

## Appendix B

### Working With Communities Questions and Proposed Responses

**1. Do you agree with this approach of identifying communities? Do you have any other suggestions that we should consider?**

The general approach proposed to identifying the Search Area is agreed. An area based on existing ward boundaries is more likely to find consensus support.

Ward boundaries enable a clearly defined Search Area at a better resolution than is possible if local authority boundaries are used. It also allows the establishment of Search Areas that straddle multiple local authority areas.

The approach needs to be responsive to future reorganisation of local government. It is important that the Search Area or Potential Host Community area, once agreed, remains constant throughout the process.

In terms of the **Potential Host Community (PHC)** it is agreed that ward boundaries are appropriate to use to define its edge, and the proposal that the Community Partnership will be responsible for agreeing the PHC is agreed.

Whilst it is agreed that electoral wards based on the geographical extent of impacts should be used to define communities, more prescription on how boundaries should be drawn is required to.

**2. Do you agree with the approach of formative engagement? Do you support the use of a formative engagement team to carry out information gathering activities? Are there any other approaches we should consider?**

It is agreed that anyone within an area should be able to initiate discussion and seek information on geological disposal from the delivery body. We would however welcome more clarity on the scope for Government Departments and agencies (e.g. Ministry of Defence, Forestry Commission, etc) to initiate discussions or propose consideration of some of their land as a potential site.

It is agreed that any preliminary or exploratory discussions need not be made public but there is a need for openness and transparency as soon as a decision is taken to move towards **formative engagement**. It is agreed that the local authority (or authorities) should be involved in discussions at this stage if they have not been involved in the initial discussions.

It is agreed that communities must be involved during the formative engagement phase. The approach taken to this first engagement with the community is critical. It is important during formative engagement that:

- (a) the developer works with NuLeAF and other parties with an expertise in local engagement processes to refine the broad approach proposed here before the siting process is launched.
- (b) the developer uses the expertise and knowledge that the local authorities within a Search Area have in communicating and engaging with local people.

It is agreed that local authorities be involved in the formative engagement team if they wish. It is important that the developer engages effectively with both the political leadership and the senior executive officers of local authorities and gives adequate time for discussion and consideration by all service areas of the council.

**3. Do you agree with this approach to forming a Community Partnership? Are there other approaches we should consider?**

The proposed size of the Community Partnership (around 12 people) and the means by which the membership is agreed are acceptable. The Partnership should involve the local authorities (if they wish) along with others representing different interests or sectors of the local population. Both the District and County Councils (in two tier areas) should have representation on the Partnership if they wish. It will be necessary to offer financial support to local authorities to enable them to participate in the Community Partnership.

The Government is right to recognise that the Partnership's membership will evolve, given the long timeframe over which this process will operate. As such, it is important that the final framework for Working With Communities is worded so as to be adaptable to changes in local government structure, either within a specific area or due to national level reforms. The geographic area covered by the Partnership should remain constant over the entire siting process, even if electoral boundaries alter.

Given that skills and perspectives needed by the Partnership may change over time, it may be beneficial for the Partnerships to have the ability to co-opt additional members.

**4. Do you agree with the approach to engaging people more widely in the community through a Community Stakeholder Forum? Are there other approaches we should consider?**

As the Community Partnership will involve only a limited number of people and organisations, making links to the wider community is essential. The proposals for a **Community Stakeholder Forum** and for ad-hoc **working groups** are supported.

As the consultation recognises, it is vital that throughout the process there are opportunities for local people to engage, raise concerns and have their questions answered. It is also important that those locally who oppose the plans for a GDF are given a voice and an opportunity to criticise and challenge. In addition to the use of a formal Community Stakeholder Forum, there should be opportunities for effective engagement through social media and mainstream media, and outreach work with particular groups such as the young. Local further education colleges should also be involved, providing as they do a forum for engaging with young adults and a means of developing the skills that local people will need to access employment opportunities flowing from the GDF. Working With Communities needs clarification and strengthening in this respect.

**5. Do you agree with the proposal for a Community Agreement and what it could potentially include?**

Yes. It is essential that both the Community Partnership and the delivery body are clear about what is expected of them, the ways in which progress can be monitored and assessed, and how disputes can be resolved. It is also important that the Agreement is flexible and able to respond to changing circumstances or issues that may arise.

**6. Do you agree with the proposed approach to the way community investment funding would be provided? Are there alternatives we should consider?**

It is felt this section lacks clarity. There is a need to be clearer as to the way in which separate and distinct elements of the overall investment in any potential host community are managed.

