



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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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):

Address / Postcode:

Email Address:

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

No

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

Yes

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

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

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.

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? Nuclear Institute

Who does this organisation represent? Professional membership body for the Nuclear Industry

What type of organisation is it?

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

	Organisation
<input type="checkbox"/>	Local Authority
<input type="checkbox"/>	Local Enterprise Partnership
<input type="checkbox"/>	Civil Society Group
<input type="checkbox"/>	Regulator
<input checked="" type="checkbox"/>	Charity
<input type="checkbox"/>	Business
<input type="checkbox"/>	Non-Governmental Organisation
<input type="checkbox"/>	Religious Organisation
<input type="checkbox"/>	Academic Institution
<input type="checkbox"/>	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?

<input type="checkbox"/>	1 – 10
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<input type="checkbox"/>	11 – 49
<input type="checkbox"/>	50 – 249
<input type="checkbox"/>	250 - 999
<input checked="" type="checkbox"/>	1000 - 4999
<input type="checkbox"/>	5000 or more
<input type="checkbox"/>	Don't know

How did you assemble the views of your members?

Please answer here [Click here to enter text.](#)

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?

<input checked="" type="checkbox"/>	Gov.uk website
<input checked="" type="checkbox"/>	National Media
<input checked="" type="checkbox"/>	Social Media
<input checked="" type="checkbox"/>	Local Media
<input checked="" type="checkbox"/>	Professional Body
<input type="checkbox"/>	Non-Governmental Organisation (NGO)
<input type="checkbox"/>	Other
<input type="checkbox"/>	Prefer not to say

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

Please answer here: [Click here to enter text.](#)

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 welcome the flexible approach outlined in the consultation document when defining communities. As noted in the consultation, such flexibility is necessary and the approach needs to be both location and project specific. We recognise, however, that as a result of such flexibility, there remains significant uncertainty as to how refinement of the communities can proceed. It would therefore be beneficial if the Working with Communities document more clearly set out the process for this refinement to take place, to enable it to proceed in an effective and timely manner.

It is likely that the potential host communities could be defined by the impact of the surface facilities, the transport routes (during construction and operations) and the communities directly above the underground layout, as introduced in para 4.17. We would therefore note that there may be communities outside the host area who may also need to be engaged in the process, to ensure they do not seek to adversely impact the process.

The consultation document provides no indication how differences of views will be resolved during the whole process. The approach to the resolution of differences of views needs to be transparent and robust, since otherwise decisions on the affected communities have the potential to become political, divisive and with the potential to delay the process through litigation.

The role of the independent chair of the Community Partnership and facilitators form a key role in decision making and dispute resolution. It is crucial that the appointment of the independent chair and the independent facilitators occurs at the earliest opportunity. In the

absence of such a chair, or a dispute as to the appointment of such a chair, we suggest there is an ability to seek wider independence, such as from an existing independent body, such as the Electoral Reform Society.

The document seems to exclude the possibility of the delivery body approaching potential interested parties based, for example, on informal discussions that have been taking place during the (current) awareness raising stage, or based on the National Geological Screening output. We envisage a better outcome if the deliver body can make the initial approach.

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.

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?

Please answer here:

In general we support the principle of formative engagement and the use of an appropriately constituted team. We recognise, however, that the key success factor will be providing the communities with enough information to support their decision makers. Given the complexity of the issue, communities should be offered a number of routes to receive information. This is particularly important in areas with no nuclear facilities.

Para 7.33 to 7.38 in the 2014 White Paper makes specific reference to this issue and provides a much clearer process by which the potential community can access third party information. It would therefore be beneficial if the approach described in the White Paper was included in the Working with Communities document.

In the consultation document, Para 4.40 and 4.47 notes the potential role of e.g. regulators, this seems to be available in later stages of the process, but not at the formative stage. It would be useful to recognise the benefit of their engagement at this earlier stage.

In addition, since the delivery organisation may be perceived to be an interested party in terms of securing potential host communities it is important that information is available from a range of sources. As the process progresses the delivery organisation will need to build a position of trust within the community, such that it is an accepted source of reliable information.

This is possibly the stage where most trust is needed, i.e. in advance of any detailed geological information being available, but when the local communities are seeking support to progress in the process. It is the stage where there is a danger that sufficient public opposition could make local willing communities feel isolated and unsupported.

There may be merit in being able to put interested communities in touch with each other (assuming they are willing to do so). At that stage they will not be seriously competing with each other to progress in the process, but they could provide mutual support.

We believe that regulators, nuclear industry, learned bodies etc. should be available and empowered to provide relevant information, at the request of local stakeholders. History has shown that a small number of motivated opposition groups/individuals can sway public opinion and for the experts to have an available voice could help maintain a constructive tension that leads to an informed position. It is important that the range of expertise available covers a range of disciplines (e.g. experts in radioactive waste, transport safety, geology, construction etc.) such that information is available to consider the multi-barrier approach to demonstrating long term safety of a GDF.

Given there may be several communities involved in the formative engagement process nationally, there is merit in having both a central team and local teams available to provide support, both potentially from the delivery organisation. Different geological environments and e.g. transport infrastructure will require specialist information that is more credible from a local expert group; whereas the central team could provide consistent information across all communities engaged at this stage of the process.

