# Working with Communities – Implementing Geological Disposal

# Response form

The consultation is available at: <https://www.gov.uk/government/consultations/working-with-communities-implementing-geological-disposal>

The closing date for receipt of responses is 19/04/2018

Please return completed forms by post or email to:

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Email: GDF-WWC@beis.gov.uk

## About You

We will only use your personal information for the purpose of administering the consultation and assessing the responses.

Name (This is a required response): Graham Duxbury

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**Would you like to be updated on Working with Communities policy developments by email? If you answer yes to this question, your email address will be added to our delivery body’s mailing list.**

Yes [x]

No [ ]

**Are you happy to be contacted if we have any questions about your response? This is a required response.**

Yes [x]

No [ ]

**Are you happy for your response to be published with identifying information? This is a required response.**

We will summarise all responses and place this summary on the GOV.UK website. This summary will include a list of names of organisations that responded but not people’s personal names, addresses or other contact details.

Yes [x]

No, I would like identifying information removed [ ]

Comments: Click here to enter text.

Are you happy for your response to be disclosed? This is a required response.

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information legislation (primarily the Freedom of Information Act 2000, the Data Protection Act 1998 and the Environmental Information Regulations 2004).

If you want information that you provide to be treated as confidential, please say so clearly in writing when you send your response to the consultation. It would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded by us as a confidentiality request.

Yes [x]

No, I want my response to be treated as confidential [ ]

Comments: Click here to enter text.

Are you answering on behalf of yourself or an organisation? This is a required response.

I am responding on behalf of myself. [ ]

I am responding on behalf of an organisation. [x]

## About you - Organisations

**If you are responding as an individual, you do not need to answer the rest of this section, go directly to the section titled ‘Responding to this Consultation’. If you are answering on behalf of an organisation, a response is required to the rest of this section.**

What is the name of your organisation? Groundwork UK

Who does this organisation represent? The Federation of Groundwork Trusts

What type of organisation is it?

Please tick **one** box in the table.

|  | Organisation |
| --- | --- |
| [ ]  | Local Authority |
|[ ]  Local Enterprise Partnership |
|[ ]  Civil Society Group |
|[ ]  Regulator |
|[x]  Charity |
|[ ]  Business |
|[ ]  Non-Governmental Organisation |
|[ ]  Religious Organisation |
|[ ]  Academic Institution |
|[ ]  Other |

If you have selected other, or would like to provide more information, please provide further details. Click here to enter text.

Approximately, how many members are there of / employees are there in your organisation?

|  |  |
| --- | --- |
| [ ]  | 1 – 10 |
|[ ]  11 – 49 |
|[ ]  50 – 249 |
|[ ]  250 - 999 |
|[x]  1000 - 4999 |
|[ ]  5000 or more |
|[ ]  Don’t know |

How did you assemble the views of your members?

Please answer here Informal internal discussion

## Responding to this consultation

The questions in this consultation are structured around the 8 main policy points that we believe are key to the Working with Communities policy proposals:

1. Identifying communities

2. Formative Engagement

3. Community Partnership

4. Community Stakeholder Forum

5. Community Agreement

6. Community investment funding

7. Right of withdrawal

8. Test of public support

There will be 10 questions overall, and you can respond to all sections of the consultation, or skip those sections which don’t interest you.

Each section contains a brief overview of the consultation document and directs you to further information within the consultation document.

Further information on the consultation, policy proposals and background and context on geological disposal can be found in paragraphs 1.1 to 4.4 of the consultation document.

How did you hear about this consultation?

|  |  |
| --- | --- |
| [ ]  | Gov.uk website |
|[ ]  National Media |
|[ ]  Social Media |
|[ ]  Local Media |
|[ ]  Professional Body |
|[ ]  Non-Governmental Organisation (NGO) |
|[x]  Other |
|[ ]  Prefer not to say |

If you would like, you can provide further details about how you heard of this consultation.

Please answer here: Direct outreach from representatives of RWM

## Identifying Communities

**The proposal**

Evidence from other infrastructure projects has shown that there is no single agreed approach to identifying the boundaries of a local community. The proposals in this consultation use a combination of the impacts of the development and administrative boundaries. It is proposed that a wide Search Area is identified initially, working towards the identification of a smaller area – which will be deemed as a ‘Potential Host Community’ – as the siting process progresses and the surface and underground sites for a geological disposal facility identified.

