Public and Stakeholder Engagement Plan, Round 3

Document No: 15.3 Draft 5th March 2012

Status: Draft

Author: 3KQ and PSE sub-group

Title: Public and Stakeholder Engagement Plan, Round 3

Notes: Working draft

1 - Background

The West Cumbria Managing Radioactive Waste Safely (MRWS) Partnership has completed two of its three rounds of public and stakeholder engagement (PSE), as set out in its engagement strategy (Appendix 1). The Partnership has also formed initial opinions on the criteria in its Work Programme, so now needs to publicly consult upon these opinions before they are amended and reported to Allerdale Borough Council, Copeland Borough Council, and Cumbria County Council. This document sets out the engagement activities that will form part of this public and stakeholder consultation.

2 - PSE3

During PSE3, essentially the Partnership will be publishing its draft advice to the Principal Authorities and asking for feedback on it from stakeholder organisations and the public. PSE3 is about making the bulk of the Partnership's work accessible to interested members of the public, including the initial opinions formed. It is also about assessing the extent of support or otherwise for participation in the siting process without commitment.

PSE3 is anticipated to run from end November to mid-March 2012, once nearly all the substantive work is complete.

PSE3 is different from PSE1 and PSE2. The Partnership is no longer exploring the issues and gathering information, it is sharing its own initial views and asking for public feedback on them.

3 – Objectives for PSE3

- 3.1 The specific objectives for PSE3 include to:
 - Objective 1: Raise awareness and build understanding of the Partnership's work to date, and its initial opinions.
 - Objective 2: Understand any reasons for concern, and reasons for support or opposition to the Partnership's initial opinions.
 - Objective 3: Assess the extent of support or opposition to entering the siting process without commitment in the areas of Allerdale and Copeland.
 - Objective 4: Understand any wider issues from stakeholders and public.

Whilst not primary objectives, it will also be important to maintain the discipline of firstly demonstrating that public input from previous engagement has led to real changes, and secondly providing a response to the issues raised in PSE3.

1

4 - Key Questions

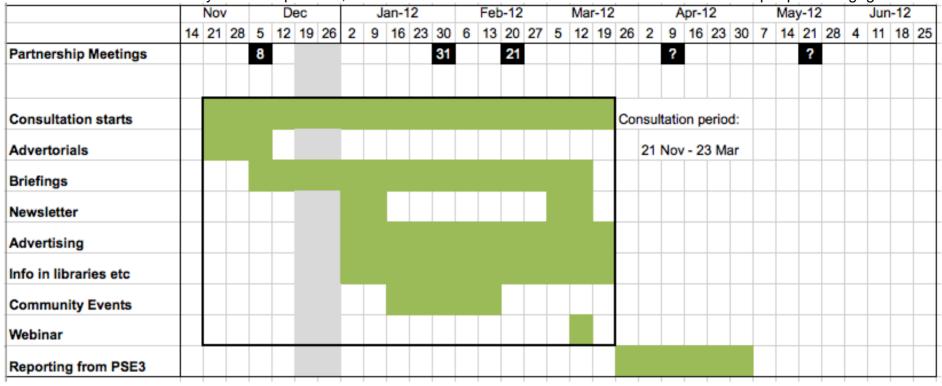
The key question in the PSE3 consultation is "To what extent do you agree with the Partnership's initial opinions on [insert criterion name], and why?"

Additionally, consultees must be given an opportunity to raise additional wider issues or concerns if they fall outside these criteria-focussed questions.

In the opinion survey, the key question is "Do you support or oppose the areas covered by [Allerdale/Copeland] borough council taking part in the search for somewhere to put a repository, without any commitment to have it?" This will be reviewed with the independent survey company before the questionnaire is finalized.

5 - Communications and Engagement Activity

This section indicates the key activities planned, both to raise awareness of the consultation and to enable people to engage with it.



Note: Throughout the consultation period additional activity will occur: media relations, website, social media updates and community discussions via intermediaries. See below for more detail.

