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### **Site Selection Process for a Geological Disposal Facility**

To whom it may concern,

Please find enclosed the response of Shepway District Council to the Government's consultation regarding the review of the site selection process for a Geological Disposal Facility.

Shepway District Council is one of the few authorities in the country to have direct experience of the current siting process and consequently, is pleased to be able to share its knowledge and learning with Government to help improve the national siting process.

This response has been approved by a meeting of Cabinet on the 27<sup>th</sup> November 2013.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A Clifton-Holt'.

**Councillor Alan Clifton-Holt**  
Cabinet Member for District Economy

A handwritten signature in black ink, appearing to read 'Susan Priest'.

**Dr. Susan Priest**  
Corporate Director, Economic Development

## REVIEW OF THE SITING PROCESS FOR A GEOLOGICAL DISPOSAL FACILITY

### **Question 1**

**Do you agree that a test of public support should be taken before the representative authority loses the Right of Withdrawal? If so, what do you think would be the most appropriate means of testing public support, and when should it take place? If you do not agree with the need for such a test, please explain why?**

The main points the council would like to make in response to question one are:

1. The council endorses the principle that local people should have the final say in any decision regarding the siting of a GDF in their community. Therefore, the council supports the 'Community Right of Withdrawal'.
2. The Government needs to define the term 'community' more precisely and explicitly. As a starting point, it could define the local community as the people living in those wards that are principally affected by the siting of a GDF in their community (even if this crosses district boundaries).
3. The council encourages the Government to make sure that the process in the 'learning' and 'focusing' phase is about transparent information provision – rather than persuasion – and for information to be provided **before** any public consultation.
4. The council recommends that multiple measures/methodologies are used to gauge public opinion throughout the 'focusing' process and that no single measure / methodology will establish the level of public support for a GDF.
5. The council would recommend that public opinion is regularly tested throughout the process.
6. The council believes that a definitive test of public opinion is needed at the end of process before the 'Right of Withdrawal' is lost. The Government should publish clear guidance on its view of the minimum level of public support needed to support any GDF proposal in a community. This guidance should cover thresholds and a clear, unambiguous, and transparent methodology.

The council would like to make the following observations:

First and foremost, Shepway District Council endorses the principle that local people have the final say in deciding whether or not a GDF should be sited in their community. The council believes, therefore, that it is essential for there to be a test of public support before a representative authority loses the Right of Withdrawal. Moreover, potential host communities may well be concerned about entering into the process (as set out in the consultation) if they could not be certain that a Right of Withdrawal would remain until they had sufficient information to form their views and had adequate opportunity to express these views to the authority representing them.

However, the Government needs to define the term 'community' more precisely and explicitly, as this will help the Government clarify its position with regard to other parts of



the revised siting process (e.g. which community can exercise the Community Right to Withdraw). As a starting point, the Government could consider the local community as the people living in those wards that are principally affected by the siting of a GDF in their community (even if this crosses district boundaries). An example of how this could operate in practice is the Marsh Million – a £1 million, three-year, economic growth fund for the Romney Marsh (where Dungeness A and B are sited). It is funded by the Magnox socio-economic programme Kent County Council, Ashford Borough Council and Shepway District Council. There will be other important communities that need to be part of the GDF siting process – they include the local business community, the local economic area (e.g. the travel-to-work area) and people living within the district boundary of the representative authority.

In order to be a credible representative of the views of a community, the representative authority needs to be able to demonstrate that its judgement (whether or not to exercise the Right of Withdrawal) is based on clear evidence of the wishes of the local community.

A single means of testing public support cannot provide an adequate barometer of the views of a local community, as all approaches have some inherent disadvantages which mean they may not accurately reflect the views of the whole community.

