



Agenda Item 9

Forth Green Freeport

Falkirk Council

Title: Forth Green Freeport
Meeting: Executive
Date: 17 October 2023
Submitted By: Director of Place Services

1. Purpose of Report

- 1.1 The purpose of this report is to provide the Council with an overview of progress on the Forth Green Freeport Outline Business Case (OBC), and to highlight key matters that should be considered in relation to the Forth Green Freeport.
- 1.2 This work aligns with the 2022/27 Council Plan Strategic Priority of supporting a thriving economy and green transition.

2. Recommendations

2.1 It is recommended that the Executive:

- 1. Notes the overall progress in establishment of the proposed Forth Green Freeport with current estimated operational commencement in Spring 2024;
- 2. Notes the forthcoming request for Falkirk Council Elected Member representation on the Forth Green Freeport Governance Board;
- 3. Agrees that the Director of Place Services is provided delegated authority to enter into any necessary agreements with other partners (and specifically Fife and CEC Councils) to ensure obligations on the Council as Accountable Body can be effectively and efficiently undertaken (ref para 5.11); and
- 4. Notes proposals for land-owner contributions for which the Council will be subject to for its tax site ownerships.

3. Impact on Climate Change Targets

- 3.1 The Forth Green Freeport proposals will support the reduction of carbon emissions in the local area. It will advance our capabilities to bring forward investment in Green Industries and support major industry to advance the UK's journey towards Net Zero by 2045. This includes renewable energy manufacturing at Leith, Rosyth, and Burntisland, with two significant expressions of interest in offshore wind manufacturing on these sites.
- 3.2 In Grangemouth, the focus will be on alternative fuel and carbon capture innovation. Green freeport incentives will enable the construction and operation of a world-scale blue hydrogen facility at INEOS in Grangemouth, with

capability for Carbon Capture, Utilisation and Storage (CCUS). Reform of the existing hydrocarbon-based industrial infrastructure in Grangemouth will require significant private sector capital investment. This can be accelerated with the provision of Green Freeport incentives.

- 3.3 All projects brought forward will be required to report on carbon savings over the lifetime of the project.

4. Background

- 4.1 In June and July 2022, Elected Members received briefings on the partnership bid for a Green Freeport for the Forth Estuary.

- 4.2. This bid was successful and was announced on 13 January 2023. The announcement confirmed the Forth Green Freeport and the Inverness and Cromarty Firth Green Freeport as the two successful bids. In February 2023 Executive agreed to:

1. Endorse the engagement of officers to develop the Outline Business Case (OBC) and Full Business Case (FBC);
2. Delegate authority to the Chief Executive, or his nominees, to sign-off and submit the final OBC and FBC to Government for approval by UK and Scottish Governments;
3. Act as the Accountable Body for the Green Freeport proposals with wide ranging responsibilities including distribution of development and seed funding, recruitment and retention of programme management staff, and appointment of consultants and technical advisors to support delivery of the OBC, FBC and support the Accountable Body requirements.
4. Work with Fife and City of Edinburgh Councils on the Green Freeport proposals;
5. Delegate authority to the Chief Executive, or his nominees to progress with other authorities and partners on arrangements for the Councils' role in the Green Freeport's governance structure and to consider the alignment with appropriate council governance requirements; and
6. That a future report(s) on progress, governance arrangements and required decisions for the Council's role in the Green Freeport's governance structure would be forthcoming in due course.

- 4.3 Regular briefings have been provided to elected members and requests for information on specific aspects have been responded to. This report provides a formal update on progress in relation to the establishment of the Forth Green Freeport.

5. Considerations

Governance

- 5.1 There has been significant progress in moving forward to formal designation and operation of the new Forth Green Freeport which is proposed to be operational from Spring 2024.

5.2 Governance – Board Establishment

An Interim Governance Board has been formed under the leadership of Charles Hammond OBE, Chief Executive of Forth Ports, and this has met twice. Two Council staff on this board are voting members. One to represent Falkirk Council's interests (Director of Place Services) and one to represent the Council's interests as Accountable Body. (Chief Finance Officer). Falkirk Council also provides secretariate to the Board as part of the Accountable Body role.

- 5.3 The Interim Board has agreed that they will be disbanded when an independent Chair is recruited, and a permanent board established. It should be noted that the Interim Board now also includes a Ministry of Defence representative to reflect the HMS Caledonia interests who have been added to the partnership together with Calachem Ltd.

- 5.4 The Interim Board has further agreed that the Chair will formally write to the Chief Executives of City of Edinburgh Council, Fife Council and Falkirk Council to ask them to identify appropriately experienced and qualified Elected Members to represent the interests of their respective Council areas.

- 5.5 The proposed membership of the permanent board is:

- Independent Chair (1)
- Accountable Body Finance Officer (1)
- Representatives from three Local Authority Areas (3)
- Industry and Landowner Representatives (4)
- Accountable Body Secretariat (non-voting)
- Technical and professional officers (non-voting)

- 5.6 The Board will oversee the establishment and management of the Forth Green Freeport and will be supported by five sub committees (currently sub-groups) covering key areas of operation, these are:

- Communications and Engagement
- Trade and Investment
- Innovation and Net zero
- Fair Work and Skills
- Infrastructure Communities and Place

- 5.7 The Board will set up the Forth Green Freeport Company and this will employ staff to carry and deliver the day to day operations of the Forth Green Freeport

5.8 Falkirk Council Accountable Body Role

As previously reported and agreed the Council will act as Accountable Body for the Forth Green Freeport. Being the Accountable Body means Falkirk can take advantage of operational synergies and complimentary investment proposals between our Tax Increment Finance, Growth Deal and Levelling Up investment programmes.

- 5.9 In summary, the Accountable Body role will be at the strategic centre for coordinating of OBC and FBC submissions to Governments. In addition, this role will have responsibility for establishing governance arrangements, and distribution of grant funding (including holding partners to account for these).
- 5.10 The Investment Programme Management Unit which sits with the Invest Falkirk Division and also leads on other projects such as the Falkirk Growth Deal has been successful in recruiting a number of key staff. These staff will provide the nucleus of the Forth Green Freeport Accountable body PMO (Programme Management Office) resource and are assisting in progressing the OBC development process, providing secretariate to the Interim Board and supporting the activities of the five sub-groups / committees. This team will expand and contract to meet the demands of all investment programmes as necessary.
- 5.11 At present, Falkirk Council staff have been entrusted with the role of “pen holder” and are coordinating activities with both public (Fife and CEC Councils) and private sector partners to develop the OBC. There has been significant input from the private sector and from both Fife and City of Edinburgh Councils to support the team.
- 5.12 As part of the establishment of the Accountable Body remit, appropriate agreements will require to be entered into with both Fife and CEC Councils to cover matters such as governance, distribution and application of support for infrastructure investments, financial support for the PMO and dealing with cross boundary activities (i.e. workforce and skills programmes). It is proposed that delegated authority is provided to the Director of Place Services to enter into necessary agreements such as partnership and funding agreements to ensure the Councils Accountable Body responsibilities can be effectively and efficiently discharged.

