should be given to air quality issues in terms of adverse effects on soils, ecological processes and wildlife habitats.	Noted. As stated both previously and in this second consultation, indirect effects will be considered throughout the SEA. It has not been possible to map potential cross-references in Section 3- there are so many potential inter-relationships, that this would over-complicate an already complex report. The links to other SEA categories highlighted in Table 4.1 demonstrate cross-references between topics.
Section 3.3.12	Land use constraints need to be considered in the context of Shoreline Management Plans and potential compensatory measures (for European sites) associated with the planned implementation of Shoreline Management Plans and other relevant plans and projects.	Noted; partially accepted. Land use planning issues at coastal sites are addressed in Section 3.3.9 (Coastal Change and Flood Risk). This includes reference to Shoreline Management Plans. The need to consider the potential effects of Shoreline Management Plans and other developments on coastal areas will be included in the assessment. The information contained in the Shoreline Management Plans for Rosyth and Devonport will be used to inform the assessment, where relevant and appropriate.
Table 4.1	<p>Biodiversity and Nature Conservation: CCW notes and, in general, welcomes objectives and policy messages. However, additional consideration needs to be given to the natural processes, functions and ecological services (physical and biological) that contribute to biodiversity and nature conservation, and to connectivity issues between habitats.</p> <p>Health (Noise and Vibration): Consideration needs to be given to noise, vibration and light pollution on biodiversity.</p>	The comments on biodiversity and nature conservation are noted with thanks. Table 4.1 summarises the key environmental protection objectives that are considered relevant to the SDP. Some of these are derived from the review of international, national, regional and local plans and programmes. It is not proposed to amend the table further, although it is noted that the assessment objectives and associated



Ref	Consultation Response	Commentary/ action taken
	<p>Soil and Geology: CCW notes and supports the consideration of soil function. Clarification would be welcomed as to whether 'function' in this context includes soil sequestration / emission of carbon and greenhouse gasses.</p> <p>Water: CCW notes and supports the cross-reference to the nature conservation and climate change objectives.</p>	<p>guide questions in Table 6.1 will enable ecosystem structure and functions and the impact of noise and vibration on people, wildlife and buildings to be assessed.</p> <p>Within the scope of this assessment, the term soil functioning will include soil sequestration, where appropriate.</p>
Table 4.1	<p>Climate Change: Clarification would be welcomed as to what constitutes 'dangerous' human interference.</p>	<p>The term 'dangerous' human interference is taken from Article 2 of the UN Framework on Climate Change. It states that the objective of the Framework is to 'stabilise greenhouse gas concentrations in the atmosphere at a level that would prevent dangerous anthropogenic interference with the climate system. Such a level should be achieved within a time frame sufficient to allow ecosystems to adapt naturally to climate change, to ensure that food production is not threatened and to enable economic development to proceed in a sustainable manner'.</p>
Table 4.1	<p>Coastal Change and Flood Risk: In the context of coastal change, reference should be made to the land use (material assets) topic. Land use constraints need to be considered in the context of Shoreline Management Plans and potential compensatory measures (for European sites) associated with the planned implementation of Shoreline Management Plans and other relevant plans and projects.</p> <p>Material Assets (transport, land use and materials): Land use and transport constraints need to be considered in the context of climate change effects and, in particular, Shoreline Management Plans and potential compensatory measures (for European sites) associated with the planned implementation of Shoreline Management Plans and other relevant plans and projects.</p>	<p>It is not the purpose of Table 4.1 to highlight cross references between potential effects and interrelationships per se, as there are many others that could be included for consideration. However, it is to be expected within the assessment of secondary, indirect, synergistic and cumulative effects that such interrelations, where they occur and are significant, will be highlighted. Table 6.1 shows where linkages across topics are expected to occur</p>
Section 5.1.1	<p>CCW notes and welcomes the intention to undertake the Habitats Regulation Assessment (at Plan level) for the SDP proposals. Disturbance issues should include light pollution and potential effects of low-level noise & vibration on vulnerable and susceptible species.</p> <p>CCW notes and supports the intention to undertake further assessment of potential effects on biodiversity for the development, operational and decommissioning stages of the SDP. The premise that the significance of environmental effects is dependant upon site location is noted. However, CCW would suggest that the significance of effects is also dependant upon the sensitivity of the receiving environment (including processes and ecological function). In addition, the significance of effects is not necessarily spatially dependant, but may depend on spatial and temporal causal pathways.</p>	<p>Noted.</p> <p>CCW's suggestion regarding the HRA will be considered by the HRA authors.</p> <p>Regarding wider biodiversity, the sensitivity of the receiving environment is a direct function of the site location(s). The issue regarding pathways has been noted for the HRA.</p>
Section 5.4	<p>Consideration needs to be given to of noise, vibration and light pollution effects on biodiversity.</p>	<p>Noted; not accepted.</p> <p>The Health (Noise and Vibration) section considers the impacts of noise and vibration on people and local communities only.</p> <p>The impacts of noise and vibration (plus light pollution) on the natural environment are included in Category 1 Biodiversity and Nature Conservation</p>
Section 5.5	<p>CCW notes and supports the consideration of soil function. Clarification would be welcomed as to whether 'function' in this context includes soil sequestration/ emission of carbon and greenhouse gasses.</p>	<p>Within the scope of this assessment, the term soil functioning will include soil sequestration, where appropriate.</p>