Instead, the council suggests that the Government considers adopting a framework which would incorporate several different approaches to public consultation in order to reach an objective and independent evidence-based assessment of all views expressed. Based on the experience of the Shepway District Council when undertaking public soundings using the previous process, the council would like to make the following observations:

1. 'Voting', including through referenda, can be problematic if carried out before adequate information is available for people to develop a fully informed view. It also tends to attract opinion from those with strong views – whether for or against – rather than those who may have a more balanced, open or as yet undecided view and for whom a simple Yes/No response is inappropriate. Voting and referenda may therefore not properly reflect the view of the whole community, although as an established method of democratic representation they should certainly be used as part of a wider assessment of views.
2. Polls carried out by independent polling companies can have value if the sample is stratified and size is sufficiently large to be representative and have statistical credibility. However both random street and phone-based interviews can favour certain types of respondent so may not be truly representative of the whole community. They can however help to establish the views of those who may not wish to vote and of young people who may be ineligible to vote.
3. Some form of geographic weighting of people's views would seem to be reasonable in principle – i.e. the closer people live to the potential site the greater their view should count. However, agreeing how this should be done is far from straightforward. Government guidance on best practice in the specific context of geological disposal would therefore be helpful and could avoid the representative authorities having to justify the approach taken and suspicions that it was chosen to favour a particular outcome. In addition to considering location (possibly assessed

by addresses registered for voting) the weighting method also needs to allow for the views of other political bodies, Government agencies, businesses, commercial and non-commercial organisations, interest groups, second/holiday home owners, tourists and other interested parties.

4. The level of support which would represent a mandate for proceeding further is an important issue that needs to be addressed by the Government up front. It was an issue that arose (but not resolved) during Shepway District Council's 'soundings' process. Many questions arose, for example whether a simple majority vote would be sufficient, or whether a greater or lesser level would be appropriate and if so what level? What if the number of people who supported proceeding further (or not proceeding further) was greater than the number that opposed but was still only a minority of the whole community because many people had not expressed a view? Government guidance on what constitutes an adequate level of support for any particular decision would be helpful to authorities and would give clarity and assurance to local people.
5. It is suggested that public support should be tested more than once during the process and not just before any decision leading to loss of the Right of Withdrawal. Moreover, the required level of support should increase as more information becomes available, reaching its highest threshold for the final decision before the Right of Withdrawal is removed. Conversely, lower levels of support should be acceptable in the early stages when less information is available, and because no final decisions are being made. This approach would demonstrate a community's continuing commitment to the process at various stages in order to justify the next stage of Government expenditure.

The council also recommends that any representative authority considering testing public support should engage a recognised and accredited communications company to develop a strategy designed to ascertain and provide objective evidence of the views of the whole community. This strategy should be widely consulted on, including within the potential host community, before being formally agreed by the authority. There should also be a clear understanding of the likely 'margin of error' in the approach taken so that this can be taken into account when the authority considers the evidence obtained. Public support for this approach is likely to be greater if the company engaged is well known and respected.



**Question 2**

**Do you agree with the proposed amendments to decision making within the MRWS siting process? If not, how would you modify the proposed phased approach, or, alternatively, what different approach would you propose? Please explain your reasoning.**

Shepway District Council is supportive of the proposed amendments to the decision-making process. The council would like to make four specific points in response to the consultation:

1. The council supports the change whereby any local body (and not just a district or county council) can approach the UK Government to find out more about the siting process and whether it could be relevant to their local area. However, the council would stress that the body should have a recognised connection with the local area (similar to the provisions in the Localism Act 2011)
2. The council welcomes the greater clarity that has been provided in the proposed new process regarding where local decision making power sits. The council agrees with Government that the level at which a host community's Right of Withdrawal is exercised (the 'Representative Authority') should be the District Council (or equivalent) in England.
3. The council reiterates the point made in response to question one, that a single measure or means of testing public support will not provide an adequate barometer of the views of a local community. In addition, communities should be given multiply opportunities to confirm their support throughout the process (as more information is established), accepting that there is likely to be a lesser level of support in the early stage of the process when less information is available.
4. The council believes that it is important to expedite the illustrative timescale shown for the 'focusing' phase, especially with respect to exploratory operations, so as alleviate any uncertainty within an area as quickly as possible.

The council would also like to make the following additional observations.

Firstly, it appears that the proposed new process is likely to result in a greater level of interest from communities in the decision-making process, as any local body can initiate the process. Previously, only district or county councils could do this. This may result in new communities deciding to come forward to enquire whether a GDF could be relevant to their local area. The council considers the revised process whereby local bodies can initiate the process accords better with Government's localism agenda than the previous GDF siting process. The council believes that this is likely to result a greater level of interest from more communities, than compared with the previous process.

