

Evaluation of the consultation and engagement on the Generic Design Assessment of Hitachi-GE's UK Advanced Boiling Water Reactor

June 2018



Contents

1. Executive Summary	3
1.2 Overview	
1.3 Evaluation: objectives and scope	
1.3 The evaluation processes	
1.4 Overview of findings and learning points	
2. Overview of the consultation and engagement initiative and the approach to evaluation	7
2.1 Introduction	
2.2 GDA – in brief	
2.3 Evaluation and learning context	
2.4 Engagement governance and planning	
2.5 Evaluation: objectives and scope	
2.6 The evaluation process	
2.7 GDA engagement process key events and milestones.	
2.8 How this report is structured	
3. Impacts of the engagement and consultation process	13
3.1 The extent to which engagement and consultation activities have informed the GDA assessments	
3.2 The impact on trust and confidence in the regulators	
3.3 The degree to which the engagement objectives have been achieved	
3.4 Whether the wider engagement activities have encouraged responses to the formal consultation process	
3.5 Communication of the engagement findings to those who were involved and key stakeholders	
3.6 The ongoing commitment to and attitude of regulators to engagement processes	
4. The consultation and engagement process	26
4.1 The engagement of the ‘correct’ stakeholders and members of the public	
4.2 The extent to which the engagement and consultation process has been appropriate for and clear to stakeholders and members of the public	
4.3 The extent to which individual engagement and consultation methods have been appropriate for and clear to stakeholders and members of the public	
5. How the GDA has related to and complemented other engagement, consultation and planning processes regarding nuclear issues.	35
5.1 GDA within the wider context	
6. Inputs to the consultation and engagement process	36
6.1 The extent to which the resources deployed were sufficient to deliver the objectives and the value for money	
6.2 The effectiveness of the management and governance structures	
7. Reflection on the achievement of H M Government’s Consultation principles and the agreed actions from the Science wise GDA public dialogue project	39
7.1 H M Government’s Consultation principles	
7.2 Agreed actions from the Science wise GDA public dialogue project	
8. Conclusion	43
Appendix 1. Evaluation framework	45

1. Executive Summary

1.1 Overview

This is the final report of the independent evaluation of the consultation and engagement on the Generic Design Assessment (GDA) of Hitachi-GE's UK Advanced Boiling Water Reactor (UK ABWR). The evaluation has been commissioned by and is reporting to the Environment Agency.

The GDA process enables the regulators (Office for Nuclear Regulation, Environment Agency, and Natural Resources Wales) to begin assessing the safety, security and environmental performance of a new nuclear power station design, at a generic level, before site-specific applications are made.

Hitachi-GE submitted its UK ABWR design to the regulators for GDA in April 2013. The Environment Agency completed its initial assessment and published its report in August 2014. Since then the Environment Agency and Natural Resources Wales (NRW) have been carrying out their detailed assessment. The preliminary conclusions, following the detailed assessment, were formally consulted on through an open public consultation which opened on 12 December 2016 and closed on 3 March 2017.

During this period, the Environment Agency and NRW held a series of stakeholder engagement events and provided other complementary opportunities for stakeholders to find out more, discuss and feedback their opinions about the GDA and its preliminary conclusions.

1.2 Evaluation: objectives and scope

The evaluation addresses both the formal consultation and the broader engagement activities that have been undertaken by the Environment Agency. Where NRW and the Office for Nuclear Regulation (ONR) also participated in engagement activities, these have been evaluated. Although communications activities worked closely with and supported the engagement work, the focus of this evaluation is on the engagement process where the public and stakeholders responded to the formal 12-week consultation and / or participated in the wider engagement activities such as workshops, drop-ins, surveys and on-line comments.

The purpose of the evaluation is to:

- Confirm the accountability and legitimacy of the engagement process.
- Identify learning that might help inform future engagement and consultation.
- Provide robust evaluation data that can be subject to scrutiny.

1.3 The evaluation process

Key evaluative activities include:

- Pre-engagement period baseline interview with the Environment Agency's Senior Stakeholder Engagement Adviser, Nuclear Regulation Group and the Policy Lead, Nuclear New Build.
- Feedback and comments sheets analysed from key sector GDA consultation briefings undertaken by the Environment Agency in the pre-engagement period.
- Analysis of 2 pre-engagement period stakeholder survey findings. Asking key sectors what aspirations and requests they had of the GDA engagement process.

- Observation of the National Stakeholder Workshop in January 2017 and analysis of the feedback from the event.
- In depth interviews with 3 participants from the National Stakeholder Workshop.
- Analysis of feedback sheets from public workshop engagement events in Thornbury on 7th February 2017.
- In depth interviews with 5 participants from public drop-in events in Thornbury.
- In depth interviews with 12 key stakeholders to the engagement and consultation process across the Environment Agency, ONR and NRW.
- Brief review of actions related to the Sciencewise GDA public dialogue project.

1.4 Overview of findings and learning points

Set out below are a summary of the headline findings and key learning across the principle areas evaluated. The main body of the report provides more detail, analysis and commentary on each of these themes.

Impacts of the engagement and consultation process

There is a need to keep under review the purpose and timing of stakeholder engagement in relation to GDA. There is a partial disconnect between the overall purpose of GDA (i.e. rigorous scrutiny process leading to a decision on design acceptability) and some of the engagement aims and objectives which envisage stakeholder input will help inform assessments. The reality of the stakeholder engagement undertaken, is that it is difficult to maintain a focus on GDA and it does not necessarily follow through into a greater number of, or more focussed responses to, the consultation document. Much of the feedback in both the wider engagement activities and the consultation responses was outside of the scope of GDA, relating to site-specific or nuclear energy policy related issues. It has nevertheless raised awareness and enabled dialogue on these wider aspects of new build.

Engagement has added value to the GDA process. That value has been more related to demonstrating openness and building relationships, understanding and trust between regulators and stakeholders than informing the assessments (due to the nature of the comments and the technical content).

Working relationships have also been enhanced and collaborative relationships developed across the Environment Agency, ONR and NRW and between technical, engagement and communications staff.

In future, it may be more useful to publish one joint regulators' plan that covers engagement, communications and consultation activities across the Environment Agency, ONR and NRW. Depending on the length of the initiative this may need updating during the process.

The summary consultation document was useful in making the complexity of GDA more accessible. This should be retained and developed for future GDA processes together with more use of infographics to support the understanding of complex processes and the role of regulators.

There has been a substantial amount of resource deployed on engagement processes and activities within GDA. It is difficult to quantify the benefit and additional value of the engagement undertaken. There needs to be further consideration of the purpose of and investment in engagement with a particular focus on the balance between informing the assessments and wider engagement objectives such as building relationships with stakeholders. A number of initial ideas are set out in 3.6 below.

The consultation and engagement process

Engagement with the 'targeted' stakeholders was largely successful and the data base of both national and local stakeholders has been updated and improved as a result of the analysis undertaken as part of the GDA process. It will be useful to maintain regular reviews of this information as new nuclear build permitting processes proceed to focus on more site-specific issues.

The consultation was well trailed, early in the process, with key stakeholders and attention paid to their feedback.

Future GDA engagement processes should consider alternative approaches to engaging with key national stakeholder groups and organisations. It may be a better use of engagement resources to facilitate one to one or sector based briefings / deliberative meetings with key organisations and individuals than attempt to satisfy all the engagement goals through a single large national event.

The main benefit of the local events, close to proposed sites, was to consult and respond to any concerns raised, whether in scope or not. Much of the interest from participants in these sessions was either site-specific or nuclear energy policy related rather than GDA. A review of the timing and focus of the local events should be undertaken.

An independent process designer and facilitator should be considered for high profile, locally focussed engagement. This could help improve the process and also enable regulators to focus more on the content of meetings and events rather than also being responsible for managing the process.

A review of the effectiveness of the principle engagement methods, drawing on the commentary in Section 4.3 should be undertaken.

How the GDA has related to and complemented other engagement, consultation and planning processes regarding nuclear issues.

There is a need to review the approach and materials to communicate where GDA fits into the wider planning arena for New Nuclear and related planning and policy areas. Good progress has been made in being able to communicate this but more could be done.

Inputs to the consultation and engagement process

The time and resource was sufficient and proportionate for the scale of engagement needed. A review of the value of the GDA engagement process, including the learning points in this report, would be assisted by a more detailed cost benefit analysis.

The engagement outcomes were enhanced by the breadth and depth of experience present at each of the engagement events. This resulted in questions and queries being addressed to a high standard and with confidence. This reflected well on the regulators and was good engagement practice.

The broader remit of the Nuclear New Build Communications and Engagement Working Group and the breadth of experience of those who are members of the group enables GDA engagement planning to be situated within a wider context. It is a long-standing group and benefits from the continuity of being able to take the learning from the GDA engagement findings and draw on these when planning engagement in relation to permitting and other site related issues. It was essential to

have programme, technical and engagement / communications staff, across three organisations, working together.

Now would be an opportune time to review the Working Group's membership and terms of reference to explore whether any changes are needed.

2 Overview of the consultation and engagement initiative and the approach to evaluation

2.1 Introduction

This is the final report of the independent evaluation of the consultation and engagement on the Generic Design Assessment (GDA) of Hitachi-GE's UK Advanced Boiling Water Reactor (UK ABWR). The evaluation has been commissioned by and is reporting to the Environment Agency. As environmental regulators of the nuclear industry in England the Environment Agency is working together with Natural Resources Wales (NRW) and the Office for Nuclear Regulation (ONR).

Hitachi-GE submitted its UK ABWR design to the regulators for GDA in April 2013. The Environment Agency completed its initial assessment and published its initial report in August 2014. Since then the Environment Agency and NRW have been carrying out their detailed assessment. The preliminary conclusions, following the detailed assessment, were formally consulted on through an open public consultation. The 12-week consultation period began on 12 December 2016 and closed on 3 March 2017. A formal [consultation document](#) set out consultation questions, detailed assessment topics and assessment findings.

During this period, the Environment Agency and NRW held a series of stakeholder engagement events and provided other complementary opportunities for stakeholders to find out more, discuss and feedback their opinions about the GDA and its preliminary conclusions.

In March 2014, the Environment Agency commissioned Icarus Collective, as independent evaluators, to work with the Environment Agency's project team to evaluate and draw out learning from the consultation and engagement process.

This report provides an analysis of the extent to which the consultation and engagement process achieved its objectives, the impacts it had, how well inputs to the process were deployed, the effectiveness of the methodology and the degree to which the initiative has connected to and complemented other nuclear related engagement processes.

2.2 GDA – in brief

The GDA process enables the regulators to begin assessing the safety, security and environmental performance of a new nuclear power station design, at a generic level, before site-specific applications are made. It enables the regulators to work with the designers and potential operators at the earliest stage when issues can be best addressed effectively and efficiently before construction begins. It also helps to reduce project cost and time risks for developers, as it enables regulatory concerns to be identified and addressed early.

2.3 Evaluation and learning context

GDA consultation and engagement processes have previously been evaluated and provide a learning context for this evaluation. A detailed review of these studies and learning documents is outside the scope of the work. We will however, within the analysis of this evaluation, reflect on whether key recommendations from previous evaluations and learning processes have been actioned.

The key GDA evaluative / learning studies are:

- The 2012 evaluation of the GDA relating to EDF (Electricite de France) and AREVA for the UK EPR™ design, and Westinghouse for the AP1000® reactor. Undertaken by Shared Practice¹.
- The 2015 evaluation which reviewed the public dialogue processes commissioned by the Environment Agency and co-funded by Sciencewise². This project was a guided dialogue, working with a sample of members of the public. The findings focussed on the needs of the wider public in relation to GDA engagement and consultation. The evaluation was undertaken by Icarus Collective.
- The GDA Sciencewise public dialogue report, produced by 3KQ, also set out recommendations for good practice in GDA engagement and consultation process and has directly informed the GDA of Hitachi-GE's UK ABWR³.
- Reporting on the workshop held on 27th August 2015 to consider how to act on the findings from the Sciencewise Public Dialogue process. This was attended by representatives from the Environment Agency, ONR and NRW⁴.

2.4 Engagement governance and planning

A joint [Engagement Plan](#) was produced (Environment Agency, NRW and ONR) in June 2014.

The engagement plan informs the detailed design and delivery of the engagement activities (those offered in addition to the formal public consultation).

The overall delivery of the engagement and consultation programme is managed by the 'Nuclear New Build Communications and Engagement Working Group'. This group includes programme and technical and engagement / communications members from the Environment Agency, ONR and NRW. The activities of this working group are overseen at the Environment Agency by the Nuclear New Build Programme and New Reactors Programme Board. All of the Environment Agency's communications and engagement activity is part of its corporate communications plan and uses the 'working with others' approach to inform its engagement activity. Ultimately, Defra has oversight of the Environment Agency's communication and engagement work.