There are 4 main elements to the proposed community investment in a potential host community:

- The **direct economic benefits** that will flow from the hundreds of jobs that will be required to construct and operate the GDF along with **indirect economic benefits** e.g. to the local supply chain, skills, or in terms of the impact of additional local spend;
- The **community investment funding** of £1million and then £2.5million per annum that every community entering the process will receive;
- The investment in **mitigation measures** that will be needed to reduce or eliminate negative socio-economic or environmental impacts; and
- The **additional investment** that will flow to the successful host community or communities.

More explanation of how each element of community investment will be designed to maximise local benefit would help provide more clarity.

In terms of **direct economic benefit**, the employment opportunities offered by GDF construction and employment should be available, wherever possible, to local people. The **indirect benefits** and spin offs should also be maximised. More information on how this is to be achieved should be provided.

It also needs to be recognised that the scale of employment and direct economic benefits from a GDF, which may be welcomed, is unlikely to be a sole deciding factor in a host community accepting a GDF. What is therefore critical to generating interest in the GDF siting process and sustaining communities in it is the delivery of significant additional investment and other spin off benefits.

In terms of **community investment funding** it is stated that funding of ‘up to’ £1million or £2.5 million per annum will be available. It is understood that these amounts are fully available subject to bids coming forward for the funding, however more explanation of this is required. For example, during the siting process, there may be years in which activity is limited. Government should clarify that this in itself should not lead to a reduction or withdrawal of community investment funding within a particular year.

The consultation also states that support should ‘*aim to ensure that best use can be made of the additional funding*’ by focussing on ‘*issues or themes that may increase the ability of local businesses and members of the community to benefit from a geological disposal facility development*’. While it is agreed that, in the early years of the process, the community should be actively engaged in considering the potential use of the larger scale additional investment that will flow to the host community (see below) it is not agreed that community investment funding should be used to support activities directly connected to the GDF development. Firstly, most of the communities entering the siting process will not be successful but should receive these benefits to spend on local projects as they see fit. Secondly, these statements seem to contradict the wider principles for the use of these funds set out in the consultation at paragraph 4.66.

The consultation is not clear on the scale of **additional investment** that will be provided. Many communities and local authorities considering entering the current siting process will be particularly interested in the potential for such large-scale funding and its potential impact on their local economy, environment or infrastructure over the long term. The final framework should be much clearer on the scale of such funding, the process for engaging the community in helping shape their priorities for the use of such funds, and the

types of projects for which investment would be provided. Examples of the type and scale of projects that might be supported should be provided.

The Potential Host Community (PHC) boundary may be limited, but there should also be the potential for additional investment to be used to fund say infrastructure projects that fall outside the PHC. For example, improvements to a rail line may require investment over a larger area and which will benefit the PHC as well as a wider area.

**7. Do you agree with the proposed approach to the right to withdrawal? Do you have any views on how else this could be decided? Are there alternatives we should consider?**

The proposed approach to the right of withdrawal is agreed. To minimise the risk that the community exercises its right of withdrawal, the developer will need to ensure it is responsive to the issues and concerns that inevitably arise and is also able to build relationships as the Community Partnership membership evolves over time. Of particular importance will be that changes in local government representation e.g. as a result of elections, are managed carefully.

**8. Do you agree with the approach to the test of public support? Do you agree that the Community Partnership should decide how and when the test of public support should be carried out? Do you have views on how else this could be decided? Are there alternatives we should consider?**

It is agreed that the Community Partnership should decide how and when the test of public support should be carried out.

The consultation states that *'If at this stage the relevant principal local authority representatives, at county council, unitary authority and district council levels (as appropriate) no longer wish to support the process proceeding, then we recognise it is unlikely that the Community Partnership will be able to launch or demonstrate a test of public support.'* We believe this is a vague and ambiguous statement: it appears to assign councils neither a clear veto nor an advisory role in the decision on the Test of Public Support and more clarity about the role of the principal local authorities in the test of public support is required.

**9. Do you feel this process provides suitably defined roles for local authorities in the siting process? Are there alternatives we should consider?**

The statement in Section 5 of the consultation that *'principal local authorities...will need to play an integral role in any Community Partnership.'*

Is welcomed, but more clarity would be helpful as stated in answer to question 8.

**10. Do you have any other views on the matters presented in this consultation?**

No.