

Second Consultation on the Guide to the Comparison of Land Management Options –Log of comments and responses			
Name	Organisation	Comments	Response
Question 1: Is the right range of issues suggested for the scope of the document? Are any sufficiently important to warrant detailed description in a specific section of the report?			
Claire Gallery-Strong	BNG SL	Yes	Noted
Mike Pearl	UKAEA	(a) Yes (b) None considered requiring detailed description.	Noted
A N Other	CBO	It is important to realise that sections of the public and stakeholders are suspicious about 'new build' and are looking to approve a site that not only handles the present waste but alleviates the complications for new build. Some acknowledgement is required that this clearing up the problems of the past is not a 'green light' to make nuclear waste. Perhaps the capacity of a site should be earmarked for past and present waste only.	The point will be made in the text that the potential for 'new build' will be a factor at some nuclear sites, and this will need to be dealt with in option comparisons (eg via selection of attributes). Waste capacity is beyond the scope of SAFEGROUNDS.
Colette Grundy	Environment Agency	Yes the correct range of issues are suggested for the scope of the document.	Noted
Question 2: Is the suggestion of guiding principles and guidelines sensible? Do you have any comment on the proposals, including suggestions for other guiding principles or guidelines?			
Claire Gallery-Strong	BNG SL	Yes	Noted

Mike Pearl	UKAEA	(a) Yes – but ensure that these are suggested principles and guidelines and non-prescriptive. (b) Other principle – that of review, ie where the output of the preferred option does not lead to a short term solution, it should be reviewed at a later time to ensure it is still valid, and other solutions haven't become available, and that the goal posts haven't moved. (c) 2.3 should note that combinations of options may be required – and the practicality issues associated with this ie not ending up with an unwieldy number which confuses stakeholders.	a) Will ensure in drafting. b) The principle of review is in LMGv1 and will be in LMGv2. It is about reviewing the preferred option, not reviewing the comparison. c) Will be taken into account, not least because Guide needs to deal with strategies as well as options.
A N Other	CBO	Micromanagement of the principles of comparisons is not sensible if stakeholders and the public feel it is just a rise to distance the public from knowing: the reliability of geo/chem/hydrological stability over time; the protection from leakage; & ability to inspect & retrieve (2.6 bullet point 2). The judgement of specialists can be clouded by theories. The common sense of the public is a great leveller.	Noted. Principles given will not be prescriptive. Guidance on stakeholder involvement will be consistent with LMGv2.
Colette Grundy	Environment Agency	Yes the suggestion of guiding principles and guidelines is sensible.	Noted.
Question 3: Is an appropriate range of options comparisons methods suggested? Is the suggested way of summarising them sensible?			
Claire Gallery-Strong	BNG SL	Yes.	Noted
Mike Pearl	UKAEA	(a) OK (b) Generally OK. The bullet point "Documenting the outcomes" should be "Documenting and reporting the outcomes" otherwise stakeholders aren't formally informed of outputs. Include something on weighting factors and the role of sensitivity analysis in testing the robustness of option choice.	a) Noted. b) Will amend wording on documenting and reporting outcomes. Weighting factors and sensitivity analysis will be covered in Section 5 of the Guide.
Colette Grundy	Environment Agency	Yes to both questions. The last method suggested, for complex sites, might also consider how best to deal with the interactions/ implications for other strategies relevant to the site (or elsewhere and which might be affected by decisions on the site).	Noted. Interactions with other strategies will be covered in this Guide and in LMGv2.
Question 4: Do you have any views on how options comparison methods should be selected? What do you believe are the key factors to be considered?			

Claire Gallery-Strong	BNG SL	Key factors demonstrating differences between complicated and contentious problems versus simple- How do you make a decision from the data	Point will mainly be dealt with in LMGv2, to which this Guide will refer.
Mike Pearl	UKAEA	First bullet point "Determining the nature and magnitude of the contaminated land" change to – defining the issue(s) and its (their) context	Will be covered in the addition to Section 1 and referred to here.
A N Other	CBO	I am suspicious about section 4 bullet point 5. Stakeholders need to be involved as far as possible and many stakeholders are specialists. A key factor is understanding the geo survey	Noted. Guidance on stakeholder involvement will be consistent with LMGv2.
Colette Grundy	Environment Agency	Suggest that in identifying key factors to be considered – that this should include the nature & sensitivity of receptors likely to be affected by any contamination, and the wider implications of any option on any other related strategy (e.g. IWS, decommissioning strategy) – both local and national (where relevant)	Noted. Will be taken into account in this and other sections of the Guide.
Question 5: What practical issues are of concern to you in the application of options comparison methods? What advice is important to give?			
Claire Gallery-Strong	BNG SL	That a decision is necessary and this is an input to that but not the decision itself	Will take into account in drafting.
Mike Pearl	UKAEA	Sanity checks on scores when numerical methods are used, ie what is the meaning of a low/high score. The importance of expressing the output of a numeric score in words which can be clearly understood by stakeholders	Ditto.
A N Other	CBO	I am concerned about prescribed rules on how and when stakeholders can be involved.	There will be guidance on stakeholder involvement, consistent with LMGv2, but no prescribed rules.
Colette Grundy	Environment Agency	It would be useful to have some guidance on the need for learning between options studies – to ensure lessons are learnt and carried across from one study to another – particularly if a similar 'pool' of stakeholders is to be quizzed on their views. Important also to recognise that uncertainties in knowledge / data do not preclude useful options assessment – and should not be seen as an excuse for 'doing nothing'	Will take into account in drafting.
Question 6: Is the suggested information on technical options sufficient?			
Claire Gallery-Strong	BNG SL	Yes	Noted.