Secondly, the proposed new process does not have formal stages (as was the case with the previous process) and so no formal decisions are required by the representative authority with the exception of whether to withdraw from the process. The council's view is that this will allow for a more considered view to be taken but only once sufficient

information has been gathered to address any specific issues and concerns raised by local communities.

Thirdly, whilst the Right of Withdrawal is the only key decision that a representative authority has to make, the council believes it will be difficult for such a decision to be made until the point when all the community's issues have been identified and answers are provided as to how these issues will be addressed. Only then will it be possible to enable the final test of community support to be undertaken.

Alternatively, if public support is tested more than once during the process, then the council suggests that Government should provide further guidance as to the minimum level of support that would be acceptable to enable a community to remain in the process. The Government should also make clear the minimum level of support that would need to be demonstrated in the final test of community support. This additional clarity would give assurance to local communities.

Finally, it is not sufficiently clear within the consultation document whether or not the Representative Authority has an opportunity to consider the outcome of the final test of community support and then formally and finally decide whether to exercise its Right of Withdrawal.



### **Question 3**

**Do you agree with this approach to revising roles in the siting process set out in the White Paper? If not, what alternative approach would you propose and why?**

Based on its limited experience of the previous MRWS process, Shepway District Council considers it important that key stakeholders are able to take a more prominent role in the siting process and at an earlier stage. Therefore, the council is supportive of the revised roles for a number of organisations, as set out in the consultation document.

The council has four specific points to make regarding the revised roles:

1. The council agrees that district councils are the appropriate body to perform the role of the Representative Authority and the council endorses the four roles for the Representative Authority. However, the Government must recompense in full any council which assumes the role of a Representative Authority.
2. The council welcomes the proposal for the District Council Leader of the community concerned to chair the Steering Group during the 'focusing phase'. However, it is felt that the County Council (in a two-tier area) should be represented on the steering group.
3. It is the council's view that there needs to be an independent, impartial body in the process because it is important that all stakeholders / local community can trust the process. The council would welcome greater clarity about which organisation / local body will perform this role.
4. During the learning phase, Government must frame the national debate and raise public awareness of the issues associated with the geological disposal of nuclear waste.

The council would also like to make the following additional comments:

Firstly, the council welcomes the Government proposal that district councils are the appropriate body to assume the role of the representative authority in the new process. Moreover, the Council endorses the four roles for the representative authority set out in the consultation document being; (1) to represent the views of its community in discussions with the Government; (2) to decide whether to exercise the Right of Withdrawal; (3) to ensure emerging community concerns are addressed; and (4) to take the final decision to volunteer to host a GDF.

However, it must be recognised that any Representative Authority would be unlikely to have the all the capacity or expertise in-house that it would need to manage a project of this scale (once the community is in the focusing phase). There needs to be a mechanism where by the Representative Authority is able to 'buy-in' additional independent support where required and this should be funded with the agreement of Government. A more general point is that the Representative Authority needs to be properly resourced by the Government – councils will not be able to perform the four roles envisaged from existing budgets. The funding mechanism that the Government puts in place (perhaps a grant or a system of recharging) needs to be clear, efficient and fair.

Secondly, the council welcomes the proposal for the District Council Leader of the community concerned to chair the Steering Group during the 'focusing phase'. The Government may wish to consider adding a county council representative (in a two-tier area) to the steering group given some of the strategic functions of the county council like skills and transport, which will be important in ensuring that a local community is able to take full advantage of the opportunities a GDF facility may provide. A risk with setting up a structure with a steering group and a consultative partnership (as proposed) is that county council feels excluded from the decision-making. It would be better for all the key stakeholders to be members of one group (for example the Romney Marsh Partnership structure, which was formed in response to the decommissioning of the Magnox nuclear power station at Dungeness and which aims to secure a sustainable economic future for the area).