It is important that equivalent expertise be available to all potential communities such that no community can claim that decisions made are inequitable and raise a judicial review. But, also, so that local teams have a route to seek additional information as needed.

Paragraph 4.25 notes that "...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." It would be beneficial if the Working with Communities document recognised that the process can proceed if there is an interested community without all levels of local authorities being engaged or 'content for it to continue'.

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.

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

Please answer here:

We believe that the consultation document in this aspect is very difficult to understand, which could cause delays or division when forming the community partnership, or during the lifetime of the process and partnership.

The role of local authorities is very unclear and the consultation document does seem to give them a veto right from the start (and require early decisions). Each local authority has to decide whether or not to get involved, and if it does not whether it is content for the process to proceed without them. As noted in our response to question 2, we would suggest that the role of local authorities is clarified and that they do not have the right to 'veto' an approach from a willing community.

The most concerning aspect in this consultation document is that a "single relevant principal local authority, is afforded the ability carry a motion with their vote (para 5.11)". This does not appear to be consistent with the 2014 "Implementing Geological Disposal" White Paper where it is stated in 7.9 that "UK Government is currently of the view that no one tier of local government should be able to prevent the participation of other members of that community". If such a veto is offered to a local authority (at any stage in the process) then this process is unlikely to succeed; and the final document would therefore benefit from amendment to align more clearly with the White Paper.

As noted elsewhere in this response, a GDF is necessary for delivery of remediation of legacy nuclear facilities, but also for enabling new Nuclear Build. Any delays in achieving an operating GDF will undermine public confidence in nuclear as a future energy source for the UK. A delayed GDF will also add significant cost to the taxpayer in terms of reducing the risks associated with decommissioning of existing legacy facilities.

We believe that access to independent views and expertise is crucial to enable effective and informed decision making at this stage.

The delivery body and local authorities are being granted seats on the Partnership. The document notes that the group may be around 12 in membership, but this number is not fixed. It is indicated that this is a number for the partnership to operate effectively; it is not clear, however, what happens if many more groups want to be represented.

It should be recognised that Partnership should be as inclusive as possible and not be constrained by numerical limits. If the Partnership itself ends up being quite large then it could establish an executive group to help with administration. The independent chair could be the arbitrator on decisions around this point.

It is very concerning that local authorities can choose to join the Partnership at a late stage in the process and, by joining, may be able to individually carry a motion with their vote, which would suggest that they can invoke a veto (5.11). This undermines the whole consent based process. It also suggests that local political elections may be dominated by pro- and anti-GDF election manifestos. Over such a lengthy process (envisaged of up to 20 years), political changes could allow short term tenures to stop the process, regardless of the progress to date.

It's difficult to see how the process is going to proceed to completion without the involvement of the local authorities, but they shouldn't be forced to make a decision about joining too early. So they need to be allowed to join when they are ready. If it becomes clear that a local authority isn't going to join in the Partnership then the delivery organisation may invoke a right of withdrawal or the Partnership could be structured to continue without their engagement; by having a clear community engagement mechanism incorporated into their working arrangements.

Para 5.4 states that “We also recognise that if the relevant principal local authority representatives do not support the launch of a test of public support, the Community Partnership will be unlikely to be able to launch any test of public support. Without a positive Test of Public Support, a final decision by the delivery body will not be able to be made to seek regulatory approval and development consent to proceed with the construction of a geological disposal facility at a particular site.”

Therefore if the local authority does not join in the Partnership, this may indicate that they will not support the launch of any test of public support. Therefore there will be a question for the delivery body to consider whether to invoke a right of withdrawal based on the involvement of the local authority if the Partnership does not have suitable arrangements for undertaking the test of public support.

It is welcome that funding will be available to support the communities to meaningfully engage with the process.

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?

Please answer here:

We welcome an approach that enables wider opinion to be considered by the Partnership. Open discussions can only be welcome and it provides a vehicle by which members of the public can express their views. Without this forum, members of the community may feel isolated from the process.

To avoid the vocal minority from having a disproportionate input, the formation of the forum needs to be carefully considered. Public meetings etc. tend to be attended by those with the more extreme views.

In the 2008 to 2013 process in West Cumbria, the delivery organisation was not empowered to communicate directly with the communities. We believe that direct access to the delivery organisation is key, in addition to regulators, industry etc. The wider community must have a choice to communicate directly with the developer.

We believe that there is a role for both formal and informal fora, to encourage the widest range of inputs to the process. Formal and public meetings may intimidate some with a valid input, so consideration should be made for those individuals. Fora could be online communities or other means to enable discussion.

This is a phase where community can be won or lost. Involving independent facilitators at this stage can help the extreme views (positive or negative) to be moderated to enable constructive dialogue.

5. 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:

The Community Agreement is a very key document that will have a significant influence as to whether this process succeeds or fails. Governance will play a key role in enabling effective and constructive progress.

As noted throughout this response, little mention is given on how disputes can be resolved from within a group of interested parties, where the views could be widely different.

