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PUBLIC INVOLVEMENT IN AGENCY ACTIVITIES

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EXECUTIVE SUMMARY

Public involvement in environmental decision-making has become a required means of giving people more say in government (DETR, 1998). Consequently, it is an area of increasing importance for the Agency, and one where there is a range of experience and expertise spread across functions and regions.

The National Centre for Risk Analysis and Options Appraisal (NCRAOA) is developing the Agency's thinking in this area through research projects, involvement in seminars, and by linking with current Agency projects which have a consultation/participation focus together with staff involved with the management of consultation and participation processes. The public involvement workshop (held in February 2000) was a step at networking Agency players in the field for the purposes of sharing key lessons that have resulted from practical experience. This report is the output from that workshop.

Predominant concerns arising out of the workshop relate to a lack of resources and Agency guidance on standard techniques, their practical use and when and where they could be employed. This publication is a first step in the development of Agency guidance and is intended to help people draw on existing internal experience. The publication is not a prescriptive document in that the Agency is at a learning stage with regard to the development of best practice procedures for public involvement (insights are gained through experiments with a number of techniques from the formal to the 'freestyle'). Neither is it a static document, it is to be updated regularly, as the Agency is moving towards an increased level of public involvement due to societal and government pressures.

Consideration of staff experience in the field offers invaluable and realistic insights with regard to designing a participation event. Hence, the *objectives* of this publication were to:

i. share Agency expertise with regard to public involvement activities;
ii. provide a framework within which to assess the process;
iii. extract the key lessons and insights from the experience (a practical perspective).

The case studies presented in the publication are structured according to the issues on which the Agency consults, these can be broadly defined as:

- strategic level (Humber flood defence strategy, strategy for Water Resources)
- plan level (LEAPs)
- project level (flood defence, licence applications)

A framework is provided so that the case studies can be considered analytically and key lessons drawn out. Each case study is structured according to:

- what was done (the process),
- what happened (outcomes – positive and negative),
- what worked well or badly (success criteria/pitfalls),
- what did it cost (costs)
- what was learnt (key lessons, evaluation).

The final section gives an overview of the key lessons learnt that should be applied in future public involvement activities. Nine key criteria emerged from the workshop, the case studies and current literature (these criteria are not listed in priority order):

- ***Fairness***: this includes agreement by participants regarding the agenda, choice of facilitator and opportunity to express views so as to ensure that a feeling of ownership of decisions is developed.
- ***Purpose***: a clear statement of purpose to the consultations and avoidance of misunderstandings by using clear and unambiguous language contribute to competent process.
- ***Competency***: highlighted is the problem of underestimating the skills required to facilitate partnerships and consensus. An experienced lead facilitator must be identified for the design and management of the process and sub-groups must be managed by trained facilitators to ensure hat outputs are achieved. Use of experienced facilitators has proved to be an effective means of improving communication and understanding and ensuring that participants do not feel excluded from the process.
- ***Inclusiveness:*** it is important that the process of consultation is inclusive as consideration of all the stakeholders at the outset can save problems further on in the process.
- ***Planning and early involvement***: which makes people aware of the benefits of a project, should generally ensure a balanced outcome. Being sensitive to the context of the consultation (eg. what else is happening at that time) ensures that participation techniques are applied appropriately, so planning is important.
- ***Developed over time:*** generally, there is a need to build a long-term relationship with the community in order to become familiar with its 'local' culture and in turn lead to an understanding of stakeholder perceptions.
- ***Flexible:*** in order to develop relationships over time, the process needs to have a certain amount of flexibility built into it so that changes can be taken on board and responses can be made to the different stakeholder requests. A flexible approach is essential where resources are limited in that a mixture of less expensive techniques can be utilised. In the long term, public involvement will often save more resources than it requires undertaking the exercise.
- ***Evaluation:*** it is important that processes are evaluated in terms of success criteria and this should include views from participants in the process as well as the view from the staff involved. Learning lessons from previous experiences can help prevent repetition of mistakes.
- ***Support:*** internal support for the process from senior management is essential if the Agency is to successfully implement the outcomes of any public involvement initiative and obtain credibility in the eyes of stakeholders.

In conclusion, the workshop and this report are the start of a process of bringing together people and knowledge in the area of public involvement. It is anticipated that this will input into more formal guidance in time, but it is hoped that this will be a useful reference document for all those who are involved in consultation and participation activities for the Agency.

Key Words: public involvement, stakeholder dialogue, participation, success criteria, costs, evaluation, consultation, best practice, key lessons, local community.

Links to Agency Duties & Powers
Many of the Agency's duties and powers require consultation. Increasingly it is recognised that doing the minimum may not be enough. This document provides examples of where staff have carried out more extended public consultation and should help in future to guide others who might wish to as well.

Public Domain and Internal References:
Refer to References and Bibliography on page 54.

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Status:
This publication is intended as an information sharing exercise and involves the identification of key principles and approaches that could potentially be applied across regions and functions. It is a first step in the direction of Agency guidance on standard techniques, their practical use and when and where they can be employed. This is not a static document, it will be updated on a regular basis with further case studies so that it becomes more representative of Agency initiatives in the field.

Dissemination Status:
Internal: Released to Regions
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1 INTRODUCTION

1.1 Purpose

This report contains a number of case studies representing the range and nature of public involvement activities being carried out by the Agency. The primary objective is to consider the case studies analytically so that best practice techniques can be drawn out and the pitfalls of techniques in a particular situation can be identified. The advantages and disadvantages of a particular technique in a specific context are considered. This approach can facilitate learning about public participation in order to improve its effectiveness.

Examples of good practice being carried out across the Agency need to be shared. The Public Involvement workshop (hosted by NCRAOA and funded by the Sustainable Development Unit – Head Office) was a step in linking staff involved in public participation and consultation so that experiences and achievements in this field could be shared. The workshop aimed to identify key principles and approaches that could potentially be applied across regions and functions.

1.2 Background

Historically, there has been a tendency for organisations to only consider public[1]/stakeholder concerns when they express disagreement with a decision. However, changes in society have presented new challenges which arise from: globalisation, demographic changes, levels of public expectancy of standards of living and quality of the environment; and health concerns. A recent multinational government effort represents a major first step at ensuring the public has a say in the decisions taken that affect the quality of 'their' environment. Ministers from Europe, central Asia and North America signed a Convention in Aarhus, Denmark which gives the public certain rights. The Aarhus Convention (signed in June 1998) represents "a commitment to access to information, participation in decision-making, and access to justice on environmental matters".

Through the Modernising Government Whitepaper a requirement has been put on local authorities and government agencies to modernise their systems and enhance public participation. Highlighted is the necessity of governments using "more direct methods to ensure that people's values, along with lay knowledge and understanding, are articulated and taken into account alongside technical and scientific considerations" (Royal Commission on Environmental Pollution: Setting Environmental Standards, 1998, para 9.75).

[1]The term 'public' is used interchangeably with the term 'stakeholders'. It is important to recognise that the 'public' is not to be perceived as a homogenous aggregate of individuals. Contemporary research in this field prefers to use the term 'stakeholders' as it suggests that there is more than one and that they come to the process because they are part of the process (i.e. have a stake in the decision outcome). The term 'stakeholder' should provoke the immediate question 'who are the stakeholders?'

Michael Meacher, Minister for the Environment, addressed the Regional Chairmen's Conference (February, 2000) according to the theme 'Engaging the Stakeholders' and conveyed some useful guidelines related to successful stakeholder engagement (Thames Regional Director, in pers. comm.). He suggested that stakeholder engagement/public involvement is a process that demands constant nurturing of the relationship and maintaining a state of openness with the stakeholders. The following rules/principles of engagement will convey to stakeholders that their views are respected and hence engagement in meaningful public involvement can take place:

1.3 Rules of Engagement (ARTIC)

A Accessibility;

R Responsiveness in taking views into account;

T Transparency and clarity – who is responsible, how are decisions made, are consultation points taken into account, what will be done to make a decision, when will the decision be made?

I Intelligibility – speak the language of the stakeholders (keep it simple, interpret all technical jargon);

C Consultation through genuine dialogue – links to the above principles, those doing the consultation must really intend to use the results. More is lost by doing a bad piece of consultation than not doing one at all.

It is important to emphasise here that successful public participation is a *process*. Focusing solely on the methods for public participation is likely to lead to lack of attention to the context of the specific issue, which may require certain types of process. In addition, not only the external context but also the organisational context in which the consultation is taking place should be examined.

Increasing public involvement is not a new priority for the Agency in terms of the social dimension of sustainable development (Environment Act, 1995) and the key aspect of social inclusion. Meaningful public involvement is a major part of addressing aspects of social inclusion. For effective regulation the Agency needs to understand and engage with the people that it serves so that their concerns can be met. This requires a sharing of Agency expertise and a respect for the expertise of others.

1.4 Role of the Agency

In making any judgement, the Agency has to consider government policy, scientific evidence, legal requirements and duties and public comment on consultation. We work within the law and are guided by government policy and commitments, but within these parameters the Agency's role is to make up its own mind after careful consideration of many factors, some of which, naturally conflict. It is a challenging role – to regulate firmly and fairly to ensure he protection of the public and the environment as a whole.

The Agency is reviewing approaches on an ongoing basis and this process is aided by research and development projects so as to ensure that we achieve a balance between widening efforts and use of resources.

2 CONSULTATION AND THE AGENCY

It is important to note that the terms 'consultation' and 'public participation/involvement' refer to different approaches to engaging the public. Consultation can be viewed as the more traditional approach adopted by the Agency (written consultation exercises and one to one meetings) whereas 'public participation' includes more innovative approaches eg. stakeholder dialogue and stakeholder decision analysis, that the Agency is currently investigating. *Stakeholder dialogue* involves processes in which people work together to overcome shared concerns. It is carefully managed to ensure a balance is reached with different stakeholder needs and expectations. The *stakeholder decision analysis* (SDA) method was developed to realise both the benefits of a participatory process, as well as providing the policy maker with a transparent and systematic means of reaching decisions (North West Norfolk LEAP). The case study examples presented here all had elements of engaging the public beyond a traditional consultation process.