2.5 Evaluation: objectives and scope

The evaluation addresses both the formal consultation and the broader engagement activities that have been undertaken by the Environment Agency. Where NRW and ONR also participated in engagement activities, these have been evaluated. Although communications activities worked closely with and supported the engagement work, the focus of this evaluation is on the engagement work where the public and stakeholders responded to the formal 12-week consultation and / or participated in the wider engagement activities such as workshops, drop-ins, surveys and on-line comments.

The evaluation was asked to consider whether the formal consultation and the broader engagement activities met the engagement objectives set out in the Environment Agency's published Engagement Plan (June 2014). These are as follows.

Our engagement aims

¹ [Evaluation](#) of the Environment Agency's Consultation on the Generic Design Assessment (GDA) for new nuclear power stations.

² "[Improving public involvement in reactor design assessments for new nuclear power stations - public dialogue](#)" 2015, Icarus Collective.

³ "[New Nuclear Power Stations – improving public involvement in reactor design assessments](#)" 2015, 3KQ.

⁴ Sciencewise public dialogue, Improving public involvement in the, assessment of new nuclear power station designs. [Implementing the findings - report of workshop held on 27th August 2015](#). EA. Published, March 2016.

We aim to strengthen trust and confidence in us as regulators by helping to ensure that:

- Our stakeholders understand our role in nuclear regulation and specifically new build
 - what we do and what we don't do;
- We understand stakeholder views so that we can use these to help inform our assessments;
- We engage with relevant stakeholders at appropriate times;
- Stakeholders understand how they can provide comments and views.

Specific engagement objectives

Our specific objectives are to:

- Share information and proposals in order to build the understanding and knowledge of interested stakeholders about GDA, our decision-making processes and the role and responsibilities of the regulators.
- Encourage and enable stakeholder input.
- Consider stakeholder inputs and, where relevant, we can use these to help inform our assessments.
- Report our progress on GDA and explain our decisions.

In addition, there are **consultation objectives set out in a [Consultation Plan](#)** (updated July 2017):

We want to make sure that stakeholders:

- understand how we assessed the reactor design
- understand the findings of our assessment
- have an opportunity to give us their views
- know what will happen next
- can help make our final decision on the acceptability of the reactor design as robust as possible.

It was also asked to assess whether the consultation met H M Government's Consultation Principles ([latest version 2016](#)).

The purpose of assessing whether objectives have been achieved is to:

- Confirm the accountability and legitimacy of the engagement process
- Identify learning that might help inform future engagement and consultation
- Provide robust evaluation data that can be subject to scrutiny.

To ensure that these assessments were made, the objectives and principles were translated into an evaluation framework and agreed with the Communications and Engagement Working Group at the start of the project. This can be found in Appendix 1. This framework provided the terms of reference for, and guided and structured the evaluative questioning and assessment tools.

2.6 The evaluation process

Given the evaluation was commissioned in March 2014, it has been 'active' for three and a half years. The evaluation budget allowed for around 22 days' work and so the process has needed to be both efficient and selective in term of evaluation activity and focus. In addition, the related Sciencewise public dialogue process took place within this wider evaluative period (November 2014 – September 2015). This was also evaluated by Icarus Collective and provided good learning that has

informed the design and implementation of the engagement and consultation process for the GDA of Hitachi-GE's UK ABWR.

The agreed emphasis has been in addressing the evaluation questions set out in the Evaluation Framework (see Appendix 1) with a focus on a participative methodology that has prioritised structured, in-depth interviews with key stakeholders and participants to the engagement activities. This would include participants who have taken part in the public and stakeholder engagement events and key stakeholders from the Environment Agency, ONR and NRW. In this way, we have gained a direct commentary from multiple perspectives on the wide range of engagement and consultative approaches used for this GDA. These are set out in 2.7 below. We also observed the National Stakeholder Workshop in January 2017.

Key evaluative activities include:

- Pre-engagement period baseline interview with the Environment Agency's Senior Stakeholder Engagement Adviser, Nuclear Regulation Group and the Policy Lead, Nuclear New Build.
- Feedback and comment sheets analysed from key sector GDA consultation briefings undertaken by the Environment Agency in the pre-engagement period.
- Analysis of 2 pre-engagement period stakeholder survey findings. Asking key sectors what aspirations and requests they had of the GDA engagement process.
- Observation of the National Stakeholder Workshop in January 2017 and analysis of the feedback sheets from the event.
- In depth interviews with 3 participants from the National Stakeholder Workshop in January 2017.
- Provision and analysis of feedback sheets from public workshop engagement events in Thornbury on 7th February 2017.
- In depth interviews with 5 participants from public drop-in events in Thornbury.
- In depth interviews with 12 key stakeholders to the engagement and consultation process across the Environment Agency, ONR and NRW.
- Brief review of actions related to the Sciencewise GDA public dialogue project.

2.7 GDA engagement process key events and milestones.

The table below sets out the key engagement events and milestones. It should be noted that extensive communications planning and activity supported the engagement work in terms of informing the public and stakeholder about GDA engagement opportunities. For example, the Environment Agency has continued to raise awareness of GDA throughout the assessment period through communications activities such as:

- Meeting with stakeholder groups (including non-governmental organisations, local councils, site stakeholder groups for existing nuclear sites).
- Briefing nuclear and environmental academics.
- Answering questions from journalists and providing information for media articles.
- Explaining the GDA process at national conferences and seminars such as those organised by [Marketforce](#), the Nuclear Industry Association and the [Nuclear Institute](#) events. Also at the Nuclear Non-Governmental Organisation Forum.
- Providing clear, accessible information available on websites; [Environment Agency](#), [Natural Resources Wales](#), [the Office for Nuclear Regulation](#).
- Issued updates through the joint regulators' [e-bulletin](#) to subscribers and the Environment Agency's and Natural Resources Wales own stakeholder e-bulletins.
- Published leaflets and used social media.

Hitachi-GE has also raised the profile of the comments process by:

- Setting up and maintaining a [website](#).
- Promoting the launch of Step 2 with a press announcement, creation of a promotional flyer, letters to UK local councils, MPs, Welsh Assembly members, libraries in Wales and South Gloucestershire, Anglesey councillors, relevant government officials and others.
- Featuring the comments process in presentations to industry groups, learned societies, the Wylfa Newydd Project Liaison Group, and wider stakeholders throughout GDA until the closing date for comments.

Key engagement events and milestones

When	Activity	Engagement notes
January 2014	Wide range of largely communications activity informing key people and organisations that Step 2 of the GDA and the comments process had begun & how to get further information / get involved.	Communications included, emails to wide range of national organisations and key people / organisations close to proposed sites. Key document published on GOV.UK and NRW websites. In Wales all materials were bilingual.
March 2014	Independent evaluation of consultation commissioned.	Icarus Collective undertaking the evaluation commission.
January 2014 and ongoing	Regular updates provided via GDA quarterly reports .	Joint EA, ONR, NRW reports to summarise the current position, progress made and to highlight key challenges and issues. The reports, aim to increase public and stakeholder understanding of GDA and offer the opportunity to give feedback to the regulators.
6 January 2014 until 15 August 2017	Hitachi-GE's comments process . Promoted throughout the GDA process.	During GDA, comments can be made about the UK ABWR design via Hitachi-GE's website. Hitachi-GE will respond to the comments and issues raised. The regulators see both the questions raised and the responses made and can use these, where relevant, to help inform the assessments. 83 comments made.
Summer 2014	Email & follow up calls to key stakeholders by EA Senior Stakeholder Engagement Adviser, Nuclear Regulation Group	Asking stakeholders how they would like to be kept informed or engaged? Recording what worked well / not so well in the last GDA?
Sept 2014	EA, ONR and NRW published the stakeholder engagement plan (Our approach to public and stakeholder engagement) and publicised this via the GDA ebulletin and joint ONR / EA website.	This can be viewed on the joint ONR / EA nuclear regulators website.
Nov 2014 – September 2015	Sciencewise GDA public dialogue project.	Supported the design and development of engagement work with the general public. Engagement learning drawn from project report and evaluation at

		EA/ONR/NRW workshop, August 2015.
Summer 2015	Stakeholder 'survey'. EA asked (email then follow up calls) stakeholders what would help them to participate in the GDA consultation and if they wanted a national seminar similar to previous GDA.	Findings fed into the design of the 24 th January 2017 Stakeholder Workshop.
Mar 2016	Soundings from Local Authorities and Oldbury Site Stakeholder Group (SSG) around Oldbury.	To inform public engagement during the consultation.
Oct / Nov 2016	Briefings to SSGs and other fora.	Wylfa Project Liaison Group , 20 th October 2016 Oldbury Site Stakeholder Group , 2 nd November 2016
Sept – Dec 2016	Attended or spoke at conferences and events organised by others.	Examples include: <ul style="list-style-type: none"> • BEIS NGO forum on 19th December 2016 • Nuclear Industry Association conference on 1st December 2016 • World Nuclear New Build conference in London from 12-14 September 2016.
12 th December 2016 – 3 rd March 2017	Formal 12-week consultation period.	Formal written responses sought. 35 responses received . Published on 13 th July 2017. Participants included, local councils, non-governmental organisations (NGOs) and industry.
24 th January 2017	National Stakeholder Workshop (England and Wales).	Jointly hosted by the Environment Agency and Natural Resources Wales
30 th January 2017	Afternoon and evening public drop-in session in Cemaes.	Hosted by NRW.
30 th January 2017	The Environment Agency, Natural Resources Wales and ONR presented to the Wylfa site stakeholder group, at the Wylfa site.	
31 January 2017	Afternoon and evening public drop-in session in Langefni.	Hosted by NRW.
7 February 2017.	Morning and evening stakeholder briefings in Thornbury.	Hosted by the Environment Agency.
8 th February 2017	Afternoon and evening public drop-in event in Thornbury.	Hosted by the Environment Agency.
March – December 2017	Post consultation review: EA consider all responses to the consultation.	Currently being undertaken.
End of 2017	The final decision document, including the Environment Agency's reply to each issue raised in consultation response.	The document will be published on the GOV.UK website.

2.8 How this report is structured

The main evidence and learning is set out in Sections 3 to 7; covering impacts, dialogue process, inputs to the project, the broader context within which GDA is operating and review of HM Consultation Principles and previous GDA evaluations. Section 8 sets out brief conclusions.

Section 3 relates to the impact, influence and changes that the engagement process has achieved or has aspirations to achieve. It considers:

- The extent to which engagement and consultation activities have informed the GDA assessments.
- The impact on trust and confidence in the regulators.
- The degree to which the engagement objectives have been achieved.
- Whether the wider engagement activities have encouraged responses to the formal consultation process.
- Communication of the engagement findings to those who were involved and key stakeholders.
- The ongoing commitment to and attitude of regulators to engagement processes.

Section 4 addresses the engagement and consultation process. It considers:

- The engagement of the ‘correct’ stakeholders and members of the public.
- The extent to which the engagement and consultation process has been appropriate for and clear to stakeholders and members of the public.
- The extent to which individual engagement and consultation methods have been appropriate for and clear to stakeholders and members of the public.

Section 5 considers how the initiative has related to and complemented other engagement, consultation and planning processes regarding nuclear issues.

Section 6 considers the inputs to the initiative including the use of project resources, management and governance. It considers:

- The extent to which the resources deployed were sufficient to deliver the objectives and the value for money.
- The effectiveness of the management and governance structures.

Section 7 briefly reflects on the achievement of H M Government’s Consultation principles and the agreed actions from the Sciencewise GDA public dialogue project.

At the start of each sub-section the headline findings are summarised. At the end of each of the main sections, ‘learning points’ are set out in shaded boxes to provide easy reference to the key learning from the evaluation.

3 Impacts of the engagement and consultation process

3.1 The extent to which engagement and consultation activities have informed the GDA assessments.

Headline findings:

Overall, the engagement and consultation activities are not likely to change the assessments and preliminary conclusions already undertaken (due to the nature of the comments and the technical content).

There is some confusion about GDA and the scope of GDA among the interested general public and local stakeholders.

Many of the issues that people want to discuss are not within the remit of the Environment Agency's engagement process or regulatory responsibilities.

It is accepted by the core GDA teams within the Environment Agency, ONR and NRW that it is very difficult, to keep an exclusive focus on the Environment Agency's responsibilities, assessments and conclusions for GDA when undertaking engagement and consultation activities.

There are a range of opinions as to how to modify the engagement and consultation processes to better align business and engagement objectives.

There is an acceptance that, purely in terms of engagement on GDA, it will be important to keep the process under review and seek improvements in efficiency. The importance of making connections with individuals and stakeholders and demonstrating that the regulators want to hear people's views and answer questions is however potentially very valuable.

The Hitachi-GE web based comments process has provided a useful and auxiliary mechanism to receive comments on the GDA process.