Progress to Date - Outline Business Case Development

- 5.13 The OBC is progressing and is following the Treasury Green Book five case method / model. This was outlined in the report on 14 February 2023. To recap, the five cases are the Strategic, Economic, Management, Financial and the Commercial Case. Initial indications are that there is no significant deviation from the initial bid proposal previously reported to Elected Members and

updated upon through stakeholder briefing sessions. An Executive Summary of the OBC is appended.

- 5.14 It should be noted that following the external analysis (undertaken by KPMG) of the Economic Case there is little difference between the OBC assessment and the initial bid assumptions, except the investment figure projection is £6bn which is slightly higher than previously reported. Direct employment numbers remain in line with the bid proposal with 50,000 jobs overall and 20,000 of these estimated to be from operations in Grangemouth and indirectly through supply chains. There will be a dedicated skills fund established under the Fair Work and Skills workstream to ensure that local people can gain the necessary skills to access jobs created. These jobs will be of good quality, well-paying, and sustainable. Analysis of the direct jobs that will be created by Forth Green Freeport shows that the wages are estimated to be significantly higher than the median wage of each authority area. For Falkirk this is estimated at 23% higher, with 15% in Fife and 7% in Edinburgh.
- 5.15 Overall, progress is positive. This is evident across all workstreams. This is a complex programme with intertwined workstreams. It involves the development and evaluation of regulatory frameworks and is driven by the development of a comprehensive OBC. The timetable has slipped slightly over the summer with completion of OBC moving to mid-November. This is approximately two to three months behind initial estimates. At the present time there is no indication that there will be any additional delays however, given the Green Freeports are entirely new and as such come with many interdependencies, governance, and regulatory implications, the possibility of further delay cannot be ignored.
- 5.16 The OBC is made up of multiple sections / parts and as each has been completed these have been reviewed by the Freeport Hub which works under the direction of the UK and Scottish Governments. So far only positive feedback has been received.
- 5.17 The OBC process aims to ensure that each of five business cases are clear, concise and robust. To achieve this significant activity has been undertaken to ensure that the proposed Forth Green Freeport demonstrates good governance and delivers the maximum benefits to partners, communities and wider stakeholders.

Outline Business Case – Financial Case

- 5.18 The OBC process require a robust Financial Case for the sustainability of the Green Freeport. This has been approached with the intention of ensuring that costs are kept as low as possible whilst recognising that Management, Board and workstream activities need to be supported. In addition, there will be ongoing costs associated with various other aspects to ensure delivery and co-ordination of activities (i.e. marketing, research, legal fees etc).
- 5.19 The current estimate is an operating budget of circa £800k per annum which includes Accountable Body costs, operating costs and legal and audit costs. The budget assumes contributions from the six main landowners towards

running costs, includes the remainder of the development funding (RDEL) and assumes that there will be retained Non-Domestic Rate (NDR) contributions from the three local authorities. The budget will continue to be developed and refined as part of the OBC process.

- 5.20 The retention and reinvestment of NDR represents a major benefit of the Green Freeports. Each Council will be responsible for the deployment of retained rates in their area. As well as supporting the Green Freeport budget set out above, this income can be used to enable complimentary infrastructure projects and stimulate the wider local economy through job creation, business space, economic activity and community benefits. The original Forth Green Freeport bid accepted by both Governments set out retained business rates from tax sites in Falkirk, Fife and CEC Councils. The estimates from the modelling work for the OBC are that up to £568m would be available to the Councils for infrastructure investment (dependent on level of investment being achieved).

Outline Business Case – Next Stages

- 5.21 There is a wide range of activities ongoing to progress the development of the OBC across all the workstreams. In summary, these aim to refine the original strategic outline / prospectus proposals and provide clarity on deliverables. Key activities include:
- Progressing initial seed funded infrastructure investment proposals;
 - Development appropriate agreements between partners and the Accountable Body (Falkirk Council); and
 - Finalising arrangements for the Forth Green Freeport Board including appropriate representation from all three Councils.
- 5.22 The timeline for OBC completion and submission is November 2023, with an expectation that approval to move to FBC by Scottish and UK Governments will be received in Dec 23 / Jan 24. This will allow progression for FBC submission in March / April 24, with approval hopefully enabling operational commencement in late Spring / Summer 24.
- 5.23 For clarity, the FBC process involves further refining, revising and updating the five-case model of the OBC, taking account of Government feedback as well as any new information or analysis. The FBC is more focused on detail and assessment and will require the finalising of elements such as management arrangements, risk management plans, benefits realisation and monitoring and evaluation.

6. Consultation

- 6.1 This report has been consulted on with Legal and Finance teams at the Council, as well as officers from across Place Services.
- 6.2 Elected members were invited to a briefing session led by both Council Officers and Forth Ports. These took place on-line and in person on 10th October. Further consultation with members and stakeholders will take place as the

process moves forward and a full communications and stakeholder plan is being developed to support this particularly as the FBC is progressed and operational commencement becomes closer.

