**GDFWatch: Response to Working With Communities consultation – 19 April 2018**

**Identifying communities**

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

*Overview*

The consultation document sets out the complexity of defining ‘affected’ communities very clearly, and rightly notes that over time the identity and boundaries of any particular ‘affected’ community may change. However, given this complexity, and the need for flexibility, there do not appear to be any proposals for independently arbitrating or resolving disputes that may arise.

Basing both “search” and “host” areas on the lowest units of public administration (electoral wards) is a sensible basis from which to start defining a ‘community’. However, there should also be flexibility to accommodate existing non-governmental or other community-based networks and affiliations. These non-statutory groupings may not align with governmental administrative boundaries but can often more effectively reflect historic ties and relationships within and between local communities.

GDFWatch believes that flexibility is necessary when defining an affected community. As the consultation documents notes (para 4.8) definitions vary between infrastructure projects. Experience from other infrastructure projects also indicates that specific affected communities become more self-evident as the discussion and planning processes progress. The key to successful public acceptance of how an affected community is eventually defined will be in how transparently that decision is taken.

*Arbitration/Dispute management*

Whatever criteria are adopted to define an ‘affected’ community or communities, a line is effectively drawn in which people at some point are either inside or outside. Wherever that line is drawn, there is always going to be someone just the other side of the line. That person may or may not have a justified grievance for being excluded, but there remains a probability that there will be someone with such a grievance.

It is currently proposed (para 4.19) that defining the ‘affected’ communities will be the responsibility of the Community Partnership. However, the Partnership itself may be, or perceived to be, a conflicted party in any dispute, and therefore any decision it reaches could be open to legal challenge.

Setting aside concerns about the potential for frivolous litigation designed to frustrate the process by unrepresentative individuals or groups, any such legal actions would inevitably delay the process and could place an open-ended financial burden on the taxpayer. This is perhaps less of an issue when the initial search area is large and no specific location, site or geographic community is yet identified as a potential host area. But the situation may become more fraught as the siting process advances and becomes more focused, and particularly as the Test of Public Support approaches.

Further thought may want to be given now to identifying an independent arbiter, which could hear public representations and make final decisions on the boundaries of any designated community. An existing statutory body with expertise in defining communities, such as the Local Government Boundary Commission, may be an appropriate independent quasi-judicial arbiter. This approach would:

* provide a clear framework for the future on how detailed assessment and decisions will be made in defining an affected community, while still retaining flexibility for the circumstances at the time and in the specific location; • underpin public trust in the transparency and independence in the process of deciding how an affected community is to be defined; • limit the scope for frivolous legal challenges;
* more effectively manage public funds.

**Formative engagement**

**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?**

*Overview*

Formative engagement is perhaps the most difficult stage in the siting process. It is at this stage that:

a) sufficient awareness and interest is required at a local level to engender some form of initial discussion; and then, b) subject to local sentiment/willingness, that initial interest will have to be migrated through the more detailed discussions, analysis and negotiations that will precede the establishment of any Community Partnership or drafting of any Community Agreement.

The current proposals have many positives but there may be ways in which the process can be improved to enhance the levels of reassurance, confidence and trust any community will need in order to consider formally entering into the siting process.

For example, it may be helpful to have an “early-formative engagement” stage that is centrally-funded to support bodies representing community-based interests to work collectively in developing ‘template’ terms and conditions for Community Partnerships and Agreements, so that individual communities subsequently negotiating and entering into their own local Community Agreements and Partnerships can do so with greater confidence that their underlying interests in this untested process have been evaluated by the wider community sector.

*Early-Formative Engagement: Enhancing Community Confidence through Collaboration*

The current proposals appear to place an onus on individuals or local organisations coming forward for initial discussions. The proposals envision a process in which interested communities enter into a bilateral process with the delivery body to identify local needs and to negotiate a place-specific way forward. Even if several communities entered into formative engagement, there seems to be an assumption that there would be a series of separate bilateral 1-2-1 relationships and discussions between each community and the delivery body.