Overall, feedback from assessors suggests that the findings of the engagement and consultation activities are not likely to influence, to any great extent, the GDA preliminary conclusions, following the detailed assessment. Evidence suggests three main strands that result in this outcome.

- The Environment Agency has undertaken a well-resourced, robust, thorough and expert technical process over a considerable period of time. There is a high degree of confidence in the conclusions.
- Many of the formal consultation responses and much of the feedback and focus of the wider engagement activities are not within the scope of GDA. They relate to wider nuclear energy issues.
- To comment meaningfully on nuclear power station design issues, within the consultative process, requires considerable technical expertise and the time and resources to respond to the consultation documentation. Stakeholders and interested parties do not always have the time and technical expertise or the ability to commission their own expert assessment.

This combination of responding to a robust assessment and the challenge of maintaining the engagement and consultation focus on Environment Agency GDA issues has generated a range of questions and challenges from both technical and engagement focussed GDA team members, across the Environment Agency, ONR and NRW.

There is a tension between knowing that the technical impact of engagement is limited while acknowledging that engaging and consulting on this element of nuclear new build, although

challenging, is appreciated by stakeholders and members of the public. In essence, there is a potential disconnect between the business and engagement objectives. The face to face contact with both local and national stakeholders through workshops, briefings, drop-ins and one to one conversations provides an opportunity for stakeholders to connect directly to regulators. It also provides regulators with a better understanding of the areas of interest and concern among technical focused stakeholders, interest groups and the wider public.

“It’s maybe too technical a project for the general public to engage with and we need to think about how we engage with them differently in the future.” Member, NNB Communications and Engagement working group, EA.

“I felt there was great value in holding the events – be seen, get out there, show people that we’re human and not robots behind a desk.” Member, NNB Communications and Engagement working group, NRW.

“The comments aren’t technical enough to inform our technical assessment work,” Member, NNB Communications and Engagement working group, EA.

“While there are only a few occasions that consultation responses have initiated changes, for me, that is still good value.” Member, NNB Communications and Engagement working group, EA.

A recurring theme across all the engagement and consultation activities (in particular, the local workshop and drop-ins) was the challenge of keeping a focus not only on GDA but on the parts of GDA that are the responsibility of the Environment Agency / Natural Resources Wales (rather than ONR). In the engagement events, there was a lot of focus on accident scenarios which is the remit of ONR. Across all engagement activities people also wanted to talk about and feedback their views on nuclear policy generally and more site-specific permitting and planning issues.

“The public don’t really understand the difference between the role of the regulator and the setting of government policy.” Assessor, EA.

“Nuclear is an emotional issue and so you get an emotional response, which as a regulator, if you’re not allowed an opinion, it’s hard to deal with.” Assessor, EA.

“Some people did say to me they did not understand the GDA step in the overall process of a new power station.” Member, NNB Communications and Engagement working group, NRW.

“It’s a bit of a grey area between safety and the environment, and accidents do impact on the environment; that wasn’t touched on at all.” Participant, National Stakeholder Workshop.

It was generally agreed that the Hitachi-GE web-based comments process has worked well. This web based resource has provided a useful additional mechanism to receive more technically oriented comments on the GDA process. The quarterly reports produced by ONR, NRW and the Environment Agency aimed to summarise the current position and highlight key challenges and issues, as well as demonstrating progress against timeframes. The intention was openness and transparency during the progress of the assessment. Feedback suggests that there have been some issues with these being delayed and therefore the information provided was sometimes out of date. They have generated some useful journalistic enquiries but as a mechanism for ongoing engagement and consultation they have been less effective.

3.2 The impact on trust and confidence in the regulators.

Headline findings:

Face to face contact between the regulators and the engaged public / stakeholders has a value in itself. Although it may be difficult in the short term, an ongoing commitment to engage openly does build trust and confidence in the long term.

Across the spectrum of stakeholders engaged the degree of trust and confidence built was variable, depending on the perspective of the individual, group or organisation and their experience of the engagement.

The feedback gathered from the GDA teams within the Environment Agency, NRW and ONR as well as from professional and community stakeholders who engaged with the process presents a mixed picture. The question of trust and confidence is very much related to the tension outlined above; the tight technical focus of GDA interfacing with a desire by many consultees to engage with and feedback their views on site-specific and policy related nuclear issues.

What is difficult to assess is the impact of not engaging at this point in the design process. Regulators across the three organisations fed back a similar sentiment, that *“you’re damned if you do and your damned if you don’t.”*

From the perspective of the regulators, most respondents felt that, on balance, the process of engagement and consultation does build more confidence and trust. Regulators fed back across the Environment Agency, NRW and ONR that being prepared to actively and honestly communicate face to face with those individuals and groups who have an interest or concern is an important function of what they do.

“We’re exposing ourselves, effectively, to that scrutiny”, “I think there’s a lot of strength in that.” Member, NNB Communications and Engagement working group, EA.

“At least the Environment Agency turned up to talk about these issues and that was appreciated. 80% of success is just turning up.” Assessor, EA.

“It may have even have had a negative effect. The information they craved at Anglesey and Oldbury was site-specific and I don’t think we provided that.” Assessor, EA.

Opinion was also mixed among the participants who attended the community drop-in and workshop in Thornbury. Of those who provided feedback there was some dissatisfaction with the process of engagement while others welcomed the opportunity to receive information and interact with the regulators. Again, the issues of the scope, focus and ability to engage with the technical content of the consultation was prominent.

There were two main strands of comments from participants, which in turn affected the levels of trust and confidence they took away from the events.

- Lack of clarity, both beforehand and at the event itself, in relation to exactly what was being consulted on.
- Who the events were aimed at and the degree of technical knowledge needed to participate effectively.

“The exhibition had people from all aspects of nuclear who were happy to discuss all sorts of things that weren’t part of the consultation, which was brilliant, but wasn’t then clear what the actual consultation was about.” Community participant, Thornbury.

“They pitched their talks in the best possible manner so that people like me could understand it and they should be complimented on that.” Community participant, Thornbury.

“There was a mismatch between what people wanted to discuss and the focus of the consultation.” Community participant, Thornbury.

“There’s a general, tacit acknowledgment that all the consultation is, is window dressing and that if the process stops people getting their pitch forks out and other forms of civil disobedience, then the process has worked.” Community participant, Thornbury.

“When you are in information overload, you resort back to emotional responses.” Community participant, Thornbury.

“I kept being deflected and told that’s not what we are considering at this stage.” Community participant, Thornbury.

Another trust based issue that was picked up by regulators and a participant at the Thornbury workshop was that of having Hitachi-GE, the UK ABWR designer, present at the engagement events. It may have impacted, in the eyes of some stakeholders, on the perception of the independence of assessment of the regulators.

“We thought, it would be good to have a representative from Hitachi GE at the events as they could answer some specific questions from the public on the design. In fact, it possibly had a negative effect as some people thought, ‘they are here as well, you must all be working together’, which isn’t the case.” Member, NNB Communications and Engagement working group, NRW.

“I consider them all with the same brush, because they are closer to each other than the distance between them and me... in terms of power, understanding, control and ability to affect decisions.” Community participant, Thornbury.

“Not sure we should have had Hitachi-GE or Horizon at any of the events as it takes away the impression of independence.” Assessor, EA.

3.3 The degree to which the engagement objectives have been achieved.

Headline findings:

The objectives, overall, were fit for the purpose of the engagement process. They could have been more succinct and it may have helped to include some metrics so that their achievement could be measured more clearly.

The published engagement aims and objectives and the consultation objectives are those set out in 2.5 above.

It is challenging to maintain a focus on GDA and therefore the objectives of the engagement process.

Intelligence about stakeholders was good but it was more challenging to engage with individuals and organisations.

Information, feedback and updates on the engagement process and consultation findings are readily available, provided individuals can access the internet.

The published engagement aims and objectives and the consultation objectives are those set out in 2.5 above. It was generally agreed that the published objectives were fit for the purpose. Overall there was some feedback that they could have been more succinct and perhaps include some metrics so that their achievement could be measured more clearly.

A brief overview of the extent to which these objectives were achieved is provided below. Further, more detailed evaluation, is provided across Sections 3 – 6, which address the specifics in the achievement of these objectives.

Our engagement aims

Our stakeholders understand our role in nuclear regulation and specifically new build - what we do and what we don't do;

Reflecting points made in 3.1 and 3.2 it was felt that the regulators did explain their role but could have done this more clearly. This may have helped the focus of the more local and community based events.

"We really needed to spell out this is who we are, this is what we do, this is why we're here." Member, NNB Communications and Engagement working group, NRW.

"I'm not convinced that the public really understand our [NRW] role in nuclear regulation – not sure they understand anybody's role clearly." Member, NNB Communications and Engagement working group, NRW.

In explaining the role of regulators, it was suggested by one respondent that there was too much of an emphasis on the process of GDA than the outcomes it sought to achieve. This focus drew consultees into the more technical detail rather than thinking more broadly about the purpose of GDA.

"The briefing doesn't actually focus upon the consultation document content rather the roles and responsibilities of various bodies and the process itself." Community participant, Thornbury.

There was also some commentary on the benefit of orientating participants within the bigger picture of new nuclear planning processes. [Infographics](#) were used for the first time and feedback was sought on their effectiveness. There was opinion from both regulators and participants that they could have been clearer.

We understand stakeholder views so that we can use these to help inform our assessments;

The learning set out in 3.1 above would suggest that it is challenging to maintain a focus on GDA (especially among non-technical stakeholders and at a local level). This in turn impacts on the value of views in informing assessments.

We engage with relevant stakeholders at appropriate times;

The findings in 4.1 below show that stakeholder intelligence was good and the mechanisms to contact stakeholders at both national and local levels was effective. The ability to engage with stakeholders was more difficult for a number of reasons, including the challenge of generating an interest in and focus on GDA. At a local level, there was reasonable engagement with a cross section of interested individuals, groups and organisations. The national stakeholder event in January 2017 was less well attended, particularly by the NGO sector. Engagement in the GDA process took place over a long period of time (January 2014 – August 2017) which again provided the challenge to maintain the interest and connection with stakeholders. Timely direct contact was made with key stakeholders (briefings, conference presentations, telephone conversations etc.) over this period which helped to maintain interest and feed stakeholder opinion about the consultation and engagement into the design of the process.

Stakeholders understand how they can provide comments and views.

Generally, stakeholders were clear about the opportunities to provide comments and views both through the wider engagement activities and in responding to the consultation document during the formal consultation period. There was perhaps less clarity among stakeholders who attended the local events in terms of appreciating that they could respond to the consultation document. Sections 4.2 and 4.3 below provide more analysis.

Specific engagement objectives

Our specific objectives are to:

- *Share information and proposals in order to build the understanding and knowledge of interested stakeholders about GDA, our decision-making processes and the role and responsibilities of the regulators.*
- *Encourage and enable stakeholder input.*
- *Consider stakeholder inputs and, where relevant, we can use these to help inform our assessments.*

The three engagement objectives above relate to the engagement aims and the commentary provided above.

- *Report our progress on GDA and explain our decisions.*

More detailed analysis is set out in 3.5 below. Information and updates regarding progress and decision making has been clear and is clearly set out on [Gov.UK website](#). The collated [consultation responses](#) have been published and are available on the joint regulators website. The challenge over what will be nearly a four-year process has been to maintain ongoing contact with key stakeholders and communicate progress and significant milestones.

In addition, there are **consultation objectives set out in a [Consultation Plan](#)** (updated July 2017):

We want to make sure that stakeholders:

- *Understand how we assessed the reactor design.*
- *Understand the findings of our assessment.*

- *Have an opportunity to give us their views.*
- *Know what will happen next.*
- *Can help make our final decision on the acceptability of the reactor design as robust as possible.*

Certainly, consultation questions were clearly set out in the consultation documentation, however, for the reasons discussed in 3.1, the assessments will only be informed by relevant comments. These are unlikely to be changed a great deal in response to the consultation submissions.

There was still some uncertainty about the timetable of feedback and decision making at the time of the consultation and there were delays in sending out a summary of responses to the consultation due to the general election period. This is now much clearer and well communicated.

3.4 Whether the wider engagement activities have encouraged responses to the formal consultation process.

Headline findings:

Although there is no hard evidence, there is consistent feedback that the wider engagement activities did encourage responses to the formal consultation. Local engagement activities may have promoted responses but many of these responses were site-specific.

35 formal responses were made to the consultation. Stakeholder feedback suggests that there were a number of reasons that resulted in a response not being submitted:

- Individuals and organisations had all the information they needed.
- Individuals and organisations local to the proposed sites may be saving their comments until the site permitting and planning stages.
- The complex technical nature of the consultation may have limited responses.
- There was a perception among some respondents that the responses will have little impact on the assessment and decision.
- Some organisations do not have the resources or capacity to respond to the technical detail as they would like.
- Some respondents may have used the GDA comments process. On closure 83 comments had been made.

The consultation summary document was well received and supported responses.