2.1 The Agency's Approach: Case Study Examples

It is important that the case studies (presented in this publication) are considered analytically (consider the advantages and disadvantages of a method in a particular context). The following points provide a useful structure for considering the case studies in an analytic (rather than descriptive light):

1. Background & Aims of The Consultation (different aims require different processes)
2. The Process:
   - Targeting Stakeholders – how were they identified, at what stage?
3. Outcome (consider the Advantages/Disadvantages of Method)
4. Costs
5. Success Criteria[2] & Evaluation:
   - What are the success criteria for a good process?
   - How is the process evaluated, in terms of what? (eg. cost, improvement to the strategy/project, low levels of controversy)
   - What are the particular issues for each case study – in each specific case, what techniques/methods worked well, didn't work well – why, was it the context (the situation for a particular local community), could the results be applied more generally – is this useful research?

These points are useful in guiding an overall evaluation of the nature of public involvement activities being carried out by the Agency. Best Practice techniques can be drawn out and pitfalls in a particular situation can be identified.

[2] Case study contributors were asked to report the success criteria that they used for their processes. In the main success was measured with respect to the objectives, and evaluated retrospectively rather than at the time. The aim of asking contributors to report the success criteria was so that those implicit criteria could be made explicit.

2.2 Issues On Which The Agency Consults

The Agency consults on many issues at a number of levels which can be broadly listed as the following:

- **strategic/policy level** e.g. Humber Flood Defence Strategy, Strategy for Water Resources, Extended Public Consultation Proposals;
- **river catchment/plan level** e.g. Local Environment Agency Plans
- **project level** e.g. flood defence projects, licence applications;

The case studies selected for this publication illustrate the similarities and differences in the approaches taken (and how well they work) with regard to the above issues. The Flood Awareness Campaign case is different in that it is a communication strategy with the aim of raising awareness, and is considered separately.

2.3 Strategic/Policy Level Issues

Strategic level issues cover a range of activities which include: national and regional strategies for Water Resources and flood defence strategies which aim at co-ordinating schemes in a geographic area (Humber Estuary Flood Defence Strategy). Strategies play an important role in the Agency's business as they enable planning and future thinking. Involving the public in their development presents some specific challenges.

One recent policy level consultation was on extended public consultation for licence applications. To date, probably due to the scale of these consultations, they tend to be carried out in a fairly traditional manner. Consultation documents of this nature will be sent to statutory consultees and the documents will be available on the Agency Website.

2.3.1 Humber estuary flood defence strategy

This case represents a fifty year strategy for the management of flood defences for the Humber Estuary. The current consultation process is termed 'Planning for the Rising Tides'. There have been two phases of public consultation using a variety of media. Groups of key external organisations have been set up to address some of the particularly difficult issues coming out of the plan. There are major issues in relation to the standard of defence provided, managed retreat and the impact of work on nature conservation.

2.4 Plan Level Issues

2.4.1 Local Environment Agency Plans (LEAPS)

These are plans based around river catchments which aim to provide environmental information about the local area together with key issues and options for action. One hundred and thirty of these plans have been produced across the Agency some by the traditional method of consultation (written consultation exercises and one to one meetings), but a few using innovative methods of consultation (eg. LEAPs[3]). These plans generally are aiming to engage local stakeholders at the first stage and then to communicate the issues to a wider public at a second stage. The innovative techniques that have been used were aimed at engaging the key stakeholders – often the statutory consultees plus other known local interest groups. An example of an approach taken to three LEAPs in the Thames region is included here as well as two other examples (West Cornwall and North West Norfolk).

2.5 Project Level Issues

2.5.1 Flood defence schemes

The Agency is the developer of Flood Defence Schemes and carries out an Environmental Appraisal on which there is a requirement for consultation. An example is how Midlands Region approaches consultation on flood defence schemes. To begin with there is the *Development of a consultation plan* which is set up very early in the project life to formalize the ways communication will take place. It lists consultees and stakeholders and defines appropriate ways of communicating and the best times or stages for dialogue. The approach taken is that of *Mixed methods of consultation to reach different people in different ways* e.g. for making contact: Postal - letters, leaflets, mailshots; Advertisements – statutory requirement; Visits - allow more time, better feedback; notice boards, bulletins, progress notes; Press releases, radio, television – wider audience.

For increased engagement, public meetings might be considered. However, these can be high risk and need to be very well managed and chaired to be effective. A public survey might be considered but this will need very careful management and design. Collaborative projects with mutual objectives are also a way to encourage greater engagement. Two case studies from the Midlands Region (River Sowe Rehabilitation & Cone Pill) illustrate this approach.

2.5.2 Licence applications

The Agency is currently involved with DETR in drawing up a policy on extended public consultation for selected licences. This proposes a process of consultation to take place for licence applications that are of significant public concern. This will be applied across all licence applications and so includes waste disposal licences, industrial process licences, water abstraction licences.

In order to carry out this process effectively guidance is being developed on which

[3] Stakeholder Dialogue (Thames Region, pg. 10) and Stakeholder Decision Analysis (Anglian Region, Pg. 16) are the innovative techniques referred to here.

mechanism to use for which part of the process. As these are consultations that will come up more than once the processes need to be cost-effective. Innovative ways of approaching controversial licence applications have been carried out in a number of cases across the regions. An example from South West Region (Blue Circle – burning of tyres) shows the whole process which used both *public meetings* and *surgeries*. Two further examples illustrate this approach (Castle Cement, Ketton and Incineration of Meat and Bone Meal at Glanford Power Station).

2.6 Flood Awareness Campaign

The 1999 flood awareness campaign was initiated in response to the Easter 1998 floods as part of a major ongoing public awareness initiative, a three year programme based on sound research into public attitudes and awareness as well as international best practice. Central government and committees provided a £2 million budget for the campaign. The Agency has been complimented on the breadth of activity accomplished within the budget by the National Audit Office.

It marks a turning point in the Agency's approach to communications with the public as it involved national advertising on radio and billboard posters. These techniques were essential in order to convince those living in flood risk areas to take a proactive approach to protecting themselves. Floods must be viewed in the same context as fire as they are just as life threatening, the public reluctance to think about the unpredictability of nature needs to be addressed. The key theme of the campaign being *'floods don't just happen to other people'*.

Although the campaign achieved largely positive coverage and public response, a huge shift in attitude is still required, very few people take any action to prepare for a flood, even when they are purportedly aware of what to do. A continuing goal of the campaign as it progresses is to ensure an education process that has a strong impact on the public so that the seriousness of the issues involved is recognized. Furthermore, the Agency aims to clarify its role with regard to flooding.

3 STRATEGIC LEVEL ISSUES

3.1 Humber Estuary Flood Defence Strategy: Planning For The Rising Tides (North East Region - *John Pygott & Philip Winn)*

3.1.1 Background and objectives

The Humber is one of the United Kingdom's principal estuaries. Flood defences around the estuary protect the homes of nearly a third of a million people, industry, ports and many thousands of hectares of high-grade agricultural land. The defences are generally in reasonable condition, but long lengths of the banks are low now, and the position will become markedly worse over the next 50 years with sea level rise. Hence, the Agency is undertaking a fifty year strategy for the management of flood defences.

The current consultation process is termed 'Planning for the Rising Tides'. There have been two phases of public consultation using a variety of media. Groups of key external organisations have been set up to address some of the particularly difficult issues coming out of the plan. Key issues relate to: the standard of defence provided, management retreat and the impact of work on nature conservation.

3.1.2 The process

In April 1999 the Agency published an initial thirty page consultation document entitled 'Planning for the Rising Tides'. This summarised the flood defence issues around the Humber, and set out the Agency's strategic approach to providing flood defences on the estuary. It also had the aims of raising public awareness about how the Agency is responding to these issues and giving those affected an opportunity to voice their concerns.

A second seventy page document was published in October 1999, titled "Planning for the Rising Tides: Options Consultation Document". This document set out the improvement options available, and highlighted the fact that the Agency may seek to move its defences back in the upper estuary to counter the effects of sea level rise.

Both documents contained detailed explanations of the Agency's proposals, and were in full colour. Considerable effort was taken to make them very readable, and attractive. Each contained a reply-paid card allowing respondents to make any form of comments they wished.

Over two and a half thousand copies of each the consultation documents were sent to consultees. Copies were sent to the primary consultees (statutory consultees, local authorities, etc), and to people owning land immediately adjacent to the estuary. A further one thousand copies of each document were distributed at meetings (of which there have been around twenty, mostly with local authorities, but there were also public meetings) or were requested.

Steering and liaison groups
Two groups were established to assist in the production of the plan and to act as a 'sounding board' for proposals at an early stage. The Steering Group was made up of a wide range of bodies including: Local Authorities, statutory and voluntary nature conservation and heritage organisations, Internal Drainage Boards and Associated British Ports. The Liaison Panel was composed from a smaller number of organisations selected to represent a broad range of interests including Local Authority, industry, agriculture and nature conservation issues. Generally the smaller Liaison Panel was used to debate issues at an early stage, and as a working group, whereas the Steering Group was used to seek views when issues had been more fully addressed and operated at a more managerial level. This approach was successful in ensuring that potential problems were highlighted early and in some cases the external organisations drafted key sections of the report to reflect their concerns.

3.1.3 Outcome
The numbers of written responses in each case was relatively low. Approximately replies were received (relating to each of the documents), ranging from detailed letters to simple notes on reply cards.

Involvement of the media
Interest from the media inevitably focussed on some of the more contentious aspects of the plan – for example, re-alignment of the flood defences. Questions around compensation for loss of land where raised very forcefully by the agricultural community and these issues were picked up by the media. In retrospect it may have been possible to 'manage' the media more effectively, however, as there was an element of "any news is good news" from the Agency's perspective, the public arguments probably did more good than harm.

3.1.4 Costs
Two consultations involved the following costs:

Report production	£35,000
Public meetings	£8,000 (estimated)
Agency staff time	£4,000 (estimated)
Total cost	£47,000

These costs have been met from project budgets. The total cost of the strategic planning work being undertaken by the Agency, and to which these consultations relate is of the order of £2M spread over 5 years.