This pathway may be the route taken by some communities, and it is certainly true that the local characteristics and requirements of any particular community will need to be individually accounted for and addressed. However, the GDF siting process is not just a difficult or long process, it is also a completely unique and untested approach. Feedback from a wide range of stakeholders suggests that the scale and complexity of the task could easily overwhelm the confidence of many individual communities, inhibiting them to open even initial discussions.

This confidence-deficit will only be exacerbated if a community feels ‘alone’, isolated and/or senses that the balance of knowledge, authority and power is with the delivery body. No matter how open the delivery body may try to be in these early discussions, it will inevitably be seen as a having an agenda.

To avoid communities feeling isolated or overwhelmed by the siting process, and as a way of more rapidly building trust at the community level, of enhancing community understanding of the issues, and of encouraging greater community participation in the siting process, it might be helpful if the Government considered the merits of supporting an ‘Association’ or similar representative grouping of interested communities to deliver ‘early-formative engagement’ activity. Such an approach would:

* allow knowledge and experience of the wider community sector to help shape siting process details, rather than rely upon individual small communities negotiating their own position
* build confidence across engaged communities that they have an independent agent on their side, offering advice and support during the siting process
* mean that generic siting and engagement issues common to any community could be identified and addressed collaboratively and collectively – enhancing the siting process’ credibility with communities
* ensure best practice, and existing community programmes and approaches, were built into the siting process from the very start
* provide a ‘clearing house’ for the sharing of information and knowledge between interested engaged communities
* reduce duplication of costs/effort for the delivery body, by having one agency with which to work on core issues rather than multiple small individual communities.

**The Community Partnership and Community Agreement**

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

*Overview*

The basic principles to the approach are sound, and we particularly welcome the Government’s acknowledgment that funding will be required to provide communities with the capacity and capability to meaningfully engage in the process. If communities are to be at the centre of decision-making it makes absolute sense to ensure as broad a spectrum as possible of local opinion and interests are represented on the Partnership, and that the Partnership be the primary decision-making body.

Our main concerns are:

* current lack of provision for independent arbitration of any disputes over membership
* proposed ‘voting’ powers of Partnership members may not be fair or equitable
* establishing clear criteria for costs that are to be covered by engagement funding.

*Independent arbitration*

The consultation document is silent on how to resolve potential disputes over Partnership membership. There may be benefit in contracting with a credible and respected independent party to act as an arbitrator.

An independent arbiter could analyse results of the local stakeholder-mapping and community-profiling outputs from the formative engagement process, and if required consult publicly on potential membership, before recommending final appointments. The independent arbiter should provide an explanation for their decision, so even if elements of the community are not satisfied with that decision, they can at least see the process was fair and transparent.

*Partnership membership & voting rights*

The delivery body and principal Local Authorities are to be automatically granted seats on the Partnership. In principle there are no issues with this proposal, but it does prompt three questions:

* in the interest of building trust with community, should the Delivery Body have any say in others’ membership? – perhaps the Delivery Body should be kept out of any local ‘wrangling’, and not ever be seen to have, let alone actually have, a ‘veto’ over anyone’s membership of the Partnership
* although principal Local Authorities are not required to be an initial participating member, if they do later take up that option will their membership be additional to existing membership? – this would be preferable to someone else being bumped-off the Partnership to keep membership at an inflexible pre-set level
* the proposal in para 5.11 that “a single relevant principal local authority, is afforded the ability to individually carry a motion with their vote” seems at odds with the consultation’s wider proposals that establish the Partnership as the primary representative and decision-making body? – it cannot be appropriate that one member can over-rule the whole Partnership.

More thought should be given to using existing local non-governmental representative or membership organisations when considering membership of the Partnership. It might also be beneficial to take account of bodies responsible for planning activity (at both neighbourhood and regional levels), so that the GDF Community Partnership as far as possible ‘plugs into’ existing community or business and planning activity.

Further thought should be given on how to incorporate a voice on the Partnership for anti-nuclear, environmental or other project opponents. More importantly, given the intergenerational issues, a ‘voting’ seat on the Partnership should be preserved for younger people.