From the regulators' perspective, although there is no hard evidence, there is consistent feedback that the wider engagement activities did encourage and inform responses to the formal consultation process. It was pointed out that a lot of the responses, that came from individuals and organisations close to proposed sites, were very site-specific. The local engagement activities may have promoted responses but the response did not necessarily address the specific GDA consultation questions.

There were 35 formal responses to the consultation. It is possible that individuals and organisations local to the proposed sites may be saving their comments until the site permitting and planning stages, having understood the generic and technical focus of GDA. This is backed up by comments from participants at the local events who are generally more interested in and concerned by site-specific issues and, having attended the event, understand the limited scope of the GDA.

“I’m interested in the planning aspects and specifics of the site in Oldbury. I don’t feel in a position to comment on the GDA itself. I don’t want to get involved until it becomes more specific.” Community participant, Thornbury.

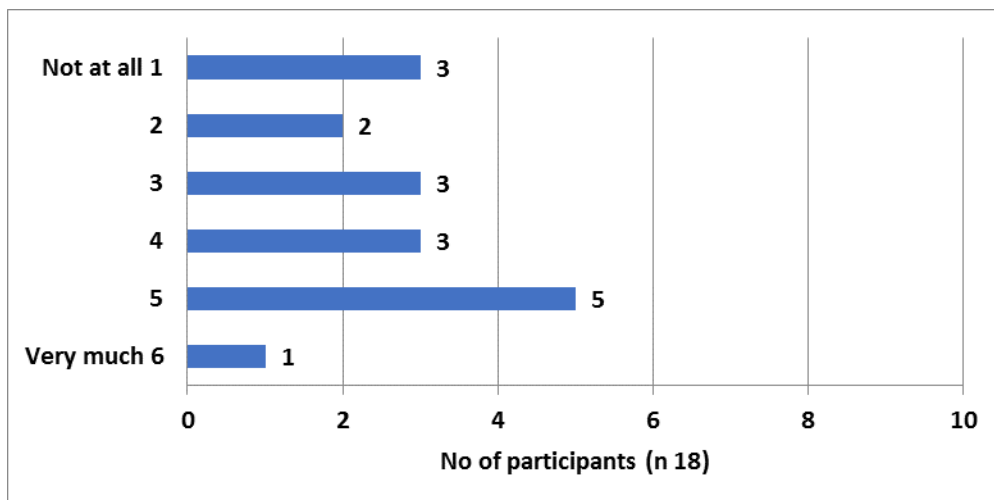
There is also some evidence from the engagement activities that participants don’t feel they will be listened to or that their comments will be impactful so there is little point in spending more time in responding to the formal consultation.

“Whether it will happen or will not happen will be the decision of people that don’t live around here and the design of what it is will be regardless of what we think, so it is pointless, like all consultation exercises are to some extent.” Community participant, Thornbury.

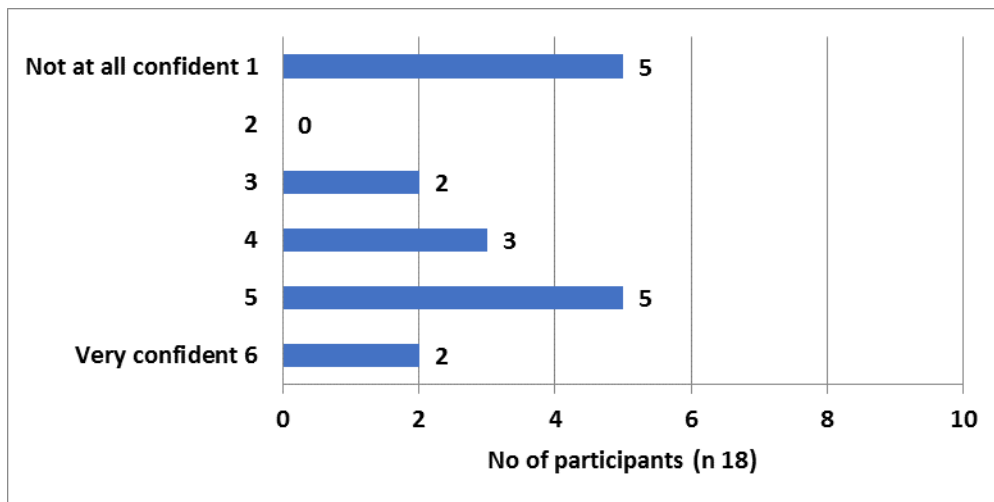
“We think it’s nonsense to think that we can influence it. Consultation infers equality, which is just not there.” Community participant, Thornbury.

The following two charts show a collation of responses from participant feedback sheets completed after the Thornbury stakeholder event on 7th February 2017. They show a mixed response to each question, with a fairly even spread of participants more or less encouraged to submit a consultation response and more or less confident that their comments will be influential.

Has the briefing supported your ability to respond to the consultation?



How confident are you that the Environment Agency will take account of comments made during the consultation period on the Generic Design Assessment?



Comments received from the National Stakeholder workshop, which took place in January 2017, suggested that the consultation summary document was very useful and an aid to responding to the consultation as the main document is “*extremely dense and technical*”. This was anticipated by the regulators and the summary document was produced to enable greater participation from a non-technical audience.

The detailed technical nature of the main consultation document may have limited responses, especially from individuals and community based groups close to proposed sites. Feedback suggests that the size and complexity was a barrier to responding and addressing the technical issues.

“If you have a big enough process, and you can disguise something enough, or make it boring enough for nobody to bother reading and then you can get anything through.” Community participant, Thornbury.

“We have produced this document. We know you’re not going to read it. You know you’re not going to read it – but that’s the process.” Community participant, Thornbury.

“When you are in information overload, you resort back to emotional responses.” Community participant, Thornbury.

A national nuclear focussed NGO suggested that, although they would respond, they did not have sufficient resources to address and challenge the detail of the technical issues as they would have liked.

“As generalists, we can comment, but to have real technical scrutiny from outside government is very difficult. I think we’re getting poorer expert independent scrutiny of government and therefore getting poorer final products. Since the 2008 recession NGOs are poorer and poorer, so struggle to find the resources to respond to these consultations.” NGO participant, National Stakeholder Workshop.

3.5 Communication of the engagement findings to those who were involved and key stakeholders.

Headline findings:

Publication of the compilation of responses made to the GDA consultation for the UK ABWR was

delayed due to the UK general election pre-election period. It has now been [published](#) and is available to all.

The next significant stakeholder contact will be the joint decision document to be published by the Environment Agency and NRW. The regulators are targeting December 2017 to publish this document.

The communications planning work related to the decision document has already begun and is being coordinated by the Joint Regulators' Nuclear New Build Communications and Engagement Group.

The comments, questions and key discussion areas in the wider engagement activities were not formally recorded.

One comment suggested that from stakeholders' perspective the process of responding to the formal consultation submission would benefit from being more rapid.

The document that has collated the formal responses to the GDA consultation for the UK ABWR was scheduled to be published in April 2017. Publication was delayed due to the UK general election pre-election period. It has now been published and is available to all.

This delay was outside the control of the regulators and was released as soon as possible after the election.

The next significant stakeholder contact, apart from the quarterly reports, will be the joint decision document to be published by the Environment Agency and NRW (ONR will publish its own reports). The regulators are targeting December 2017 to publish this document. The document will also include responses to the comments and questions contained in the submissions to the consultation. The EA and NRW will also publish a summary report and assessment reports.

The communications planning work related to the decision document has already begun and is being coordinated by the Nuclear New Build Communications and Engagement Group.

The comments, questions and key discussion areas generated during the national stakeholder event in January 2017 were noted and fed back to attendees. In the local workshops and drop-ins notes were not formally taken. If there had been any issues raised that may have impacted on the regulators' preliminary conclusions they would have been considered, even informally. Throughout the national and local events nothing emerged that would need to be fed into the preparation of the decision-making document. Regulators encouraged people to put their thoughts and comments in writing through the formal consultation process to ensure they were captured for all to see and not misinterpreted.

One comment from regulators suggested that they felt the process of responding to the formal consultation submission would benefit from being more rapid. They suggest that regulators need to balance the needs of stakeholders against the time needed for the internal work of responding to the consultation responses.

3.6 The ongoing commitment to and attitude of regulators to engagement processes.

Headline findings:

Evidence suggests that engagement does add value and it is important to make direct contact with stakeholders. There does need to be a review however of how best to use engagement resources within both the GDA and the wider nuclear new build programme. From a technical point of view assessors, in particular, fed back that consultation, at a different stage could potentially add greater value to the technical assessment but recognise further thought would be required.

Ongoing learning would explore how to value and address stakeholder technical opinion while maximising the value of engagement to build relationships, reduce conflict and improve understanding and perception of regulators by stakeholders and the general public.

A range of ideas and options have been framed to address the perceived weaknesses in engagement approaches.

This section focusses again on the questions addressed in 3.1 and 3.2 above, relating to the pros and cons of engagement, with which stakeholders, at what level and at what stage of the GDA process.

It is generally accepted that a great deal of engagement resource is deployed within a GDA and it is often difficult to quantify the benefit and additional value of the engagement undertaken. There would appear to be two main strands of thought within the GDA regulatory teams.

Feedback from across the Environment Agency, NRW and ONR suggests that engagement does add value but this is mainly focussed on relationship building, reducing conflict and improving the understanding and perception of regulators by stakeholders and the general public. From a technical point of view assessors, in particular, fed back that consultation, at a different stage could potentially add greater value to the technical assessment but recognise further thought would be required. There does need to be a review of how best to use engagement resources within both the GDA and the wider nuclear new build programme.

“My personal opinion is that people don’t really care about a paper design. They just care about how it’s going to impact them, their families and their communities, so they will generally only have site-specific issues about health and safety, impact on home value, visual impact, traffic etc.” Member, NNB Communications and Engagement working group, EA.

““The GDA process is an assessment of a generic design and not specific to any location or proposed site. I think we should continue with public consultation and engagement at GDA if the public sees value in it. However, it may be better to concentrate our resources on public consultation of actual site-specific projects.” Member, NNB Communications and Engagement working group, NRW.

“We are willing to do it if it’s going to add full value, but I’m not convinced that what we’ve done adds value.” Member, NNB Communications and Engagement working group, EA.

The majority of feedback suggests that there needs to be ongoing learning with respect to understanding better how to maximise the value of engagement to both regulators and stakeholders. This would involve valuing and enabling not just the technical feed into GDA from stakeholders but the less quantifiable objectives of relationship building, conflict resolution and the perception of regulators by stakeholders and the interested general public.

A number of ideas have been put forward for ongoing review:

- Considering an engagement process at this stage of GDA that would be more web based. It could be similar to the comments process run by Hitachi-GE but managed by the regulators.
- Develop further the profile and understanding of GDA with stakeholders and have a more consistent approach across regulators. For example, integrating the engagement work around both the Environment Agency, NRW's and ONR's GDA responsibilities. In this way bringing together environmental performance and safety. This is one area which confused / frustrated stakeholders.
- Others may find it useful to consider collaborating more with the regulators so that environmental, safety and other matters can be addressed in a more integrated way.
- Explore whether it is possible and productive to design the focus and scope of different levels of engagement according to the interest of stakeholders. National and professional stakeholders will be more able to engage with the generic and technical issues whereas local stakeholders and members of the public will inevitably want to comment more on site-specific issues and nuclear policy in general.
- At a local level, make better use of local communication and engagement resources. For example, local social media, blogs, newspapers, posterage.
- At a national / technical stakeholder level, review whether a single stakeholder workshop is the most effective approach to engagement. It may be possible to have more ongoing one to one dialogue with key organisations or 'piggy back' on their own sectoral events (NGOs, academia, public health, the nuclear industry etc.).
- Recognise and grow the staff available to support engagement design and delivery. Experienced technical staff who can operate effectively within contentious meeting environments have been seen to be an essential resource.
- Engaging on GDA at a different point in the process. Possibly consider moving it forward in the process to consult prior to the assessment and preliminary decisions. The stakeholder feed in could then inform the assessments underpinning the preliminary decision rather than respond to it.

Section 3 Learning points.

Impacts of the engagement and consultation process

There is a need to review the purpose and timing of stakeholder engagement in relation to GDA. There is a partial disconnect between the overall purpose of GDA (i.e. rigorous scrutiny process leading to a decision on design acceptability) and some of the engagement aims and objectives which seek stakeholder input to inform assessments. The reality of the stakeholder engagement undertaken, is that it is difficult to maintain a focus on GDA and does not necessarily follow through into a greater number of, or more focussed responses to, the consultation document.

Engagement has added value in the GDA process. That value has been more related to demonstrating openness and building relationships, understanding and trust between regulators and stakeholders than informing the assessments.

In future, it would be useful to have one plan, aligned across the Environment Agency, ONR and NRW, for all communications, engagement and consultation activities, with one set of objectives. Any internal and external published versions of this plan should share the same objectives.