7. Implications

Financial

- 7.1 The development of a Forth Green Freeport enables companies within designated areas access to additional tax and funding benefits. From a Council perspective it enables retention of NDR secured from new business locating within the Green Freeport Tax Sites. This funding can then be utilised to support the wider development of the local economy through direct investment in strategic infrastructure. Subsequent investment decisions for the Council will be subject to a business case process and will follow the Council reporting and decision-making processes for capital investment proposals.
- 7.2 Whilst Green Freeports seek to retain 100% of new business rates within the designated areas, Government require that this funding be largely used for additional activity such as infrastructure and environmental enhancements and other “levelling up” activity including investment in skills, as it relates to the Green Freeport objectives..
- 7.3 As Falkirk Council already has an active TIF programme, the interaction and integration of these obligations requires examination and financial scrutiny The development of the Forth Green Freeport and any final position in relation to the NDR must align with the Falkirk TIF programme. It is essential that there is no dilution of TIF resources or risk to this programme as a consequence of the Forth Green Freeport proposals. Discussions with UK and Scottish Governments reflect the Councils continued commitment to TIF.
- 7.3 The OBC under the ‘Financial Case’ will assess all monetary costs and benefits associated with Forth Green Freeport including capital and revenue requirements. This will include an assessment of the financial risks associated with the programme and a sensitivity analysis of the projections of retained business rates.
- 7.4 The Council has already drawn down £300,000 of RDEL funding for 2022/23 to support the OBC development process and will draw down a further £450,000 this financial year (2023/24). A further £250,000 RDEL funding will be applied for in 2024/25. This fund is ringfenced for the development of the OBC and FBC and supports the recruitment and redeployment of officers in Falkirk, City of Edinburgh and Fife Councils and the set-up of the Forth Green Freeport Company. It also pays for specialist consultants and any sundry costs arising from the bid process. Falkirk Council as Accountable Body manages the RDEL funding and reports to the Scottish and UK government on how it is spent.
- 7.5 On approval of the OBC and FBC, £25 million of seed funding will be released to Falkirk Council for the development of the Tax Sites named within the bid. This is ringfenced for capital projects that directly improve these sites and allow

investment to happen. A short-list of projects has been developed by Officers from all three Councils working with landowners and have been agreed to progress for inclusion in the OBC by the interim board. Falkirk Council as Accountable Body manages the seed funding distribution and monitoring process and reports to the Scottish and UK government on how it is spent.

- 7.6 Once the Green Freeport is operational, retained rates from the new investment on the tax sites, will be at the disposal of Falkirk, City of Edinburgh and Fife Councils for use on future Capital Projects (similar to TIF), within the geography of the outer boundary; these benefits are estimated to be up to £568m over the life of the programme. (25 years)

Resources

- 7.7 The delivery of the Forth Green Freeport represents a truly transformational opportunity for the Council area but to ensure delivery there are capacity demands across a number of areas which require to be adequately resourced. For example, to complete the OBC and FBC during this set-up phase in line with Government guidance requires input and expertise from across the Council (finance, asset management, strategic infrastructure, strategy, economic development, communities, legal, skills development & training and planning etc).
- 7.8 The Investment Programmes Management Unit is currently recruiting and has also engaged specialist consultants to ensure the Council is adequately resourced to ensure progress is made, and obligations are met. Private sector partners are also committing resources and have appointed specialist external technical, economic and financial modelling support. Funding of £1m as outlined in section 7.4 is provided to help support all partners in the development of the business cases and to establish the Green Freeport Operational Company.

Legal

- 7.9 There has been substantial development of the structures and governance frameworks for the Green Freeport model. Whilst similar to the English Freeports, there are many unique features that mean guidance is being written specifically, and detailed government guidance and legislation is in some areas being developed and awaited. An example of this is the treatment of NDR retentions.
- 7.10 This creates some residual uncertainty and risk in relation to the delivery and implementation of proposals. However, this is being mitigated through ongoing collaborative approach to the development of the proposals with both governments, partners and stakeholders.
- 7.11 The detail of the full legal and governance structure remains under development and is subject to agreement with both partners and government. The governance arrangements will be subject to principles of transparency and the Nolan principles for standards of behaviours.

- 7.11 The submission of the OBC and FBC in themselves are not legally binding, however the commitments within these will become obligations which the Council will have to ensure delivery of either directly or with partners as the Accountable Body. The Council has agreed to be the Accountable Body for significant public funds from government and to oversee governance arrangements to ensure compatibility with public sector requirements.
- 7.12 Final governance arrangements will be provided to Council for scrutiny. It should be noted that despite the Council's role as Accountable Body it is one of a number of partners and whilst representations will be able to be made on certain key elements of the business case and governance arrangements, decisions will be through the Forth Green Freeport Board.

7.13 Risk

Whilst risk can be mitigated through the use of appropriate contracts there will always be a risk which will remain with the Council if deliverables are not met. There is scope for the Council to have to repay funds or ensure delivery of projects. This type of arrangement exists in a number of settings, and generally can be managed effectively through Legal recourse to those responsible for deliverables. The Council has the necessary general statutory powers to engage in these arrangements at this point and to act as Accountable Body.

- 7.14 It must be recognised however, that the role of the Council as the Accountable Body and as a voting member of the Governance Board are distinct roles in themselves and should not be permitted to influence each other. In addition, the Council has specific statutory duties particularly around matters such as Planning Strategy and Development Management and Property where separate future decision making will also be necessary. These cannot also be influenced by other relationships with the Green Freeport. It is likely that there will need to be regulator or policy changes at both national and local level to deliver some elements that may emerge in the future. We will need to monitor these to ensure the Council remains operating within its powers.
- 7.15 The following table is a summary of initial risks that have been identified for the Council's role as Accountable Body and the Green Freeport generally. These are incorporated in more detail within the OBC and will be rigorously evaluated as part of the FBC process.

Risk	Profile	Mitigation
Falkirk Council		
Repayment of Funds – all grant funding comes with	Low	Falkirk Council has a good track record of leading initiatives across regional partners in a number of areas and has the trust of the public and private

conditionalities which includes repayment for non-delivery,.		<p>sector partners to be able to perform this function well.</p> <p>Falkirk Council will have the authority to hold to account any of the members of the bodies within the governance structure or projects, should they present a risk to the overall programme. A Grant Offer Letter between the UK Government and the Accountable Body will set out the terms and conditions attached to Green Freeport funding. These terms and conditions will be replicated in separate agreements between the Accountable Body and other partners, with any additional specific requirements necessary for Falkirk Council to fulfil its role as the Accountable Body clearly set out.</p> <p>The OBC process ensures that all financial risks are considered in depth and careful monitoring on our progress against the conditions of the grant will be a feature of the programme governance.</p> <p>We will ensure that these risk are minimised through ensuring robust vetting procedures, reviewing business cases and allocation of funding in phases. We will also ensure that appropriate risk transfer processes are in place to ensure that the risk is proportionate and shared with partners thus minimising the Council's exposure to risk</p>
There is a risk that Falkirk Council does not have the resources or staff to take on the responsibilities of the Lead	Low	<p>During the programme development phase there is £1m available to pay for the costs of developing the bid, and Falkirk Council has access to a proportion of this to cover costs of staff, legal expenses and other items associated with the development of the Forth Green Freeport</p> <p>By taking on the Accountable Body role Falkirk Council can coordinate the Functions of the Green Freeport with other investment programmes e.g. the Falkirk Growth Deal.</p>
Forth Green Freeport		
There is a risk that jobs created will be low wage jobs	Low	<p>Checks and balances through the Fair Work and Skills workstream will ensure that the jobs created will both be high quality and available to local people. There is a conditionality proposed that any company that locates to the Tax Sites and</p>