*Engagement funding*

The proposals appear very generous financially, for example the consultation document says:

* “anyone engaging in the siting process can do so without incurring costs” (para 4.38)
* “to cover administrative costs associated with the operation of a Community Partnership. It will be used to provide secretariat functions. It will cover any costs associated with implementing the right of withdrawal, the third-party expert view mechanism and test of public support processes” (para 4.40)
* “to develop the skills and confidence of groups ... It is proposed that this advice, as well as the resources required to administer this capacity-building function would be provided through engagement funding” (para 4.41)

Such generosity is easy to commit to on paper but will need monitoring to ensure that it is delivered in practice and sustained over the many decades ahead. The delivery body is charged with developing funding criteria and guidelines. Its work may have more credibility and acceptability if a basic framework was agreed through collaboration with a wider community sector “association” rather than being negotiated on a bilateral basis with specific communities. There will be specific local needs, but a basic funding foundation will underpin every Community Agreement/Partnership – so why not negotiate a core settlement with the wider community sector, drawing on their experience and knowledge, to help individual communities have greater confidence in the process and available funding.

**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?**

*Overview*

The consultation document proposals on community engagement are ambitious and to be welcomed. As with so much in the siting process proposals, our issues and concerns are generally related to implementation rather than the principles. The observations and ideas below are offered as suggestions to improve implementation of policy.

*Community Forum*

Given the limitations on membership numbers to allow for an effective working Partnership, the Stakeholder Forum may offer a process for allowing wider opinion, organisations or individuals who cannot all be Partnership members to regularly discuss issues, table ideas and even hold non-binding votes – such discussion and votes being one possible additional way in which to systematically and regularly assess community opinion.

A ‘Forum’ need not just be a regular set-piece meeting -- such events at fixed venues and times tend to favour those with the time to attend set-piece meetings, and so further thought should be given to how best to address diversity and accessibility issues within a community, so that people can participate on terms which accommodate their needs.

Getting people actively involved on any issue is difficult, and there is a constant risk that a vocal minority can dominate debate and decisions by default – this must be actively avoided by being imaginative in opening up community participation through enhanced accessibility channels (whether this be through social media, other technological solutions, or more traditional methods). There is significant experience and expertise within the community sector on best practice in community engagement, to make participation more accessible to the wider community, not just for those motivated and able to attend specific events.

*Working Groups & Harnessing the community’s expertise*

Alongside but separate from the Stakeholder Forum, active consideration should be given to harnessing, developing and co-opting the talents, expertise and experience of local people as members of formal Working Groups. These working groups could be aligned with each workstream within the overall siting process, so that community representatives were involved in assessing data, identifying issues and finding local solutions. Not only would this allow local views to be incorporated into the management of the process but may also prove helpful in addressing any subsequent community concerns, because fellow residents will have been involved in the detail of an issue.

Experience from Sweden indicates that securing community confidence is enhanced by involving citizens in all aspects of the process, from technical and safety case assessments through to determining how to mitigate local environmental impacts.

Consideration should also be given to formalising regular cultural and social engagements with other UK communities involved in the siting process to share knowledge, experience and build collective confidence in the overall siting process. Similarly, links with communities in other countries who have or are going through similar experience should be encouraged and supported.

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

*Overview*

There clearly needs to be some form of ‘constitution’ or governance document which sets out the Partnership’s purpose, its authorities, obligations, roles and responsibilities, and that explains how it will engage with its own community.

The Community Agreement appear to be THE key pillar of this process -- it is a cornerstone document. Yet it commands just four paragraphs of explanation in the consultation document – while well-intended it is currently woefully under-articulated, focusing primarily on voting rights within the Partnership.

*Community Agreement: a contract between the people and the delivery body*

If the community is to feel, as well as be, ‘empowered’ the Agreement will need to go beyond simply establishing internal administrative processes for the Community Partnership. It will potentially need to map out a broad framework of activity with clear deliverables and milestones, as well as setting out rights and responsibilities. This will be necessary so that all parties have clarity of purpose, and confidence in how disputes will be resolved. It will also help ensure that progress can be made on technical assessment of site feasibility, as well as incorporating how issues of community concern are managed.

**Community investment funding**

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

As the consultation document makes clear, the provision and distribution of community funds is a well-established process with multiple models in operation. No further comment on which is the most appropriate, other than different models may be more suitable for particular communities.