Thirdly, trust is a very important issue for local communities – they must be able to trust both the revised process as well as the local bodies who are undertaking work and taking decisions on their behalf. The council believes that it is important that there is an independent, impartial body throughout the whole of the 'learning' and 'focusing' phases and would welcome greater clarity about who that body should be. The Government could consider using a mix of independent experts to provide information on particular topics – for example the BGS for geological expertise and the HSE for nuclear safety. Importantly, local communities must be able to hear directly from those independent experts – either in public meetings or published reports – without going through an intermediary.

The Government may wish to address the point about the objectivity of the representative authority through the process. For example, should it be required to remain impartial in the process (i.e. not to actively promote nor dissuade its community from the idea of a GDF) or can it express a view publically (either one way or the other) regarding the merits of a GDF in its area? This would need to be reconciled with its proposed role to accurately reflect its community's view in its deliberations on whether to exercise the Right of Withdrawal. Alternatively, the 'consultative partnership' could be the independent local body and if so, its impartiality would have to be part of its terms of reference.

Fourthly, the council believes that it is important for any representative authority to actively engage with its local community once the process has started, in order to identify and seek answers to the issues raised by local communities. This will ensure that these issues are addressed within the socio-economic report commissioned by RWMD.

Fifthly, the council believes that regulators should have a more prominent role in the new process, as is proposed in the consultation document. The regulators should be able to engage with communities to address the many safety and environmental issues that are likely to arise. The council's view is that this can be best achieved through a requirement for the regulators to be members of the Consultative Partnership.

Finally, the council agrees that the Government should take a more prominent role to frame the national debate through a national public awareness and engagement programme. The council believes that this will lead to a more informed debate within local communities regarding the arguments both for and against siting a GDF facility in their area.



The need for greater public awareness and information regarding the issues associated with a GDF was demonstrated during the community consultation Shepway District Council undertook using the previous process. It is the view of the council that local communities were unaware of the legacy issues associated with the nuclear industry in the United Kingdom and the Government's policy for disposing of this waste. This resulted in people taking a view on the GDF debate based on rumours and hearsay rather than established facts.

#### **Question 4**

**Do you agree with this proposed approach to assessing geological suitability as part of the MRWS siting process? If not, what alternative approach would you propose and why?**

The council is supportive of the revised approach to assessing geological suitability. Its main responses to the consultation are:

1. The council agrees that there is a need for **more information earlier in the process**.
2. The council's view is that Government needs to re-examine the phasing of this work as it could potentially take up to 15 years, which is too long. Long periods of uncertainty can be damaging for local communities and business. It is better to try to speed up the work so that local communities can take an informed decision as soon as possible.

The council has the following comments:

Firstly, information on geological suitability should be provided much earlier than proposed in the previous process. The experience of the council during the 'soundings' process previously carried out in Shepway was that there was little understanding among local people about geology in general and the local deep geology in particular. The almost complete lack of any information led to widespread confusion and concern about the likely suitability of the local geology, particularly with regard to safety.

Secondly, the council agrees with the Government's reasoning for not proposing to carry out 'suitability' and 'unsuitability' screening at national level and its proposed phased approach. The council also appreciates that there must be an acceptance (without commitment) of the Government's offer to find out more before costly work by the BGS can be authorised for any particular area.

However, the council notes that this approach will mean there will be little local geological information available at the beginning of the 'Learning' phase. This can lead to confusion and concern, as experienced by communities in Shepway during the previous process. The council suggests, therefore, that the pre-launch and launch work described in the consultation paper (3.14 & 3.15 respectively) be as informative and accessible as possible. The 3D geological model in particular requires further development so that it is as accessible as reasonably possible for people with limited ICT skills, living in areas with poor broadband, without computers and internet access and/or with little or no knowledge of geology.



**Question 5**

**Do you agree with this proposed approach to planning for the geological disposal facility? If not, what alternative approach would you propose and why?**

The council supports the proposed approach to planning for the Geological Disposal Facility, as set out in the consultation document. In particular:

1. The council agrees that the construction of a GDF and the associated site investigations should be brought within the definition of a national significant infrastructure. The council welcomes the consistency this will provide.
2. The council welcomes the proposed National Policy Statement, as it will provide clear criteria against which the provision of a GDF will be determined.