such as warehousing		receives incentives will commit to an ethical framework that includes fair work and equalities principles. In addition, there will be a skills fund created to support upskilling and new entrants. This will be written into the Green Freeport Investment Principles.
There is a risk there will be displacement of industry from other areas of the UK	Medium	In setting out the activities and industry requirements for the Forth Green Freeport there is a focus on industries in transition that need a particular set of circumstances to bring forward the technological advancements to take the country towards Net Zero. The range of private sector partners and interested investors include companies that are looking to work with the Chemical Industries to develop new energy sources and decrease dependency on carbon intensive energy, companies that are looking to develop off-shore wind that need the deep water of the forth and the onshore land availability to create and transport large structures. It is unlikely that these companies or industries would find these specific conditions outside the Forth Green Freeport area.
There is a risk that local residents will be impacted by the increase in activity around the Port and will lose green space	Medium	The Tax Areas are wholly enclosed by the current port and industrial complex, which means that no green space will be used in its development. The Green Freeport aims to positively impact on the communities adjacent to the ports, by bringing forward lower carbon manufacturing processes, local jobs and funds for infrastructure improvements. The governing body will have Council as well as private sector representation to ensure that community interests are upheld.

- 7.16 In addition to general risks such as those outlined above there is rigorous safeguards across the wider partnership to mitigate public concerns / suggestions that Freeports can have a number of undesirable consequences. These concerns are around areas such as national security, criminal activities and employment / work practices. The structure, governance arrangements and transparency on operations with three local authorities, extensive UK and Scottish Government involvement and highly reputable / established private sector partners means there is a commitment and an in-built wide range of mechanisms to ensure these undesirable aspects do not materialise.

Equalities

8. A Full EPIA has been completed for this project. Forth Green Freeport will prioritise the inclusion of protected groups in contributing to, and benefiting

from, the investments secured by Green Freeport levers. Industries targeted for investment in Scotland's Green Freeport policy have historically had relatively lower rates of representation of protected characteristics. Without direct action, the direct jobs created by Green Freeport levers would likely create disproportionately more jobs for male employees (77%) and create disproportionately fewer jobs for youth (8%), and people with disabilities (12%).

8.1 Proactive efforts from the Green Freeport to correct this imbalance will include:

- Age - Skills investments will be accessible to people of all working age groups. Young people will benefit from partners' commitments to schools' outreach, apprenticeships, scholarships, and bursaries. Older populations will benefit from in-work up-skilling investments in virtual reality (VR) and simulation technology.
- Disability - Disability-inclusive hiring practices, together with access to funding for skills bursaries will encourage open access to employment for people with disabilities.
- Sex - Access to funding for skills bursaries will be prioritised for women through preferential scoring in applications.
- The Permanent Board will set quantitative 'Social Impact Key Performance Indicators (KPIs)', to track impacts against the nine protected characteristics. Adoption of a clear inclusive hiring policy for all businesses operating in the Green Freeport will expand opportunities, enhance quality of work and reduce stigma in the communities around the Forth Estuary.

9. Conclusions

- 9.1 There has been significant progress made on the development of the Forth Green Freeport OBC and we are on track to submit this in November 2023 and for the Green Freeport to be operational by Summer 2024.
- 9.2 The next stage is the completion and submission of the five case OBC, closely followed by development and submission of the Full Business Case.
- 9.2 Falkirk Council has agreed to be Accountable Body for the Forth Green Freeport.
- 9.4 In developing the bid, partners were and continue to be aware of concerns of displacement of jobs from other areas, opportunities for local job seekers, benefits for communities and social impact. The Forth Green Freeport will have a wide range of measures including effective governance and public sector scrutiny to ensure positively on such matters.
- 9.5 The successful bid for a Forth Green Freeport, provides us with a unique opportunity to advance our Net Zero and economic priorities. It closely aligns with the Falkirk Growth Deal and other large investment programmes such as TIF and Levelling Up. Working closely with neighbouring authorities in Fife and

Edinburgh and key industrial partners, we can take steps to preserve an industrial base in Scotland focused on bringing forward high-quality jobs, economic growth and greater emphasis on Net Zero technologies that will meet the challenges of the climate emergency.

- 9.6 The question of what happens next at Grangemouth, Fife and North Edinburgh once the carbon intensive industries decline, is a difficult one, but replacing and transforming these industries offers the opportunity to ensure that our industrial complexes remain viable and that there are high paid jobs and skills development and training opportunities available for local people. Forth Green Freeport gives us some of the tools to incentivise industries to embrace this transformation.

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Director of Place Services

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Appendices:-

Appendix 1 – Executive Summary of the Green Freeport OBC

List of Background Papers:

Forth Green Freeport Report – 14 Feb 2023
Elected Members Briefings – October 2023



Executive Summary

Introduction

The Forth Green Freeport (FGF) was shortlisted by the Scottish and UK Governments on 13th January 2023, following a competitive bid process to identify potential Green Freeports in Scotland. A consortium of private and public sector partners is now working alongside both Governments to develop the Outline Business Case (OBC) and Full Business Case (FBC). At the same time, the consortium is establishing its governance arrangements and as part of this process is recruiting an independent Chair of the FGF Board. This Executive Summary is for the benefit of key stakeholders, to inform them of the contents of the OBC to be submitted for consideration and endorsement by the UK and Scottish Governments by the 17th of November 2023. The FGF tax sites will become designated on the approval of the OBC this will be followed by the FBC which on approval will unlock the availability of the seed funding.

Why Forth Green Freeport?

The FGF consortium partners are Forth Ports, INEOS, Babcock International, Scarborough Muir Group, CalaChem, the Ministry of Defence, Edinburgh Airport, Falkirk Council, City of Edinburgh Council and Fife Council.