Ref	Consultation Response	Commentary/ action taken
Section 5.6 - Water	CCW notes the statement that the significance of the effects on water resources and the water environment will depend on 'the site location relative to sensitive local receptors.' CCW would suggest that, particularly in the case of water resources, significant effects may not be determined by immediate locality and that further consideration should be given to potential spatially distant effects (both in terms of supply of water resources and discharge of waste water). Consideration will also need to be given to the relevant Water Resource Plans for projected sites.	<p>Noted; accepted.</p> <p>It is acknowledged that both water supply and discharge may affect areas distant from SDP facilities. The term 'local' in this context could easily refer to areas where water is taken/ discharged, as well as the vicinity of SDP facilities.</p> <p>As a result, none of the guide questions in Table 6.1 are specifically 'tied' to considering the vicinity of any SDP infrastructure. As a consequence, consideration will be given, to the effects on potentially distant water resources, as appropriate.</p> <p>Consideration will be given to Water Resource Plans (produced for depleted/ vulnerable catchments) in the Assessment.</p>
Section 5.7 - Coastal Change and Flood Risk	In the context of coastal change, reference should be made to the land use (material assets) topic. Land use constraints need to be considered in the context of Shoreline Management Plans and potential compensatory measures (for European sites) associated with the planned implementation of Shoreline Management Plans and other relevant plans and projects.	<p>Accepted.</p> <p>Section 5.7 will include an additional comment that references the potential effects on land use in the context of coastal change.</p> <p>Table 6.1 shows where linkages across topics are expected to occur</p>
Table 6.1 - Biodiversity	CCW welcomes the inclusion of a guide question on the structure and function of natural systems. Clarification would be welcomed as to whether this guide question includes issues related to ecological connectivity.	<p>Noted, with thanks.</p> <p>Ecological connectivity concerns the whole life cycle of species and the habitats that are required to support life cycle. For fresh water migratory species it includes spawning grounds as well as locations of adult populations. Where relevant, such factors will be considered under the biodiversity and nature conservation topic (A) and will also draw on the findings of the HRA screening of the project.</p>
Table 6.1 - Noise and Vibration	An additional guide question should be added in respect to potential impacts of noise, light and vibration on biodiversity.	<p>Noted; not accepted.</p> <p>The Health (Noise and Vibration) section considers the impacts of noise and vibration on people and local communities only.</p> <p>The impacts of noise and vibration (plus light pollution) on the natural environment are included in Category A, Biodiversity and Nature Conservation</p>
Table 6.1 - Geology and Soils	CCW welcomes the inclusion of a guide question on soil function. Clarification would be welcomed as to whether 'function' includes soil sequestration of carbon.	Within the scope of this assessment, the term soil functioning will include soil sequestration, where appropriate.
Table 6.1 - Air	An additional guide question should be added in respect of air quality effects /impacts on natural habitats and processes (other than dust or odours)	<p>Noted; not accepted.</p> <p>As stated both previously and in this second consultation, indirect effects will be considered throughout the SEA. It is not practical to map the potential cross-references in Table 6.1, as there are so many potential inter-relationships. To include explicit questions for all indirect effects across all environmental receptors would over-lengthen and over-complicate the assessment table. The links to other SEA categories highlighted in Table 4.1 demonstrate cross-reference</p>



Ref	Consultation Response	Commentary/ action taken
		between topics.
Table 6.1 – Land Use and Materials	CCW would suggest another guide question needs to be added in respect to proposals raised by Shoreline Management Plans and associated compensatory measures for European Sites.	Noted; not accepted. The potential effects (if any) on the SDP from Shoreline Management Plans and any subsequent compensatory measures are indirect, and as such, will be captured in the assessment of secondary, indirect, synergistic and cumulative effects. This could also be informed by any findings of the in-combination effects assessment associated with the Habitats Regulations Assessment (undertaken).
Table 6.1 – Cultural Heritage:	CCW would suggest an additional guide question be added in respect of significant and historical landscapes.	Noted; not accepted. The assessment objective M Cultural Heritage is to 'Protect and where appropriate enhance the historic environment including cultural heritage resources, historic buildings and archaeological features'. Under Objective N Landscape and Townscape, there is also assessment question 'Will the SDP proposals affect the fabric and setting of historic buildings, places or spaces that contribute to local distinctiveness, character and appearances?'. These two elements of the assessment are considered adequate to assess any potential effects on a culturally significant and historical landscape. See also response to CCW comment regarding NTS Table 3.
Table 6.1 – Landscape and Townscape	Consideration should be given to AONBs, Heritage Coasts and other landscape classifications.	Noted; not accepted. Under assessment objective N, the guide question is 'Will the SDP affect protected/designated landscapes townscapes, such as National Parks or Conservation Areas?' This is couched in sufficiently general terms to encompass the additional categories suggested. See also response to CCW comment on NTS Table 3.
Table 6.2	<p>CCW welcomes and supports the proposals in respect of mitigation, but would suggest that a sequential approach be undertaken in respect of potential adverse effects on the environment. Measures and policy proposals should initially seek avoidance and reduction of adverse effects in advance of mitigation measures. CCW would suggest that 'working with partners,' while welcomed and supported, does not constitute a mitigation measure.</p> <p>Given that this plan will be subject to the HRA process which requires, where necessary, demonstrable avoidance and mitigation measures to be developed in advance of development, it is suggested that this SEA process takes full account of the findings and recommendations contained within the anticipated HRA.</p>	Accepted. The proposed mitigation measures in Table 6.2 are illustrative examples of the range of potential measures that could be used, and should not be read as definitive. The use of a sequential approach to mitigation measures is strongly endorsed (and whilst not explicitly stated, the measures proposed, which run sequentially from enhancement, avoidance, minimisation, mitigation and compensation) is consistent with this hierarchy. Table 6.2 will be revised to include reference to the mitigation hierarchy.
5. Cadw		
	No response received	
6. Welsh Assembly Government		
	No response received	



Ref	Consultation Response	Commentary/ action taken
7. Scottish Environmental Protection Agency		
General comment	We provided a number of comments in our response to the first scoping consultation (letter dated 22 July 2010) and we are pleased that our comments have been taken into account in the updated scoping report. We provide some additional comments in an annex to this letter, particularly in relation to detailed baseline information that we hope you find useful. We are generally content with the scope and level of detail proposed for the Environmental Report.	Noted, with thanks.
General comment	<p>We note that the scoping report update is a second formal scoping consultation on the SEA process for the Submarine Dismantling Project (SDP). We welcome the inclusion of Annex F on how the consultee responses have been addressed in the revised scoping report and consider that generally our comments have been taken into account.</p> <p>The report has also been updated as a result of the process of indentifying potential candidate sites and provides an indicative list for initial dismantling site options. The indicative sites are Devonport Royal Dockyard, Plymouth; Rosyth Royal Dockyard, Fife; or some combination of both sites.</p> <p>We provide some additional comments in relation to baseline data on Rosyth Royal Dockyard that we hope you find useful in undertaking the environmental assessment.</p>	Noted, with thanks.
Section 3.2 (Water)	<p>The Lower Forth Estuary at Rosyth is a transitional water body currently at Good Ecological Status and in order to meet the objectives of the Water Framework Directive (WFD) and the River Basin Management Plan there should be no deterioration in status.</p> <p>If there is a need for further development at Rosyth to support the dismantling operations this should take account of the RBMP objectives for the Lower Forth water body.</p> <p>Please note that under WFD we are required to manage hydromorphological change in all coastal and transitional water bodies as well as other aspects that contribute to the status, such as water quality or biological parameters. In practice this means that proposals should be considered in line with RBMP objectives and wherever possible opportunities for enhancement should be consider</p>	<p>Noted</p> <p>The relevant RBMPs have been referenced within the summary of sub-regional plans and policies (e.g. p32 Annex C) as well as in the presentation of baseline a evolution of the baseline information for the sites. Ecological status information of water bodies is also presented.</p>
Section 3.2 (Water)	<p>Water Body Information Sheets provide extensive information about the current status, planned future status and pressures and measures on all designated water bodies across Scotland available on our website: www.sepa.org.uk/water/river_basin_planning/waterbody_data_sheets.aspx. For ease of reference please refer to the relevant data sheet for Rosyth at the following link: http://apps.sepa.org.uk/rbmp/pdf/200435.pdf.</p>	<p>Noted.</p> <p>Where relevant, information from the data sheet for Rosyth will be referenced in Annex C.</p>
Section 3.3.9 (Flood risk)	<p>Rosyth dockyard lies within the 1 in 200 year (0.5% annual probability) flood envelope of the Indicative River & Coastal Flood Map (Scotland), and may therefore be at medium to high risk of coastal flooding. We note that the scoping report considers the defensibility of the site from coastal flooding and sea level rise.</p>	<p>Noted.</p> <p>The flood envelope data will be included in Section 3.3.9; Annex C will be updated.</p>
Section 3.3.9 (Flood risk)	<p>Due to the vulnerability of the proposed sites to coastal flooding, the scoping report proposes that flood risk assessments will inform site selections and appropriate flood defence measures will be used (Section 5.7.1) and we welcome these proposals.</p> <p>Please note that site planning and design should include evidence to support that the flood risk is not increased to nearby areas as a consequence of these defences and we would recommend that mitigation measures refer to this. We also recommend that the consideration of climatic factors is incorporated into the site design to ensure the site remains fully functional during extreme events, as ports will be more vulnerable in the future as a result of increased risk of storm surges. Access/egress</p>	<p>Noted.</p> <p>The SEA will indeed consider the potential for SDP activities to affect flood risk in nearby areas. The des of SDP facilities will also need to take flood risk into account, given the projected impacts of a changing climate and sea-level rise.</p>