It is the view of the council that any application for a GDF should be sought through and brought within the definition of a 'Nationally Significant Infrastructure Project' and by setting this out uncertainty is avoided. The likely consultation arrangements and involvement of the District and County Councils, statutory and non statutory consultees and members of the public within this process should be explained (in general) from the outset (3.34-3.36).

The Council supports the proposed amended approach to site investigations being brought within the definition of a 'Nationally Significant Infrastructure Project'. It is the view of the council that an approach to intrusive investigations being determined by the Planning Inspectorate is a positive development as it will ensure consistency of decision-making and consultation processes across the country.

The Council considers the publishing of a National Policy Statement (NPS) will provide clear criteria against which the provision of a GDF can be determined. It maintains a planned approach which would sit well alongside the requirements of the National Planning Policy Framework (NPPF). The Appraisal of Sustainability (AoS) of the NPS, together with a Habitat Regulations Assessment (HRA) of the Statement will further ensure that the social, economic and environmental effects of the NPS have been considered. In addition, they will provide initial criteria against which individual sites that come forward can be considered so as to ensure that if more than one site is available options are robustly tested.

**Question 6**

**Do you agree with this clarification of the inventory for geological disposal – and how this will be communicated with the volunteer host community? If not, what alternative approach would you propose and why?**

The council main points with regard to the inventory for geological disposal are:

1. The council welcomes the proposal to clarify the inventory and the Government commitment to provide more information for local communities.
2. It is crucial that the Government provides adequate information to be able to reassure the public about safety, volume and types of waste to be stored in a GDF. The Government should also provide information on the upper limit of the size of the inventory and should share this information with local communities, as part of the learning and focusing phases. Transparency on this matter is critical.
3. The Government should consider introducing a mechanism to recompense the community if the size of inventory should grow in the future (or above what is agreed when a GDF is constructed).
4. Information needs to be accessible to all members of the community.

The council has the following comments it would like to make:

Shepway District Council agrees that the waste inventory should contain information about waste types, estimated volumes and anticipated transport movements. Moreover, the council believes that local communities should be provided with clear information about the radiological content of the waste (including radioactivity levels, half-lives, potential for migration etc). It may not be appropriate to provide this information in the same place as the inventory but it should nonetheless be readily available to be read in conjunction with it.

The council suggest that this information – along with all other information relating to geological disposal – should be communicated to local communities on a 'layered' basis. In practice this means initially providing high level and relatively simple information at first but make additional information available with the ability to "drill down" to increasing levels of detail. This will mean that people need not be put off by complex technical information and can find information at a level that suits their needs and level of understanding. This information could be provided on the website of the representative authority or the Consultative Partnership (if a separate website is created).

The council believes that communication of information relating to the GDF siting process needs to be done using a variety of communication channels and not just through websites. In order to raise public awareness this should include television, radio, social media and information in community settings (e.g. local libraries, community centres etc). Ideally – if funding and staff resources allow – there should be at least one permanent exhibition in the potential host community area so that people can access information whenever it suits them. This should be supported by access to suitably knowledgeable staff to answer any questions not covered by the published materials.



The Government needs to consider how it can make greater use of social media – not in isolation but combined with public meetings, community events and traditional media communication channels, as part of an integrated communications strategy. Another important issue that the Government needs to address is the speed and accuracy of communications, which is where social media can be a useful tool. It can be used to have a dialogue with local communities, correct inaccuracies or misunderstandings and share information quickly (e.g. after a community event).

The council considers it likely that any potential host community will be concerned that the waste inventory does not increase significantly from the moment the Right of Withdrawal can no longer be exercised (i.e. the community has agreed to host a GDF). The Government should, therefore, estimate the upper limit of the size of the inventory (based on the best available forecasts) and should share this information with local communities, as part of the learning and focusing phases. The baseline inventory should therefore include a forecast of all possible future waste that will be stored in the GDF. Local communities may find it helpful if the Government makes a distinction between legacy and new-build nuclear waste. Government may want to explore more fully a connection of a waste facility for storage with those areas that have an active generating facility.

If it is not possible to forecast upper limit of the size of the inventory, there should be an agreed mechanism where by local communities can agree to and benefit from any increase in the volumes of waste being stored in a GDF over and above what was accepted originally through the Community Benefits package (see response to question seven).