Public Consultation. A written public consultation using the full draft Partnership report as the consultation document, provided as part of a Consultation Pack (see below). This will be the main 'spine' of consultation during PSE3. It would encourage online submissions for efficiency and transparency but also allow for paper submissions. *(Lead: Helen Fisher, 3KQ).*

Consultation Pack. A self-contained and standardised pack of information and questions that can be sent out during PSE3. It would contain:

- 8page Overview, potentially with a tear-off comment slip (this could also be the final newsletter that goes to all West Cumbrian residents)
- DVD setting out main conclusions and broadly how we've undertaken the work
- Full consultation document (the draft Partnership report) with questions, approx. 50pp
- Template questionnaire to complete, with freepost envelope for return

The aim is to standardise the materials and cater for most peoples' needs in one place. (Lead: Helen Fisher, 3KQ, with Osprey leading on the DVD and summary).

Advertorials and media liaison. In addition to continued press releases and media invites to meetings, we will buy advertorial space in local newspapers at the start of the consultation period. We will continue liaising with the BBC and other channels about whether there are opportunities for providing some more in depth coverage on Radio Cumbria and possibly also on regional TV as part of their public service remit. (*Lead: Osprey*).

Briefings. Request a range of individual briefings to update specific organisations and signpost the formal consultation if they wish to submit views. For those organisations who are better informed already, these briefings can be more of a bilateral meeting which explores their views on specific areas of the Partnership's work. Aim to piggy-back on events already in the calendar where possible for most briefings. Each briefing would comprise a 10-15min presentation on the Partnership's work and initial opinions, a short Q&A session, and signposting to the full consultation where people can feed in their views.

<u>All</u> Partnership organisations should organise a briefing for their own organisations. There is funding available for this, as well as materials and support from presenters. *(Lead: Jenny Willis, 3KQ).*

Newsletters to households. Two mass communications to provide an overview to the Partnership's work and highlight the consultation. One immediately after Christmas, and probably one just before the end of the consultation period. *(Lead: Osprey).*

Advertising. We will use advertising to further raise awareness of the MRWS process in Cumbria. This will likely include a mix of print and other advertising, depending on geography and cost effectiveness. (*Lead: Osprey*).

Community Events. Organise 12 bespoke community events across Cumbria, offering an open opportunity for both residents and stakeholder organisations to get briefed on the consultation, ask questions of the Partnership's work and learn about the formal consultation. Four in Allerdale, four in Copeland, and one in each of the other Cumbrian boroughs. Open to the public and

stakeholder organisations, with careful advertising of the agenda. (Lead: Jenny Willis, 3KQ, with support from ABC, CBC and CCC).

Webinar. A potential live online event that is aimed at younger people and those people who choose not to, or cannot, physically visit a community event. It would consist of a real discussion/presentation event with an audience that is videoed and streamed live online, with viewers being able to submit questions and get them answered live. *(Lead: Osprey).*

Additional activities that are not reflected in the main timeline above include:

Publications. Secure articles in a range of publications including those of Partnership members. Support Partnership members with text as required. (*Lead: Osprey*).

Website. The website will continue to be the main source of information on the Partnership and the MRWS process in Cumbria. We will continue to provide a range of information from an accessible overview to detailed Briefing Notes, as well as the full audit trail of Partnership documents. A new addition for PSE3 will be a weblog with guest bloggers each week from different perspectives (Lead: Osprey, with lan Curwen CBC leading the blog).

Social media. The Partnership currently uses Facebook, Twitter and YouTube. (Lead: Osprey)

Community Discussions using the Consultation Pack, via intermediaries. Build on the work done in PSE2 delivering the Discussion Pack by contracting intermediaries to organise and run a suite of targeted community discussions with the consultation pack. The main focus would be on reaching people that are otherwise unlikely to participate in PSE3, such as young people and other under-represented groups. We currently envisage working with Connexions to develop materials to aid discussions with young people. (Lead: Jenny Willis, 3KQ).

Opinion Survey. Re-run the opinion survey at the end of PSE3 to assess the extent of support or opposition. The methodology and survey questions would be independently peer reviewed so as to be reassured that it is robust and fair. (*Lead: Kieran Barr, CCC*)

6- Specific groups/audiences

There are some specific groups of stakeholders that warrant a targeted approach:

Young People. Various methods are planned to target younger people, including:

- Develop specialist support materials that are appropriate for children, mirroring the content of the consultation document but being complementary to lesson format.
- Contract Connexions or other intermediary to offer and run at least one discussion session with pupils in all secondary schools in West Cumbria, plus the Schools Council as appropriate.
- Provide specialist materials to all interested schools, including a small budget to help them run an off-curriculum day on MRWS, as appropriate.
- Contact all West Cumbrian primary schools encouraging them to publicise the consultation pack session with their parents/teachers.
- Publicise the Consultation Pack and materials to all Cumbrian schools.
- Depending on levels of interest and take-up, hold a closing event to bring the youth work together, potentially in liaison with the Schools Council and Connexions.