Ref	Consultation Response	Commentary/ action taken
	should also be considered to ensure that the site is accessible during peak coastal events, especially as the surrounding area is low-lying.	
Section 3.3.9 (Flood risk)	The approximate peak 1 in 200 year and 1 in 1000 year still-water tide levels for this area are 4.52mAOD and 4.64mAOD, respectively. This extreme tide level, based upon the POL112 method (Proudman Oceanographic Laboratory, Internal Document 112), does not take into consideration storm surge or wave action. In addition, UKCP09 (U.K. Climate Projections 2009) project sea level rise, relative to the 1990 sea level height, to be 10.5 – 18 cm by 2050, and 23.4 – 39.2 cm by 2095, depending on the climate scenario modelled. Another estimate for the 200 year still-water tide level for this area is 4.58 mAOD.	Noted. This data will be used to provide additional data in Annex C (evolution of the sub-regional baseline).
	Should this project be deemed as essential civil infrastructure, it is recommended that the 1 in 1000 year flood level is considered as the standard of protection where applicable. Given the SDP proposed lifetime, sufficient freeboard should be incorporated into the design for predicted sea level rise for the lifetime period alongside freeboard for storm surge and wave action.	Noted. This need will be included in the environmental report as appropriate.
Annex C (waste)	SEPA has published a series of maps showing existing waste management facilities in Scotland, in support of the emerging Zero Waste Plan. These are available on our website: http://www.sepa.org.uk/waste/waste_infrastructure_maps.aspx . The maps include National level maps on landfill facilities, energy from waste and other incinerators, and Local authority area maps showing all operational licensed and permitted waste management facilities within each local authority area including landfills, metal recyclers and other treatment plants. For waste facilities in the Fife area please refer to: http://www.sepa.org.uk/waste/waste_infrastructure_maps/local_authority_maps.aspx .	Noted, with thanks. The Scotland Zero Waste Plan is referenced in Annex B. Annex C will be reviewed; any further data from the websites which is relevant to the SDP will be included in the finalised report.
Annex C (Air)	There are no Air Quality Management Areas (AQMAs) covering Rosyth dockyard or in its vicinity.	Noted. Annex C will be amended to include the location of the AQMA identified.
8. Historic Scotland		
General comment	I have reviewed the Scoping Report on behalf of Historic Scotland in its role as a Consultation Authority under the SEA Regulations (Section 12(6)). As you know, we responded to an earlier version of the SEA Scoping Report, and I am pleased that all our comments have been taken into account.	Noted, with thanks.
General comment	I have found this second Scoping Report to be very clear and comprehensive. I particularly like how you have sought to scope in/out various aspects of the project in recognition that some elements are more likely/ unlikely to have significant environmental effects (pages 65-6 of the report). I agree that the assessment (<i>of cultural heritage</i>) should focus on the development phase and that there are less likely to be significant effects arising for the historic environment during the operational phase.	Noted, with thanks.
5.13 (cultural heritage)	I am pleased that consideration will be given towards the preservation of artefacts as items of important cultural, military and nautical heritage. We appreciate that there are likely to be various practical and security matters surrounding the retention of artefacts, but nonetheless welcome that this will be explored through the SEA process.	Noted, with thanks.
5.13 (cultural heritage)	In terms of the decommissioning phase, I consider that disturbance from noise, traffic and dust upon the historic environment is unlikely to be strategically significant, and you may therefore wish to consider scoping this element out of your assessment (which I note you have scoped in on a precautionary basis). Perhaps this is something to keep under review as work progresses.	Noted. We would not seek to eliminate this issue from further consideration, unless other heritage consultees are in agreement with it. We may seek to clarify this with those organisations.