The consortium's vision for the FGF highlights the critical importance of reducing industrial carbon emissions in the Forth estuary. Using Green Freeport status, it will support the right investments into the estuary to address the 2045 net zero target whilst contributing to the economy of Scotland. The positive ambition is to deliver a just transition for Scotland's industrial heartland, through a green reindustrialised future. The Forth corridor is already a physical asset – one of scale and with businesses of international acclaim and is a corridor that can influence and lead – through sustainable reindustrialisation and transformational growth. The FGF brings forward 552 hectares of industrial land that will be developed to provide the necessary infrastructure to attract investment.

Green Freeport status attracts a range of tax and customs incentives, access to other levers, such as planning support, marketing and promotion support, collaboration with government

agencies, access to up to £25m of seed funding, and locally retained non-domestic rates for reinvestment. The toolkit of levers is on offer to Green Freeports to create a more attractive ecosystem for future inward investment and trade opportunities, thus encouraging new or additional industrial activity to the identified tax sites at Grangemouth, Rosyth, Mid-Forth (Leith to Burntisland) and the proposed market led customs site at Edinburgh Airport.

The FGF aims to attract investment and economic growth in key sectors including green technologies, renewable energy and alternative fuels, low carbon logistics, and advanced manufacturing. This will make a significant contribution to the re-industrialisation of Scotland. An economic impact assessment, prepared by KPMG, has projected that the FGF will drive up to £6bn of private and public investment over a 10-year period, delivering gross value added of estimated £4.2bn and creating up to 50,000 jobs (gross).

The FGF is the right public intervention, given the geography of the Forth Estuary and the partners involved. It is poised to deliver sustainable inclusive growth across Central Scotland and beyond. The Forth estuary is uniquely placed to drive Scotland's decarbonisation aided by our globally recognised business base and our ability to harness the Edinburgh and South-East Scotland City Deal economic investment commitments alongside those of the Falkirk Growth Deal.

Governance

The OBC has been developed by a Steering Group, overseeing six working groups all leading on specific topics, including Infrastructure, Placemaking and Communities; Fair Work and Skills; Innovation; Net Zero; Trade and Investment; and Communications and Engagement.

An Interim Governance Board is in place to scrutinise and provide leadership during this interim set up phase.

Moving forward, the Steering Group will be disbanded and replaced by an operating company and a full Forth Green Freeport Board (FGFB) will be established, comprising up to nine members. FGFB Members are drawn from public and private partners and will be led by an independent Chair. To enable delivery, the FGFB will establish a range of sub-committees with a broader membership to guide and coordinate activity against distinct topics. The FGFB, once established, will discuss additional representation and invite other suitable members to the Board e.g., a Trade Union or other worker representative, as well as other key people from the sub-committees.

Proposed membership of the FGFB is as follows:

- One seat for an independent voting Chair
- Four seats for the largest tax site landowners: Forth Ports, INEOS, Scarborough Muir Group, Babcock International
- Three seats for local government representatives: Falkirk Council, Fife Council, City of Edinburgh Council
- One seat for the Accountable Body (Falkirk Council). This is in addition to the seat for the local government representative.

The sub-committees will be:

- Infrastructure, Placemaking and Communities
- Fair Work and Skills
- Innovation and Net Zero
- Trade and Investment
- Communications and Engagement

The roles and responsibilities of the FGFB and its sub-committees will include:

- Strategic Leadership
- Investment promotion and marketing
- Overseeing delivery, including implementing policy levers
- Risk management
- Foster innovation
- Monitoring & Evaluation and reporting to UK and Scottish Governments
- Promoting, setting, and monitoring security standards
- Promoting and monitoring compliance with environmental standards
- Promotion of skills and Fair Work

All FGFB Members will undertake an induction and governance training and will be required to adhere to the seven principles of public life – the ‘Nolan Principles’ in addition to the Ethical Standards in Public Life etc. (Scotland) Act 2000 and the UK Corporate Governance Code (2014). In practice, the Scottish Government publication ‘On Board’² published 2017 will be a guiding handbook against which specific FGF approaches will be developed.

The FGF is committed to promoting and celebrating diversity and inclusivity, and has produced a Diversity & Inclusivity Statement, complying with the public sector duties and will operate in line with the Equality Act 2010.

The FGFB will set up a company that can employ staff and enter contracts on behalf of the FGF. A core team of four full time staff, including a Chief Executive/Managing Director, will be recruited, who will be responsible for the day-to-day operations of the Green Freeport.

Falkirk Council - the Accountable Body

Falkirk Council is accountable for the management of the FGF public funds and responsible for any liabilities incurred in the use of these, some of which may be transferred to lead partners via partnership agreements. Whilst not confirmed at this stage, it is likely that as Accountable Body the Council will require to provide periodic monitoring and evaluation reports to the UK and Scottish Governments and provide support on a wide range of activities including those associated with the sub-committees.

Falkirk Council hosts a Programme Management Office (PMO) to manage these arrangements, with the Director of Place, Chief Governance Officer and Chief Finance Officer overseeing its duties.

Workstream - Trade and Investment

As a new global hub for trade and investment, it is estimated that the FGF will leverage over £6bn of public and private investment over a 10-year period, with planned activities aligned with regional, Scottish Government and UK Government policies.

FGF has developed a targeted trade and investment strategy focussed on developing an ecosystem to be at the forefront of building clusters in emerging clean industries. These include offshore wind, alternative fuels and carbon capture, and innovative chemicals. FGF will accelerate its expertise in shipbuilding and capitalise on the existing collaboration between industry and academia, delivering progress in advanced and modular energy component manufacturing and automation.

Major investments in new industries will attract Small and Medium sized Enterprise (SME) activity at zoned areas within FGF sites as well as the outer boundary. New investments will stimulate growth in trade, where plans for additional logistics and trade capacity is critical to ensure enough supply and the right infrastructure is in place to deliver the increased activity in existing and new industries.

The tax sites, customs sites, and seed capital projects complement one and other. Anchored by major companies and organisations along the Forth estuary, such as INEOS, Babcock International and Forth Ports, they complement the availability of under-developed land and fiscal benefits for investors. The benefits of clustering and collocation will help attract and accelerate investment and economic growth. These anchor institutions will create opportunities for synergies and collaboration for the market, particularly in the Green Energy sectors. They will create an industrial ecosystem and cluster by attracting different suppliers and service providers with secondary and tertiary supply chains. This will create new and added value for the FGF hinterland (outer boundary) areas which include North Edinburgh, Forth Valley, Mid-Fife and other parts of east central Scotland. In addition, the tax site of Mid-Forth uniquely includes space for Creative Industries linked to film and TV Industries to expand.