(Lead: Jenny Willis, 3KQ)

Parish councils. Planned activity includes:

- CALC organise briefings for parishes, before PSE3 starts
- Sending a Partnership letter to Parish clerks:
 - West Cumbrian parishes: to include two hard-copy Consultation Packs with an offer of sending more packs, offer a face-to-face briefing, send posters to advertise their local community event
 - Rest of Cumbrian parishes: to include update, announce PSE3 and how can find the consultation pack, offer of briefing, posters to publicise their local community event/s

N.B. Aim to send one letter only to each parish to avoid overload, with all information included.

- CALC providing updates to their regular District Association meetings
- CALC sending out E-bulletins to West Cumbrian clerks and councillors
- CALC sending out their Cumbrian circular, before and during PSE3
- CALC organizing a Parish Conference in West Cumbria, to which <u>all</u> Cumbrian parishes will be invited. Funding provided by Partnership.

(Lead: Guy Richardson, Chris Shaw)

Environmental NGOs. We have restated the offer to organise a bilateral meeting either before or during PSE3. This was made to FoE, Greenpeace and CORE in June 2011. They will also be formally invited to participate in the consultation.

(Lead: Rhuari Bennett, 3KQ)

Councillors at County, Borough and Parish level. Ensure that councillors have an opportunity to discuss the Partnership's work well before it concludes. Lead by individual organisations.

- Allerdale BC
- Copeland BC
- Cumbria CC
- CALC

Neighbourhood Forums. Update the forums in West Cumbria on progress made since PSE2 by writing individually and directly to everyone on the Forum database, around 3000 people. In particular this written update would publicise the consultation pack as the main source of information, and the community events to attend if people wish to ask questions or discuss in more depth the Partnership's work. *(Lead: Jane Dalton, 3KQ).*

Rest of Cumbria. We propose the following approach to engaging the non-West Cumbrian parts of the county:

- Media releases and updates countywide.
- Advertorials countywide.
- Hold at least one community event in Barrow, South Lakes, Eden and Carlisle.
- Market the Consultation Pack countywide.
- Via CALC, provide an MRWS update to all parishes in Cumbria.
- Partnership letter to all parishes in Cumbria updating them on the consultation (see parish section, above)
- Target publications that are countywide e.g. Your Cumbria. We do <u>not</u> propose sending an additional newsletter to all households in Cumbria.

(Lead: Kieran Barr, CCC)

8 - Reporting

8.1 The reporting process for the PSE3 Report and for the Partnership's Final Report was agreed at the February 2012 Partnership meeting. See document 252 for more detail. 3KQ will lead the PSE3 reporting process, with scrutiny from the PSE sub-group and the Partnership. 3KQ will also lead the process for drafting the Final Report, with clear guidance and scrutiny from the Partnership and the Steering Group. Both reporting processes will be observed and evaluated by the Partnership's independent evaluators Wood Holmes. Following the consultation close, the Partnership will consider if and how to change its initial opinions in the light of all PSE3 consultation inputs. This will guide the drafting of the Final Report, currently expected to be adopted by the full Partnership in June 2012.

Appendix 1 – Overarching PSE strategy

1 - Background

- 1.1 The West Cumbria MRWS Partnership exists to 'make recommendations to Allerdale BC, Copeland BC and Cumbria CC on whether or not they should participate in the geological disposal facility siting process, without commitment to eventually host a facility'. The Partnership is therefore predominantly concerned with the process up to a Decision about Participation in the Government's siting process, and not beyond.
- 1.2 The Partnership is aware that significant public and stakeholder engagement (PSE) will be required in its Work Programme. This is due firstly to the requirements set out in the White Paper (see Appendix 1) and secondly due to the moral and practical need to engage widely on an issue of such sensitivity, especially given the history of nuclear waste management in West Cumbria.
- 1.3 The Partnership exists because the Decision-Making Bodies (DMBs) have asked key organisations representing community interests to come together to inform their decision about participation¹ in the siting process. This means that the Partnership will ask for *endorsement* from the DMBs on its plans at key stages. The Partnership will then oversee delivery of the PSE plan on behalf of the DMBs.