3.1.5 Success criteria, advantages and disadvantages and issues raised by the methodology adopted:

- The general reaction to the approach adopted by the Agency has been very good. Consultees have consistently appreciated a very open, involving, and informing approach;
- The strategy has definitely been modified through the consultation process, though the majority of the real shaping has resulted from the comments of the (relatively small number of) key consultees;
- The big return from going out very widely with detailed consultation documents has been that people (i.e. the public included) are generally very clear about what the Agency is trying to achieve;
- Our decision to approach the consultation process in this way was driven to a large extent by the experiences of a neighbouring local authority which led on the production of a coastal shoreline management plan, and where the consultation process was unsuccessful;
- With many different organisations involved, all with varying agendas, there has been considerable potential for conflict in developing the plan. So far it has been possible to continue to make progress however. The use of what appears to have been a successful consultation approach has contributed significantly;
- The costs of consultation have been high, but they are perhaps reasonable in relation to the overall project costs.

3.1.6 Key lessons

The approach adopted in this instance has been one of trying to do the best possible job. That decision was driven by political considerations (a recent 'failed' consultation), and the fact that the plan potentially impacts on many organisations, and on large numbers of members of the public. The number of responses received has been low, but the fact that most of our consultees are still supporting the Agency's work, and that public disquiet appears to be low, seem to be better measures of success.

4 LOCAL ENVIRONMENT AGENCY PLANS

4.1 Stakeholder Dialogue In Local Environment Agency Plans (Thames Region - *Juliette Chan & Nicola Pinnington*)

4.1.1 Background and objectives

The LEAP team in the South East Area of the Agency's Thames Region piloted the use of stakeholder dialogue as part of the process of producing Local Environment Agency Plans (LEAPs) between March 1998 and March 1999. Three particular cases are focused on, the Wey, Loddon and Mole river catchment areas, in order to illustrate the success criteria and pitfalls of the method of public involvement ('stakeholder dialogue') undertaken by this team. All three rivers are tributaries of the non-tidal Thames, entering upstream of Teddington Lock.

In all three cases, a common theme amongst the issues raised across the whole range of Agency interest, related to the need to improve communication and understanding between all parties involved in managing the environment. As an example, the issue of striking a balance between the needs of river users and the environment can only be addressed through improved communication and understanding.

For the purposes of this publication the LEAPs process (as a whole) will be considered initially followed by an overview of the three cases (Wey, Mole and Loddon LEAPs) with regard to costs, success criteria and key lessons. Thereafter, each case is considered individually. This structure allows the reader to consider each process in the context of whether or not it met the success criteria and demonstrated value for money etc.

4.1.2 The process – LEAPs in general

The underlying theme of the LEAP process is the partnership approach. It is recognised that the Agency cannot work on its own to manage the environment effectively and joint action is essential in order to address environmental issues.

The traditional use of written consultation exercises and one to one meetings meant that:

- The LEAP Officer acted as a messenger between the different groups which didn't increase mutual understanding amongst stakeholders. Views of many consultees stayed the same so historical conflict and contentious issues were therefore not always addressed;
- Too much time was spent revisiting internal and external consultees to clarify their comments;
- Although all views were taken into consideration, all the power and accountability for decisions lay solely with the Agency;
- External organisations saw the LEAP process as closed and secretive and many queried the usefulness of the plans. There was a lack of ownership of LEAP actions and few partnership opportunities arose;
- Many of the Agency's technical staff felt detached from the LEAP process and the external consultation exercise, as they were not directly involved.

The SE Area LEAP Officers recognised the need to address the above inadequacies of the traditional consultation process to strike a balance between the different expectations of the stakeholders (including Agency staff). This could only be achieved by enabling stakeholders to talk directly to one another and 'stakeholder dialogue' events were organised.

Stakeholder Dialogue is a process in which people work together to overcome shared concerns. It is carefully managed to ensure a balance is reached with different stakeholder needs and expectations.

Identification of key stakeholders is crucial to any public involvement activity. Prior to each 'stakeholder dialogue' event, the following questions were used to guide stakeholder identification (and ensure a representative selection, i.e. no 'missing links'):

- Who makes the decisions?
- Who will carry out the actions?
- Who has the knowledge (i.e. local knowledge)?
- Who has an interest in the issues involved?
- Who has potential funding?

4.1.3 Outcome (Wey, Loddon & Mole LEAPs)

At each event, participants were asked to evaluate that day and the dialogue process. All participants (except one or two) said that stakeholder dialogue was better than the traditional consultation approach. Success was judged from this feedback as well as informal feedback. Participants were positive and encouraging. Some had attended all workshops (eg. Thames Water) and were very supportive. The ownership of the Wey LEAP was much greater (although because of staff shortages, the momentum has been lost slightly, so this now needs to be rebuilt). Agency staff were also asked for comments and all thought that the events were worthwhile – despite the fact that the Issues Workshops did not go to plan.

With respect to the aims of stakeholder dialogue, all objectives were met for the Wey Day. The Loddon and Mole cases were more difficult in that the Issues Workshops did not go to plan. Some objectives were recouped in the Action Planning Days but inevitably this was not an outright success.

4.1.4 Costs

As external facilitators are expensive (total cost between £2,500 and £3,500), there is a need to develop the existing pool of trained and experienced people locally - for example, supporting the Surrey Consensus–Building Network (see footnote 5 on pg. 31) and training more Agency staff.

For the purposes of keeping costs to a minimum, low budget venues were used (average cost being £1,000 for a whole day event including catering). This is in contrast to the traditional approach of launching documents in that reasonably posh venues were utilised (costs ranging from £2,000 to £4,000).

In order to save on printing costs, documents were written in a concise and reader-friendly manner. A corresponding benefit was the fact that the documents were therefore more readily understandable for stakeholders, saving on resources further down the line (Agency staff time).

4.1.5 Success criteria

General success criteria for the 3 LEAPs include: positive feedback from the evaluation; partnership actions; new issues; positive movement on long-standing issues, less controversy. Intangible criteria included: increased understanding and awareness, the ripple effect – communication between groups that wouldn't normally meet and could result in actions or projects outside the LEAP process. Overall, the Agency carried out an open and transparent engagement process. The use of two LEAP officers trained in consensus building and facilitation techniques contributed greatly to its success.

4.1.6 Key lessons/future directions:

1. The stakeholder dialogue process must be carefully designed and tailored to meet the particular needs of each LEAP.
2. An experienced lead facilitator must be identified for the design and management of the process. Eventually, this resource must be provided from within the Agency or the Network to keep costs to a minimum.
3. Sub-groups must be managed by trained facilitators to ensure that outputs are achieved.
4. When properly managed, stakeholder dialogue may shorten the consultation exercise and the drafting of the LEAP by improving stakeholder involvement in its development.
5. If not managed or designed properly, stakeholder dialogue can increase time spent on consultation as well as the LEAP production.
6. Stakeholder dialogue is worth including in the LEAP process. However, the following areas need to be given more consideration and developed further by the SE Area LEAP staff:

- Including stakeholder dialogue effectively at the beginning of the LEAP process and in Annual Reviews
- Ensuring that supporting information and data for issues is obtained

It is important to keep these key lessons in mind when evaluating the process of each specific LEAP. Outlined below is the particular consultation/stakeholder dialogue process that was undertaken for the Wey, Loddon and Mole LEAPs.

4.2 The Wey LEAP (Thames Region)

4.2.1 Background & objectives

In March 1998, the Environment Council[4] was approached to design and run an event – the *Wey Day* – with the following *aims/objectives:*

- to improve shared understanding of the issues affecting the Wey catchment;
- to enable discussion and collaborative work locally; and,

[4] The Environment Council is an independent charity dedicated to enhancing and protecting Britain's environment through building awareness, dialogue and effective solutions.

- to inform the final Wey LEAP Action Plan.

The *Wey Day* was designed to maximise the opportunity for dialogue between the stakeholders, whilst also obtaining a list of possible actions to resolve the LEAP issues. The aim was to enable organisations with different interests, values and resources to build mutual understanding, find common ground, resolve shared problems, and reach agreement over some of the complex issues.

4.2.2 The process

It was essential for the *Wey Day* to be designed and facilitated by an independent third party to ensure that the process was transparent so that any real or potential conflict was positively managed. A core group was set up to help plan the event which took place on 17 November 1998.

The Environment Council provided the lead facilitator whose role was to design the event, with overall responsibility for managing the process on the day. He was supported by a group of trained facilitators from the *Surrey Consensus-Building Network*[5]. These 'voluntary' facilitators managed the sub-groups, working with the principle that all views were valid.

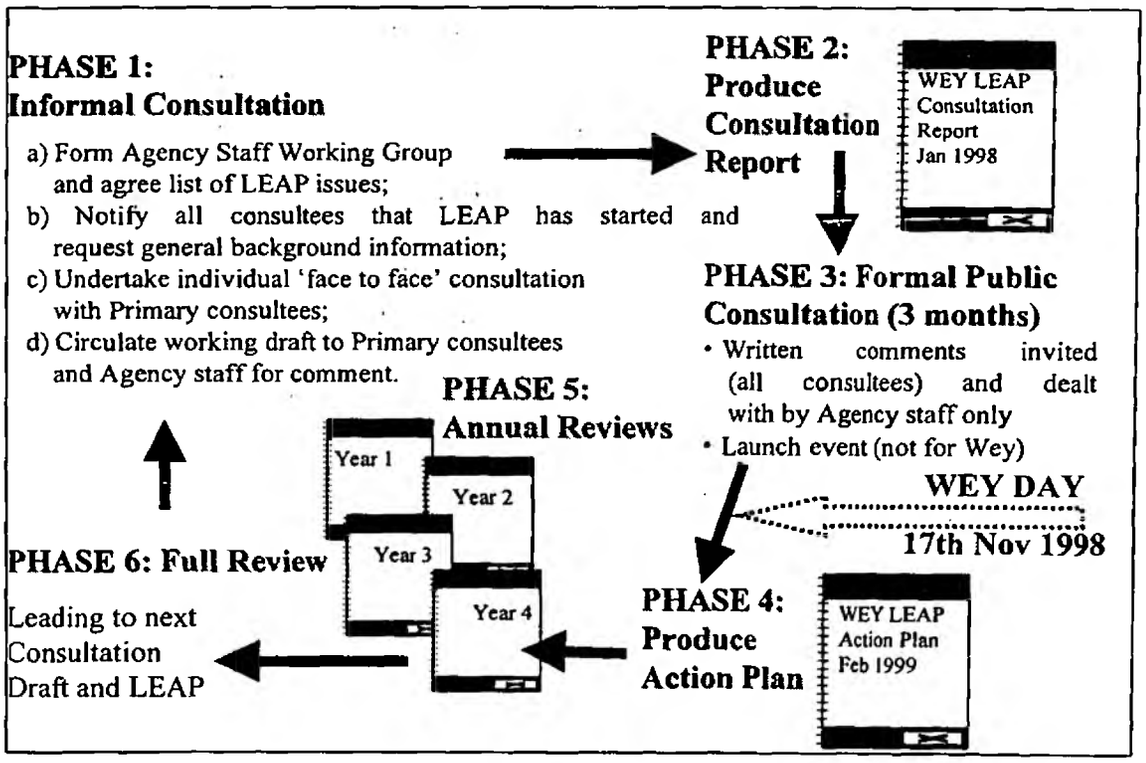

Figure 1: LEAP Process (Jan 1998)

The above model summarises the process used for the Wey LEAP (Jan 1998), showing traditional consultation at Phases 1 and 3 and where the *Wey Day* fitted in.