There are two areas of concern which will require clarification:

* ‘substitution’ and ‘additionality’ of these funds – some mechanism needs to be introduced to ensure there is no risk of existing community, Local Authority or other sources of public funding being withdrawn because of the availability of these funds
* given the potential timescales of both the non-intrusive and intrusive phases of geological testing, there needs to be thought given to how a community might draw down longer-term funding at an earlier stage to build trust, show good faith, and keep the project progressing.

**Right of withdrawal**

**7 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?**

*Overview*

The proposed process is sound in principle. The key determining success factor will be community confidence that their right of withdrawal is protected or guaranteed in some way. A community is unlikely to enter into or remain within the process if people feel they might be forced to stay in a process they no longer wish to participate in, or forced out of a process in which they wish to remain.

Thus the proposal in para 5.11, that one member of the Partnership has a vote that can over-ride everyone else, is a flawed proposal which will undermine confidence in the wider process.

Monitoring and reflecting wider community sentiment, so that any decision to remain within or withdraw from the process is based on transparent data from multiple sources, may be the Community Partnership’s most important responsibility.

It is also worth noting, that the party most likely to initiate a withdrawal is the delivery body. The most likely situation is an assessment that geology is not suitable, or that a facility could not be built to the exacting regulatory standards required. However, the delivery body will also have a duty to Parliament (through the PAC and NAO) to justify expense of taxpayer funds – there is a plausible scenario that the delivery body, for myriad reasons, becomes concerned that continued investment in a community cannot be justified or may be open to Parliamentary censure.

Regardless of the grounds for withdrawal of the delivery body, the fact that multiple communities are sought for initial site assessments but only one facility is envisaged means that the majority of communities entering into the process will not be successful in eventually hosting the GDF. The delivery body will need to build ‘exit management’ into the process, and how that is to be done will need to form part of the Community Agreement. This may require, for example, phased rather than abrupt ending to community investment funding.

*Assessing Community Sentiment*

The more channels used to systematically and regularly monitor and assess public sentiment the better. Mood will fluctuate over time, even driven by boredom and lack of sense of progress. The experience of the community of Osthammar in Sweden suggests that there can be long periods (up to three years) while geological testing takes place, during which there is little to discuss, and community interest can wane.

Evaluating sentiment cannot be a precise science. The Partnership will need to regularly review and balance sometimes conflicting indicators. Establishing tracking data, over time, will give indications of trends as well as current snapshots to guide decision-making. Whenever a Partnership exercises (or declines to exercise) the Right of Withdrawal, there will always be disappointed parts of the community. It will be very important that the Partnership is obliged to transparently explain its decision and how it reached that decision.

In addition to community sentiment, there will be a range of external forces to take into account, eg:

* geological assessment results readings
* loss of confidence in receiving long-term investment funding
* national or local/regional economic situation
* ability to align local with regional planning priorities
* new environmental or other legislation and/or standards adversely impacting otherwise locally-accepted plans

**Test of public support**

**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 that we should consider?**

*Overview*

Some body has to take the decision of when and how the Test of Public Support (ToPS) will take place. The Community Partnership is the best placed to do so. There seems no obviously more conclusive and public way of expressing community ‘consent’ than through a local referendum. However, once again, the consultation document is silent on independent arbitration and dispute resolution. This needs to be addressed.

*Independent Arbitration*

The consultation document makes clear that because of the timescales involved and because there will be no known specific geographic areas under consideration when the siting process starts, a high degree of flexibility is required when defining the “host” community. The same uncertainties affect definition of the ‘electorate’ if a local referendum is called. There may be an assumption today that the “host” community is the same as the ‘electorate’ – however, future circumstances may mean the two have slightly different boundaries.

It is not possible now to determine sensibly any parameters regarding the nature and extent of the electorate in any referendum being used as a ToPS. This can only be fairly assessed at the time and in the specific circumstances. What can be determined now is that such a public vote is likely to lead to disputes and challenges about who has the right to vote, and that therefore an independent arbitration process is likely to be required.