 A community needs to be identified at the right point to enable the appropriate engagement, which may also include the relevant principal local authorities. This will provide the basis for fair and transparent community engagement for the distribution of community investment funding; to enable the right of withdrawal from the siting process to be exercised; and if the community remains supportive after the engagement and information gathering process, to undertake the final test of public support.

Further information on the policy proposals can be found in paragraphs 4.5 to 4.21 of the consultation document.

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

Please answer here: We think this approach to identifying communities is appropriate but believe the principles of maximum flexibility and inclusivity should be applied to the process of establishing boundaries. Electoral wards provide a useful administrative unit for decision-making but are often not how communities identify themselves. It is likely that during the engagement process there will be different views about which communities are likely to be ‘affected’ by the search activities and ‘impacted’ by any future siting process. It will be important for the Community Partnership to consider these views and representations and to take an inclusive approach for as long as possible while exploratory work is underway. The working presumption should be that if a community considers it will be impacted then it should continue to have a voice in the engagement process as this will lessen the likelihood of boundary issues becoming a material block on future stages of the decision-making process. In view of this it may also be advisable to consider the need for an independent dispute resolution process to address any conflicts arising over which communities (and potentially which local authorities) should be eligible for investment funding and included in any test of public support.

## Formative Engagement

**The proposal**

Discussions can be initiated by anyone with an interest in a geological disposal facility siting process. To ensure an open, transparent and broad conversation as the siting process progresses, these discussions should be opened up to include people more widely in the community. To move into formative engagement, all principal local authorities should be informed and involved, unless they are content for formative engagement to proceed without their involvement.

To support this aim, a formative engagement team will be established to help build confidence in the community engagement process and to start to understand and answer any questions the community may have. The formative engagement team may include representatives from local government including the relevant principal local authorities. It will also need to include the delivery body, an independent chair and facilitators to ensure transparent, appropriate and constructive discussions.

To help communities shape their role in these early discussions, the delivery body will cover the costs of community engagement activities and provide access to independent support.

Further information on the policy proposals can be found in paragraphs 4.22 to 4.36 of the consultation document.

1. **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?**

Please answer here: The formative engagement stage is one of the most important and challenging aspects of this process as it is in these early discussions that attitudes towards the theory and practicalities of geological disposal within communities will form and could become entrenched. We welcome the approach proposed and think that working through a suitably resourced formative engagement team is a sensible approach. The role of independent facilitators will be crucial in this process as it is likely that these initial conversations with the community will be starting from a very low base in terms of pre-existing knowledge. Any perceived lack of transparency or equity at this stage could mean suitable sites are never explored or that opposition is engendered within a minority which ultimately frustrates a process agreed by the majority. We have a concern that the current proposal for formative engagement rests initially on the outcome of bilateral discussions between ‘interested parties’ and the developer without any reference to any wider public discussion of the issues and opportunities. This approach carries the risk that some communities may feel they are being brought into a process on the back of ‘private conversations’ but also means other opportunities may be missed if no interested parties initiate a discussion in an area where a willing host community could ultimately be found. Whilst we recognise it is important for all those involved to be able to deliberate and ask questions in confidence before initiating a difficult and potentially divisive public debate, we believe it would be beneficial for the concept of geological disposal to be more widely communicated within communities at the earliest possible stage. Setting the tone of this early debate is vital, not least because the whole engagement and siting process revolves around incrementally building the knowledge and understanding of a relatively small group of people likely to be directly impacted. However, any test of public support is likely to be influenced by a debate among a much wider group of people who may not be as knowledgeable. If early stages of the process are not effectively or transparently communicated these ‘noises off’ could have a detrimental impact on the willingness of a suitable host community to continue with the process. In particular it will be important to manage the message around motivation in the formative engagement process. It is most likely that public debate around the search process will revolve around the potential for economic regeneration. This carries two risks. On the one hand, local authorities and local enterprise partnerships may be perceived by communities to be ‘competing’ for an investment ‘prize’, which could be seen to influence how they respond to other concerns raised by residents. On the other there is a possibility that search areas are proposed on the basis of the need for regeneration – which is likely to mean a concentration on areas experiencing economic and social disadvantage, which in turn may lead to accusations of ‘environmental injustice’. For all of these reasons we believe there is a strong case for the government (not necessarily the developer) to engage existing community facing organisations in a process designed to ensure the issues and opportunities attached to geological disposal are understood. The UK has a strong network of community infrastructure organisations who could be engaged to initiate debates at a national level but also at a local level in parallel to discussions between the developer and interested parties. For example, this could include providing information through online resources such as mycommunity.org or initiating a community networking programme similar to that commissioned by Smart Energy GB to build grass roots support for a smart meter rollout plan. This additional networking capacity would offer valuable support to – and genuine independence from – the formative engagement team, in particular ensuring that this engagement reaches all sections of the local community, especially those who are ‘seldom heard’. Working through national infrastructure bodies and networks will also have the advantage of efficiency as many of the questions asked and issues raised by local communities will be similar and lend themselves to a collective response. Should there be a number of communities showing interest at this stage of the process we believe the government should consider adopting a ‘peer-to-peer’ approach to formative engagement. This would enable communities – who may be at different stages of understanding - to learn from each other and for the developer to demonstrate transparency and equity in its communications, mitigating any ‘competitive’ element to the process. This is also an effective approach for helping communities increase their own confidence and capacity to engage in the subsequent, more challenging phases of the process. For example, Groundwork UK managed a peer learning and support process for the Big Lottery Fund as part of its Communities Living Sustainably programme. This enabled communities in 12 areas of England to learn from and support each other in a broad range of areas from exchanging ideas on consultation techniques to developing business plans for community energy projects. This included opportunities for communities to visit each other and collaborate on proposals that brought benefit to their own areas. Feedback from those communities participating was very positive and the programme has led to some remaining in contact with each other in the longer term.