Mike Pearl	UKAEA	Add to the bulleted list: <ul style="list-style-type: none"> • Type of management option (removal, immobilisation, containment) or method of control (source control, pathway interception/control, receptor control) • Media treated (soil, groundwater, vapour) • Limitations (eg types of soil the technology doesn't work with) • Track record • On-going maintenance (ie whether on-going maintenance is required eg of a cover system) • Regulatory environment 	Will add to list.
A N Other	CBO	I want to see geochemical and hydrological forecasts	Point will be made when discussing information to be made available to stakeholders.
Colette Grundy	Environment Agency	Presumably these would be set in a UK context e.g. 'availability' meaning it is available within the UK market? Perhaps useful to include links to or description of where the technical option has been used (both UK and elsewhere). Resource requirements – this should include both manpower and skills requirements as well as an indication of other resources e.g. water, energy.	Yes, the context will be UK. Will include links if possible. Will add resource requirements.
Question 7: Do you have any views on the structure of the section describing options comparisons methods in detail? Should it depend on the method or follow a common structure?			
Claire Gallery-Strong	BNG SL	Method	Will try common structure.
Mike Pearl	UKAEA	(a) OK. (b) If possible try to follow a common structure	a) Noted. b) Agreed.
Colette Grundy	Environment Agency	A common structure should be followed where feasible.	Agreed.
Question 8: Is Question 8: Is the suggested range of examples sufficient? Are hypothetical examples better able to illustrate the methods or should real case studies be presented (if available)?			
Claire Gallery-Strong	BNG SL	Real case	Will try to use real cases as far as possible but hypothetical ones may be needed.

A N Other	CBO	(a) I am concerned I have not seen a good range and examples (b) In addition to real case studies, hypothetical examples are useful. (c) Real case studies are essential	Noted.
Mike Pearl	UKAEA	OK Hypothetical examples are OK as long as they cover all aspects of a site and are not too simple. Tackling multiple contaminants on a licensed site which is being progressively decommissioned would be realistic – eg suppose the site (i) is licensed, (ii) has a number of areas where radiological and chemical contaminants are known to occur and others where contamination is suspected, (iii) has some areas of contamination which are polluting groundwater, (iv) the site is being decommissioned over a period of time, and (v) some of buildings are not planned to be demolished for several years but have contamination below them.	Agreed.
Colette Grundy	Environment Agency	Real case studies should be used if available	Agreed.
OTHER COMMENTS			
Colette Grundy	Environment Agency	The document is well thought out and well written	Noted.
Mike Pearl	UKAEA	What seems to be missing in this outline is a section/sub-section on understanding the problem for which remedial options are being considered. Section 4 hints at this but isn't quite there and comes too late in the doc. Surely understanding the problem (conceptualisation of the problem) and the context of the options study is fundamental to the options study and setting its objectives (ie what are you trying to remediate - eg reduce impact to groundwater, reduce dose to workers from soil). Appendix A The 8 bullet points. It would be useful to separate the 5th bullet point into two: 1) Discharges, 2) Waste - waste minimisation and waste management. Waste generation, waste minimisation are always a major concern with many remedial schemes and should be dealt with as a separate issue to discharges.	Agreed will add sub-section early in document (in Section 1). Agreed, will separate discharges and solid wastes.

SPECIFIC COMMENTS

Name	Organisation	Section or Sub-section	Page	Comment	Response
Colette Grundy	Environment Agency	2.1	4	Suggest use "represent" rather than be in final bullet, first line.	Do not agree.
		2.5	4	Second bullet needs rewording re "if an important issue is not covered it can be missed in the options comparison"	Agreed
		2.6	5	Second bullet. Uncertainties and limitations in the quality of information available should be <i>recorded and</i> reflected in the options assessment	Agreed
		2.6	5	Third bullet. If scores are allocated the rationale behind them should be recorded <i>and their limitations recognised. They should be no more than an aid to decision making.</i>	Agreed
		3	6	Second para, second bullet, delete "of"	Will delete.