2 - Over-arching objectives

- 2.1 The framework set by the Government means that useful objectives for the Partnership's PSE programme include:
 - a) Provide a mix of engagement opportunities to share information and ensure feedback from stakeholder organisations and disinterested members of the public.
 - b) Identify the extent of support for a decision whether to participate or not, any issues of concern, and the reasons given for and against participation.
 - c) Demonstrate the credibility of the Partnership's recommendations on whether to participate or not, including through demonstrating good practice in consultation.
 - d) Produce a report setting out the approach taken to engagement, the activities undertaken, and the outcomes, including feedback on support, concerns and opposition.

Note that detailed objectives for each round of engagement are set out below.

3 - Broad Approach to PSE

¹ Although the White Paper uses the phrase "Decision to Participate", the Partnership has adopted the phrase "decision about participation" so that it is clear that the decision has not yet been made.

- 3.1 Where possible the Partnership will adopt an approach to PSE that will:
 - a) Time engagement to allow for maximum input/influence (earlier vs later).
 - b) Use a variety of methods (existing and new) to reach different people.
 - c) Seek people's views at key points, rather than tell them how it is.
 - d) Be willing to make tangible changes as a result of these views.
 - e) Give prompt feedback as to how views have been taken on board.
 - f) Give regular updates on progress.
 - g) Regularly reconfirm the support of Partnership members along the way.
 - h) Be inclusive rather than selective (whilst also being proportionate).

4 – What do people want from engagement with the Partnership?

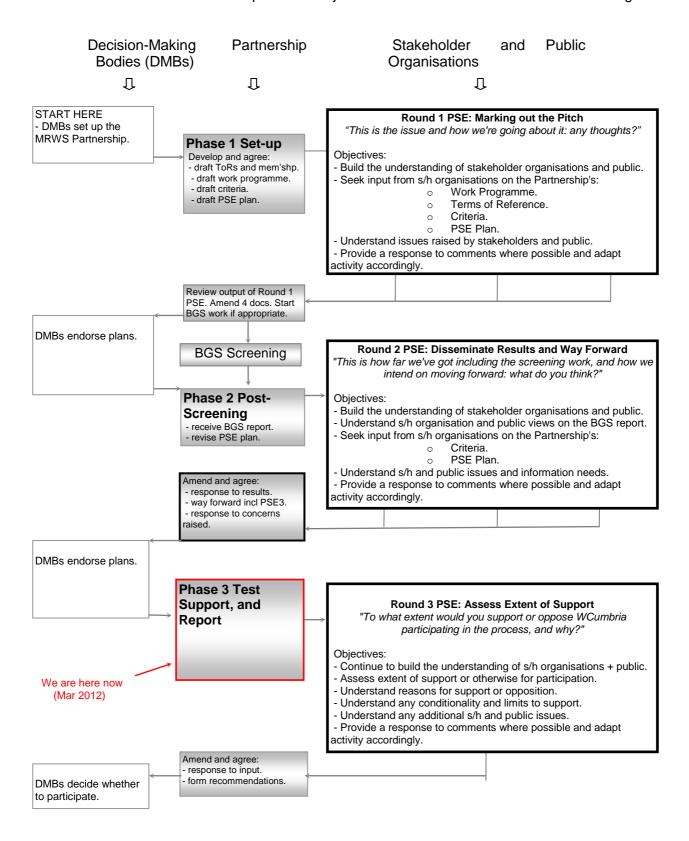
4.1 In developing a PSE Plan, the Partnership is aware that different people will want different things from engagement, as set out in the table below.

| Ctakahaldar | What they might want from | What the Bortnership |
|--|---|--|
| Stakeholder | What they might want from | What the Partnership |
| Category | engagement with the Partnership | wants from engagement with them |
| Dublio | | - understand what we are |
| Public: Potentially all interested people who are not represented below. | - reassurance that this | |
| | difficult issue is being handled properly. | trying to achieve. |
| | | - understand what we are |
| | - information that allows | not doing (siting). |
| | me to know what's going | - tell friends and family |
| | on when, and get more | what's going on if they may |
| | involved if I want to, | be interested. |
| | (including info on the pros and cons of participating). | - input their views at key |
| | and cons or participating). | points, so we can change |
| | - opportunity to feed in my | our work appropriately. |
| | views and knowledge at | |
| | key points, and have them | |
| | considered and responded | |
| Otal al al la | to respectfully. | |
| Stakeholder | - updates at key points in | - keep their organisation and |
| Organisations: All other formal | the Partnership's life so I | members updated and feed in their views. |
| organisations that | can keep abreast of activity. | in their views. |
| have an interest in | activity. | - canvas and feed in the |
| MRWS in West | - opportunity to input at key | views of their organisation |
| Cumbria. | points if I have views and | and members at key points |
| Garribria. | knowledge that are | so their views are taken |
| | material to the | properly into account and |
| | Partnership's work. | there are no 'surprises' later. |
| Decision-Making | - reassurance that the | - explicit support for the |
| Bodies: | Partnership is a credible | approach being adopted at |
| Full Councils of | body. | key points. |
| Allerdale BC, Copeland BC and | - assurance that the | - guidance on any areas that |
| Coperatio DC atto | partnership's programme | need to be changed to |