The travel to work area includes access to a large skilled labour pool and several internationally recognised universities, in addition to a strong regional network of further education providers. The strategic location along the Forth uniquely positions the FGF to be a central hub of net zero manufacturing capability along the UK's East coast with proximity to maritime installation sites on the East coast, and strategic links to other sites including Net Zero-focused Freeports in Teesside and the Humber, and links to Dundee and Aberdeen.

The Forth estuary is also home to UNESCO World Heritage Sites (within Edinburgh and the Forth Bridges), in addition to being a prospective multi-modal corridor, offering the opportunity for inter movement through increased export routes to Europe and beyond, and intra movement across Central Scotland and England.

By utilising the Green Freeport support available, FGF will deliver credible investors for large underdeveloped industrial sites at pace, with a natural focus on new investment in sectors with strong trade potential. The tax benefits available to investors at Grangemouth, Rosyth,

and Mid-Forth (Leith and Burntisland) tax sites, totalling 552 hectares, will be critical in securing additional inward investment.

Tax relief often influences international companies' decision-making by reducing costs, improving cash flows, and mitigating risk. These commitments from the UK and Scottish Governments will signal a supportive business environment and continued public sector support to promote economic growth. The Economic Case outlines that tax benefits are typically worth over 10% of a typical FGF private capital investment representing a significant determinant of investment viability, if applied.

The use of Green Freeport customs special procedures is available to new or existing businesses within the FGF outer boundary and it is expected to support, in particular, SMEs who have not previously had the resource or expertise to utilise customs special procedures historically. This will boost sustainable international trade from existing clusters, building upon where outer boundary partners have existing strengths serving the domestic market, parlaying these into exports, by using Green Freeport customs benefits to make it easier and cheaper for them to export.

Investors in the Green Freeport tax sites will be assessed for suitability against a set of Investment Principles. Within the Investment Principles, a process and accompanying guidance is set out to support landowners, local authorities, the FGF Company and FGFB to make an assessment to ensure that all future businesses looking to locate in one of the tax sites are aligned to the strategic objectives of the FGF. It will also ensure adherence to the two Governments' official Green Freeport objectives, such as the need for fair work and just transition and reassure investors that, if compliant, they will be able to access the relevant tax benefits. The FGF Chief Executive/Managing Director will have delegated authority from the FGFB and be responsible for confirming the outcome of such assessments and will inform the FGFB, Accountable Body and relevant Local Authority during the various stages of the assessment process. The FGFB will be ultimately responsible for holding landowners to account in terms of delivery of the proposed Green Freeport plans.

Existing/new parties located in the outer boundary or new investors to FGF who are interested in using Green Freeport customs special procedures and becoming a customs site operator (CSO) will also be required to adhere to a FGF CSO policy and work with HMRC to ensure the required security measures and accreditations are in place before they can access the Green Freeport customs benefits.

The influence of these tax and customs benefits available to potential investors will be reinforced by the trade and investment support provided as part of the Green Freeport. Effective marketing campaigns and a cohesive brand will raise awareness around the Forth's unique value proposition, including our skilled workforce, engineering expertise, and strategic location in the heart of Scotland.

The lead generation strategy will include detailed targeting and identification of target businesses/sectors; value proposition and collateral development (e.g., promotional website, pitchbooks); active lead generation (e.g., events/engagement activities); onboarding; and aftercare.

FGF will work closely with local authority, Scottish Development International (SDI) and Department for Business and Trade (DBT) partners and other organisations involved with trade and investment, such as Chambers of Commerce. This will ensure the most efficient use of resource and a collaborative approach to promotional activities and enquiry handling.

A trade and investment manager will oversee FGF trade and investment activity. The Trade and Investment Strategy, which has been coproduced by landowners and local authorities' economic development teams, is intended to compliment and not duplicate the mechanisms already in place by other public and private sector partners. Landowners retain the right to handle the commercial negotiations with an investor but will be supported through the onboarding process by partners as appropriate.

Ongoing engagement with trade and investment stakeholders will be formally undertaken through the trade and investment sub-committee.

Green Freeport status is already attracting significant expressions of interest from investors, including for sites which have been vacant and actively marketed for more than 10 years. Without the activities of the Green Freeport, these sites will struggle to compete with other areas worldwide that offer more attractive incentives and better promote their unique selling points. The FGF landowners are also managing proactive enquiries from businesses looking to set up as a CSO.

Planning

Planning lies within the statutory responsibilities of the local authority and the FGF does not look to circumvent the process and authority of the respective planning committees. However, there is a desire to work more collaboratively to promote better understanding and collaboration between all the partners involved, not only planning authorities but other regulatory bodies.

The planning authorities of City of Edinburgh Council, Falkirk Council and Fife Council are key consortium partners of FGF and existing good working relationships between the local authorities, landowners and developers are already supporting swift decision making. A dedicated regulatory and land use planning sub-group has been established, currently comprising private sector landowners and key local authority planning colleagues. The planning group are working closely together with the Scottish Government Depute Chief Planner (PARD) and colleagues including key agencies to put in place a framework which will support the consenting process for FGF development, including confirming shared objectives, discussing and developing future working protocols, scoping out issues and risks, and agreeing the way forward in terms of deploying the various tools and mechanisms which will promote streamlined land use and regulatory consenting.

Other regulatory regimes such as licensing and environmental health will also be subject to regular liaison to ensure compliance requirements are effectively implemented.

Early discussions have taken place with the (Key Agencies Group) KAG and the Scottish Environment Protection Agency (SEPA) Grangemouth Regulatory Hub, who have responded

positively, and work is in hand to identify those consultees who will have the most critical role in advising on planning and other consenting matters. It is intended that the FGF key consultees group will:

- Be partners to any protocol which is developed around consenting and be involved in ongoing monitoring of the effectiveness of the protocol.
- Assist in scoping out, highlighting and prioritising key strategic and site level issues/constraints/risks (potentially through a joint scoping workshop) as they arise and work together to share solutions.
- Contribute to information sharing.
- Highlight infrastructure dependencies, and where appropriate, potential synergies in consenting across FGF sites.