[5] The Network was set up to promote the use of consensus building techniques and consists of trained, independent facilitators. Members trade their services on an informal and 'cash-less' basis. It is mostly made up of officers from several local authorities in Surrey and the Environment Agency Thames Region as well as a few private individuals and volunteers.

4.2.3 Outputs

The main outputs from the sub-groups were:

- Agreed list of issues;
- Existing initiatives/actions/plans that partly or completely address these issues;
- Areas where new or more work is needed;
- Actions needed, lead organisation and partners, timescales and resources.

4.2.4 Costs

Without the help and expertise of the Network members and the informal exchange system, the *Wey Day* would not have been possible, as funds were limited.

4.2.5 Success criteria

The *Wey Day* was well received by the stakeholders who felt that there now was a better understanding of the variety of issues and the pressures placed on the resources of the Agency and other organisations. As a result, external expectations of the Agency in the catchment are perhaps more realistic. Partnership opportunities also emerged as the stakeholders signed up to new joint actions. Both external stakeholders and Agency staff welcomed the opportunity to discuss areas of concern and new issues, not raised during written consultation, were identified.

The outputs of the day were also extremely useful in formulating the final plan for the Wey catchment, which took much less time to draft. The real measure of success however, will be in the delivery of the actions and this will be monitored through Annual Reviews.

4.2.6 Key lessons

The importance of using lead and sub-group facilitators experienced in stakeholder dialogue is evident from the success of the *Wey Day,* and the problems encountered during the initial Loddon and Mole LEAP Issues Workshops, where they were not used.

4.3 The Loddon and Mole LEAPs (Thames Region)

4.3.1 The process – Issues Workshops

Stakeholder dialogue events were also trialed at the beginning of the LEAP process for the Loddon and the Mole catchments.

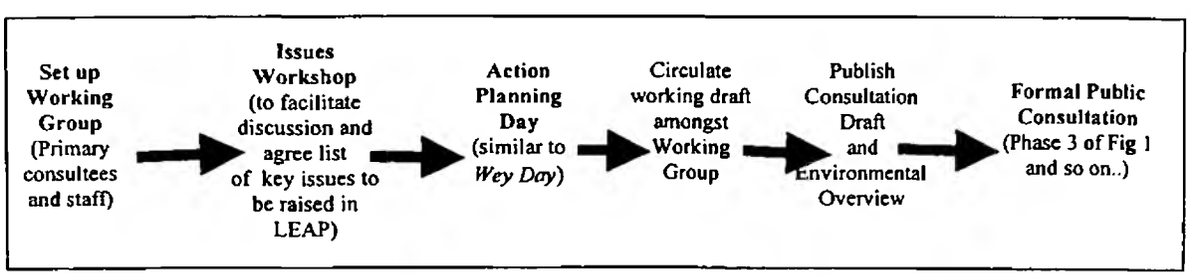

Figure 2: The Process

A one-day workshop was held in October 1998 for the Loddon, followed by a half-day event in December 1998 for the Mole. In an attempt to save money (*costs*), the workshops were designed and run by environmental consultants (not specialists in stakeholder dialogue) and the LEAP Officers. No Core Group was formed although the main stakeholders were contacted by phone in advance of the written invitations.

The workshops involved a general introduction to the Agency and the LEAP process, followed by identification of issues. For the Loddon, the stakeholders were also asked to group and prioritise the issues. No trained facilitators were used for sub-group work at either events.

4.3.2 Outcome

Although the feedback received showed that these workshops had been beneficial by increasing mutual understanding and awareness of issues, the parts of the day involving issue identification and prioritisation needed to be improved.

It was clear that a more flexible approach and design of the workshops, as well as using trained facilitators, were essential for effective stakeholder dialogue. Consequently, the Environment Council was once again approached to design and run the Loddon and Mole Action Planning days.

4.3.3 The process - Action Planning Days

These one-day events took place in March 1999 and were very similar to the *Wey Day*. As with the Wey, the sub-groups were facilitated by members of the *Surrey Consensus-Building Network*.

4.3.4 Success criteria

Stakeholders present felt that the days had been productive and almost all felt that this approach was better than the historical informal consultation.

4.3.5 Key lessons

There were some concerns over the fact that a few key organisations were not represented and that everything was not covered. The absence of Core Groups may have been a factor.

Much of the work carried out during these days has been used to develop the Mole and Loddon LEAP Consultation Drafts. However the unwieldy outputs from the initial Issues Workshops slowed down the LEAP process, as clarification of issues and supporting information was still needed.

4.4 North West Norfolk: Stakeholder Decision Analysis (Anglian Region - *Rona Chellew & Adam Nicholls*)

4.4.1 Background and objectives

(Adapted from LEAPs: Evaluation of a Stakeholder Approach to Environmental Management in North West Norfolk by Darren Bhattachary, 1999.)

Darren Bhattachary, a PhD student at University College London's Environment and Society Research Unit, approached the Agency in relation to the North West Norfolk Draft LEAP. As part of his PhD Darren was investigating participatory approaches in environmental decision making. Having previously undertaken a similar project with the New Forest LEAP Darren was going to build on this experience and explore ways of overcoming the shortfalls identified.

The aim of this project was to explore ways of improving the participation of key stakeholders in the LEAP process, principally concerning the identification and prioritisation of issues within a LEAP area.

In particular, a variety of goals were sought:

- consensus over the agreed plan of action for the identification and prioritisation of issues in the LEAP;
- partnerships and coalition building between stakeholders and the Agency;
- increased knowledge of the Agency, its roles and responsibilities;
- increased receptiveness of the Agency to stakeholder concerns; and
- effective planning respecting the multiple uses of environmental resources.

The project built upon a previous R&D project; 'Prioritising the issues in LEAPs through consensus building in stakeholder groups' (the New Forest LEAP).

The *stakeholder decision analysis* (SDA) method developed within this project aims to realise both the benefits of a participatory process, as well as providing the policy maker with a transparent and systematic means of reaching decisions.

4.4.2 The process

Recruitment for the North West Norfolk LEAP began just under one month before the first workshop. This meant that there was insufficient time for face-to-face recruitment. As such, invitations were sent out via post to a broad range of organisations from the public, private and environmental sectors. Members of the Area Environment Group (AEG) also suggested potential participants for the workshop group, and indeed two AEG members were included as representatives on the stakeholder group. However, it should be noted that their attendance was to represent their professional organisations, rather than to articulate AEG concerns.

Within the North West Norfolk stakeholder decision analysis process, participants met for a series of workshops with the following tasks in mind:

- to undertake site visits (River Nar SSSI and King's Lynn STWs);
- to introduce the Agency roles and responsibilities and the Project aims;
- to discuss and identify the issues;
- to develop a set of criteria to appraise issues;
- to apply the criteria to prioritise the issues;
- to discuss and agree prioritisation; and
- to feedback the process from the stakeholders.

First workshop
The first LEAP workshop attempted to give the participants an 'in the field' experience of North West Norfolk, through site visits to areas where environmental quality and management issues predominate (the River Nar SSSI and King's Lynn Sewage Treatment Works).

This workshop consisted of presentations from the Agency upon their roles and responsibilities as a regulator and from the facilitating group at UCL concerning the workshop program. The role of the AEG in relation to the decision making process was explained. Particularly, it was stressed that they were keen to support the Agency in attempting new methods for engaging key groups within their practices.

The final review session was not undertaken due to lack of time. Instead a question and answer session took place between the participants and the main facilitator from UCL. A broad variety of themes were discussed, including: the process, other LEAP issues, the choice of site visits and group representation.

A task sheet was handed out for the second workshop where individuals were asked to think about new issues for the LEAP and well as criteria to appraise them.

Second workshop
The second workshop explored issues to be considered within a LEAP and criteria through which these issues could be appraised. Responses from the task sheet issued in the first workshop were collated and used as the basis for discussion.

There were two main tasks for the workshop. First, stakeholders were to discuss environmental issues, as well as contributing new issues. The second task for the workshop involved the development of criteria through which issues could be appraised. The identified criteria were individually weighted by participants, on a scale of 0-100, to rank their relative importance.

Third workshop
The third workshop concerned the prioritisation of the draft LEAP issues. This was to be achieved through the evaluation of each of the issues by the twelve highest weighted criteria generated during the second workshop.

To undertake the prioritisation, systematic application of every criterion to each issue was undertaken. The issues were assessed on a score of low, medium or high.

Fourth Workshop
This workshop had two roles, to discuss the prioritised LEAP issues and to reflect back upon the process.

The group discussed difficulties with prioritised LEAP issues. This mainly centred on the fact that issues concerning flood defence seemed to fair relatively less well in relation to other issues. Indeed, seven of the lowest twelve ranked issues were related to flood defence.

4.4.3 Costs

Costs for this project were kept to a minimum. This was due to it being part of a PhD thesis (the facilitators only charged for travel and time at the workshops) and the stakeholders providing venues for the workshops free of charge. Two hundred thousand pounds (£2,000) was made available from R&D and the project was run within budget.

4.4.4 Success Criteria

The objectives of this project were highlighted in section 4.4.1 and success will be judged against these objectives.

Overall, the participants worked well together and were able to quickly resolve difficulties within the prioritised LEAP through a process of negotiation and consensus. This was a result of the relations that had been built up through the process with regard to the Agency's approach to the LEAP. Participants generally felt that they knew more about the Agency as an organisation, and though they welcomed the move by the Agency to trial new methods for achieving wider participation upon the plans, they also felt that the Agency can be more flexible within its approach to environmental management.