The summary consultation document was useful in making the complexity of GDA more accessible. This should be retained and developed for future GDA processes together with more use of infographics to support the understanding of complex processes.

There is a substantial amount of resource deployed on engagement processes and activities within GDA. It is difficult to quantify the benefit and additional value of the engagement undertaken. There needs to be further consideration of the purpose of and investment in engagement with a particular focus on the balance between informing the assessments and wider engagement objectives such as building relationships with stakeholders. A number of initial ideas are set out in 3.6.

4 The consultation and engagement process

This section considers the work involved in designing and delivering the consultation and engagement process.

4.1 The engagement of the 'correct' stakeholders and members of the public

Headline findings:

Stakeholder intelligence was good both nationally and locally.

The consultation was trailed well, and early in the process, with key stakeholders well in advance and attention paid to their feedback.

There was a disappointing turn out for the National Stakeholder Workshop in January 2017. Although invited there was particularly low attendance across the interested NGO sector.

Although the Environment Agency thoroughly publicised the local events in Thornbury there was some participant feedback to suggest that publicity could have been more effective. The main lesson in Anglesey regarding publicity was an over reliance on social media.

Reaching and engaging the 'correct' stakeholders is fundamental to the process at both a national and local level. The Environment Agency has a good database of national professional stakeholders which is regularly updated. At a local level, there was a lot of effort made by area teams to make sure stakeholder databases were updated. This included, for example, making sure interest groups in Bristol were identified and contacted about the engagement activities locally. Segmentation, by distance from the proposed site, was also undertaken for the local events. Stakeholders within 10 miles of the proposed site got a much more personal invitation. It is recognised that stakeholder identification is challenging as the picture is constantly changing but evidence would suggest that the contact databases were as good as they could be.

The consultation was trailed for a long time and initial soundings from stakeholder groups were undertaken as early as 2014 and 2015. The Environment Agency's Senior Stakeholder Engagement Adviser, Nuclear Regulation Group, undertook close to 20 telephone calls, between April and September 2014, with a wide range of national and local stakeholder groups who had an interest in nuclear energy issues. These included; academic forums, learned societies, local authorities, NGO's, site stakeholder groups, nuclear new build site forums, professional institutions, trade associations and trade unions. The calls focussed on how these groups would like to be engaged in GDA. So far in advance of the consultation, the exercise was largely awareness raising but it did elicit some invitations to address stakeholder meetings, additional contacts and new mechanisms for contacting stakeholders.

In summer 2015 surveys were conducted in both England and Wales, asking key stakeholder sectors what would make it easier for them to participate in a GDA consultation. Similar sectors and groups who had been contacted in 2014 were surveyed. A mixed assortment of comments was fed back with a majority interested in attending a national GDA consultative seminar early in the consultation period. There were also more invitations to speak at stakeholder events and offers to publicise the GDA consultation through their own networks.

Between 2014 and 2017 the Environment Agency hosted discussions with and made presentations to technical audiences such as the UK Nuclear Academics Forum, industry bodies, such as Market Force, the NDA National Stakeholder Meeting and the Royal Academy of Engineering. There were also presentations made at the 2015 and 2016's [World Nuclear New Build Conference](#), The Nuclear Industry Association's annual conference and the DECC / BEIS NGO forum amongst others. These meetings and briefings were broadly awareness raising about GDA and the upcoming consultation.

In March 2016, more detailed sounding were taken with local authorities around Oldbury. This was specifically to inform the stakeholder and public engagement process locally. The authorities contacted were; Forest of Dean District Council, Stroud District Council, Bristol City Council, Wiltshire Council, North Somerset Council, South Gloucestershire Council, Sedgemoor District Council, Herefordshire County Council, Mendip District Council, Cheltenham District Council. They were asked about:

- Other organisations / stakeholders who need to be engaged.
- Who should be on the Environment Agency's stakeholder list from their organisation.
- Mechanisms available to inform the community about the GDA engagement.
- Venues suitable for drop-ins and workshops.
- Use of local media.
- Any pre-planned meetings / consultations that the GDA engagement could link with.
- Anything to avoid.

This process provided good intelligence and additional contact points for the local events and was timely in relation to the planning needed for the local engagement events.

The National Stakeholder Workshop – 24 January 2017

Additional commentary is provided below, relating to the content of this workshop. In terms of the engagement of the 'correct' stakeholders however it is interesting to note that this event was not particularly well attended. There were about 40 attendees, less than expected, due to a number of no-shows from organisations who registered to attend and very few NGOs and community focused organisations.

Anecdotal feedback suggests that stakeholders may have felt that they already knew enough about GDA to respond to the consultation. It was also pointed out that for Welsh stakeholders, focussed on Anglesey, it was a long way to come to Birmingham and that a separate, or closer workshop may have been better attended (although there were local consultation events on Anglesey). There was poor attendance by NGOs which may reflect the focus of their interest in new nuclear (policy and site-specific rather than GDA) and may not have been helped by the decision not to offer travel expenses to any delegates, including this sector.

Local events and workshops

Attendance at these events was reasonable. 45 people attended the stakeholder briefings and 59 attended the drop-ins over the two days of events in Thornbury (7 and 8 February 2017). Despite the

thorough stakeholder identification work locally some participants fed back that in their opinion these events were poorly publicised. Three out of the five participants interviewed about the Thornbury events felt the publicity was poor and didn't explain well what the meeting was about.

"My axe to grind was the appalling publicity that the event had been given." Thornbury workshop participant.

"Having been involved previously, I would have expected to have been told that it was on." Thornbury workshop participant.

Despite these comments it is evident that the events were advertised and promoted widely and thoroughly by the Environment Agency; directly to stakeholders by email, in the local media, using social media and on posters. In brief, the following was undertaken to advertise and promote the events.

- **Emails** – databases used included national organisations and people who live near to the Oldbury and Wylfa Newydd sites such as parish and local councils, non-government organisations, environmental groups, professional institutions, nuclear and environmental academics, the nuclear industry and trade unions.
- **Local newspaper** adverts, in the Bristol Evening Post, Gloucestershire (Thornbury) Gazette, and The Forester.
- **Press releases** to trade, national and local media. This resulted in several articles in print and digital media.
- **Social media** (Twitter, Linked-in) to promote links to the regulators' consultation pages and the time and location of drop-in events in Thornbury and on Anglesey.
- **Blogs** on GOV.UK about the consultation and tweeting of this blog
- **Posters** sent to all South Gloucestershire libraries and other public locations near Horizon Nuclear Power's sites.
- **Third parties and advocates**; securing their support to raise awareness. For e.g. [South Gloucestershire Council](#), Turnberrie's community centre, Thornbury, Notices in parish magazines and websites.
- **Horizon Nuclear Power's December 2016 newsletter**; information about the events was delivered to around 16,000 homes (including every house in Thornbury).

At the Anglesey events, the main observation and learning regarding publicity was an over reliance on social media. With an elderly resident profile, many people are not users of social media and so could not have accessed this method of communication.

It was noted that better stakeholder intelligence locally may have reduced the disruptive behaviour of some participants at the Thornbury meeting. The groups and individuals were known to the Environment Agency and had attended other events. Some advance direct contact with this group or specific individuals, to explain the focus and structure of the event may have mitigated some of the disruptive behaviours within the meeting that worked against other participants getting the most from the meeting.

"A conversation with the leader of the pressure group beforehand would have been useful." Member, NNB Communications and Engagement working group, EA.

4.2 The extent to which the engagement and consultation process has been appropriate for and clear to stakeholders and members of the public.

Headline findings:

It is difficult to maintain engagement with a process that has taken place over nearly five years.

Leading up to and during the 12-week formal consultation period the intensity of engagement activity increased and the legibility of the engagement and consultation process became clearer.

Stakeholders representing professional bodies, with an interest in nuclear new build, understand the focus and timetable of the GDA process. At a local level, the picture is more complex and mixed in terms of understanding.

During the GDA consultation there were few other nuclear energy consultation processes happening. It is possible that this encouraged stakeholders to bring a much broader spectrum of issues and comments to GDA than would otherwise have been expected.

The broader engagement and consultation process has, in effect, taken place over nearly five years. The comments process opened and the GDA quarterly reports started in early 2014, followed by the soundings with and briefing of key stakeholder groups from the summer that year. The process has not had the same intensity of activity throughout and so from an external stakeholders' perspective it is harder to track and to maintain a connection to GDA. It is apparent from stakeholder interaction with GDA during this period that it is difficult to maintain an appreciation of a continuous process and to keep individuals and organisations engaged.

Leading up to and during the 12-week formal consultation period the intensity of engagement activity clearly increased and the legibility of the engagement and consultation process became clearer. This was the main focus of engagement activity and where the majority of stakeholders got involved, either attending workshops and drop-ins and / or responding formally to the consultation.

Feedback would suggest that stakeholders representing professional bodies, with an interest in nuclear new build, understand the focus and timetable of the GDA process. The main issue here was engagement rather than understanding of the process, as pointed out in 4.1 above. At a local level, the picture is more complex and mixed. Feedback from the local meetings would suggest that some participants understood the focus of the meetings, the overall process of GDA and where GDA fitted into the wider nuclear new build policy and site-specific planning / decision making process. Others however stated that they didn't really understand the focus of the meetings and the relationship with responding to the GDA consultation document. This is evidenced through comments received and the fact that people wanted to engage with a wide range of nuclear policy and planning issues, not just GDA. Some stakeholders / participants at a local level may have decided to ignore the GDA focus and use the events to put their perspective about nuclear energy in general across. Others were genuinely confused.

"The exhibition had people from all aspects of nuclear who were happy to discuss all sorts of things that weren't part of the consultation, which was brilliant, but I wasn't then clear what the actual consultation was about. I would have liked to have seen more about the consultation in the drop-in. I came away unclear what they were consulting on and had to ask someone, who said it was about a specific document". Participant, drop in, Thornbury.

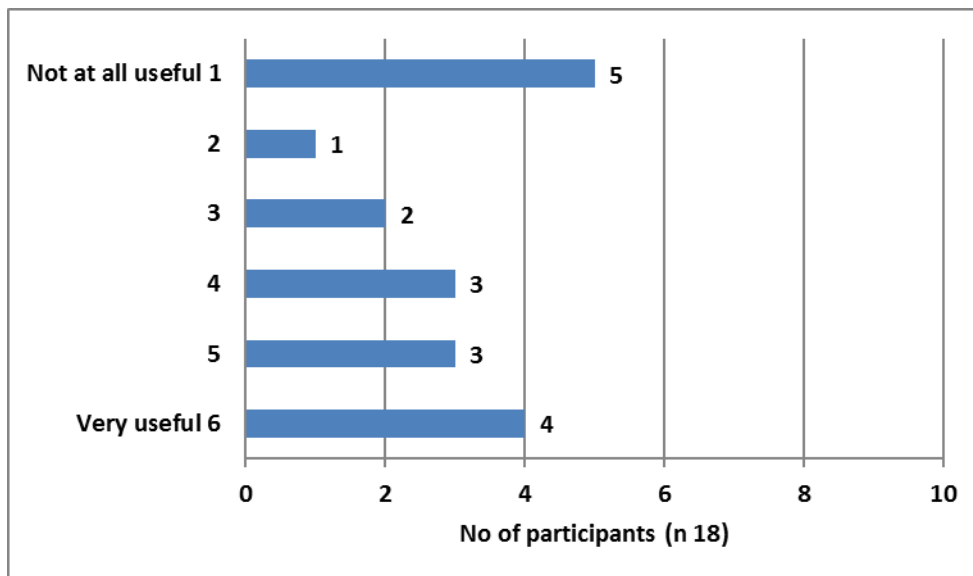
"EA staff are aware that these [wider] issues existed but it [the consultation] wasn't framed in any wider context. That is why you get anger amongst the public and it looks as though we're not joined up with other organisations. I think that riles people, that we're not looking at things holistically" Area staff member, EA.

The design of the workshops and drop-ins was challenging. There was a recognition that participants would want to talk broadly about nuclear issues and so staff were open to doing this. This was so that people felt that their questions were being responded to and not being ignored. It may be however that in doing this the focus on GDA and the consultation process was diluted to the point of confusing some people.