The independent chair and facilitators will have a key role in this so that the Partnership can resolve such issues without escalation to other bodies.

If a community agreement is drawn up in one area of the country that differs significantly from the agreement in another area, there is a risk that this could form the basis of a request of a judicial review from individuals who are opposed to the process. We welcome the approach set out in paras 1.12, 2.4, 3.27, 4.9, 4.28, 4.41, 4.46, 4.77, 4.85, 4.91 to ensure consistency where it is essential.

As currently proposed, the Community Partnership defines the Community Agreement. But Principal Local Authorities may choose not to join the Community Partnership in the early years. If they (or another significant stakeholder) join the partnership at a later date, does that nullify the Community Agreement or, indeed, introduce a change to any approach previously agreed for decision making? Paragraph 5.11 suggests that once a Principal Local Authority joins the Partnership, they may be afforded the ability to individually carry a motion with a vote.

The policy needs to be clear as to whether a Community Agreement is legally binding throughout the whole process, or whether individual organisations can force a rewrite of the agreement at any stage.

As noted previously in this consultation response, the final document would benefit from amendment to align with the 2014 White Paper.

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.

6. 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:

There are many positive examples of how community investment funding can be provided and used.

But, the definition of the host community and the affected community being flexibly defined may lead to local tensions as to how the funding is used.

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.

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?

Please answer here:

We disagree with the current proposals for the “right of withdrawal”. The appetite of a community to enter into a process will very much depend on their ability to withdraw from the process, or on the powers offered to other parties to invoke a “right of withdrawal”.

As noted earlier, the experience in Cumbria during the 2013 process was that while the local borough views were supportive in continuing in the process, the views of the county could prevent the process continuing.

The proposal in paragraph 5.11 is interpreted by us as enabling the Local Authorities to invoke a right of withdrawal even during the formative stages. Whether it is individuals or groups who are considering entering the process, they are likely to provoke local opposition. Any ability of a local authority to stop the process at that stage is likely to dissuade the individuals involved from getting involved. In order to empower a Community Partnership, invoking a Right of Withdrawal must be clearly articulated in the Community Agreement.

A worst case example is if the process to secure a potential host community progresses for many years, only to fail very late in the process. That may result in a wasted e.g. 15 year work programme with the associated costs of the community funding, but also significant costs associated with site investigations and safety case/design work. The delivery body must work to minimise this risk.

The delivery body can invoke a “right of withdrawal” if there is a view that other potential host communities offer greater certainty of siting a facility. It is important that all decisions, documents and assessments are appropriately retained such that if other host communities are rejected, for whatever reason, earlier considered communities can be revisited.

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.

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?

Please answer here:

We welcome the approach of a test of public support. As with previous answers, through paragraph 5.11, a local authority may prevent such a test. Even launching such a test will be a divisive issue locally and as such a strong independent chair of the Community Partnership must be given the authority to resolve such issues.

One way for those opposed to a GDF in their area is to campaign strongly against such a test, particularly where the predictions indicate the test will support a GDF. We interpret the consultations as saying that if that test results in a positive vote the right of withdrawal ceases.

There may need to be clear criteria when such a test occurs, to avoid litigation that the test was being taken in the face of too many uncertainties.

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.

9. 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:

The consultation document is very confused in this area and the final document would therefore benefit from significant clarification. As noted previously, the key aspect is the 2014 White Paper that “UK Government is currently of the view that no one tier of local government should be able to prevent the participation of other members of that community”. There are many paragraphs that seem totally at odds with the aspirations in the 2014 White Paper. In our previous responses we identified a number of areas where and how this contradiction could be resolved and the final document would benefit from amendment.

We consider that there are too many means by which the process can be halted (or at least stalled by many years):

- 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.*
- Para 4.57: *whether a single relevant principal local authority is afforded the ability to individually carry a motion with their vote.*
- 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 duration of the process described in the consultation document, there are likely to be many local elections; and there is a risk that the power of the locally elected officials may result in these elections being focused on pro- or anti-GDF candidates. This is likely to result in withdrawals by the community. It is anticipated that there will only be one GDF, hence, if there is uncertainty as to where the GDF is sited, a community may decide that the disruption caused by the process is not worth the local political turmoil encountered.

We strongly believe that there should be no political veto.

Other Views

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

Please answer here:

We believe that in order to fully reflect the principle of 'consent based siting', the consultation could be more inclusive of approaches. Para 4.22 says "...discussions with the delivery body can be initiated by anyone with an interest in the geological disposal facility siting process." This seems to exclude the possibility of the delivery body approaching potential interested parties based, for example, on informal discussions that have been taking place during the (current) awareness raising stage, or based on the National Geological Screening output. Should there be more flexibility such that the delivery body can make the initial approach?

The document is silent on the consistency between England/Northern Ireland and Wales. Wales is proposing a similar siting process, but the planning regimes are different (the NPS only applies in England) which needs careful treatment.

The role of the independent chair of the Community Partnership and facilitators form a key role in decision making and dispute resolution. It is key that appointment of such an independent chair and the independent facilitators occurs at the earliest opportunity.

The current consultation is sufficiently unclear such that a policy derived from it may be very unlikely to succeed.

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.