## The Community Partnership and Community Agreement

**The proposals**

For the siting process to be successful, the delivery body will need to work in partnership with representatives of the relevant principal local authorities and other representative members of the local community if they wish to be involved, which could include parish, town or community councils, residents, businesses and voluntary and community organisations (refer to Table 3 of the Working with Communities Consultation Document). It is proposed that a Community Partnership would be formed from organisations identified during formative engagement as important to the local area. The Community Partnership should also involve members from the delivery body. Members of the Community Partnership will be responsible for sharing information between the community and the delivery body and entering into dialogue with people more widely in the community about a geological disposal facility.

An agreement will be signed by the Community Partnership to establish a suitable level of engagement and agreement on ways of working between the delivery body and the community throughout the siting process. The agreement will be used to track progress and will enable the community members to hold the delivery body to account in the provision of information.

A community is constructively engaged in the siting process when a Community Partnership has been formed and there is a Community Agreement in place. At this point community investment funding of up to £1 million per community, per year, is made available.

To support the operation of the Community Partnership, a Community Stakeholder Forum could be set up to provide outreach to the people in the community more widely. The Community Stakeholder Forum is proposed to be chaired by a member of the community partnership, and could take the form of open public meetings inviting people from the Search Area and neighbouring local authority areas (as appropriate) to discuss the siting process. This would allow questions to be asked and concerns to be raised and for updates to be provided on the work of the Community Partnership. These meetings could be held at regular intervals and could ensure that anyone who wants to know more about the work of the Community Partnership has an opportunity to do so.

Further information on the policy proposals can be found in paragraphs 4.37 to 4.59 of the consultation document.

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

Please answer here: We welcome the principle of establishing a Community Partnership to guide and steer subsequent aspects of the engagement and decision-making process but we have a concern that, as currently envisaged, the partnership may not be seen as a body acting transparently in the best interests of the whole community. Given the complex and time-consuming nature of the task, the need for a workable size of group but also the emphasis placed on ensuring representation from statutory bodies – potentially multiple local authorities, LEPs, mayors and the developer – there is a strong likelihood that Community Partnerships will be dominated by public officials. Purely by dint of their professional background it is likely that these representatives will have a different level of pre-existing knowledge and expertise and will have certain expectations around the timing, location, format and frequency of meetings. It will be important to ensure that Community Partnerships are flexible, accommodating and inclusive in the way they go about their business to ensure community representatives are able to have an equal voice. There have been many examples in previous community regeneration projects of attempting to ensure significant decision-making is being informed and steered by residents, for example New Deal for Communities and Housing Market Renewal Pathfinders. Evaluation of these programmes highlighted the risk of ‘burn-out’ for community participants who often had to juggle the demands of representing their neighbours and peers, learning about the technical elements of the process while maintaining their own work and home life. For this reason we feel the government should be open to different approaches to fulfilling the functions envisaged of the Community Partnership, rather than necessarily following a prescriptive approach. In some areas there may already be a representative community forum in place, which could be built on and supported to take on the duties of the Community Partnership. In others there may be local infrastructure organisations with extensive experience of engaging the local community in planning and decision-making who could be commissioned to undertake Community Partnership functions. When deciding how to establish a Community Partnership the formative engagement team should be asked to consider if and how existing structures could be utilised. Building on an existing community body would have the advantage of ensuring public officials – including the developer – are invited to contribute to the discussion as ‘expert advisers’ to the community rather than being seen as the experts seeking community input to their decisions.