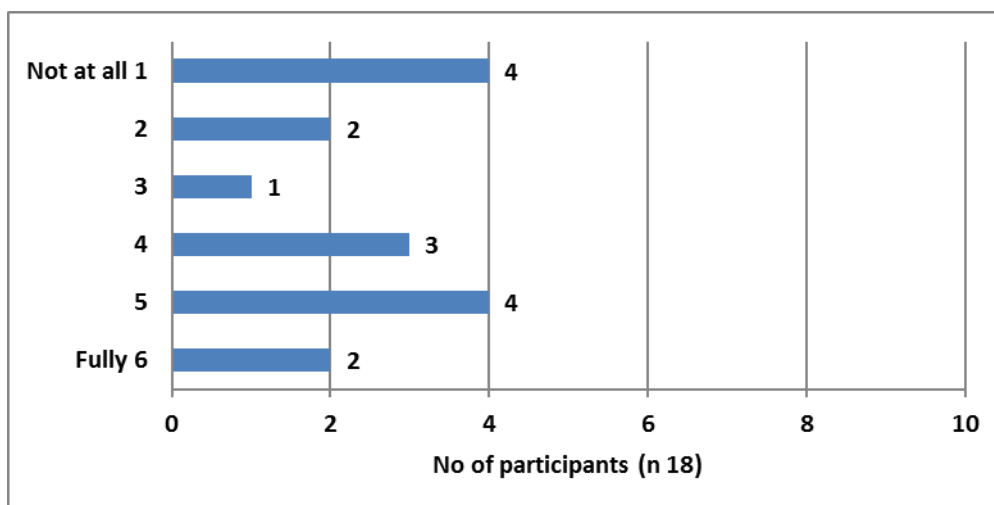
It was pointed out that during this GDA consultation (unlike previous GDA consultations) there were few other nuclear energy consultation processes happening (e.g. policy related, long term spent fuel storage, local planning and permitting) and so the GDA process filled a bit of a vacuum, and attracted a much broader spectrum of issues and comments than would otherwise have been expected.

The following summarised feedback from the 7th February consultation event in Thornbury gives some indication of the mixed views of participants.

How useful overall did you find the briefing?



To what extent have your questions and queries about the consultation process been answered?



4.3 The extent to which individual engagement and consultation methods have been appropriate for and clear to stakeholders and members of the public.

Headline findings:

A succinct evaluative overview of the main engagement methods deployed is set out in the table below.

As set out in 2.7 above, there have been a range of methods used to engage and consult over a considerable timescale. Some have been one off events and meetings such as key stakeholder briefings, workshops and drop-ins whereas other methods have sought to facilitate comments and questions over the entire period. Finally, there is the formal 12-week consultation period. The table below provides an overview commentary on the principle methods used. The degree of evaluation intelligence varies according to the feedback received, the capacity of the evaluation in covering such a broad spectrum and the complexity of the methodology.

<p>GDA quarterly reports.</p> <p>As mentioned in 3.1 above, there have been some issues with these being delayed and therefore the information provided was sometimes out of date. They have generated some useful journalistic enquiries but as a mechanism for ongoing engagement and consultation they have been less effective. This tool is currently being reviewed and will relaunch in 2018 to provide reporting on other aspects of the regulators' work in relation to nuclear new build. This will include licensing (ONR) and permitting (Environment Agency / NRW).</p>
<p>Hitachi-GE's public comments process.</p> <p>Feedback suggested it worked well. It was good that it ran continuously throughout the process. There are suggestions about building on this mechanism. It could be enhanced to provide a more user-friendly interface and perhaps combined with the information providing intention of the quarterly reporting (see changes to quarterly reports above). The pros and cons of the Environment Agency taking this function in-house need to be considered. It may build stakeholder confidence in its independence or result in stakeholders thinking that the regulators are responding on behalf of the requesting parties. The consultation tool, however formulated, would be particularly targeted at technical and scientific people.</p> <p>This enhanced information giving and comment receiving tool may even involve periodic workshops (face to face or webinar style) to pick up on the comments and suggestions, focussed on national technical stakeholders. This may work better and be more productive than a single GDA National Stakeholder Workshop.</p>
<p>Email & follow up calls to key stakeholders. Summer 2014 and Stakeholder 'survey'. Summer 2015.</p> <p>These early and direct contacts with key stakeholders was good practice, built awareness of the GDA process and highlighted / informed engagement opportunities. It also started to build relationships with stakeholders who would potentially be providing insightful responses to the consultation document. It elicited useful additional contact information within sectors, that would enhance the stakeholder identification and analysis process and facilitated a number of invitations to attend briefing meetings with members and associates of those organisations contacted. With the benefit of hindsight, it may have been a more productive exercise closer to the consultation period. The start of the consultation period was delayed and so this could not have been anticipated.</p>
<p>Sciencewise GDA public dialogue project. November 2014 – September 2015.</p>

This [GDA public dialogue](#) project has been separately evaluated. The lessons learnt are still very applicable to this evaluation reporting and is worthwhile revisiting in any review of the current GDA engagement programme.

Soundings from Local Authorities around Oldbury. March 2016

A useful, good practice exercise that elicited a range of contacts and practical information that would support the design and delivery of the public and stakeholder events close to the proposed sites.

Formal 12-week consultation period. 12 December 2016 – 3 March 2017

The fact that the consultation document and summary were produced as plain English documents was well received. In particular, stakeholders fed back that the summary document was useful as the main document was complex, technical and long.

“People were saying to me that the assessments themselves and the reports were too technical and too difficult for ordinary people outside the area to engage with or even understand. People were saying, how can I ask a question as I really don’t understand it,” EA, Assessor.

“We need to ask ourselves whether it is the right approach to engage the public on issues that are so highly technical. Do we want to water it down so that it is accessible and understandable or do we want to say reactor design is not something that the person on the street is going to understand much or even care much about? Is it appropriate that in future we stick to professional and technical audiences?” Area staff member, EA.

There may be a need to review the process of communicating GDA to reduce the number of responses that are out of scope.

National Stakeholder Workshop (England and Wales). January 2017

The workshop had the following aims and objectives:

Overarching aims:

- To share our initial views and the findings so far from our 'Generic Design Assessment' (GDA) of Hitachi-GE’s UK Advanced Boiling Water Reactor design.
- To ensure that stakeholders understand the GDA consultation process, its context, how best to contribute their views and how those views will be considered.

Objectives:

By the end of the seminar participants will:

- Have a basic understanding of the reactor design currently being assessed through the GDA.
- Understand how the Environment Agency (EA) and Natural Resources Wales (NRW) have reviewed the design to ensure that it can meet high standards of environmental protection.
- Understand how the Office of Nuclear Regulation has reviewed the design in terms of safety and security.
- Have an opportunity to discuss some of the key issues arising from the GDA process so far.
- Be clear about the role of the EA and NRW in relation to proposed new nuclear power stations, particularly the Generic Design Assessment and any related site permitting processes.
- Have an understanding of the roles of other organisations involved in new nuclear build including the Department for Business, Energy and Industrial Strategy (BEIS), the Office of Nuclear Development (OND) and the Planning Inspectorate.
- Understand the GDA consultation process, including the questions being asked, the timetable, how best to respond and how responses will be managed.

The summary of the feedback sheets from participants suggested that the majority of participants 'tended to agree' that the objectives had been achieved. There was broad agreement that it was possible to ask questions and contribute to discussions. There was less consensus on the format and programming of the workshop with a number of comments suggesting the balance could have been better, allocating less time for the formal presentations and focussing these more on GDA content than process. It was generally agreed that the Environment Agency / NRW would pay attention to the comments made and the majority of participants who commented felt better equipped to respond to the consultation.

Additional comments made after the event during the three interviews conducted with participants and the observation of the workshop by the evaluator highlighted a number of issues.

- The event wasn't well attended, with a number of 'no shows'. There were about 40 attendees. The NGO sector was particularly poorly represented possibly due to the decision not to pay travel expenses to any attendees.
- Feedback suggested that although copies were available on the day no attendance list was provided in delegates packs. This may have worked against understanding where people came from and what they did, which may have stifled richer interaction on the day.
- Much of the morning presentation was related to GDA process which was more familiar to the people in the room. A focus on findings and assessments would have been more useful.
- Presentations were long and filled the whole morning, limiting time for more interactive discussions between regulators and a range of sector representatives.
- There was very limited time during the day for round table discussions or being able to choose the GDA theme where you had an interest.
- Questions were generated from delegates but there was too little time to respond to them all at the event. It was said by the organisers that all the questions generated would be collated and answered in writing. They were sent out on 28 February 2017.
- There was no movement offered from the table you were allocated at the start of the day which limited interaction between delegates.

"When I came in and we were in small groups, I thought we'd be moving around, talking about different aspects of the consultation, whereas it was very controlled in a central way. It was difficult to get to talk to other people as you were kept in your little area. I thought that was a missed opportunity." Participant, national stakeholder event.

Drop-in sessions and consultation events in Cemaes and Langefni (Anglesey) and Thornbury (Gloucestershire). January / February 2017

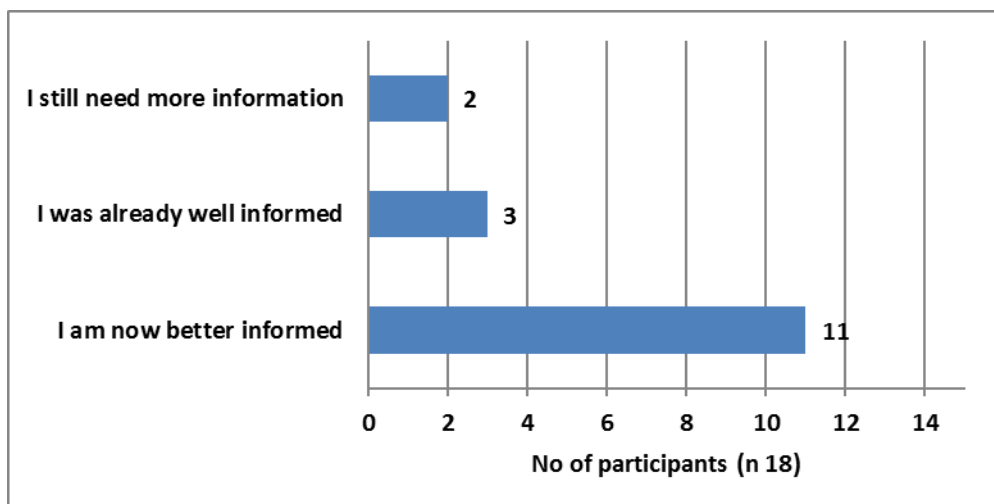
As discussed above (particularly, 3.1, 3.2, 3.6 and 4.2), there is ongoing discussion as to the most appropriate timing for and focus of GDA consultation with communities and stakeholders who are local to proposed sites. There is opinion within the regulators that would propose a different timing, focus and perhaps methodology. Options may include:

- Not undertaking face to face engagement work on GDA with local stakeholders but waiting until consultation can be focussed on more site-specific and permitting issues. GDA consultation could be undertaken through more remote methods, for example, surveys and web based environments. The counter argument is the risk of criticism for not engaging face to face at this stage.
- In terms of thinking about alternatives to regulator organised meetings, it may be worth exploring the potential to go to other organisations' events and have a slot for GDA.

The use of an independent facilitator to support the meeting and drop-in process was advocated a number of times in the feedback, particularly in light of the disruption at the Thornbury meeting. A facilitator could be used not only to manage the meeting but also to support the process / event design and a pre-event conflict analysis. This approach may also enable regulators to focus on the content and style of communication rather than having the additional responsibility of managing and facilitating a meeting.

It was a strength of the regulators' teams present at the local events that there was good representation across the Environment Agency and ONR (NRW leading in Wales). This meant that a wider range of questions and topics could be discussed with authority. This was also appreciated by many of the participants.

Has the briefing enabled you to be better informed about the Environment Agency's role in the regulation of nuclear new build? (Thornbury, stakeholder event, 7 February 217).



At the events there was an indication that there is an appetite for ONR to consult (even though this is not a statutory requirement).

“Very worthwhile process - it does look strange though that ONR do not consult themselves.” Participant, Thornbury Stakeholder event.

It was essential to have fluent Welsh speakers at the Anglesey events and equally, in Wales, it was important that it was clear that NRW were running the event, not the Environment Agency. This was undertaken successfully.

Section 4 Learning points.

The consultation and engagement process

Engagement with the 'correct' stakeholders was largely successful and the database of both national and local stakeholders has been updated and improved as a result of the stakeholder analysis undertaken. It will be useful to maintain regular reviews of this information as the process proceeds to focus on more site-specific issues.

Future GDA engagement processes should consider alternative approaches to engaging with key

national stakeholder groups and organisations. The national stakeholder event was not very cost effective in terms of informing or gaining feedback from these sectors. It may be a better use of engagement resources to facilitate one to one or sector based discussions / deliberative meetings with key organisations / individuals than attempt to satisfy all the engagement goal through a single large national event.

Much of the interest from participants at the local events, close to proposed sites, was either site-specific or nuclear energy policy related rather than GDA. A review of the timing and focus of the local events should be undertaken.

An independent process designer and facilitator should be considered for high profile, locally focussed engagement. This could help improve the process and also enable regulators to focus more on the content of meetings and events rather than also being responsible for managing the process.

A review of the effectiveness of the principle engagement methods, drawing on the commentary in 4.3 should be undertaken.