Ref	Consultation Response	Commentary/ action taken
9. Scottish Natural Heritage		
	We provided a number of comments on the first scoping report in a letter dated 13 th July 2010. We are pleased to note that our comments have been addressed in this second scoping report.	Noted, with thanks.
10. Scottish Government		
General comment	The Scottish Government has no specific comments on the report. However, we would like to re-iterate that the Scottish Government remains firmly opposed to the possession, threat and use of nuclear weapons and it will continue to play a part in ending nuclear proliferation and promoting early disarmament to the extent that it is able to under current constitutional arrangements.	Noted.
General comment	You should be aware that the Scottish Government published its Policy for higher activity radioactive waste on 20 January 2011. The Scottish Government Policy is for the long-term management of higher activity radioactive waste in near-surface facilities. Facilities should be located as near to the site where the waste is produced as possible. Developers will need to demonstrate how the facilities will be monitored and how waste could be retrieved. All long-term waste management options will be subject to robust regulatory requirements. The Policy makes clear that it does not apply to higher activity waste arising from the decommissioning and dismantling of redundant nuclear submarines including those berthed at Rosyth. A copy of the Policy and the SEA Post Adoption Statement can be found at: http://www.scotland.gov.uk/hawpolicy http://www.scotland.gov.uk/hawpostadoption	Noted. Annex B (pp85-86) will be updated to reflect the recent adoption of the Scottish policy.
General comment	A number of other developments are proposed for the Rosyth area: for example, the proposed Container Terminal at Rosyth and the new Forth Road Bridge. The MoD should ensure that the SEA undertaken for the SDP addresses the cumulative environmental impacts that may arise as a result of the SDP and these other developments.	Noted with thanks. The potential effects (if any) of the SDP and other proposed and consented developments will be captured in the assessment of secondary, indirect, synergistic and cumulative effects. This could also be informed by any findings of the in-combination effects assessment associated with Appropriate Assessment (if undertaken).
General comment	You might also find it useful to refer to the SEA Environmental Report which was published for the National Renewable Infrastructure Plan: Stage 2 in August 2010 http://www.hie.co.uk/common/handlers/download-document.ashx?id=d5356d48-336f-4ed2-ad6c-f4cd9416e5ed	Noted, with thanks. We are aware that the NPS includes proposals for the future use of Rosyth dockyard, and will include these proposals in the assessment of cumulative effects.
11. Northern Ireland Environment Agency		
General comment	NIEA acknowledge that some aspects of the data relating to Northern Ireland within the Scoping Report is not complete. However we consider that the information within the updated Scoping Report is of sufficient scope and detail to enable the MoD to substantially assess the strategic environmental impacts of the Submarine Dismantling Project on the following aspects of the Northern Ireland environment: Biodiversity and Nature Conservation; Soil and Geology; and Landscape and Townscape.	Noted, with thanks. The SDP team will regular review the baseline information during the remainder of the assessment to ensure that it continues to be sufficient to enable an informed assessment to take place. Any additional updated baseline information that is used (supplementary to that contained in the final updated scoping Report) will be included in the subsequent Environmental Report (when completed).
General comment	NIEA is also satisfied that all potential significant impacts on the aquatic environment have been included in the scope. However, the document still fails to address the specific Northern Ireland legislative framework. Therefore should Northern Ireland be considered a potential location for dismantling or storage sites, any NI specific issues	Noted, with thanks. The SDP team will regular review the legislative framework information (as part of the review of plans



Ref	Consultation Response	Commentary/ action taken
	<p>should be addressed in the Environmental Report.</p>	<p>and programmes) during the remainder of the assessment to ensure that it continues to be sufficient to enable an informed assessment to take place. Any additional or updated baseline information that is used (supplementary to that contained in the final updated scoping Report) will be included in the subsequent Environmental Report (when completed).</p>
Annex A - Air	<p>Air quality in Northern Ireland has improved substantially in recent years. In particular, levels of pollutants associated with coal and oil combustion have reduced significantly over the past two decades. However some pollutants in some parts of Northern Ireland continue to exceed air quality objectives.</p> <p>No exceedences of PM10 objectives were identified in the most recent monitoring report for 2009 which was published in December 2010. With regard to NO2 data from 18 sites utilising automatic monitoring data is also available for 2009. Four roadside or kerbside automatic sites exceeded the AQS Objective for the annual mean (40µgm-3) all of which are close to busy roads. One site also exceeded the AQS Objective of 200µgm-3 for the hourly mean more than the permitted 18 times.</p> <p>Results from Northern Ireland's network of automatic air quality monitoring stations in 2009 show that the UK Air Quality Strategy Objectives for carbon monoxide, benzene, 1,3-Butadiene, ozone and sulphur dioxide have also been met by the due dates. However, there remained a number of sites close to busy roads in urban areas that did not meet the AQS Objectives for nitrogen dioxide.</p> <p>Major sources of air pollution: Air Quality Management Areas (AQMA) are predominantly in urban areas and are generally related to nitrogen dioxide (NO2) and particulates (PM10) emissions largely, from domestic fuel combustion and road transport.</p>	<p>Noted, with thanks.</p> <p>Annex A will be updated to include this information.</p>
Annex A – climate change	<p>Here is an update with figures from the 2008 greenhouse gas emissions inventory.</p> <p>Total carbon dioxide emissions: In 2008, Northern Ireland net emissions of carbon dioxide were provisionally estimated to be 16.2 million tonnes.</p> <p>Carbon dioxide (CO₂) accounts for around 85% of total UK greenhouse gas emissions.</p> <p>In 2009, 6.3% of CO₂ emissions were from the energy supply sector, 31% from road transport, 34% from business and 30% from residential fossil fuel use.</p> <p>In 2008, Northern Ireland's total greenhouse gas emissions accounted for 3.5% of the UK total. Since 1990, Northern Ireland's total greenhouse gas emissions have decreased by 11.2%. This is less than the reduction seen for the UK as a whole, which has seen a decrease of 19.5% on 1990 levels.</p> <p>The statement, "In 2009, 6.3% of CO₂ emissions were from the energy supply sector, 31% from road transport, 34% from business and 30% from residential fossil fuel use." looks like it has perhaps, unlike the other figures quoted, come from an end-user inventory. For consistency with the other figures quoted, we would suggest discussing CO₂ emissions from the latest emissions inventory.</p> <p>Thus:</p> <p>In 2008, 30.1% of CO₂ emissions were from the energy supply sector, 28.2% from road transport, 23.5% from residential fossil fuel use and 8.9% from manufacturing industry and construction.</p> <p>And for the UK, by comparison:</p> <p>In 2008, 32.5% of CO₂ emissions were from the energy supply sector, 22.0% from road transport, 14.8% from residential fossil fuel use and 17.3% from manufacturing industry and construction.</p>	<p>Noted, with thanks.</p> <p>Annex A will be reviewed and updated to include this information as appropriate.</p>