1. 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?

Please answer here: In line with our response to Q3 we think there should be an acknowledgment in the final proposals that the functions of the proposed Community Stakeholder Forum could be delivered in a range of flexible ways depending on the groups and networks already operating in an area. In some areas it may be necessary for the Community Partnership to create a new infrastructure for engaging the wider community in its deliberations. However, in many others it may be more appropriate and beneficial to work through one or more existing networks or agencies to undertake a range of stakeholder engagement activities rather than establishing a new structure. For example, Groundwork is currently funded to engage communities living around the Colne Valley regional park in Buckinghamshire in a process to develop a mitigation plan surrounding the construction of HS2. In the case of GDF it is unlikely that a programme of structured stakeholder events will ensure all views in the local area are heard, however well-intentioned and designed. Stakeholder engagement will require a range of techniques to be used from community outreach events to door-to-door surveys to online discussion. This will need to include activities which are specifically targeted at those least likely to engage in public forums, for example working through faith organisations to reach out to specific cultural groups or housing and health support workers to reach those who are isolated or vulnerable. Given the multi-generational nature of the search, siting and development process it will be important to find creative ways of engaging young people in the debate and decision-making. This will be a particularly important consideration in the test of public support, which is asking the local community to commit to a process which will impact most on their children.

1. Do you agree with the proposal for a Community Agreement and what it could potentially include? Are there other approaches we should consider?

Please answer here: Ensuring the roles and remit of the Community Partnership are agreed in a transparent way is an important building block in this process. However, as currently proposed in the consultation we believe there is a risk of conflating two different processes. We agree that an agreement is needed which sets out the nature of the interactions between the different members of the Community Partnership including representation, voting, dispute resolution etc. There are many examples of such ‘partnership agreements’ which are binding on members but which don’t have legal consequences. Good partnership governance is built on clarity and equity and it will be important for any agreement to set out how the different parties are contributing to the discussion and in what capacity. Ensuring there is a mechanism for identifying and resolving conflicts of interest will also be important. The proposal suggests that the Community Agreement might also set out a programme of interaction between members of the partnership over time. We believe this should be a separate process to drawing up the Community Agreement itself, in effect creating a work plan or project plan for the partnership members to deliver, governed by the Community Agreement. We think this separation is important as it enables all parties to hold each other to account for the delivery of their elements of the project plan. This would mirror arrangements which are commonly used in the development and management of other partnership ventures.

## Community investment funding

**The Proposal**

The Government will make community investment funding available via the delivery body of up to £1 million per community, per year in the early part of the geological disposal facility siting process, rising to up to £2.5 million per community, per year for communities that progress to deep investigative boreholes that are needed to assess the potential geological suitability of sites. Community investment funding can only be used to fund projects, schemes or initiatives that: provide economic development opportunities, enhance the natural and built environment, and/or improve community well-being. A community investment panel, made up of members of the community and the delivery body would review and decide on applications for funding against agreed criteria. Applications for community investment funding can be made by anyone within the Search Area.

Further information on the policy proposals can be found in paragraphs 4.60 to 4.73 of the consultation document.