The Stakeholder Decision Analysis was a learning process for all that took part, and was generally viewed as a positive experience. As a method it permitted a wide variety of individuals to come together and discuss priorities within environmental management. Moreover, they were able to come to an agreement on how to best progress the LEAP nationally and at a local level. This is a notable achievement, considering the time constraints on the process, and the range of interests represented.

With this in mind, overall the stakeholder decision analysis method worked well for the Agency. It gave a chance to survey views upon issues, permitted exchange upon values and criteria, and perhaps more importantly, promoted a relationship with stakeholders so that concerns could be articulated and worked through within a process.

ENVIRONMENT AGENCY

Your Ref:

Our Ref: CTR/CRS/PI Publication

Date: 14th July 2000

Information Officer
National Library and Info. Service
Rivers House, Cardiff
Wales

Dear Colleague

RE: PUBLIC INVOLVEMENT IN AGENCY ACTIVITIES

Further to the Public Involvement Workshop (February, 2000) hosted by NCRAOA and funded by the Sustainable Development Unit, please find enclosed our publication: *Public Involvement in Agency Activities.* The area of public participation is becoming an increasingly important one for the Agency, and one where there is a range of experience and expertise spread across regions and functions. The workshop was a major step at networking Agency players in the field for the purposes of sharing key lessons that have resulted from practical experience. The publication, being the main output of the workshop presents a number of case studies representing the range and nature of public involvement activities being carried out by the Agency. It should be seen as is a first step in the development of Agency guidance (to be updated regularly) on standard techniques, their practical use and when and where they could be employed.

I hope that you find it a useful and interesting document and would welcome any feedback on the form attached. If you would like more copies to give to colleagues then please contact Pip Wittenoom (7-10-6800) and if you would like more information about social issues then please contact Clare Twigger-Ross (7-10-6705).

Yours sincerely,

Dr CLARE TWIGGER-ROSS
Social Issues Officer

Encs: PI Publication & Feedback Form

The Environment Agency, Steel House, 11 Tothill Street, London SW1H 9NF
Tel 0171 664 6705 Fax 0171 664 6911

4.4.5 Key Lessons

- The recruitment process needs to be examined. Greater commitment from stakeholders must be achieved if sessions are to run smoothly and the process is to be legitimate (only five stakeholders attended all four workshops);

- Time allotted for the discussion of issues and the prioritisation of the issues needs to be reviewed if the prioritisation process is not to be superficial. With hindsight, the sessions were overly ambitious;

- There were general concerns over the information provided to explain the issues (both those provided by the Agency and the stakeholders);

- The Agency must balance the importance of information provision with the needs of facilitating open debate. Providing too much detail in a document may give the impression of a '*fait accompli*'.

- To facilitate identification of criteria and a starting matrix should have been provided (as with the issues).

4.5 West Cornwall Leap Annual Review Forum (South West Region - *Cathy Doidge*)

4.5.1 Background and objectives

Offered here is a personal view of participation techniques that have been used in the Cornwall Area (as with all participation methodology it is very much a case of 'horses for courses').

LEAPs can be defined as integrated environmental management plans based around river catchment areas. The process includes local consultation with stakeholders and the general public to put together 5-year action plans for local environmental improvements. The plans include actions for the Environment Agency, other organisations, partners. They are reviewed annually in order to report on progress of actions described in the plan and to identify any new or changed issues. The forums have come about as a way to involve stakeholders in the ever evolving management of the local environment.

The purpose of the West Cornwall Annual Review Forum is to review progress on local issues, new issues and priorities (if applicable). This involves not only review of the effectiveness of actions so far but also identification of new stimuli and directions in order to keep the process alive and maintain stakeholder interest (demonstrate openness). Links between issues and their solutions need to be established and actions updated in to take account of changing issues and concerns. The Forum links up other organisations (who have responsibilities in the sector) by bringing together representatives of major players with local interests. New directions are considered, for example, Best Value and community planning in local authorities.

4.5.2 The process

Due to limited resources, it was considered that these would be best targeted towards the key stakeholders rather than a 'full-scale' public involvement. Presently the Cornwall LEAP is at the Annual review stage and has made many contacts and links throughout the process with many interested parties including individuals who have commented during the previous public consultation. These contacts constitute the key stakeholders which were invited to attend a half day forum. Therefore, identification of key stakeholders was as simpler task here than is usually the case.

Other stakeholders which were invited to the half day forum included: Members of the Area Environment Group (AEG) and the LEAP steering group, Local interest groups, Councillors district and town (approximately 50 attendees). Before the forum the Steering Group were asked if they had identified any new issues. These, together with a draft review of actions, formed the basis of discussions within the facilitated group exercises.

Participation exercises carried out during the forum entailed a mix of small workshop sessions and open forum. Each workshop looked at a number of issues under a broad theme - 'looking after the land'. Approximately 12 people in each group were chosen to reflect a wide range of interests. A second session took place over tea to allow forum-

goers to join a second group if they wished.

Agency staff facilitators were briefed beforehand on a set of ground rules to try to ensure objectivity and that the forum goers had their say (and got their points recorded). As some of the staff had never done facilitation work before we teamed the novices up with experienced facilitators into a pair per workshop.

4.5.3 Outcome

An 'action list' was produced which recorded all the points that were made during the forum, and what was going to happen (i.e. send concerns to other organisations, add new actions, etc.). This was circulated 2-3 weeks after the event.

Although the forum was not intended to prioritise LEAP actions, the workshop groups identified actions they considered to be of high importance and the draft LEAP review was updated in light of the discussions. Hence, the LEAP process and documentation has been improved by the input of the forum and identification of new issues and comments on the implementation of actions has updated the Plan.

4.5.4 Costs

LEAP team work covered the costs of design time, locating the venue, and general organising.

- The venue was hired off-season and cost £200 (including tea, coffee and biscuits);
- Six Agency facilitators were used for half a day, two were used for a whole day therefore total days spent was 5;
- Travel time and expenses for Area manager and visitors from other Areas and Regions;
- Minimal costs for equipment (flipcharts, marker pens and post-its);
- Overheads: postage for 150 invitations, 100 odd draft copies of review before the forum and 100 copies of notes to be circulated afterwards.

Generally, the event was an inexpensive one. This is mainly to do with its location (South West Cornwall).

4.5.5 Success criteria

The workshops created an informal atmosphere to discuss contentious issues. This informal atmosphere allowed for increased stakeholder understanding with regard to the issues involved and it demonstrated the Agency's openness to stakeholder concerns (the draft LEAP review was updated in light of the discussions during the workshops). Generally, single-issue 'prima-donnas' do have such a large audience in a forum workshop hence, some of the confrontation was avoided. It was a learning process for all 'sides' including Agency staff.

To summarise, success criteria that were met by the forum include: inclusion, staff development (new skills & contacts), networking and nurturing of networks and sign-up to the process by partnership organisations (attendance at the forum is evidence of this).

4.5.6 Key lessons

Participation techniques involving bringing together different interests are popular BUT did not always focus in on absolute actions for local area. Some groups come up with principles and policy that need to be sent on to a wider audience – we do this by sending the forum comments to Regional/National Agency or other organisations. Prioritisation of actions using a forum has not been attempted primarily because of the short timescale of the event (approximately 2 - 2½ hours). More time would be required and involvement of a full range of partners would be required in order to prioritise actions successfully.

The forum acts as a mirror on perceptions and messages being sent out by the Agency and how they are received locally. If the Agency is to receive an accurate reflection of how it is perceived locally, 'missing links' or non-representation of interest groups needs to be avoided. The Cornwall forum was held at the review stage of the LEAP process and hence, it is more likely that most of the major players have been identified. Key partners such as LA21 officers have there own networks which were helpful in this case. However, it can never be taken for granted that all those who should and are willing to be involved have been identified. Public involvement is an evolving process, new stakeholders 'come in to play' continually.

If the Agency is to be perceived as 'protector' of the local environment with a genuine interest in community concerns, it essential that LEAPs have a local focus in order to arouse the communities interest and keep it. This requires an awareness of the prevailing local culture. Contentious issues raise interest, as does 'localness'.

It is important to increase the role of the steering group and AEG (Area Environment Group, certainly some of them would be acceptable facilitators. Increased involvement of these bodies would demonstrate partnership to other forum-goers. In this case, the chairman of the AEG opened the forum, facilitated a session and led a final plenary session. He is a well-known and respected member of the community in West Cornwall and his involvement was appreciated by the forum-goers

For many staff facilitation is a new skill, and a forum with its informal atmosphere and a joint facilitator to help, is a reasonably 'safe' place to try out new skills. It is also an opportunity to widen personal networks.

On a practical level, when planning any public involvement activity, it is essential to provide an appropriate location that has sufficient facilities. If there are enough refreshments to go round, enough quiet breakout rooms for workshop sessions, and the location is well known and central then the forum-goers will concentrate on the work in hand rather than 'worry' about the conditions.

To conclude, a practitioner's view following experiences of running the LEAP process in Cornwall offers some invaluable and realistic insights with regard to designing a participation event. These insights result from experiments with a number of techniques from the formal to the 'freestyle':

- True consultation – where on the ladder of consultation do you want to be – and is it appropriate. Don't call it consultation if it is information dissemination.
- Time and money – materials can be kept very simple and cheap, but consultation IS costly in officer time.
- Local focus, culture – essential to arouse interest and to keep it. Agency must be seen to go out to the rest of the community.
- 'Death by plans' – check what other organisations are doing, can we link in?
- Keep It Simple (KISS)

5 PROJECT LEVEL ISSUES: FLOOD DEFENCE & LICENCE APPLICATIONS

5.1 River Sowe Rehabilitation, Coventry (Midlands Region - *Liz Galloway*)

5.1.1 Background and objectives

The project was an urban river rehabilitation scheme, affecting 1.6km of the River Sowe through Longford Park in Coventry. The Environment Agency was responsible for restoring the river channel and peripheral wetlands within the City's plan to rehabilitate the park. Considerable upheaval was anticipated due to excavation and re-shaping to create a new natural meandering channel through an extensively used park. Many activities, such as dog walking, children's play, organised games such as football and simply passive recreation were likely to be affected by the change. The existing landscape although regularly maintained had relatively little variation or interest value.

A number of problems existed on site, the most significant of which was vandalism; most incidents seemed to arise from outside the immediate area, but there was evidence of a great deal of petty vandalism on site. During the works, one of the two footbridges across the river was burnt down. One *key objective* in rehabilitating the park landscape was to create an enhanced sense of value within the local community.