Ref	Consultation Response	Commentary/ action taken
Annex A – Cultural Heritage	Annex A lists the single World Heritage Site in NI under Cultural Heritage. As this is a natural as opposed to man-made feature it might avoid potential confusion and be more appropriate to list it under Geology (p10), although it is mentioned in the Landscape heading (p26).	Accepted. The Giant's Causeway will be moved to the Soil and Geology baseline.
Annex A (Table A2) – Biodiversity (p28)	<p>We note in the Annex A that it is suggested that the trends of priority habitats and species for which information is available is unchanged between 2005 and 2008 in Northern Ireland. This is not completely accurate as there have been a number of changes, however, we acknowledge that the trends are very broadly similar in 2005 and 2008 with a varying number of habitats and species at different rates of decline or increase:</p> <p>http://www.ukbap-reporting.org.uk/status/uk.asp</p> <p>We note that consultee input is welcomed for a number of issues in the Scoping Report Annex. Please note that we cannot identify any strategic landscape 'targets' for Northern Ireland.</p> <p>We acknowledge that more specific sub-regional information will have to be gathered if any location in Northern Ireland is going to be considered as a potential Candidate Site for submarine dismantling.</p>	Accepted. This information will be updated in the finalised scoping report, as appropriate.
Annex A (Table A2) – Air (p37)	Further information on trends in NI air quality is available at: http://www.airqualityni.co.uk/reports.php?n_action=trend	Noted, with thanks.
Annex A (Table A2) – Climate Change (p39)	<p><u>Climate change (p39)</u></p> <p>There is only a discussion of greenhouse gas emissions trends, and not climate trends, as for the other regions.</p>	Noted. Trend information for NI is presented in the baseline Table A1 of Annex A.
Annex A (Table A2) – Cultural Heritage (p48)	<p>For cultural heritage, it might be useful to insert relevant targets from the NIEA Business Plan:</p> <p><i>Improve the condition of our monuments and listed buildings, including structures currently on the Built Heritage at Risk Register (BHARNI).</i></p> <p><i>Save at least 45 buildings or scheduled monuments on the BHARNI by March 2011, contributing to the target of saving 200 structures in 10 years i.e. by 2016.</i></p>	Accepted. Annex B (review of Plans and Programmes) will be updated to include this information.
Annex B – Air	A full list of NI air quality legislation is available at: http://www.airqualityni.co.uk/airquality.php?n_action=legislation	Noted. Annex B will be updated to include this information where appropriate to do so.
Annex B – Climate Change	http://www.doeni.gov.uk/protect_the_environment/climate_change.htm	Noted. Annex B will be updated to include this information where appropriate to do so.
Annex B – Cultural Heritage	<p>For Northern Ireland, this should also include:</p> <p><i>Historic Monuments and Archaeological Objects (NI) Order 1995 – Objectives – provides for the scheduling of historic monuments into State Care, licensing of archaeological excavations and reporting finds.</i></p> <p><i>Planning (NI) Order 1991 – Objectives – power to designate conservation areas and control over demolition of unlisted buildings in conservation areas; requirement to list</i></p>	Noted. Annex B will be updated to include this information.



Ref	Consultation Response	Commentary/ action taken
	<i>buildings and powers to protect them.</i>	

Feedback received from UK Government Departments/ Agencies on the Stage 'A2' SEA Scoping Report

Ref	Consultation Response	Commentary/ action taken
1a. DEFRA Air Quality Team		
	No response received.	
1b. DEFRA Hazardous Waste Team		
General comment	We are pleased to note (section 2.3.3) that the SEA will assess generic impacts of ship-breaking and managing the resulting waste streams to highlight any significant differences in the environmental impacts of ship-breaking at initial dismantling sites versus at a generic commercial site.	Noted, with thanks.
General comment	We would prefer the report, when referring to commercial facilities, to refer to "Ship Recycling" Facilities rather than "Ship Breaking Facilities".	Agreed. All references to 'ship-breaking' will be updated.
Annex B (waste data)	<p>Does the data for non-radioactive waste include hazardous waste? In respect of England and Wales, the Environment Agency publishes separate data for hazardous waste. It is important to ensure that hazardous waste is included and preferably separately identified since, if the parts of the submarine that may be sent to commercial facilities are similar to ships, they may well contain hazardous (non-radioactive) waste.</p> <p>I also note that the most recent year for which you have included figures is 2007. It is not clear to me why. The Environment Agency published 2009 figures a few months ago and 2008 figures have been available for over a year.</p>	<p>Accepted.</p> <p>Table A1 and A2 of Annex A (Review of National Baseline conditions) contain waste data rather than Annex B.</p> <p>Hazardous waste is included in the total quantities contained in the national baseline information presented; however, it is not separated out. The specific quantities will be included in the updated report derived from the following EA source:</p> <p>http://www.environment-agency.gov.uk/static/documents/Research/EWHaz09_Final.xls</p>



Ref	Consultation Response	Commentary/ action taken
1c. DEFRA Biodiversity Team		
	Response given on the Habitats Regulations Screening and Scoping report.	MOD's response will be included in the updated HRA.
1d. DEFRA Noise Team		
Annex B	The suggested reference to the Noise Policy Statement for England (NPSE) in Annex B under the National heading has not been included.	Accepted. The Noise Policy Statement for England (NPSE) will be included in the final Annex B.
	The suggested reference to the WHO Night noise guidelines for Europe 2009 have also not as yet been included. We would continue to suggest that these documents are incorporated into Annex B.	Accepted. The WHO Night noise guidelines for Europe 2009 will be included in the final Annex B..
	The risk of disturbance arising from the dismantling works primarily depends on the proximity of sensitive receptors to the sites. If there are nearby receptors that could be adversely affected the following should be taken into account.	Noted. The impacts of noise will be fully considered within the SEA at the appropriate level. It must be noted, however, that the SEA will not take the place of subsequent EIAs, which will be conducted at the chosen site(s) and will assess environmental impacts at a far greater level of detail.
	With respects to noise there is legislation in place which provides a means of controlling the noise from construction activities and in our view the principles would apply to the submarine dismantling. The legislation is to be found in section 60 and 61 of the Control of Pollution Act (COPA) 1974. We would advise that the dismantling contractor seeks prior approval from the relevant local authority under section 61 regarding the methods to be employed, the equipment to be used, the proposed hours of work, the likely noise impacts on nearby noise sensitive receptors and any noise mitigation. Adopting this approach provides certainty for both parties and for the contractor means that the local authority cannot take action under section 60 of COPA if the various agreed methods are being followed. Further advice on noise mitigation from such works can be found in British Standard 5228:2009-Code of Practice for Noise and Vibration Control on Construction and Open Sites.	Noted. Both the Control of Pollution Act 1974 and the Environmental Protection Act 1990 are referenced in Annex B. The contractors(s) undertaking SDP activity will agree an approach to managing nuisance with the Local Authorities concerned, once decisions have been made about the location(s) to be used.
	Similar principles should be adopted regarding avoiding dust and other sources of potential nuisance arising from the works.	See above.
	Consideration might be given for producing a informal code of practice which describes the mitigation	The statutory processes in place for initial dismantling, subsequent ship recycling and interim storage, will require Best Available Techniques to be adopted before any activity can take place. This will include codes of practice, agreed with relevant