5. How the GDA has related to and complemented other engagement, consultation and planning processes regarding nuclear issues.

5.1 GDA within the wider context

Headline findings:

The regulators understand the need to better explain the whole nuclear life cycle and where GDA fits in. Good infographics have been produced and used in workshops and events but more could be done.

It would also be helpful to situate GDA (without going into detail) in relation to structures and timetables for, for example, planning for flood risk management, visual impact, land use, bathing water, jobs, habitat protection and transport.

Developing, and communicating to stakeholders, an understanding as to how the GDA process fitted into the wider new nuclear policy and implementation environment was a key recommendation of the Sciencewise process. As we have seen above, understanding the purpose and focus of GDA is critical to enabling and facilitating an 'in scope' conversation and 'in-scope' consultation submissions.

The regulators have picked up on the need to better explain the whole nuclear life cycle and where GDA fits in. Good infographics have been produced and used in workshops and events but more could be done.

Feedback suggested that it is not just the nuclear life cycle that GDA needs situating within but also planning and policy areas such as flood risk management, visual impact, land use, bathing water, jobs, habitat protection and transport. As one Environment Agency member of staff fed back, *"I think it riles people when we're not looking at things holistically. People think about things in their entirety and don't think, I'll just comment on this now and in two years' time I'll be able to comment on another aspect of it."* The Environment Agency is aiming to explain this complexity and overall planning context but has limited influence over other organisations' processes.

In terms of approach, this issue returns to the tensions and themes discussed in other sections of this report. Whether to engage at all at the GDA stage, whether to keep the focus very tightly on GDA, or to embrace a much broader engagement approach and be ready, willing and able to go off topic.

Section 5 Learning points.

How the GDA has related to and complemented other engagement, consultation and planning processes regarding nuclear issues.

There is a need to continue to review and seek to improve the approach and materials to communicate where GDA fits into the wider planning arena for new nuclear and related planning and policy areas. Good progress has been made in being able to communicate this but more could be done.

6. Inputs to the consultation and engagement process

This section considers the inputs to the initiative including the use of project resources, management and governance.

6.1 The extent to which the resources deployed were sufficient to deliver the objectives and the value for money.

Headline findings:

The time and resource was sufficient and proportionate for the scale of engagement needed.

There is a need to deploy sufficient engagement resources not only to satisfy the need for a technical appraisal but also to build trust and open communication between stakeholders and government agencies.

It would be a useful appraisal to consider the cost of delays to the project if consultation / engagement wasn't done properly and there was a legal challenge.

Feedback suggests that there could always be more engagement resources deployed but that a decision needs to be made as to the optimum level of engagement and consultation activity to most effectively satisfy the requirements of the technical assessment. It is generally felt by regulators that the time and resource was sufficient. In terms of events, there was one national workshop, two public events in Anglesey and two public events in Thornbury. This was felt to be proportionate to the need for engagement. The majority of costs are recharged to the nuclear reactor design company (requesting party), so there is a requirement to use resources effectively and efficiently and to take a judgement on what is sufficient and proportionate.

As discussed in more detail in the sections above, there is a need to reflect on the time and resource allocated to the different engagement elements and to draw conclusions as to whether these represented good engagement value for the investment made. As we have seen, this is not only related to technical appraisal and stakeholder follow through into a focussed consultation response but is also about being seen to engage, being open and honest and building trust between

stakeholders and government agencies. In purely financial terms it was a huge resource to deploy on just a few community and stakeholder responses to the consultation however there are other dimensions to consider.

As one member of the regulatory team pointed out, it is important to consider the dis-benefits of not doing the engagement work as well as the value of doing it. For example, it would be a useful appraisal to consider the potential cost of delays to projects if consultation / engagement wasn't done properly and there was a legal challenge. The cost of delays to the programme can be significant and much greater than the cost of quality engagement work. For example, regulatory, including engagement, costs are small compared to EDF's estimate of the cost of constructing the Hinkley Point plant to be £19.6 billion.

A high level, non-monetary overview gives some impression of the engagement and consultation resources deployed (England only):

- The Environment Agency employed two engagement /communications advisers, working full-time on the GDA process and other Nuclear New Build / nuclear regulation projects. These two members of staff also drew on resources from area, customer and engagement teams, the communications delivery team, website editors and e-consultation advisors.
- Technical staff time. Nuclear New Build technical staff were involved in planning and attending the engagement events, as well as other engagement opportunities such as presentations at conferences and site stakeholder groups. They were also responsible for writing the consultation material and presentations, as well as the consultation document, summary report and assessment reports.
- Additional costs included, venue hire, travel and subsistence for staff, refreshments for attendees and security staff in Birmingham and Thornbury. Consultancy fees including a facilitator at the national event, independent evaluator and editorial and printing of engagement documents.
- Other costs included the design and printing of event materials, postage, advertising consultation events and courier services.

At the face to face national and local stakeholder meetings and drop-ins the regulators provided a wide range of experienced staff both with both a technical and engagement focus. The developers and nuclear reactor design company (requesting party) were also present. Although resource intensive it meant that questions and queries could be addressed to a high standard which built confidence and generated a good level of discussion. This deployment of staff was considered essential given the high profile of the issue, the technical complexity of the initiative and the emotive responses that nuclear power often elicits.

6.2 The effectiveness of the management and governance structures.

Headline findings:

The Nuclear New Build Communications and Engagement Working Group worked well. It was a good mechanism to enable the three regulators to work together.

It was essential to have programme, technical and engagement / communications members working together across the three organisations.

The relationship between the working group and areas staff was good providing a useful steer and clarity as to what was required from area staff.

It was suggested that an addition to the working group should be the Environment Agency's Delivery Management Lead for reactor designs.

Deputies for key members of the working group would be useful.

Consideration and space was provided for NRW to establish its own organisational character and develop a way of working that was appropriate for Wales.

A joint regulators group, the Nuclear New Build Communications and Engagement Working Group, has been the key governance structure providing planning, advice and direction to the GDA engagement process. This group has been meeting regularly since 2007 and brings together both engagement / communications and technical specialists from the Environment Agency, ONR and NRW. It meets monthly. The group works not only on GDA engagement and communication but also on permitting and other site related issues. This group has provided direction and support to the regulators' staff members working on delivering the engagement and communications activities.

In turn, within the Environment Agency, the Nuclear New Build Programme, New Reactors Programme Board and then the Nuclear New Build Programme Board provide oversight and approvals to the communications and engagement planning. ONR and NRW have similar approval routes. Overall, the Environment Agency's engagement work is informed and directed by its Corporate Communications Plan and the 'Working with Others' approach.

Feedback from members of the Nuclear New Build Communications and Engagement Working Group and those who had contact with it suggested it worked well. It was a good mechanism to enable the Environment Agency, ONR and NRW to work together on engagement planning and delivery. It was also essential to have technical and engagement / communications members working together across the three organisations. Technical representatives on the group highlighted the importance of engagement and communications as a key skill set that enabled complex technical information to be communicated and engaged on.

The feedback received from area based staff who were coordinating local engagement events was positive. The working group provided a useful steer and were clear what was required from area staff. This enables area staff to feed in local information and sense check the work locally.

It was suggested that an addition to the working group should be the Environment Agency's Delivery Management Lead for reactor designs. It was also pointed out that it would be useful to have deputies for key people on the working group, to provide better continuity when there were absences from meetings.

Although it was very useful having a joint regulators group, the Environment Agency was aware that it should not be making plans and decisions that were for NRW to make. It recognised that especially as a new organisation, space was required for NRW to establish its own organisational character and develop a way of working that was appropriate for Wales. The Environment Agency did however provide advice and assistance to NRW, based on its approach and experience, when requested.

Section 6 Learning points.

Inputs to the consultation and engagement process

A review of the value of the GDA engagement process, including the learning points in this report, would be assisted by a more detailed cost benefit analysis.

The engagement outcomes were enhanced by the breadth and depth of experience present at each of the engagement events. This resulted in questions and queries being addressed to a high standard and with confidence. This reflected well on the regulators and was good engagement practice.

The broader remit of the Nuclear New Build Communications and Engagement Working Group and the breadth of experience of those who are members of the group enables GDA engagement planning to be situated within a wider context. It is a long-standing group and benefits from the continuity of being able to take the learning from the GDA engagement findings and draw on these when planning engagement in relation to permitting and other site related issues.

Now would be an opportune time to review the Working Group's membership and terms of reference to explore whether any changes are needed.

7. Reflection on the achievement of H M Government's Consultation principles and the agreed actions from the Sciencewise GDA public dialogue project

The consultation aimed to reflect the government's consultations principles and also to apply the learning generated from the 2015 Sciencewise GDA public dialogue project.

Below we set out a brief overview, reflecting on the extent to which the consultation principles have guided the GDA formal consultation process and the impact of the key areas of learning from the public dialogue on the GDA engagement process.

7.1 H M Government's Consultation principles

A. Consultations should be clear and concise

Use plain English and avoid acronyms. Be clear what questions you are asking and limit the number of questions to those that are necessary. Make them easy to understand and easy to answer. Avoid lengthy documents when possible and consider merging those on related topics.

GDA is a necessarily complex process and the consultation provided consultees with 16 questions in relation to a wide range of technical issues to help focus responses. As we have seen, feedback suggests that many respondents found the consultation document complex, lengthy and technical and some struggled to have the capacity or technical knowledge to respond in the way they would have liked. Many of the formal responses were site-specific or policy focussed and so did not follow the consultation questions. There were also a limited number of responses which may suggest potential respondents were put off by the complexity of the document.

The consultation summary document was well received and supported responses to the consultation.

The consultation questions were clear and limited to what was necessary but the main issue was the ability, capacity and willingness of respondents to respond. There was some tension in relation to producing the consultation documents in plain English as one respondent fed back.

“When we tried to make it more plain English the technical assessors often pushed back and said no that is the terminology and that’s what we’re sticking to. Even terminology like ‘aqueous’ and ‘gaseous’ – technical team were not happy with ‘water’ and ‘gas’. From a public perspective that was what was needed.” Member, NNB Communications and Engagement working group, EA.

B. Consultations should have a purpose

Do not consult for the sake of it. Ask departmental lawyers whether you have a legal duty to consult. Take consultation responses into account when taking policy forward. Consult about policies or implementation plans when the development of the policies or plans is at a formative stage. Do not ask questions about issues on which you already have a final view.

The evaluation has highlighted a debate within the regulators about the value of engaging / consulting on GDA given its very specific technical remit and the quality and focus of the responses, which were often outside of the GDA consultation scope. There is also likely to be little impact on the final decision document targeted for December 2017 because it is also likely the conclusions are well considered and robust. There is a view that the GDA consultation could potentially be moved forward in the process to consult prior to the assessment and preliminary decisions. The stakeholder feed in could then inform the assessments underpinning the preliminary decision rather than respond to it.

C. Consultations should be informative

Give enough information to ensure that those consulted understand the issues and can give informed responses. Include validated assessments of the costs and benefits of the options being considered when possible; this might be required where proposals have an impact on business or the voluntary sector.

Again, this principle is challenging due to the complex technical nature of GDA. There was certainly sufficient information available, the issue was whether potential consultees could understand and have the capacity and expertise to adequately respond. Technically focussed organisations with sufficient capacity to respond were in a better position to respond to the GDA consultation document. The consultation summary document certainly helped and supported responses to the consultation.

D. Consultations are only part of a process of engagement

Consider whether informal iterative consultation is appropriate, using new digital tools and open, collaborative approaches. Consultation is not just about formal documents and responses. It is an on-going process.

This principle was taken on board and a range of wider engagement methods and approaches were used. The more detailed commentary on the success of this work is set out above.

E. Consultations should last for a proportionate amount of time

Judge the length of the consultation on the basis of legal advice and taking into account the nature and impact of the proposal. Consulting for too long will unnecessarily delay policy development.

Consulting too quickly will not give enough time for consideration and will reduce the quality of responses.

The formal consultation period of 12 weeks was sufficient and adequate. The overall GDA process, leading up to the formal consultation period was lengthy (nearly 3 years). This resulted in periods of activity together with periods of inactivity in terms of consultation and engagement. The process may benefit from being planned over a shorter and more focussed time period to enable stakeholders to better follow the thread of consultation activities.

F. Consultations should be targeted

Consider the full range of people, business and voluntary bodies affected by the policy, and whether representative groups exist. Consider targeting specific groups if appropriate. Ensure they are aware of the consultation and can access it. Consider how to tailor consultation to the needs and preferences of particular groups, such as older people, younger people or people with disabilities that may not respond to traditional consultation methods.

Generally, the GDA process contacted the correct range of people and explained the purpose of the consultation and how to get involved. The challenge was to tailor the consultation to the needs and preferences of particular groups given the complex technical nature and the wide range of stakeholders, opinions, interests in nuclear energy and ability to respond.