Security and Illicit Activity

The FGP commits that the FGFB will honour the obligations set out in the OECD Code of Conduct for Clean Free Trade Zones and the UK's Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 and will ensure this commitment extends to FGF CSOs through relevant contractual arrangements.

A Security Working Group (SWG) will include security managers of the relevant FGF sites and relevant stakeholders, including enforcement bodies (e.g. Police Scotland, HMRC, Border Force, Department for Transport, etc.). Market surveillance bodies (e.g. Trading Standards, Environmental Health) and others will be invited as required.

Individual CSOs and businesses locating within tax sites will remain responsible for implementing security arrangements and liable for any breaches. Every FGF business will have a reporting mechanism into the SWG, and they are expected to report any significant security breaches and illicit activity.

The SWG will conduct an annual review of FGF CSOs to ensure the certification remains valid and up to date.

Workstream - Infrastructure Communities and Placemaking

Development Proposals using Seed Capital

The FGF tax sites have undeveloped land which have hosted heavy industry in the past, such as petrochemicals, wharfage, and shipbuilding. In addition, some of the identified tax sites are constrained by inconsistent or insufficient utility services, including inconsistent grid network capacity to accommodate future inward investment requirements, limited access to sustainable freight transport connectivity options and existing digital connectivity that is unable to accommodate future expected technological requirements such as the area wide need for 5G.

To resolve constraints like these, the UK Government is making up to £25m of Seed Capital available, which the private sector partners have matched with up to £31m, representing an immediate investment in the region of £56m.

In developing these initial investment proposals, consideration has been given to economic public policy objectives as set out by the three FGF local authority partners and the FGF vision. Prioritisation of seed funding projects recognises the role of the Edinburgh and South-East Scotland City Deal and the Falkirk Growth Deal, ensuring close alignment with economic development objectives and proposed place-based regeneration activity.

Seed capital projects have been prioritised by a working group led by the three local authorities, and with a list of guiding principles with proposals grouped and assessed as follows:

- Enabling Transition to Net Zero
- Regional Infrastructure
- Building Resilient and Sustainable Places
- Driving Sustainable Economic Growth
- Locational Benefits or Site-Specific Need

Assessment and prioritisation was undertaken on this basis and in line with application of the Scottish Government Investment Hierarchy approach. Ten seed capital projects have been identified in the OBC as priority for investment:

- Land preparation at Port of Leith to unlock 30 acres of land for renewable energy technology manufacturing facility specialising in offshore wind.
- Rosyth Integrated Energy System – to deliver a decarbonised estate at the Rosyth Dockyard and the surrounding investable land using a combination of renewable technologies.
- Port of Grangemouth utility capacity – to provide upgrades to utility capacity enabling expansion of the dock side services and improve investment potential.
- Grangemouth low carbon hydrogen production land preparation to enable significant switch to hydrogen production and decarbonise on site energy needs.
- Rosyth Arrol Gibb Innovation Campus (AGIC) Skills and Innovation Centre to improve and accelerate the re-skilling, upskilling and capability of local underemployed workforce to fill jobs created by Green Freeport and delivering an improved location for innovation clustering via innovation infrastructure development and wrap around support.
- Rosyth Dockyard railway restart – to enable more efficient rail movements into, around and from the Rosyth area by re-introducing a live railhead into Rosyth Dockyard to support freight logistics, reducing carbon footprint of the road network.
- Land remediation at South Bridge Street, Grangemouth – to deliver an investable site to meet demand for low carbon HGV refuelling and inward investment proposals close to the dock entrance.
- Land remediation at Wholeflats, Grangemouth – preparation of sites for a biotechnology and carbon utilisation centre in Grangemouth.
- South Shore Road - Grangemouth Road access improvements to Grangemouth Dock

- FGF wide utility constraints study – a Green Freeports wide constraints assessment to provide a data set of constraints for future development and to assist the phasing of Green Freeport programming.

Use of Retained Non-Domestic Rates

The three local authorities will benefit from retaining the uplifts in non-domestic rates (NDR) from new business attracted to the tax sites for a period of 25 years. This is additional to the NDR already being paid by businesses in the area covered by the FGF (which are not retained locally). The value of the non-domestic rates from new business in the tax sites is estimated to be in the region of £190m in Falkirk, £195m in Edinburgh and £181m in Fife (dependant on projected levels of investment being achieved). The expectation from the UK and Scottish Governments, as set out in the Green Freeport Prospectus, is that this income from NDR will support new or enhanced economic capital infrastructure that leads to additional regional and local prosperity through economic growth.

A proportion of the retained NDR will be required for the running costs of the Accountable Body (Falkirk Council) and operational costs of the FGF Company, including staff who will conduct the day-to-day operational management of the FGF itself. The landowners of tax sites will also contribute to the costs through a contribution charge based on a flat rate applied on a hectareage basis. It is estimated that the Accountable Body and Company costs will be in the region of £800K per annum.

It is further proposed that each Local Authority will ringfence £10m of retained NDR over a 10-year period for improvements to local infrastructure that benefits the communities adjacent to the FGF tax sites. The FGF Infrastructure, Communities and Placemaking group has developed a prospective model for deployment of such a fund which will include participation of port adjacent communities or those directly influenced by the new economic growth to occur. Currently, this is likely to be the communities of Grangemouth, Leith, Rosyth and Burntisland and will be facilitated using a Place Based Infrastructure Investment Framework approach. All new investment in community infrastructure and place-making will require to be linked to clear economic regeneration outcomes and shared economic prosperity objectives – these will be agreed in advance with representatives and stakeholders and overseen by respective Local Authorities and partners.

The balance of the retained NDR will be for each Local Authority to agree the use for – it has been confirmed that the money can be used for projects within the wider Travel to Work Area of the FGF. Projects will require to fit with the UK and Scottish Government's Green Freeport Objectives and can include things like transport infrastructure, town centre initiatives and investment in skills. They will be required to fit with local Council economic and infrastructure development goals and it is recognised that they will depend on the very differing needs of the Green Freeport localities. Led by Council Officers, the potential projects will be developed with partners represented on the FGF sub-committees and will be presented to each Council for consideration and approval.