Ref	Consultation Response	Commentary/ action taken
	management plans for the range of environmental impacts that might arise.	Statutory and Planning Authorities.
	<p>On the Summary Objectives and Policy Messages – Health (Noise and Vibration) under National suggest that instead reference is made to the Noise Policy Statement for England as follows:</p> <p>Promote good health and good quality of life through the effective management of noise in the context of Government policy on sustainable development.</p>	<p>Accepted.</p> <p>The Health (noise and vibration) topic in Table 4.1 will be revised to include the following additional objective, 'To promote good health and good quality of life through the effective management of noise in the context of Government policy on sustainable development'.</p>
1e. DEFRA Soils Team		
	No response received.	-
1f. DEFRA Water Quality Team		
	<p>We have had a look through the papers, particularly the environmental assessments etc. which highlight where surface, ground and coastal waters may be affected by the dismantling. We have seen nothing here that would cause us any difficulties, and where there may be potential for discharging waste waters, we're pleased to see that acknowledgement has been given to the need for permits, and the necessity to obtain them from the Environment Agency.</p> <p>So overall, it seems fine and we have no comments to make</p>	Noted, with thanks.
2. Department for Transport		
	No response received.	-
3. Health Protection Agency		
General comment	HPA provided comments on the original version of the scoping report and are please that most of these have been taken into account. However, I would like to draw your attention to a couple of instances where an HPA comment is reported as having been accepted and the report updated but this does not appear to have been done (see reply to Question 4).	-
General comment	In order for HPA to comment effectively on public health aspects, we request that all information relevant to health is brought together in a single section (or at least referenced explicitly from that section). In our response, we suggest that Section C on Health and Wellbeing would	<p>Noted.</p> <p>Category C (Health and Wellbeing) will cover the majority of health-related effects associated with the SDP's strategic options. This will include the assessment of cumulative effects, which will consider indirect impacts to health from other environmental issues, e.g. water, air and soil quality and waste generation.</p>



Ref	Consultation Response	Commentary/ action taken
	be an appropriate place to do this (see response to Question 4). Please note that detailed guidance for external stakeholders on the HPA's role within SEA will shortly be made available on the HPA website.	At this stage, we do not propose amalgamating Health and well-being with Noise and Vibration (Category D). This categorisation is derived from the MOD's published approach to SEA; we also consider that noise disturbance is a significant issue in its own right. Previous experience indicates that stakeholders prefer to see a separate section addressing noise and vibration issues (rather than having it amalgamated, and to some extent lost within a larger topic section). Disturbance due to noise and vibration can also affect other sensitive receptors (biota, cultural heritage assets) that would not be adequately captured if noise and vibration were contained under a human health topic
General comment	Our response focuses on health protection issues related to chemicals and radiation only. As the scope of the HPA's advice does not extend to wider public health issues we recommend that the Ministry of Defence (MoD) ensures that other health stakeholders are consulted.	Noted. The Department of Health has been consulted on both Scoping Reports, and will (in line with other Statutory Consultees and relevant Government Departments/ Agencies) be kept informed of progress with the Environmental Report.
Q1	Do you have any further comments on the revised approach to undertaking the SEA? No further comments.	Noted, with thanks.
Q2	Do you agree with the revised national baseline information? No further comments.	Noted, with thanks.
Q3	Do you agree with the additional sub-regional baseline information? Section 3.3.3 (page 30) of the scoping report states that: "Background levels of natural radiation vary considerably from area to area and any additional exposure (however small) may be an important issue for those communities who are already exposed to high natural background levels." There is no information in Annex C about the natural background radiation exposure in Plymouth or Fife and this should be included.	Noted. The only published information available on background ionising radiation levels is the HPA national data, last published in 2005 and referred to in Annex A. However, more detailed information will be sought for both initial dismantling sites and included in the Stage B assessment.
Q4	Are there additional plans, programmes and strategies which should be considered in the SEA? Under the Human Health section of Annex B, the MoD section includes their radiation safety handbook. However there is no mention of national or international guidelines or regulations about radiation safety e.g. IRR99, ICRP or HPA guidance on dose constraints etc. These references should be included. HPA also made this comment on version A1 of the scoping report, and Annex F of the updated scoping report says that this has been accepted and the scoping report updated. It appears that this has not	Accepted. The outstanding guidance will be included in the finalised scoping report.



Ref	Consultation Response	Commentary/ action taken
	actually been done.	
Q4	Transport regulations have been moved from the material assets (transport) section (where they appeared in version A1 of the scoping report) of Annex B to the material assets (waste management) section. It is not clear why this has been done, but it would seem more logical to refer to transport regulations in the transport section	Accepted. Transport Regulations will be moved back to the Transport section.
Q4	In addition the Radioactive Materials (Road Transport) Regulations are still referred to, despite the current relevant regulations for road transport being the Carriage of Dangerous Goods Regulations 2009, as noted in HPA comments on version A1 of the scoping report. Annex F of the updated scoping report says that this comment was accepted and that the scoping report was updated, but this does not appear to be the case and this should be rectified.	Accepted. The Carriage of Dangerous Goods Regulations 2009 will replace the Radioactive Materials (Road Transport) Regulations in Annex B.
Q4	As transport of submarines will definitely involve sea transport, and ILW transport may involve rail it may also be worthwhile to refer to regulations governing other modes of transport than road.	Accepted. Regulations referring to sea and rail transport will be included in Annex B. In addition, reference to the Railways Act (p74) will be removed as it is not relevant.
Q4	The MoD should consider whether the Managing Radioactive Waste Safely programme should be mentioned under the material assets (waste management) section.	Noted. Reference to the MRWS is made within Section 2 concerning the SDP background and earlier consultation outcomes. Specific reference is made to the proposed Geological Disposal Facility within section 3.3.11, Key Material Assets (waste Management) Baseline Issues. No further changes will be made.
Q4	The MoD should give consideration to the Protocol on SEA (Kyiv, 2003) ² , which is not currently referenced within the scoping documents. The SEA Protocol was adopted in Kiev on 21 May 2003 and was signed by 38 states (including a number of non-EU states) and the European Community. It entered into force on 11 July 2010. The UK is a signatory to the Protocol, but to date it is not one of the 19 parties that have ratified the Protocol. The entry into force of the SEA Protocol may result in changes to the SEA Directive, requiring, inter alia, greater involvement of health organisations within the SEA process. Amendments may also extend the scope of the SEA Directive (so as to better address certain issues such as climate change, biodiversity and risks), and	Noted. The scope of the SEA is set out in the Scoping Report and includes 14 topics (in excess of the SEA Directive's current list of 12 as set out in Annex I of the Directive). Additional topics scoped into the assessment include socio-economic effects, noise and vibration, energy use, coastal change and flood risk, transport, waste management, land use and townscape. Comments from consultees suggest that the inclusion of these additional topics is appropriate to the assessment and very few (minor) areas have been scoped out from the assessment. In consequence, it is not proposed to amend the scope further; however, it is recognised that some potential effects, if deemed significant will require greater assessment. Biodiversity and nature conservation is one such potential area; however, in this case, the SEA will be able to draw on the findings of the HRA.