G. Consultations should take account of the groups being consulted

Consult stakeholders in a way that suits them. Charities may need more time to respond than businesses, for example. When the consultation spans all or part of a holiday period, consider how this may affect consultation and take appropriate mitigating action.

The formal consultation period ran for 12 weeks from 12 December – 3 March. This covered the Christmas and new year holiday period. No additional time was added to the consultation period to recognise this. There was substantial planning and research undertaken to understand and respond to the needs of both national and local stakeholders and engagement activities were designed and delivered in response to this intelligence. Feedback did suggest that the charity and NGO sector found it more challenging to attend engagement events (for e.g. the national stakeholder workshop in January 2017) due to lack of capacity or resources. Again, the focussed technical nature of GDA probably impacted more on participation than the consultation methodology.

H. Consultations should be agreed before publication

Seek collective agreement before publishing a written consultation, particularly when consulting on new policy proposals. Consultations should be published on gov.uk.

This was undertaken.

I. Consultation should facilitate scrutiny

Publish any response on the same page on gov.uk as the original consultation, and ensure it is clear when the government has responded to the consultation. Explain the responses that have been received from consultees and how these have informed the policy. State how many responses have been received.

This will be undertaken in the decision document, which the regulators are targeting for completion in December 2017.

J. Government responses to consultations should be published in a timely fashion

Publish responses within 12 weeks of the consultation or provide an explanation why this is not possible. Where consultation concerns a statutory instrument publish responses before or at the

same time as the instrument is laid, except in exceptional circumstances. Allow appropriate time between closing the consultation and implementing policy or legislation.

Responses will not be published within 12 weeks in this case. It will be a minimum of 9 months between the consultation closing on 3 March and the decision document, targeted for December 2017. The consultation responses document states that the decision document will aim to be published towards the end of 2017 but no explanation is provided as to why it is not possible to publish this within 12 weeks of the end of the consultation.

K. Consultation exercises should not generally be launched during local or national election periods.

If exceptional circumstances make a consultation absolutely essential (for example, for safeguarding public health), departments should seek advice from the Propriety and Ethics team in the Cabinet Office.

This was not the case however the publication of the responses to GDA consultation document was delayed by the pre-election period related to the 2017 general election.

7.2 Agreed actions from the Sciencewise GDA public dialogue project

A workshop took place in August 2015 involving the Environment Agency, ONR, and NRW to consider actions related to the findings from the Sciencewise public dialogue project to improve public involvement in the assessment of new nuclear power station designs.

The regulators committed to consider their engagement and consultation approach, style and tone in the light of the Sciencewise reporting and evaluation, mindful of the constraints within which they must work.

The Sciencewise dialogue asked three questions:

- How do the public want to be involved in the Generic Design Assessment (GDA) process?
- What do people need to know (what are their concerns / interests?) and how can the nuclear regulators address their concerns / interests as part of the GDA process?
- What can the regulators do to help improve people's trust in them and confidence in their decisions?

The workshop addressed 6 areas of engagement and consultation practice and considered how regulators would respond to the recommendations made. Below we provide a brief overview of the significant areas of practice that the workshop committed to address, and comment on the degree to which the commitments were followed through into the actual GDA engagement and consultation processes. As noted and referenced in 2.3 above the final reporting and evaluation from the Sciencewise dialogue provides a useful learning resource alongside this report.

Who to involve?

A commitment was made to have a stronger focus on engagement and consultation within 25 miles of proposed new nuclear sites. This was followed through in terms of the workshops and drop in events organised in Thornbury and Anglesey. In addition, there was a more personal invitation provided to stakeholders who lived / worked within 10 miles of the proposed sites. In addition, there was a substantive amount of communications activity focussed at a local level.

How to involve people?

Web pages would be reviewed to be appropriate for members of the public. The web content regarding GDA is good and generally in plain English. The main issue, as mentioned above, is not the

web functionality or the language used but the complex technical nature of GDA and the need for a lengthy consultation document.

There was commitment to review the potential of social media. This was undertaken and social media used, especially at a local level. In Anglesey, it was noted that there was perhaps too greater reliance on social media to communicate information about engagement opportunities as a significant number of people did not use this method of communication.

Addressing the language barrier / terminology

Regulators committed to considering the more extensive use of infographics. This was done to good effect and it is an area which could be explored and used further given the complexity of GDA and the Nuclear New Build process in general.

Reducing barriers to public engagement

Similar commitments were made as under the 'how to involve people' theme. Access to websites, good use of written material, graphics and social media were all used and kept under review.

Providing GDA context and more information

Infographics were used to provide the 'bigger picture' contextualisation as to where GDA fits into the wider Nuclear New Build policy. It is difficult to assess how successful this was as a lot of the discussion in engagement events and in the consultation responses was related to policy of site-specific issues and so was out of scope.

The Sciencewise reporting was shared with the Department for Business, Energy and Industrial Strategy (BEIS), other regulators and nuclear operators and the Environment Agency highlighted the signposting issue. The Environment Agency continues to signpost to other relevant organisations and initiatives within its own materials and encourages links to it from other organisations.

Increasing trust and confidence in the regulators

Again, this area of recommendations re. building trust related to providing a mechanism to better explain how GDA relates to other planning and decision-making processes such as site permitting.

There was also a commitment to continue to offer face to face opportunities where the public could meet and talk to regulators. This was followed through into the GDA engagement process.

8. Conclusion

The GDA engagement and consultation process overall has been well resourced, well managed, has drawn on learning from previous GDA engagement work and undertaken with a high level of skill and integrity.

There have however been a number of engagement and consultation challenges, mainly arising from what GDA is and aims to achieve. It is generic and has a specific focus on the technical performance of a new nuclear power station design. These engagement challenges are more evident with individuals and organisations who have an interest in nuclear energy policy, but without detailed technical knowledge, and those stakeholders who have an interest as they live or work close to a proposed site. With these stakeholders, there are two main engagement challenges to overcome:

- Designing and delivering engagement in a way that satisfies the needs of the technical assessors by enabling and encouraging stakeholders to engage meaningfully with the technical nature of GDA and the specific consultation questions.
- Maintaining stakeholder focus on GDA, while accommodating comments and questions that relate to the wider planning arena for new nuclear build, related policy areas and more site-specific issues.

It will be important to maintain an ongoing review as to where, when and how to best deploy engagement resources across the different parts of the New Nuclear Build planning process. There needs to be an informed judgement made as to the engagement resources invested at GDA and at the stages that address site-specific and permitting issues.

The value of engagement at GDA needs to be measured both in terms of informing the assessments as well as that of building trust, demonstrating openness, breaking down barriers between regulators and people and being seen to be actively consulting. It is considered that the benefits of engaging outweigh the consequences of not engaging.

The evaluation as a whole, on balance, would support continued engagement at GDA. It would be timely for the New Nuclear Build Engagement and Communications Working Group to draw on its experience of the process, the views of stakeholders and the findings of the evaluation to review the approaches to engagement and consultation. This may include some of the suggestions set out in 3.6 above, such as, changing the format of some of the engagement processes, integrating the scope of engagement across the Environment Agency's, NRW's and ONR's GDA responsibilities and engaging at an earlier stage in the GDA process.

Appendix 1.

Evaluation framework: An independent evaluation of the Environment Agency's consultation on the 'Generic Design Assessment' (GDA) of Hitachi-GE's UK ABWR in England

Evaluation objectives:

To provide an independent assessment of the credibility, legitimacy, effectiveness and success of the Environment Agency's consultation on the 'Generic Design Assessment' (GDA) of Hitachi-GE's UK ABWR. The evaluation will assess and report on what is done, how well the consultation is undertaken and what is achieved as a result of the process. Learning will be identified as work progresses and at the end of the process to support future engagement and consultation.

In particular the evaluation will assess and draw out learning in relation to whether the consultation has met:

- The requirements of HMG's Consultation Principles
- The Environment Agency's engagement objectives
- The Environment Agency's formal consultation objectives

Scope:

- The evaluation will assess the formal consultation and also the Environment Agency's broader engagement activities. A number of the broader engagement activities will be undertaken jointly by ONR, NRW and the Environment Agency.
- Those being consulted will include members of the public and stakeholders.

Key area	Evaluation questions	Source of data						Evaluation methods						
		Members of the public	Key Stakeholder	Regulators	Operators	Comms & Eng WG	Consultation deliverers	Baselining exercise	Observe events	Event feedback form	Interview sample participants	On line follow up survey - dialogue participants	Professional stakeholder interviews (ink SRG)	Professional stakeholder focus group
1: Impact (outputs and outcomes)	A) To what extent have the comments and views gathered across the different consultation and engagement activities informed the assessments related to reactor design?			✓	✓	✓	✓		✓	✓	✓		✓	
	B) To what extent have trust and confidence in the Environment Agency, as a regulator, been strengthened through the process of consultation and engagement activities relating to the GDA?	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	
	C) To what extent do stakeholders and the public better understand the Environment Agency's role in nuclear regulation of new build as a consequence of the consultation and engagement activities relating to the GDA?	✓	✓					✓	✓	✓	✓		✓	
	D) To what extent has the engagement process met the expectations and / or stated objectives of the regulators?			✓		✓		✓	✓	✓	✓		✓	
	E) To what extent has the process been legible and legitimate from the point of view of those engaged and consulted?	✓	✓						✓	✓	✓			
	F) Has the broader engagement work encouraged/generated responses to the formal consultation process?	✓	✓	✓		✓				✓	✓		✓	

G) Have the findings been effectively communicated to those who need to see them?	✓	✓	✓	✓	✓								✓	
H) Have there been any unintended influences / outcomes related to the engagement work?			✓	✓	✓	✓				✓			✓	
I) What insights from the dialogue have been most useful / interesting for regulators?			✓		✓								✓	
J) Is there anything else that has, or will, be done to make it more likely that the findings will be impactful?			✓	✓	✓								✓	
K) To what extent have participants in the consultation process taken value and benefit from their participation? To what extent do they feel that their views will be impactful in influencing the assessment process?	✓	✓						✓	✓	✓				
L) Have participants' views been changed in any way through involvement in the process?	✓	✓			✓			✓	✓	✓			✓	
M) Having taken part in the engagement / consultation, are participants more or less willing to be involved in future engagement relating to new nuclear?	✓	✓						✓	✓	✓				
N) What are the lessons from the engagement / consultation process, and how will those lessons be disseminated and used to improve future engagement / consultation processes?			✓	✓	✓								✓	
O) Having been involved in this process, to			✓	✓	✓								✓	

	what extent are the regulators and operators willing and able to use public dialogue in future?													
2: Inputs	A) Were the objectives of the engagement / consultation the right ones?	✓	✓	✓	✓	✓	✓	✓					✓	
	B) Were the objectives changed or adjusted in any way during the project? Why? What has the effect of any changes been?					✓	✓						✓	
	C) Have the inputs (time, money, resources) to the process been sufficient to deliver the engagement/consultation's purposes?	✓	✓	✓	✓	✓	✓						✓	
	D) Has the initiative provided good value for the resources invested?			✓	✓	✓	✓						✓	
	E) Has the governance of the process been appropriate and effective?			✓	✓	✓	✓						✓	
	F) What contribution has the GDA Communications and Engagement Working Group made to the project?			✓	✓	✓	✓						✓	
	G) Has the project management of the process been appropriate and effective?			✓	✓	✓	✓						✓	
3: Process	A) To what extent have the 'correct' stakeholders and members of the public been identifying and engaged at the appropriate level and stage of the process - to maximise influence?	✓	✓	✓	✓	✓	✓		✓		✓		✓	
	B) Has the overall delivery of the engagement / consultation process been appropriate (clear to consultees, given sufficient time and effective)?	✓	✓						✓		✓		✓	

	C) Has the process changed in any way during the project? What have been the reasons and effects of any changes?			✓	✓	✓	✓						✓	
	D) To what extent have consultees been able to engage with the content (environmental, technical, economic, policy context etc.) of GDA and contribute their perspectives on these issues? Has the content been sufficient and at the appropriate level of detail?	✓	✓			✓	✓		✓		✓		✓	
	E) Have the consultation methods used been appropriate and engaging?	✓	✓	✓	✓	✓	✓		✓	✓	✓		✓	
	F) Have there been particularly successful approaches or challenges in the process design, delivery or reporting that future consultation processes could learn from?	✓	✓	✓	✓	✓	✓		✓	✓	✓		✓	
	G) Did the methodology provide the best way to achieve the objectives of the project? How else could the objectives have been realised?	✓	✓	✓	✓	✓	✓		✓	✓	✓		✓	
	H) To what extent did those consulted understand the scope / extent / level of their influence?	✓	✓						✓	✓	✓		✓	
	I) How are the consultation results, and the influence of those results, being communicated back to consultees?					✓	✓						✓	
4: Context	A) To what extent has the process related to and complemented other dialogue and wider decision-making processes regarding nuclear issues?			✓	✓	✓			✓	✓	✓		✓	