As set out in our reply to Q1 in the consultation, perhaps the best way to address this issue is to appoint an existing independent statutory body with expertise in determining electoral districts and/or managing elections, such as the Elections Commission or the Boundaries Commission for England. Given the likely timescales involved (perhaps 3-4 decades before such a ToPS is required), it may be preferable to propose a statutory body like the Electoral Commission or Boundaries Commission, to allow for potential machinery of government changes, and to be able to use a successor body which has a direct administrative lineage and heritage of expertise.

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

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

*Overview*

A GDF will not be built if relevant Local Authorities (LAs) are opposed to its construction. That is simply a reflection of fact, recognising that LAs have a range of statutory duties and other legal obligations, and they need to plan for and provide a range of public services.

This critical role in the process does not therefore need any additional powers, voting rights or veto for local authorities. Indeed, there is clear evidence from

around the world that giving different tiers of government some form of veto or blocking power only serves to frustrate the siting process. In effect, if the Government chooses to give such a power to principle local authorities, the new siting process will be DOA.

*Background*

As the consultation document makes clear (paras 1.7-1.10 and 3.26-3.27) the gestation period for a GDF is intergenerational and spans multiple electoral cycles. All of the Government’s previous consultation, expert advisory groups, and open policy-making activity has recognised the need to move away from a staged siting process dependent on local authority approval, and to find a community-based, democratic process which runs alongside of but separate to traditional local decision-making models.

The consultation document is interspersed with references to the potential role of local authorities, but these offer little clarity (in fact they generate confusion) and seem to be at odds with thrust of wider consultation proposals, eg:

* para 4.25: the interested party and delivery body should involve the relevant principal local authorities ... unless they choose not to be involved in formative engagement and are content for it to continue without their involvement.

This suggests a LA could stop a siting process before it even started, by refusing to allow the process to continue without their involvement. Is the Government seriously suggesting that after all the evidence it has collated saying it should avoid staged processes which lead to premature decision-making, that it intends providing a power to stop its own policy before its even started?

* para 4.57: whether a single relevant principal local authority is afforded the ability to individually carry a motion with their vote.

The suggestion that a local authority should be given privileged voting rights on the Partnership undermines the whole concept of placing the community at the centre of decision-making. It makes a mockery of the Government’s own policy.

* para 4.20: If the relevant principal local authority representatives, at county council, unitary authority and district council levels, no longer wish to support the process proceeding, then we recognise it is unlikely that the Community Partnership will be able to launch a test of public support at that time.

Given the lengthy timescales it is hard to envisage a situation when the views of LAs are not known at any and every stage of the process. These views may change over the years. However, while it is true that there would be little point in proceeding with a ToPS if a LA was opposed to the GDF project, it would be perverse if a community (with LA support) reached the point of ToPS and then the LA sprang a surprise.

*Evidence from around the world*

The most current example of GDF siting inertia caused by different tiers of government having a blocking or veto authority is in the United States. The Yucca Mountain site has been stalled for decades. There is still considerable technical assessment of the site to be completed, which may indicate that it is not a suitable location. However, even that technical work has been stopped by the State government of Nevada. This is despite the fact that the local affected community, Nye County, overwhelmingly supports progress on the project, and that the federal government, other States, and the House of Representatives are in favour of progressing the project.

Discussions related to both a multinational repository and the siting of low-level radioactive waste facilities have been a feature of political debate in South Australia over the past five years. As in the United States, the federal government and those communities living nearest the proposed facilities are in favour of testing and discussing the issues but have been stymied by State-level players.

*Role of Local Authorities*

The scale of impact of a GDF on any area’s economic planning, infrastructure requirements, longer-term public service provision etc means that all levels of LAs will ultimately be involved in the process. They are interwoven partners. How active or passive any level of LA is at any particular stage may vary.

The community discussions and technical assessments will all take decades. LAs often have invidious choices to make with finite resources. Some LAs may initially see a GDF as threatening to their existing plans, programmes and budgets. However, given the timescales involved there will be ample opportunity for them to assess and amend the impact of the GDF on their plans and wider legal obligations (both positively and negatively) and manage the change accordingly. This is not dissimilar to the sorts of compromises being made between LAs in City Region and Northern Powerhouse situations.