²http://www.unece.org/env/eia/sea_protocol.htm



Ref	Consultation Response	Commentary/ action taken
	reinforce synergies with other pieces of environmental legislation.	
Q5	<p>Do you agree that the revised SEA objectives (Section 6) cover the breadth of issues appropriate for assessing the SDP?</p> <p>Proposed SEA Themes, Objectives and Guide Questions, Table 6.1 (page 70). The objectives and questions in Table 6.1 are reasonable. However, it would be useful if Section C on Health and Wellbeing covered those aspects relevant to health contained in other subject-specific sections (e.g. Geology and Soils; Water; Air; Land Use and Materials etc) to ensure that these are accounted for. The following additional questions should be covered, either in Section C or the subject-specific section:</p> <p>“Will the SDP proposals lead to a situation where land poses a significant possibility of significant harm?”</p> <p>“Will the SDP proposals affect the quality of public or private drinking water supplies?”</p> <p>“Will the SDP proposals lead to exceedence of environmental standards?” i.e. the standard for the affected medium (such as UK Air Quality Standards and Objectives; Environmental Assessment Levels; and Soil Guideline Values)</p>	<p>Noted.</p> <p>It is fully recognised that effects on one environmental receptor can have impacts on others; the impacts of poor air quality on human health are known to be significant, as they are on biodiversity and protected species, historic features etc.</p> <p>The indirect impacts of the SDP will be fully assessed at Stage B. However, since there are so many potential inter-connections between different environmental issues, it was felt that explaining the potential indirect impacts at scoping stage would over-complicate the report.</p>
Q5	<p>Section 6.2 (page 80) defines three timescales for characterising the effects: short term, medium term and long term. The text indicates that the impacts will be assessed for these three timescales and this is welcomed. Whilst Table 6.3 considers these three timescales, Tables 6.2 and 6.5 do not and it would be useful if this information were included.</p>	<p>Noted.</p> <p>The three different timescales will be considered throughout Stage B.</p> <p>The tables in Section 6 are for illustrative purposes only.</p>
Q6	<p>Do you have any further suggestions regarding the proposed approach to SEA?</p> <p>Detailed guidance for external stakeholders on the HPA's role within SEA will shortly be made available on the</p>	<p>Noted, with thanks.</p>

³www.HPA.org.uk/SEA

⁴http://www.unece.org/env/eia/sea_manual/health.html

⁵http://collections.europarchive.org/tna/20100509080731/http://www.dh.gov.uk/prod_consum_dh/groups/dh_digitalassets/documents/digitalasset/dh_073262.pdf



Ref	Consultation Response	Commentary/ action taken
	<p>HPA website³. The United Nations Economic Commission for Europe⁴ has published relevant guidance and the Department of Health has published draft guidance on health in SEA⁵. The MoD may find these documents to be useful references in the future development of the SEA.</p>	
HRA comments	<p>On page 1 there is no explanation about what SPAs, SACs and Ramsar sites are. This should be included.</p> <p>In the Annex B tables, where the impact of Stage II on a given site is listed as none, MoD should consider stating that it is uncertain. It is currently reported as none because no intermediate level waste (ILW) storage sites have been identified yet, but future ILW storage could be at a location that would impact on the site of interest.</p> <p>In the Annex B tables, there is no mention of radioactive discharges linked to any of the stages, although it is recognised in the SEA that these might occur. These should be included within Annex B.</p>	The Habitats Regulations Assessment is a separate and specialist assessment; these comments will be considered by the HRA authors.
Section 2.3.2 (second bullet)	<p>Low level waste (LLW) and ILW are not the only categories of radioactive waste that will be produced during dismantling. The text should reflect that some waste may have sufficiently low levels of radioactivity that it can be classified as exempt waste or can be cleared for recycling or re-use. The MoD should ensure that the waste hierarchy is applied to radioactive materials as far as possible.</p>	<p>Accepted.</p> <p>Additional reference will be made to vLLW and the options for managing this material.</p>
Section 3.3.12 (Land Use and Materials)	<p>The MoD requests consultee input. In terms of information on land use issues associated with brownfield development, the authors may find the Environment Agency's position statement on brownfield land redevelopment useful⁶. Local Authorities have statutory duties in relation to contaminated land and planning and will be able to provide local information regarding development.</p>	<p>Noted, with thanks.</p> <p>The EAs position statement will be reviewed and included, if relevant.</p>
Annex A - Air	<p>Number of days of <u>moderator</u> high air pollution." should be corrected.</p>	<p>Accepted.</p> <p>This will be amended to 'moderate or'</p>
Annex A - Air	<p>Current issues for air quality: human health impacts are not discussed and should be included. It has been estimated that current levels of air pollution in the</p>	<p>Noted.</p> <p>It is fully recognised that effects on one environmental receptor can have impacts on others; the impacts of poor air quality on human health are known to be</p>

⁶http://www.environment-agency.gov.uk/static/documents/Research/brownfield_land_908146.pdf



Ref	Consultation Response	Commentary/ action taken
	UK reduce life expectancy by an average of seven to eight months ⁷ .	significant, as they are on biodiversity and protected species, historic features etc. The indirect impacts of the SDP will be fully assessed at Stage B. However, since there are so many potential inter-connections between different environmental issues, it was felt that explaining the potential indirect impacts at scoping stage would over-complicate the report.
Annex A - Noise	The MoD requests consultee input regarding data sources related to noise in Wales. The MoD may wish to consult Public Health Wales regarding this information.	Noted, with thanks.
Annex A	When considering sources of baseline information the MoD should refer to those presented by Government Departments in Appraisals of Sustainability accompanying National Policy Statements, and in their Monitoring Strategies ⁸ .	Noted. Any additional and relevant information contained in the AoSs will be added to the finalised scoping report.
Annex B	<p>The scoping report references the World Health Organisation (WHO) (2004) Children's Environment and Health Action Plan for Europe (CEHAPE) and the "Health Protection Agency (2007) Children's Environment and Health Action Plan. A summary of current activities which address children's environment and health issues in the UK". Additional information regarding these plans is provided below:</p> <p>Relevant Plan, Programme, Strategy (page 21) references the "Children's Environment and Health Action Plan for Europe (CEHAPE) 2004". The following text is of relevance to the objectives and target of this plan and should be included: <u>World Health Organisation (2004) Children's Environment and Health Action Plan for Europe (CEHAPE) Objectives:</u> The WHO Action Plan was launched in June 2004 and signed by all 53 member states of the WHO European Region, including the UK. The aim of the CEHAPE is to protect the health of children and young people from environmental hazards. The CEHS (HPA, 2009) provides recommendations to UK Government as to how it can meet its' commitment to CEHAPE. <i>Targets:</i> WHO CEHAPE Goals to be achieved by all 53 member states of the WHO European</p>	<p>Noted, with thanks.</p> <p>The relevant information from this reference will be used to finalise the health section of the finalised scoping report.</p>

⁷<http://www.publications.parliament.uk/pa/cm200910/cmselect/cmenvaud/229/229i.pdf>