5.1.2 The process

This project involved extensive communication and public involvement media. With the guidance and collaboration of the City's Leisure Services Department, a communication plan was made. This reinforced verbal agreement and the goodwill between parties. Planning approval was sought by the Leisure Services Department.

A Project Officer was on call during normal working hours to answer queries. Consultations were carried out with statutory bodies and NGOs and the following public involvement and communication media were used:

1. A Memorandum of Agreement was signed between the Environment Agency and Coventry City Council, setting out objectives, responsibilities and outputs;
2. A mailshot was sent to 6000 local residents outlining the plans and inviting them to attend a manned exhibition of poster displays describing the works;
3. A community group was formed to monitor the progress of works and involve local residents whenever possible;
4. A manned display was mounted in the Department's caravan on the site for three days prior to the works starting. This should have been a focus for problems related to the works, but in practice, a great deal of interest was shown but little comment which might have helped to anticipate problems;

5. The Local Education Authority was involved and plans were made to involve local schools and create access for nature study, surveying and geographical study. In addition, support was given for artistic involvement by local children. Plans were made to document environmental decision making rationale.
6. A colourful site notice board was installed, explaining the works and this aroused a lot of interest amongst local youth who threatened to destroy it; it outlasted the main phase of works – six weeks (just);
7. The local community was involved with volunteers and the Leisure Services team in planting trees on site to implement part of the plan for the park around the river;
8. Local Councillors were made aware of the scheme and involved in events such as the tree planting day. Support was given resulting in press photographs and articles;
9. Press releases were made at a number of key stages and positive interest was shown;
10. A Global Action Plan initiative involved Agency staff and local residents, including children in planting up berms (shelves around the water level at the bottom of the bank) with marginal plants.

5.1.3 Outcome

The vast majority of the works were achieved with no worse problems than those which normally arise out of contractual procedure and physical conditions on site. However, one simple aspect of the works that was not expected to cause any problems did develop into a major issue due to the protest of only one stakeholder who had initially agreed to the works (the building of a reedbed near her house). Whilst this stakeholder was travelling abroad, the reedbed was dug and planted in the agreed location. When she returned she complained that she had not been informed and had never agreed to the location (she raised Health & Safety issues). Local elections were running at this time and she involved local councillors who advised her to get up a petition. She followed this advice, a commitment was made by councillors that the reedbed would be filled in and despite repeated attempts to negotiate a middle course this was eventually done. Sadly the children lost their nature study area and also the protection which the reedbed could have been afforded the water quality in the river. In all, this exercise proved costly to the environment, the community and the Council (financially).

5.1.4 Costs

The extensive communication and public involvement (detailed above) cost in the region of £9,000 (estimated), split evenly between staff time and presentation materials (excluding availability of Project Officer).

The cost of excavating and planting the reedbed within the contract was £4,800 and the costs of filling it in (a further £5000) were borne by Coventry City Council at the request of the Agency. Relative to the overall cost of the project (£140,000) this was not significant, but in a situation like this, additional costs to maintain safety fencing and keep plant and staff standing by until a final decision was made, could become a burden.

5.1.5 Success criteria

This project was successful in that people could be seen enjoying passive and active recreation on site and there were no significant complaints or concerns after completion. Overall, greater value was put on the environment by the community (more care and less vandalism). The rehabilitated channel was successfully integrated into parkland with varied landscape character, both visually and functionally.

Additional evidence of success includes: similar work being carried out by Local Authority in other locations and value for money (no abortive work or wasted resources).

5.1.6 Key lessons

Never assume that the absence of militant action groups – or even an immediate response means acquiescence. Dormant or suppressed opinion can erupt violently at an embarrassingly late stage of the project.

This experience conveys how local politics carry risk and can affect normal decision making processes. Furthermore, planning approval of detailed plans can easily be overturned. Ideally, a response should be sought from every single person who may have an interest in the scheme (depending on its size!). It is important to remember that people's perceptions of site works or disturbance don't always match reality. Early community involvement work and making people aware of the benefits of a project should generally ensure a balanced outcome. Commitments made in haste may be difficult if not impossible to overturn at a later stage when a more balanced appraisal of the issues can be made.

Although time consuming, frustrating and costly, it *is* possible to manage change in a well planned project. Once acknowledged, damage was limited. With regard to unexpected costs, partners can help share the burden.

5.2 Estuary Flood Defences: Cone Pill (Midlands Region - *Liz Galloway*)

5.2.1 Background and objectives

This is an estuarine site of very considerable nature conservation significance. Potentially, any changes made in the process of creating a flood defence could harm the conservation interest, but the failure to provide defence against flooding would render part or all of the flood plain relatively valueless for its current use, i.e. agriculture. An existing bank was eroding at 1 metre a month and soon land would be unprotected. Numerous engineering options with different benefits and dis-benefits had been examined and discussed individually with farmers over a period of at least four years. Unfortunately, this had been carried out on a random basis and results had not been recorded consistently. Landowners had reached a state of frustration and confusion and were about to seek some influential support to stop the project.

Hence, the *objectives* of the consultation were to explain the options and the scheme rationale to all landowners and make a careful record of their responses. Identification of other, hitherto undiscovered options were considered. Additional aims were to identify social or economic impacts of the proposed works and get a steer on opportunities to mitigate the negative socio-economic impact. Furthermore, it was important to demonstrate the Agency's open and transparent approach to decision making so that a relationship of good will was maintained between the Agency and the community. Overall, this project aimed to establish a clear and balanced appraisal of the facts for the EIA.

5.2.2 The process

This was a very small problem in scale – only seven landowners – but they represented the majority interest in the scheme. They were likely to experience varying degrees of negative impacts in that their livelihood was threatened by the unavoidable retreat of the flood defences leaving part of their farms unprotected. Their current farming practice would no longer be viable in front of the defence.

In order to achieve a fair basis for evaluation of the options, the landowners were approached by means of an informal questionnaire asking opinions on various outcomes, e.g. "would you consider moving to another farm?" or "would you leave your land?". Agency staff spent thirty to forty minutes with each family in order to discuss the background of the project (MAFF, EN and Agency viewpoints) and asking for views on various options and outcomes. This was done so that the Agency could understand the individual response and motivation of each landowner and explain that there would inevitably be some 'losers'. Furthermore, the Agency aimed to obtain information on acceptable opportunities (mitigation) and get an indication of costs, perceived value of land and value to the individual. The use of the informal questionnaire was appropriate at this level in that there were only a few farming families involved.

5.2.3 Outcome

The outcome was that landowners all had different values and priorities. Some would not consider moving from the family home while others were interested in farming primarily and would consider replacement land elsewhere. Some would be happier to stay put but manage the land for conservation and others were prepared to have a go at diversifying. Thus, we understood the issues and had the makings of a plan for mitigation. A management agreement was negotiated in principle to ensure some funding to support land in wetland use once the scheme went ahead. Those farmers who were to lose protection, but did not want to relocate accepted that they had chosen their own path with the knowledge of all the alternatives. Generally, there was a good reaction to the consultation with the landowners feeling grateful for the personal contact.

5.2.4 Costs

Costs were an issue and collaboration was sought with organisations such as English Nature and RSPB to manage part of the site for wetland. Some additional funding was available from within the scheme and a limited amount of compensation could be found as long as the circumstances were appropriate. It was far better that potential compensation funds be used to enter into a management agreement with a farmer than simply be paid over as a lump sum with no environmental benefit. Consultation costs totalled approximately £750 (all staff time).

5.2.5 Success criteria

Success criteria are difficult to describe in this case. Most of the outcomes were unacceptable to most of the landowners since their current situation was to be worsened and the Agency had no means of avoiding this. The following success criteria relate largely to understanding and mitigation:

- Acknowledgement that the situation had been explained fairly to everyone;
- All ideas and options had been discussed and considered fully;
- Some worthwhile mitigation opportunities had been identified;
- 'Difficult role' of the Agency was understood and acknowledged by consultees;
- No bitterness or criticism of the Agency.

Broader environmental sustainability criteria were addressed successfully in that the project resulted in protection and respect of a site of international nature conservation importance. The Agency's EIA process was demonstrated by open and fair dialogue, both with individuals and at a strategic level. The 'bigger picture' was conveyed to consultees with regard to agricultural, flood defence and nature conservation issues and their inter-relationship. Social and economic issues were addressed in relation to loss of agricultural income and opportunities for funding of habitat management were identified and pursued. In a 'nutshell', a sustainable solution was sought as an outcome to the change brought about by providing a necessary flood defence.

5.2.6 Key lessons

It is vital in such negotiations to ensure that all interested parties are both informed and up to date on project development, otherwise the risk to the project is magnified.
The views and attitudes of interested parties must be recorded systematically and must be based on a similar perception or awareness of the same information. If consultees are not in possession of background information about the project, they are unlikely to make balanced – or appropriate responses. In fact, they may make negative and detrimental responses which, with access to all the facts, might have been supportive. Consultees all need to be in possession of the same facts, if they are being asked to comment on the same range of issues. If not, evaluation of the issues is not possible.

It is necessary to review EIA periodically, particularly with long running projects and ensure that data are current and all interest have been recorded. It is similarly important that all consultations are valid, i.e. no older than about a year.

5.3 Industrial Licence Applications: Blue Circle Cement Works, Westbury (South West Region - *Martin Weiler*)

5.3.1 Background and objectives

Blue Circle operates a cement works in the Wiltshire town of Westbury. Travellers on the London-Penzance railway line pass the site. Traditionally coal has been used to fire the kilns, but the company came forward with a proposal to use tyres as a substitute fuel for coal. Immediately a series of potential pros and cons came to the fore. On the one hand the potential for environmental gain (i.e. tyres burnt rather than landfilled; better emission standards than coal); while on the other hand there were community concerns over a range of issues from health effects to black smoke.

Blue Circle had carried out two tyre burning trials in 1996. These had been approved by the Agency with little other than the legally required narrow formal consultation on the company's applications. At this stage the Agency had a very low profile. A local pressure group 'The Air That We Breathe' had been established and held a major public meeting at the end of the second trial. Friends of the Earth were on the top table, the Agency in the audience. The situation was made even more difficult by the company who had tried to 'sit-on' some poor emission figures in the second trial. As a result there was a low level of public confidence in the process. It was not considered transparent.