The ultimate decision on where a GDF is located is rightly being left in the hands of a specific (though not yet specified) local community. However, as explained in the consultation document, there are multiple technical and other assessments that need to be conducted before a decision is even required of a community. Not least of which is the wider infrastructure, environmental and socioeconomic impact of a facility. The sheer scale of the GDF project will have implications beyond the immediate environs of the head facilities. There will be ‘concentric’ rings of impact flowing from the facility, which will affect existing (or wished) development plans at the regional level. So the siting process does not only have to account for community’s interests in its own development, but place that in the context of wider regional infrastructure and other development and planning.

There is always tension between local community priorities/needs (micro level) and wider regional priorities/needs (macro level). It is 100% certain that on ‘day one’ of any GDF siting process these micro and macro perspectives on development will not be aligned. Thus there may be value, for example, in funding analyses to help interested communities and the surrounding region to identify how a GDF might be integrated within and support delivery of their respective longer-term development plans. Such an approach fits within industrial and regional strategy. It also helps build broader understanding of geological disposal, placing the GDF into a more appropriate context.

**Other views**

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

*Overview*

The Working With Communities consultation document is to be applauded for proposing an inclusive, ‘bottom-up’ decision-making approach to help the UK make its own national contribution to a global environmental problem, while protecting the rights and respecting the wishes of those most affected by wherever the UK’s GDF is eventually located.

The proposals are right to emphasise the need for flexibility, to account not just for the particular characteristics and aspirations of different communities, but also for the intergenerational timescales involved. However, there is a risk that such well-intended flexibility is so open-ended that it can appear opaque, potentially meaning all things to all people without actually meaning anything to anyone.

Our responses to the consultation questions are intended to help improve articulation and implementation of the raw policy proposals out for consultation. We have some additional general, cross-cutting and thematic observations below.

*Interacting with other public policy areas: GDF siting process is not operating in a vacuum*

The consultation document indirectly refers to many wider issues of contemporary public discourse, without ever actively engaging with the processes or parties already involved in trying to address those issues. Issues such as:

* nationally critical infrastructure planning and long-term decision-making
* localism, local wealth creation, community development plans and activities
* devolving financial and planning responsibilities for regional economic development, so that decisions be taken closer to those impacted, but also help deliver greater parity in growth opportunity across all the UK’s regions
* engaging and empowering communities to better shape their own local destinies, and to more actively understand and contribute towards their respective regional development plans
* rural affairs issues
* 25-year national environmental plan
* industrial and green growth strategies.

The GDF siting process should not be viewed in isolation, as a standalone process, but structured to help communities achieve their ambitions across a range of public policy issues.

*Consultation & Communities*

It is clear that those responsible for developing and implementing a wide range of community-based activity have not really been involved in this process or the policy-making to date. This could impact adversely on the effective implementation of the consultation’s proposals. The consultation may in fact be a helpful starting point for bringing these organisations ‘inside’ the implementation tent. With appropriate engagement funding, there may be value in the Government and delivery body working with a nationally-representative grouping or association of community-centred organisations to develop practical guidance and information that any community entering the process will need.

Such a collaborative approach would also help address concerns about the powers and responsibilities of the delivery body. At the moment the delivery body is responsible for developing all guidelines, for interpreting and implementing the policy, and for determining funding mechanisms.

This is a new and untested way of managing an infrastructure project in direct partnership with communities. There is much that can be learned from other infrastructure projects, but the GDF siting process proposals are unique. The current perceived imbalance of knowledge and power may be a barrier to entry for many communities. Steps are needed to bring a more ‘independent’ perspective and input into implementing the policy, so that communities feel more comfortable with the balance of power in their relationship with the delivery body.

*National Policy Statement (NPS)*

GDFWatch is not submitting a separate response to the National Policy Statement consultation. It appears to us that in the absence of a specific site, the draft NPS is very generic and stating obvious issues to be taken into account. We do not have the technical expertise to competently comment on more detailed aspects of the NPS and related documents.

However, it is worth noting that many if not all the issues which will need to be addressed in developing a site specific NPS are the very issues most likely to concern a community. Further thought might be given to involving community representatives, through the proposed community working groups, in helping to develop the local NPS.