⁸<https://www.energynpsconsultation.decc.gov.uk/>

<http://www.defra.gov.uk/corporate/consult/waste-water/index.htm>

<http://www.dft.gov.uk/consultations/closed/portsnps/>



Ref	Consultation Response	Commentary/ action taken
	<p>Region are:</p> <p>to prevent and significantly reduce the morbidity and mortality arising from gastrointestinal disorders and other health effects, by ensuring that adequate measures are taken to improve access to safe and affordable water and adequate sanitation for all children;</p> <p>to prevent and substantially reduce health consequences from accidents and injuries and pursue a decrease in morbidity from lack of adequate physical activity and by promoting safe, secure and supportive human settlements;</p> <p>to prevent and reduce respiratory disease due to outdoor and indoor pollution, thereby contributing to a reduction in the frequency of asthmatic attacks, in order to ensure that children can live in an environment with clean air; and</p> <p>to reduce the risk of disease and disability arising from exposure to hazardous chemicals (such as heavy metals), physical agents (e.g. excessive noise) and biological agents and to hazardous working environments during pregnancy, childhood and adolescence.</p> <p>Relevant Plan, Programme, Strategy (page 22) references the "Health Protection Agency (2007) Children's Environment and Health Action Plan. A summary of current activities which address children's environment and health issues in the UK". The following text is of relevance to the objectives and target of this plan and should be included: <u>Health Protection Agency (2009) A Children's Environment and Health Strategy for the United Kingdom</u> <i>Objectives:</i> This strategy provides recommendations to the UK Government as to how best it can meet its commitment to the Children's Environment and Health Action Plan for Europe (CEHAPE) 2004 <i>Targets:</i> None</p>	
Annex B (Air, p53).	<p>The reference here to the Air Quality Regulations 2000 and The Air Quality (Amendment) Regulations 2002 requires updating. The ambient air quality directive (2008/50/EC) has been transposed into English legislation as the Air Quality Standards Regulations 2010⁹, which also</p>	<p>Noted.</p> <p>These references will be updated.</p>

⁹http://www.opsi.gov.uk/si/si2010/uksi_20101001_en_1



Ref	Consultation Response	Commentary/ action taken
	incorporates the provisions of the 4th air quality daughter directive (2004/107/EC). Equivalent regulations exist in the UK devolved administrations.	
Annex C (Air, p8).	Reference 4 (to UK Air Quality Archive and South West Observatory) appears to have a broken hyperlink.	Accepted. This hyperlink will be restored.
Annex C (Air, p18).	Here the MoD requests consultee input regarding Plymouth level trend data. Further information on local air quality trends will be available from the local authority, both directly ¹⁰ and via their annual submissions to DEFRA.	Noted, with thanks. Local information will be sought to undertake the Stage B assessment and will be included in the finalised scoping report, if found.
4. Department of Health		
Annex A	The National Trends section looks as if it needs checking/updating, as many of the reports have probably now been updated. This section would also probably benefit from referencing Michael Marmot's most recent review (on the UCL website). There are no longer any national targets, so this section will need to be taken out.	Accepted. This section will be updated accordingly.
Annex C	These health data may need checking to ensure they are still in date.	Accepted This data will be checked and amended if necessary.
5. Nuclear Decommissioning Authority		
	No response received.	-
6. Dept of Energy and Climate Change		
	No response received.	-
7. Dept of Communities and Local Government		
	No response received.	-
8. Nuclear Installations Inspectorate (Health and Safety Executive)		
General comment	NII has its own route for dialogue with xxxxxxxxxxxx team through the regulatory level 2 RIF. On the SEA I have purposefully distanced this regulator from this process. NII is only interested in the outcome. We are not a statutory consultee for the SEA and (are not) connected with it.	Noted.

¹⁰<http://www.plymouth.gov.uk/homepage/environmentandplanning/pollution/airquality.htm>



Ref	Consultation Response	Commentary/ action taken
9. Plymouth City Council		
Annex C (Plymouth)	<p>Some of the baseline info on Plymouth is outdated and inaccurate. We are keen that the assessment is based on the most upto date would recommend a review of the source documents that have been used to collate the baseline. We don't have the resource to check the accuracy of every statement, but from a brief overview we are concerned that many of the source documents that the document currently draws its baseline from have been superseded or updated. The attached document provides the links through to the most accurate and up data for the issues that you are seeking to cover. We would recommend that the scoping report is revised to include this detail.</p>	<p>Noted.</p> <p>The hyperlinks provided by Plymouth CC were re-checked for accuracy. Most of the data was found to be both accurate and timely. Whilst we only found limited evidence of baseline data being inaccurate, there were some instances where more recent data had been published since the production of the initial Plymouth baseline assessment. This has now been updated in Annex C, as required.</p>
Chapter 6	<p>The scoping report proposes a single set of objectives & assessment questions to cover both the high level, and site specific options that are being considered. It is not clear how the difference in extent of impacts between the 2 sites will be ascertained with this approach For instance the report is not clear about what metrics and / or indicators will be used to inform the assessment questions. Given the difficulty with making an assessment on the extent to which the SDP proposals will.....</p> <p><i>Affect opportunities for investment, education, and skills development?</i> <i>Affect the number or types of jobs available ?</i> <i>Affect how diverse and robust local economies are?</i></p> <p>....it is important that the assessment is based on accurate / up to date info (see above), and for it to make clear at the scoping stage what metrics or indicators it will use to explore the difference in impact between Rosyth & Devonport. We would recommend that the scoping report is revised to include this detail.</p>	<p>Article 5 (1) of the SEA Directive requires the determination of the likely significant effects on the environment of implementing the SDP, rather than determining the 'extent of the effect'. However, in determining significance, extent is one of the factors to consider, along with:</p> <ul style="list-style-type: none"> the probability, duration, frequency and reversibility of the effects; the cumulative nature of the effects; the trans-boundary nature of the effects; the risks to human health or the environment (e.g. due to accidents); the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected); the value and vulnerability of the area likely to be affected; and the effects on areas or landscapes which have a recognised national, European or international protection status. <p>The approach to determining significance is set out in Section 6.2 of the Scoping Report. The approach to assessment uses objectives and guide questions to assess the potential generic and site specific effects of the SDP programme. This approach is consistent with Government and MOD guidance on SEA, as well as prevailing SEA practice. For each objective, the assessment considers the performance of the SDP proposals (broken down into defined stages, from design and construction of a facility through to its eventual decommissioning) against each guide question, informed by the use of national and sub-regional baseline information to provide context for the assessment. For each potential effect identified, the above criteria will be used to identify the potentially significant effects associated with the stages of the SDP.</p> <p>The same assessment framework (covering the 14 topic areas) will be applied to both generic and site assessments to ensure a consistent and comprehensive assessment of potential effects.</p>
10. SDP Advisory Group - SEA Sub-Group		
General comment	<p>The table referring to transport could be amended to clarify that it considers transport from point of generation to a</p>	<p>Accepted</p> <p>This will be updated in the finalised report.</p>



Ref	Consultation Response	Commentary/ action taken
	hypothetical storage site.	