| Cumbria CC. | is robust and sufficient to inform a credible decision about participation. - opportunity to influence any aspect of the Partnership at key points in its life. | maximise the robustness and respect given to the Partnership's recommendations. |
|---|---|--|
| DECC | reassurance that the Partnership is a credible body. assurance that the Partnership's programme is robust and sufficient to inform a credible decision about participation. regular updates on activity and plans so we can ensure appropriate consistency with the White Paper to warrant the spending of public funds. opportunity to support where appropriate. | financial support and flexibility. support and advice on the Government context and constraints we must work within. distance: to allow us to develop our own work and thinking towards a decision whether to participate. |
| Other official bodies: other Government, the NDA, Regulators. | - regular updates on activity and plans so we can highlight issues that we can assist with or that impact on us. | - advice on request: particularly where Partnership work impacts on or needs to be coordinated with, their work. |
| | - opportunity to input at key points. | keep their organisations up to date regarding the Partnership's work. confidence that regulatory processes will be robust. |
| Partnership Members: All organisations that sit on the Partnership. | - opportunity to be involved in and affect every part of the Partnership's work. | - active participation in the work, including a significant time commitment. |
| | - to have their name, views and expertise associated with the Partnership. | - explicit ownership of the Partnership's work and recommendations. |
| | | - keep their organisation updated and feed in their views. |

High-level PSE plan: Objectives for 3 rounds of PSE

The main rounds of activity are set out below with associated objectives, as agreed at the start of the Partnership's work. Objectives in rounds 2 and 3 will need confirming.



Government White Paper requirements and other good practice

The Government White Paper sets out various requirements and suggestions for how the public and stakeholders should be involved prior to a decision whether to participate. These are not quoted verbatim but include:

- Develop a programme of community engagement, to inform a decision to participate (DtP). Planning for this may run in parallel to the BGS screening. (Page 51 Step 8)
- Undertake community engagement. A mixture of engagement methods could be used to ensure feedback from stakeholders and disinterested members of the public. This might include citizens' panels, workshops, discussion in local groups or organisations, information provision to local communities, groups or individuals, quantitative feedback from opinion polls etc. Engagement should seek to identify the extent of support for participation, any issues of concern about participation, and the reasons for any opposition to participation. (Page 51 Step 10, and paragraph 6.24)
- The Government will want to be satisfied that a DtP is credible.
 Credibility might be demonstrated on the basis of a local consultation process applying established local good practice. Credible local support would be expected amongst organisations likely to form a Community Siting Partnership should a DtP be taken, as well as among the local community. (Paragraph 6.22)
- Provide a report setting out the approach taken to engagement, the outcomes of that engagement and making clear the basis of the DtP.
 This report should accompany the DtP. (Paragraph 6.25)
- Government is not expecting, or seeking, a particular threshold of support but is keen to see evidence of appropriate community engagement and meaningful feedback on any concerns of those affected. (Paragraph 6.26)

There are further requirements and suggestions placed on a full Community Siting Partnership <u>if</u> a DtP is taken but these are not directly relevant to the current Partnership at this stage. In addition, there are various sets of guidance that the Partnership should be aware of, although the extent to which they apply to the work programme varies. These include but may not be limited to:

- HM Government Code of Practice on Consultation, July 2008, focusing on formal written consultations.
- Scottish National Standards for Community Engagement.
- Department of Communities and Local Government White Paper called Communities in Control, July 2008, including the 'duty to involve' placed on local authorities.
- Parish Charters or similar authored by the DMBs.

- Statements of Community Involvement or similar authored by the DMBs.
- Aarhus Convention.
- Freedom of Information Act.