#### Question 7

**Do you endorse the proposed approach on community benefits associated with a GDF? If not, what alternative approach would you propose and why?**

The council's main points regarding the proposed community benefits package are as follows:

1. The Government should be very explicit with local communities about any community benefits package associated with a GDF **at the very earliest opportunity**. This would correct a significant problem with the previous siting process and would allow local communities to make an informed decision about approving or rejecting any GDF in their area.
2. The council recommends that the Government should provide **more information earlier in the process**. This information could include: the size of the community benefits package; the purpose of the package and what it can be spent on; the phasing of payments to local communities; and the governance arrangements for administering any community benefits package.
3. The Government needs to improve the way information is communicated to the public so that people can see what any proposal would look like, how it would work, and what a community benefits package might consist of.
4. The Government needs to amend its proposals to consider more than community benefits but also potential opportunities to develop local economies and business supply chains.
5. The council proposes that local communities are able to draw down funding earlier in the focusing phase.
6. The Government should consider revising the structure of the community benefits package to include a fixed payment (for construction of GDF) and a variable payment (per tonne of waste – dependent on type while bearing in mind the storage requirements of the waste matter to be stored).

Shepway District Council is broadly supportive of the proposal to develop the community benefits package associated with a GDF. The council's own experience to date endorses the need for a clearer understanding of what community benefits package is potentially available both in terms of the amount of funding but also what it can be spent on. With regard to the proposed approach, the council has the following observations.

Firstly, the council welcomes the Government's commitment to "make clear, early in a revised siting process, the potential scale of community benefits". This will assist representative authorities to facilitate a debate about the merits of any GDF with local stakeholders. However, an important issue for the Government to address is how it can improve the way information is communicated to communities. The Government needs to improve the way information is shared with the public so that people can see what any proposal would look like, how it would work, and what a community benefits package might consist of.



Secondly, the council believes that local communities should be able to access the community benefits package earlier in the process. In the consultation document, the Government makes the distinction between the 'learning' and 'focusing' stages. During the learning stage, the Government envisages that "participating communities and their neighbouring local authorities could begin to scope projects for funding through community benefits, informed by the study on socio-economic prospects for the area". The "UK Government would start paying benefits during the 'focusing phase'. The remainder of the available funds would be paid, including into the community fund, following the final decision to construct a GDF and during the early years of underground operations".

The view of Shepway District Council is that the Government should make some form of community benefit package available as early as possible in the focusing phase so that communities can prepare for a GDF in their area and as a way of ensuring that local communities can see some tangible benefit from a hosting a GDF. It may be appropriate for a Community Fund to only be established once a community has agreed to host a GDF in its area. In which case, the Government may need to distinguish between an initial community benefits package which all areas entering the focusing phase can access and the larger Community Fund, which is only available to the community, which grants consent for a GDF.

Thirdly, the council does not think that payments to a Community Fund should be restricted to the early years of underground operations but rather payments should cover the lifetime of the GDF. The council suggests that the Government reviews the structure of the community fund and in particular it should consider adopting both a fixed and variable element to any community benefit package.

The fixed element could consist of a community benefits package available to all areas, which proceed to the 'focusing stage' and a Community Fund, which would be made available to a community once consent is granted to site a GDF in their area. The fixed sum paid into the Community Fund would relate to the construction of the GDF facility itself and would be used to help the local community benefit from the development of this nationally significant infrastructure project (e.g. to fund skills and training packages for local people, improve transport links, develop local supplier networks etc).

The variable element could consist of ongoing payments paid into the Community Fund throughout the lifetime of the facility, possibly based on payment per tonne of nuclear waste stored in the GDF and which could vary with the type of waste stored at the facility. This means the size of the Community Fund would grow relative to the amount of nuclear waste stored in the GDF. This would negate (to some extent) the need to go back to the community if in the future the Government wants to increase the size of any GDF beyond that originally approved by the community. Moreover, it would mean that money would build up into the fund over time so that future generations could benefit from the community funding package. This is only fair as they will live with the legacy of any decision to site a GDF in their community. And importantly, it allows the Government to stagger any payments into the fund over a longer period of time rather than paying it all up front, which could be an important consideration given the state of the nation's finances. Payments would be funded, at least in part, by charges the Government makes of waste producers at the time of disposal.