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

Please answer here: We fully support the proposals for making community investment funding available within each search area and agree with the broad parameters for how that funding might be targeted and distributed. Investment funding is important not just to help communities benefit from the search activity but also to maintain levels of interest and engagement during a process which is likely to be characterised by flurries of activity followed by long periods of deliberation. There are many examples of government making funds available to support communities and the management processes involved in these should provide considerable learning and reassurance in terms of risk management. We agree the proposal for identifying an independent fund management body and would have concerns about this role being undertaken by the developer in terms of public perceptions around transparency. The role of fund manager could be undertaken at national level by an independent body commissioned by the developer to deliver this service, working to a number of agreed KPIs. The fund manager would be responsible for liaising with each Community Partnership to establish a local grant panel. Applications for funding could be sifted against agreed criteria and then a longlist recommended to the panel for decision. This model would strike an effective balance between independence and the need to reflect local priorities. Experience from other grant schemes suggests that communities often need support in interpreting funding criteria and ensuring that applications have the relevant permissions from statutory bodies or the support of a wider group of people in the local area. We agree therefore that it would be beneficial to include an ‘enabling’ service within the fund management proposals. This again could be provided independently as part of the fund management role, mitigating against the potential for conflict in terms of the role of local authorities and ensuring that all communities are able to influence how investment funding is spent. This supported and arms length approach to investment will also ensure that funds are not ‘swallowed up’ by better organised community and voluntary groups, nor used by local authorities to replace public spending. This will be a particularly important consideration in search areas where there are more marginalised or transient communities or where there is a greater ‘pull’ on statutory funds – these are likely to be areas in need of regeneration and therefore potentially prioritised by local authorities as search areas. In order to support maximum engagement in the debate surrounding the siting process we recommend investment funding is offered in a range of forms and sizes, from small grants which can be accessed directly and quickly by community groups to build their own capacity and deliver projects that improve the quality of life in their area to larger, more strategic grants that can be used to improve the wider community, environmental, education and business infrastructure and which are likely to involve larger organisations acting as accountable bodies for funds. This twin track approach is currently being utilised by HS2 through its parallel ‘community and environment funds’ and ‘business and local economy funds’, both of which are managed by Groundwork UK as an independent national grant provider.

## Right of withdrawal

**The proposals**

Communities can enact their right of withdrawal at any stage of the siting process; the geological disposal facility delivery body can also withdraw at any stage if they determine that the siting process is unlikely to be successful in a particular community.

Should the right of withdrawal be enacted prior to the siting process having progressed to identifying a Potential Host Community, the people within the Search Area would decide whether they wish to withdraw from discussions.

Further information on the policy proposals can be found in paragraphs 4.74 to 4.82 of the consultation document.

1. Do you agree with the proposed process for the right of withdrawal? Do you have views on how else this could be decided? Are there alternatives that we should consider?

Please answer here: We agree with the proposed process but would welcome more detail in the final proposals about how to ensure the delivery body is seen to act transparently in making its decisions about withdrawal. It is highly likely that a situation will arise whereby a community is positively in favour of a facility but the developer reaches a conclusion that the proposed site is technically inappropriate or simply not as straightforward from a development potential as another area. The community will then suffer the loss of both immediate investment funding and the long-term economic benefit of the development. The reasons for this withdrawal need therefore to be clearly communicated – and at the earliest possible point. We would also recommend that consideration is giving to phasing out investment funding over time rather than seeing it stop abruptly in recognition of the need some communities may have to adjust to the decision or consider an alternative plan for the economic development of their area.

## Test of Public Support

**The proposal**

Before a final decision is made by the delivery body to seek regulatory approval and development consent to proceed with the construction of a geological disposal facility at a particular site, there must be a test to ensure that there is public support to proceed. The test is designed to elicit a final view from the people in the community as to whether they are content for the delivery body to proceed to apply for development consent for a geological disposal facility in their area, and other permissions to proceed from the environmental and nuclear safety and security regulators. The test could be carried out using a range of methods, including a local referendum, a formal consultation or statistically representative polling.

The test will be undertaken by the people within the Potential Host Community, as they will be directly affected by the proposed geological disposal facility development. The Community Partnership will decide when the test of public support should take place and the method by which it is delivered. If at this stage, the principal local authority representatives no longer wish to support the process proceeding, then we recognise it is unlikely that the Community Partnership will be able to launch any test of public support at that time. Without a positive test of public support, a final decision by the delivery body to proceed with the subsequent stages will not be possible.

Further information on the policy proposals can be found in paragraphs 4.83 to 4.89 of the consultation document.

1. 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 that we should consider?