It was clear to everyone involved in the Agency that it was time to get to grips with the issue. The first step was to make it clear to the company and the public that the Agency was not happy with the first two trials and that we would not, at this stage, look favourably on an application for permission to burn tyres on a permanent basis. As a result the company announced its intention to apply for permission to hold a third trial. The Agency immediately resolved that any such application would be dealt with using enhanced communication and consultation techniques.

The *objectives* were: to clearly communicate our regulatory action; to be open and transparent and to engage and listen to the community.

5.3.2 The process

The company applied to carry out a third trial during 1997. The Agency responded with its new approach. As in all situations the Agency needed to work on: Who are the audiences? What are the messages? How to communicate? Above all the Agency had to 'know the community'. It was soon recognised that there was a good mix of audiences and messages and that a good mix of communication tools would be needed and so a strategy was developed that had three key strands: a) Face to face meetings with key stakeholder organisations; b) Two public meetings (one at start of process; one near end); c) Active use of media. Informal feedback from participants both at meeting (verbal), after meeting networking (verbal) and correspondence, media quotes etc (written) was used to gauge whether or not the consultation was a success.

5.3.3 Outcome

The public meetings
The first meeting underlined the dangers if you have not built up a good relationship with and understanding of the community. The Agency was criticised for the date clashing with another local event; the choice of venue; the start time; and poor publicity.

Nevertheless there were many gains including the fact we were holding a meeting at all. The meeting was well managed and well chaired (good female chairs seem to be particularly effective). Agency speakers were good – clear and non-technical. The main gap between public expectation and Agency delivery was on the issue of health. There was clear frustration from the audience who wanted health answers. Unfortunately the various health bodies were not in attendance. However the Agency got strong credit by firmly promising to take up the issues with the health organisations including the Department of Health. So overall a big step forward but still lessons to learn.

For the second public meeting various organisational shortcomings were discussed with local interests and addressed. As a result it was ensured that the date didn't clash, a preferred venue was booked, the meeting started at a later time and the event was publicised via a door to door flyer.

The meeting was again well managed and another building block in gaining confidence from the community. One initiative did back-fire. The meeting was to discuss our 'minded to' decision and it was felt that it would aid discussion on the night if we publicised our views in advance. However, local perception was that the Agency 'had made up its mind' and deliberately publicised our views in advance to put people off from coming to the meeting. Nothing could have been further from the truth but it taught that perception is reality.

The Agency did finally give the trial the go-ahead with several stringent conditions reflecting issues of concern raised during the consultation. The trial started but after a short time the company broke the licence conditions. The Agency immediately stopped the trial. This was a further vital step in winning local confidence in our role as the 'green police'. The key lesson here was that enhanced communications and consultation have to be backed up by strong regulatory action.

The surgery
After a lengthy time the Agency finally allowed the trial to restart. A local authority committee asked for a further public meeting and the Agency considered this request carefully. In the end the Agency offered (and this was gratefully accepted) to hold a public surgery where individual members of the public (or groups) could book slots to raise issues with officers. A surgery was decided on at this stage because it was felt to be more appropriate. There had already been two public meetings and there was a danger of meeting fatigue. The surgery offered very individual concerns to be raised in a face-to-face personal forum. It was well used and generally approved of.

5.3.4 Costs

Four Senior Staff attended the original 'Air That We Breather' public meeting. Costs included preparation time and manpower.
Agency public meetings came to £500 for room hire plus staff costs (no data on this). The Surgery cost £300 for publicity plus the equivalent to 8 'man days'.

5.3.5 Success criteria

Evidence from informal feedback indicates the extent to which the success criteria were met by the consultation techniques. The success criteria were: to build understanding of the Agency and its role; to enhance our decision making and regulation and to win and build trust.

In this case the Agency has proactively managed the process and built better relationships with the community and key stakeholders. The effort undertaken by the Agency in regulating Blue Circle's application (trial burning of tyres) has raised it's profile in the eye of stakeholders. In turn, stakeholder respect has boosted internal morale in the Agency.

5.3.6 Key lessons

The key lessons learnt were the need to build a long-term relationship with the community; it does take resources (but better to proactively use these than be forced to do so anyway but reactively); once the process has started you need to stay involved and there are positive gains all round.

With regard to the current situation, the latest trial has been completed and the data is currently undergoing analysis. The company is believed to be preparing an application for permanent authorisation.

5.4 Burning Of Tyres, SLF And Processed Fuel At Castle Cement, Ketton near Stamford, Rutland (Anglian Region - *Gordon Holland & Aidan Whitfield*)

5.4.1 Background and objectives

The use of wastes as substitute fuels in cement kilns is recognised as an economically and environmentally viable option in the UK, reducing the use of coal and petroleum coke which are the conventional fossil fuels. Burning substitute fuels in cement kilns makes use of their energy content which would be wasted if they were disposed of to landfill or commercial incinerators. This case is unique in that Castle was the first cement company to request the trial use of a Solid Substitute Fuel, termed 'Processed Fuel'. This is a blend of paper and plastic waste streams from industrial process such as off-cuts from disposable nappy and paper sack manufacture".

Before the use of substitute fuels is Authorised the Agency requires the Operator to carry out trials to demonstrate that emission levels do not exceed those of conventional fuels. In accordance with the Environmental Protection Act 1990, Castle Cement's overarching aim entailed "Preventing or minimising pollution of the environment due to the releases of substances into any environmental medium" (sections 4 & 7).

The process

Two IPC (Integrated Pollution Control) applications to burn substitute fuel applications were submitted within several weeks of one another (see below). The Agency decided to put the first one 'on hold' until the second one arrived so that there would only have to be one consultation exercise.

SLF/tyres application

Requesting permission for the continuous burning of up to 25% tyres and to increase the amount of Substitute Liquid Fuel (SLF) burned from 20% to 30% – following trials which were undertaken in 1997. (Burning 20% SLF had been Authorised since 1995);

SLF/processed fuel application

Requesting permission to conduct trials burning up to 40% SLF and "processed fuel" which is a mixture of waste paper and plastics.

The consultation process was guided by the criteria outlined in the following documents:

- IPC Guidance notes on Cement Manufacture and the burning of wastes;
- Agency procedure set out in the "Substitute Fuels (Bedford) Protocol".

A Project Group was set up to manage the handling of these applications several months before they were actually submitted. This group was constituted of: a Core Team of Regional and Area staff, from Process Industry Regulation (PIR), Legal and Public Relations – who attended meetings; and a Support Team of National Staff – who were sent copies of all correspondence to ensure national consistency in the implementation of Agency policies.

The Anglian Regional Management Team agreed that at least one public meeting would be held to consult on the applications. The format of the consultation process was also discussed with the Ketton Local Liaison Committee constituted of: the Agency, Castle Cement, local councillors and residents. This body meets twice a year.

With regard to written consultations, the following stakeholders were sent copies of the applications: Public Registers held by the Agency and local authority; statutory consultees – Rutland County Council, HSE, MAFF and English Nature and additional consultees – South Kesteven D. C., Stamford Town Council, Leicestershire Health Authority, Department of Health, Ketton and Tinwell Parish Councils.

The Agency prepared Consultation Documents that summarised each of the applications. Copies were circulated to local MPs, MEP, 4 public libraries, tourist information centres, all members of the local liaison committee and the two local parish councils. The company placed a statutory advertisement of the applications in local and national newspapers that included details of the public meeting.

The public meeting was advertised by issuing a press release and putting up posters in neighbouring villages. It was held at the beginning of the determination process (31st March 1998) to ensure that the representations could be considered during the determination. Information circulated included: an agenda, Agency press statement and a public reply form with pre-paid envelope. Copies of the consultation documents were available on request.

Pam Halliwell who is the Chairman of the Welland and Nene Area Environment Group (an Agency advisory committee) chaired the meeting. Castle Cement gave a presentation explaining their proposals and Agency staff explained their role in assessing the applications. The meeting was attended by approximately 75 people including local residents, local councillors and council officers. Most of the meeting involved answering questions from the audience.

5.4.2 Outcome

The public meeting conveyed how the majority of residents were opposed to the burning of further wastes at Castle Cement because they believed that the Agency and Castle could not prove that it was safe in terms of public health. Hence, health studies and longer trials, with more monitoring were requested.

Responses to the consultation documents were as follows:

- Statutory Consultees raised issues relating to sampling and monitoring during trials;
- Non-Statutory Consultees requested local area health studies. The local MEP requested confirmation that the proposals complied with the relevant EC Directives on incineration of hazardous waste etc;
- Four members of the public responded, 3 opposed the application due to health concerns whilst one was in favour of the proposals.

The applications were reviewed by the Agency's Substitute Fuels Technical Advisory Panel (SFTAP) who checked on the validity of both the trials data and the environmental assessments made by the company as well as reviewing the draft Variation produced by the Site Inspector.

The Project group provided a mechanism for the Agency to decide internally which procedures to follow at each stage. The Agency decided that it would not hold a second public meeting because the level of public interest was low with only a handful of written responses and the local liaison committee advised that a second meeting was unnecessary. Furthermore, the burning of SLF and tyres was not a new issue for the Agency since several other cement works were already burning them and Agency policy was well established. Hence there were no options to discuss at a second meeting.

Whilst the burning of waste paper and plastics is a new issue for the Agency the only option at the time was whether or not to permit trials. Following any such trials the Operator will submit a second IPC application for continuous burning which will require a further public meeting. That meeting will provide an opportunity to discuss the issues from a more informed position (the decision would be explained in the Decision Documents).

Consultation on the Agency's proposals was limited to the Site Inspector holding separate meetings with the local authority and the local liaison committee. This ensured that they were adequately briefed in advance of the decision being made public.

The SLF/tyres application

This application did not involve any new legislative or technical policy and consequently it was determined within the 4 month statutory time period. However this was only achieved because the Agency knew in advance that the application was coming and was willing to commit significant resources to the determination.

The Agency issued a Variation to Castle Cement permitting the burning of up to 30% SLF and 25% tyres in July 1998. At the same time the Agency issued:

- a press release (and had staff available to give media interviews);
- a one page leaflet explaining the Agency's decision which was distributed to the company, local authority, local libraries, local liaison committee, MPs, MEPs etc.
- a comprehensive Decision Document which explained the decision and how the comments received during the consultation process had been addressed. The company, local authority, local libraries and the local liaison committee each receive several copies and the Agency had further copies available on request.
- The Agency wrote to the MEP and each member of the public who had sent a written response enclosing a copy of the Decision Document.