Fourthly, the council believes that it would be helpful for the Government to issue further guidance regarding the purpose and scope of any community benefits package. This guidance could provide further information regarding what benefits the community fund is designed to deliver, as well as what it can be spent on.

These functions could include for example:

- Training programmes (including apprenticeships, traineeships)
- Support for local FE/HE provision in professions associated with the GDF
- Grant funding for companies to develop local supply chains
- Local transport infrastructure including better commuter rail services if the local rail infrastructure is upgraded in an area to transport the nuclear waste.
- Social housing
- Financial compensation for any reductions in house price for people living near the new facility
- Flood protection schemes
- Initiatives to promote green tourism

This extra information would assist participating communities to identify and scope potential projects, which could receive funding through the community benefits package.

The Government does not necessarily need to issue guidance at this stage but rather set out how these points will be addressed going forward. The council supports the view that any Community Fund should be additional to the Engagement Funding provided by central Government.

Finally, it would be helpful if the Government publishes further guidance regarding the scope and governance of any community benefits package to help communities with this process. It would also be helpful to have further information about how any funding given to local communities would be administered and governed at a local level. In particular, it is important to know how decisions should be taken and which organisation would act as the accountable body for any public money spent through a community benefits package.



**Q8. Do you agree with the proposed approach to addressing potential socio-economic and environmental effects that might come from hosting a GDF? If not, what alternative approach would you propose and why?**

The council's main points are:

1. The council agrees with the proposed approach but reiterates the point that phasing is important. The Government should consider how it can conduct the socio-economic and environmental impact assessments at same time as the geological studies are being undertaken.
2. The council stresses the point that the socio-economic assessment needs to be based on local information (and not just national studies) in order to be able to properly inform the community benefits package.
3. The Government should make a distinction between economic impact (e.g. on house prices, congestion etc) and economic opportunities for the local business community that arise from the construction and operation of a GDF.
4. It is important that the process enables local bodies (either the Representative Authority or Consultative Partnership) to commission independent studies locally if they are deemed necessary and these studies should be fully funded by Government.

Shepway District Council agrees with the need to address environmental and socio-economic issues earlier in the process. The council believes that local communities need more information – particularly with regard to potential impacts at a local level – in order to make an informed choice regarding whether or not to consent to site a GDF in their area. In this respect, the council believes that there is limited use in providing generic information and more detailed studies need to be commissioned at the local level earlier in the process.

The council believes that it is important that local stakeholders receive relevant information in order to make an informed decision. To this end, the council proposes that representative authorities – or consultative partnerships – have the right to commission independent studies during the 'learning phase' of the process. Based on the experience in Shepway to date, it would be important to have greater information about the potential socio-economic impact of siting a GDF in a particular area including:

- The precise nature of the permanent and temporary job opportunities that will arise from the construction of the GDF including the number of posts, salary and range of positions (including skilled and manual positions).
- Information relating to the nature of the permanent job opportunities that will be created once the GDF becomes fully operational.
- An assessment of the opportunities that will arise in the supply chain for local companies.
- The impact on land values and house prices in the local area.
- Any impact on traffic flows and congestion in the local area during the construction and operational phases of the GDF.

The Government should make a distinction between economic impact (e.g. on house prices, congestion etc) and economic opportunities for the local business community that arise from the construction and operation of a GDF. For example, these opportunities could include the contracts that local businesses could win and what support / investment government could provide to allow local businesses to invest in new machinery, buildings, training opportunities etc. The opportunities to secure local economic growth are an important part of any community benefits package.

With regard to the environmental studies, the council understands the logic of undertaking more detailed studies when the process starts to focus on a few 'more suitable sites'. It is important, however, that the Government ensures that sufficient information is provided early enough in the process to address the environmental concern which will arise. Again, the council is proposing that representative authorities (or consultative partnerships) have the opportunity to commission independent studies should the need arise.

The council also supports the Government's transparency agenda. In keeping with this principle, the council proposes that it should be a requirement in the process that any studies that are commissioned are made publically available either on the website of the representative authority or on a dedicated website (e.g. one that is created for the consultative partnership).