Placemaking and Communities

The FGF bid (2022) recognised that the port adjacent communities of Grangemouth, Rosyth, Burntisland and North Edinburgh face stronger burdens from the proximity of industry and that levels of deprivation indicate that these communities do not always benefit in proportion to the wealth created in their locality. The FGF aims to redress this through a number of initiatives, including the detailed Fair Work and Skills Plan and by setting up a Place Based Economic Investment Fund. Specifically, as FGF levers increase investment in the area, the Fund would look to create community benefits directly from the wealth created in the form of infrastructure investment in town centres, transport networks and community spaces. A framework will be developed in conjunction with the FGFB, and other stakeholders including local authorities to govern this and apportion spend where economic outcomes and shared prosperity objectives are clear.

Workstream - Innovation

“Fostering an innovative environment” is integral to the delivery of all FGF objectives with the “Green Freeport” designation providing critical value in creating focus and investment.

Innovation focus will be *vertical* i.e., improvement of processes, services and products and *horizontal* i.e., the effective transfer of knowledge/technology (from innovation) from one sector to another.

FGF will focus on innovation within seven areas of focus:

- Advanced materials and manufacturing (inc. large scale manufacturing)
- Energy and environmental technologies
- Data driven and digital technologies
- Electronics, quantum, photonics
- Bioscience / bio economy
- Robotics, AI and smart systems
- Maritime technology

Building on existing innovation activity and assets, e.g. FASTBLADE project at Rosyth, INEOS and Petroineos at Grangemouth (who, as part of the Acorn project, plan to capture and store up to one million tonnes of CO₂ by 2027), planned FGF innovation infrastructure developments, e.g. AGIC, will act as an attractor to businesses who are innovators and applying innovation across their business.

FGF innovation projects will deliver a wide range of benefits for businesses within the FGF area through private and public sectors and academia research and development (R&D) investment. The innovative environment fostered from innovators collaborating in new ways and through providing physical and virtual spaces to develop and trial innovative ideas and technologies, will help accelerate commercialisation of R&D and spin out start-ups. In addition, the innovation developed and applied across the FGF territory will also have wider benefits e.g. creating new markets for technologies and UK products and services and the

productivity improvements this drives within our key sectors, through jobs, skills development and investment secured across the FGF area and beyond.

Workstream - Fair Work and Skills

The FGF will deliver lasting regeneration to the deprived areas around the designated tax and customs sites by creating up to 50,000 gross jobs locally and nationally, the majority of which will be high skilled, high paid jobs in comparison to Scotland and the rest of the UK.

The Investment Principles have been developed to ensure fiscal support goes to investors that will support Green Freeport objectives, including skills development and Fair Work First, and a FGF Fair Work Charter has been developed based on the principles of the Scottish Government's Fair Work First guidance and the Fair Work Convention.

Embedding Fair Work practices, prioritising the rights, wages, and working conditions of employees and fostering an environment of respect, equality, and collaboration within the FGF holds significant implications for both economic and societal well-being. Complying with the Fair Work Charter will therefore be a pre-requisite for all prospective investors to receive Green Freeport incentives.

Employers in the FGF will be required to commit to upholding the values of the Charter and to perform annual self-assessments against the Charter to ensure continuous compliance. In addition to this, in recognition of the importance of the 'effective voice' element there will be employee and/or Trade Union representatives on the FGF skills and fair work sub-committee.

It is also recognised that, in addition to the workforce development commitment that individual employers make, there is a wider workforce development opportunity across the FGF area and tax site operators will deploy a Skills Fund to nurture the skills for tomorrow, using our knowledge of today. As part of the FBC development, a detailed study is therefore taking place to assess the supply and demand side of the jobs which will be created in and around the FGF area – establishing when, where and what types of roles and skills will be required; allowing partners and education providers, including higher and further education, to put appropriate mechanisms in place to ensure demand can be met by relevant workforce training and development.

Commercial activity on FGF sites will generate additional revenues for investors, some of which will be required to be re-invested into supporting this development of the skills landscape. It is envisaged that up to £2.1m of the additional revenues will be invested in a Skills Fund over five years, with potential for it to be matched and/or enhanced with public sector funding and continued investment from the private sector over the longer term. The fund will provide direct support to institutions to deliver skills training for local workers, tailored to Green Freeport needs.

A comprehensive skills strategy and skills fund initiative will be developed at FBC stage to complement tax and customs site/s investment planning. Both will seek to support greater alignment of economic infrastructure with skills, the needs of the labour market and the wider spatial and social agendas.

Workstream – Promoting Decarbonisation and Net Zero

All investors in the FGF will be obliged to confirm that they have decarbonisation plans in place. The FGF is a major step in Scotland's journey to net zero. Co-ordination by the landowners and Local Authority partners will promote decarbonisation by delivering a renewables manufacturing hub spanning across the Forth and by fuel-switching to decarbonise existing industry.

The tax and customs benefits at Mid-Forth will enable the site to be developed as a turbine marshalling and integration facility. This site could support the delivery of approximately one gigawatt (GW) of offshore wind every year. This represents a sizeable contribution to Scotland's deployment targets at potentially half the expected run rate from the early 2030s. It will also enable improved cross Forth logistics and shipping movements or related marine activity supporting associated complimentary development and economic investment along the Fife Forth coast; particularly at Energy Park Fife Methil, Kirkcaldy harbour and Inverkeithing Bay. The Mid Fife supply chain is also expected to benefit with up to an estimated 600 companies (Fife Business Base 2022) having improved access to contract opportunities and the investment in labour market/s or workforce skills.

Seed capital investment will remediate the land necessary for a new blue hydrogen production plant in Grangemouth. The carbon capture and storage technology used in this production can be leveraged by Grangemouth's industrial plants to reduce carbon emissions. The resulting hydrogen could also be used as a fuel for nearby industrial processes, including the INEOS refinery – Scotland's single largest industrial emitter.

This twin-track approach to decarbonisation will lead to synergies between the Green Freeport investments. Co-locating offshore wind and hydrogen projects will allow infrastructure and resources to be shared, such as transportation networks, utilities, and our skilled workforce. It will also enhance the Forth's reputation as a leader in clean energy and sustainability. This can attract more investment to the area, further supporting the growth of clean energy industries.

Conclusion

The FGF OBC has an estimated date for submission in mid-November 2023 and with the FBC following on into the Spring of 2024.

The strong partnership and shared vision will seek to deliver significant investment estimated at over £6bn gross value add in the area along with approximately 50,000 gross jobs locally and nationally. The FGF intends to have the highest level of integrity and transparency in its operation, and these will be enforced through robust Fair Work and Investment Principles alongside a firm commitment to Net Zero and to the communities adjacent to the FGF locations.