Please answer here: We agree with this proposal and learning from other process eg housing estate regeneration points to the benefit of identifying a point at which community engagement and consultation has enabled sufficient consensus for a binding decision to be made. In any such process, identifying the most appropriate time for a more formal decision to be made is a challenge and needs to consider a range of factors. We agree that the Community Partnership – assuming it has delivered an effective and inclusive programme of outreach and engagement – will be best placed to decide when and how to carry out the test of public support. In practice, a test of public support is only likely to be undertaken when a positive outcome is predictable. Whichever mechanism is chosen for the exercise, it will be important to ensure sufficient support is in place to enable everybody in the area to be – or feel they have been – represented in the decision-making process. Guidance around the test of public support should advocate the most inclusive mechanism – likely to be a local referendum – and consideration should be given to this guidance being produced by government (or possibly an independent body such as the Electoral Commission) as opposed to the developer, who will be perceived as having a vested interest in obtaining a positive result. As stated in response to earlier questions, we believe it will be important to demonstrate flexibility in deciding how many communities are involved in the test of public support and to have a process in place to arbitrate in the event that some communities who perceive they will be impacted by the decision feel excluded from any vote.

## The Role of County Councils, Unitary Authorities and District Councils

**The proposals**

This consultation includes proposals which set out clear roles for relevant principal local authorities to perform within the siting process. The relevant principal local authorities for each community will be able to demonstrate their support for engagement with the siting process and the Community Partnership through:

• choosing to be members of the Community Partnership;

• as members of the Community Partnership, deciding to remain engaged in the siting process by not wishing to invoke the right to withdrawal through the Community Partnership; and

• deciding whether to support the test of public support that comes at the end of the engagement process. Relevant principal local authorities will also need to help design and launch this test as part of their role in the Community Partnership.

Further information on the policy proposals can be found in paragraphs 5.1 to 5.12 of the consultation document.

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

Please answer here: Local authorities are clearly crucial to the siting process given their role in developing local economies, representing the interests of their residents and acting as statutory bodies in terms of planning and public health. It is therefore right that they are fully and actively involved in all elements of the engagement process and it is highly unlikely that this process will lead to a test of public support without their consent. However, we don’t believe it is appropriate for individual local authorities to have special powers within the Community Partnership, which should be bodies established on the principle of equity and charged with seeking consensus on the way forward. The local authority representative on a Community Partnership should be there to provide information to other members on what might need to be done to ensure the local authority is in a position – practically and politically – to agree to a test of public support and subsequently to provide the consents needed for any development process to begin. This should not be the same as the right to exercise a veto around the Community Partnership table. This will be particularly important in search areas covered by two-tier administrative arrangements where it is feasible that a lower tier local authority may approve a proposal while an upper tier authority may have reservations linked to wider public or political opinion above and beyond consideration of the direct impact on the host community.

## Other Views

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

Please answer here: In our view the proposals set out in this consultation are well considered and provide a strong framework for supporting communities through a uniquely challenging set of circumstances. What isn’t covered by the consultation is the process through which communities may become interested parties at the outset of the engagement exercise. We understand that the developer is currently charged with the task of communicating the ‘offer’ and process involved in implementing geological disposal with relevant stakeholders. The risk attached to this approach is that the framing of those initial communications may undermine the ultimate aim of the engagement process, either because some suitable and willing communities don’t hear about the opportunity or because the debate is quickly dominated by voices which ‘frighten off’ some that do. Equally there is a risk that the perceived vested interest of the developer may mean that the community engagement process is made more difficult from the outset due to questions around motivation. This is likely to be exacerbated by the fact that there is the potential for communities to be ‘overwhelmed’ by the weight of scientific information and educational material that the developer has spent many years generating. The reality is that the vast majority of communities in the UK are unaware of the arguments around geological disposal and of the current consultation exercise. Those who have some knowledge of the issues – and whose voices are likely to be heard first and most in public debates – are those who are most positive for the solution or most critical of the policy. This could leave many communities struggling to determine whether or not to engage in discussion. Whilst we recognise that this is a big issue which is ultimately likely directly to impact on only a small number of people in a single host community, we believe consideration should be given to ensuring there is broader public understanding of the benefits and risks of geological disposal to ensure subsequent community engagement processes are more informed and effective. As stated in Q1 this could be achieved by engaging existing community-facing organisations and networks more fully in initiating, hosting or moderating debates on the subject.

## End of response form

Thank you for completing the consultation.

Once this consultation has closed, the Government will consider comments received and publish a summary of the consultation responses and its final policy decision. The delivery body will produce more detailed guidance as to how the siting process will work in practice.