SLF/processed fuel application
Due to the unique nature of this application, significant policy issues had to be resolved before the determination of the application could be completed. Hence, a decision on this application took longer than in the case of burning tyres.

The Agency issued a Variation to Castle Cement in October 1998 permitting trials burning: nappy offcuts, x-ray acetate film & photographic paper, paper sacks and packaging (clean cardboard and paper wastes only) and used cement sacks. Permission to burn sawdust and coffee grounds was refused on the grounds that insufficient information on the composition of these fuels had been provided. Further exclusions included: No dioxins/furans, no biologically active materials, no radioactive materials, no medical/clinical wastes, no pesticides and no materials containing PCBs>10mg/kg used in Processed Fuel. (Decision Document, 20/11/98, p.21).

The Agency's final decision in this case will have significant financial implications for UK industry because of the interaction with Government initiatives such as the landfill tax and packaging waste regulations which are aiming to divert materials from landfill to recycling and energy recovery.

Furthermore, the burning of waste paper and plastics has implications for many other IPC processes such as power stations as well as cement kilns.

5.4.3 Costs
A total of 737 man hours were spent which is about 100 man days. The direct costs of holding a public meeting and producing leaflets etc were about £750. The total cost is therefore approximately £101,000 which is some 6.5 times the income provided by the two application fees.

It is estimated that handling the policy issues surrounding the use of processed fuel required about 100 hours of Area and Regional PIR staff time which is included in the figures given above. This is some 13 man days which is about the same cost as the application fee income for a single application. Costs were higher due to the fact that new policy issues were involved (required additional consultation).

5.4.4 Success criteria
The Local Liaison Committee was a huge benefit in that the company has been willing to listen to issues of local concern and local councillors have been able to build up an understanding of the company's operations.

The use of a project group with a Core team and Support Team worked well – providing a mechanism for the Agency to decide internally which procedures to follow at each stage. Furthermore, public and the local authority appreciated the fact that the Agency had held a public meeting to explain the applications to them and listen to their concerns.

5.4.5 Key lessons

A Local Liaison Committee is a useful means of providing ongoing contact between the company, the Agency and the local community. The Local Liaison Committee at Castle cement, Ketton had been in existence for over 5 years and the Agency was able to use it to provide advice on how to tailor the consultation process to satisfy local circumstances.

The public meeting highlighted a number of *needs for the Agency*:

- A Chairman with experience of handling public meetings who understands the workings of the Agency and has local credibility. A suitable member of one of the Agency's advisory committees would be ideal.
- National experts who could attend such events to give a National and International perspective which complements the local knowledge and expertise of the Site Inspector and other Area and Regional staff. In this case the local Agency staff only had experience of other sites in the UK whilst one of the Castle Cement Managers had visited sites across Europe burning similar wastes.
- Publicity and presentational material on the methodology of determining an IPC application in general and the use of substitute fuels on cement kilns.

The public still have significant concerns over the health effects of cement works and the burning of substitute fuels. The main issue of concern at Ketton is dust releases caused by fluctuations in operating conditions which is a matter unrelated to burning substitute fuels. Due to their being no agreed policy covering some of the issues involved with regard to the processed fuel application, it was difficult for the Agency to explain its position during the first public meeting.

Please refer to the article 'Where burning tyres don't go up in smoke' in the March 2000 (Issue 24) edition of the Agency's publication 'Environment Action' for further information. Regarding future directions, this article conveys how the EC landfill Directive (which came into force in July 1999) will prohibit the landfilling of whole tyres by July 2003 and shredded tyres by July 2006.

5.5 Incineration Of Meat And Bone Meal At Glanford Power Station North Lincs, By Fibrogen Limited (Midlands Region - *John Collins & Jackie Willems*)

5.5.1 Background and objectives

Fibrogen applied to burn meat and bone meal (MBM) and tallow oil from the Over Thirty Months Scheme (OTMS), instead of poultry litter, at Glanford Power Station. The heat released is used to generate steam and ultimately electricity. The existing permission did not allow Fibrogen to burn MBM from the OTMS, and a new authorisation would have to be applied for.

The OTMS was put in place in 1996 by the Government to restore confidence in British beef following the Bovine Spongiform Encephalopathy crisis (BSE or mad cow disease). Animals over thirty months and showing no clinical signs of BSE are rendered and turned into meat and bone meal. Although the OTMS is designed to exclude BSE infected cattle, it cannot be guaranteed to be absolutely free of infectivity.

In view of the understandably high public concern regarding BSE issues, the Agency considered this to be suitable employment of its Selective Licence Application Procedures. In doing so the Agency aimed to: more widely publicise that an application had been submitted, explain the application to the public and the Agency's role in determining it and enhance public confidence and a wider understanding and acceptability of the Agency's decision. In order to ensure a transparent decision making process the Agency had to provide opportunities for the public to voice its concerns and have its representations taken into account, consequently allowing a better informed decision through taking account of local issues. In order to take into account stakeholders' views, it was necessary to provide a forum where the applicant could address the public's concerns. Additionally, the Agency has to provide an efficient and professional service to industry and hence avoid judicial review of the Agency's decision, or appeal by Fibrogen.

5.5.2 The process

The application was received on 1 December 1998, copies were placed on Public Registers and distributed to statutory consultees. Adverts were placed by the company and a press release by the Agency announced the receipt of the application and informed the public how it could obtain further information and/or make representations. The Agency wrote to other interested parties which included: eg local councils (both Parish and County), local MP's and Health Authority. Written comments were sought and all written comments/representations were acknowledged and responses provided.

It was important to do one's homework prior to receiving the application, that is: know the area; know whether there are any local groups set up to protest the issue; be aware of any local 'specialist' who may be used to advise these groups; find out about local Parish Councils, local MEP and MP's; decide who needs to be contacted/consulted; enquire about local venues for public meetings; make contact with the local Area Health Authority and Planners.

A Selective Licence Application Team (SLAT), chaired by the Area Manager, was set up where officers involved with the application; PIR/RSR team leader, area solicitor, Regional PIR/RSR manager, press officer, project technical officer et al met and discussed the process. The team produced a plan identifying actions, deadlines and responsible officers.

A brain storming session was activated to come up with examples of questions which would likely arise. Both technical and non-technical questions were listed and answers were produced. This enabled the team to consider and discuss many of the problems which were likely to present themselves and the Agency was therefore better equipped to deal with these problems. The establishment of this group also meant that a pool of expertise/ideas/decisions was available. This was very useful as a means of communicating the situation as a whole to staff who needed to know what was going on. The group met regularly and discussed the procedures and action plan as it progressed. Other Selective Licences were also dealt with by this group.

Public meeting
A public meeting was widely advertised in the local press, with adverts, press releases, local radio broadcasts where the PIR/RSR Officer was interviewed and letters were sent to all local Parish Councils informing/inviting then to the meeting. A mail shot to all businesses on a local industrial estate was carried out. The Public Meeting was held on 12th February and was chaired by the local MP and was attended by over one hundred members of the public.

A full Consultation Document, summarising the application and associated issues and the legislative policy framework by which the Agency would determine the application, was sent to all consultees and additional parties, seeking their written comments. A Consultation Leaflet, summarising the Consultation Document, was published and distributed to all attendees as well as a booklet 'An Introductory Guide' to Integrated Pollution Control. The public meeting was recorded in full, a transcript was prepared from the recording and all questions and their answers were scrutinised.

5.5.3 Outcome
By far the main concern of the public was the potential for the release of BSE infectivity. The Agency encouraged people to write and confirm the issues they raised at the meeting to ensure these were fully understood and properly considered. Although very few did so, the Agency endeavoured to consider all the issues raised from a transcript of the meeting. All written representations were answered in writing.

It was felt that a second Public Meeting would not be necessary. It was felt that there was nothing to be gained since all the issues raised had been addressed. The nature of some issues were unlikely to be disposed of by any amount of consultation.

A Decision Document was distributed to all consultees and a Decision Leaflet (summarising this document) was published and distributed. This leaflet contained information on Public Registers, where they were, what information could be found on them and hours of availability.

5.5.4 Costs:

- Publishing leaflets: a) Consultation Information and b) Agency Decision;
- Advertising Public Meeting in local papers;
- Hire of venue for Public Meeting (including light refreshments);
- Hire of audio recording equipment;
- Cost of transcribing taped public meeting;
- Cost of Agency people's time;
- Postage of large documents.

5.5.5 Success criteria:

The Agency provided a forum where the applicant could address the public's concerns. Additionally, the Agency provided an efficient and professional service to industry and hence avoided judicial review of the Agency's decision, or appeal by Fibrogen. All issues/representations were addressed in the Decision Document. This process can be seen successful in that no complaints or representations were received about the decision. One local councillor even described the Agency's approach as 'brilliant' which gives some measure of his (the councillor's) appreciation of the procedure.

5.5.6 Key lessons

The nature of some issues were unlikely to be disposed of by any amount of consultation hence sometimes there may be no point in holding a further public meeting.

With regard to public concern over the release of BSE activity, the Agency encouraged people to write and confirm the issues they raised at the meeting to ensure these were fully understood and properly considered. However, very few people responded by means of written feedback. This scenario points to the fact that alternative communication media (or obtaining feedback immediately after the meeting) may be needed if the Agency is to obtain an accurate idea of which issues become emphasised by the public and why certain issues rather than others. In this case, the Agency endeavoured to consider all the issues raised from a transcript of the meeting and all written representations were answered in writing.

5.6 PR Plan: Review Of British Nuclear Fuels Sellafield Authorisations (North West Region - *Ian Parker*)

5.6.1 Background and objectives

This case study differs from the others in that it is a PR plan regarding the review of nuclear site authorisations at Sellafield which is to be undertaken every three years. In accordance with the ministerial requirement from 1994, the Agency is committed to review all nuclear site authorisations at least every four years.

This case represents a full re-examination by the Agency of all the Sellafield authorisations granted under the Radioactive Substances Act (RSA) 1993. The aim of the review is to ensure that public exposure to radiation and its impact on the environment from authorised releases from Sellafield are as low as possible.

This case is particularly unique in that it is the first time the Agency has published a *Scope and Methodology* document, outlining the procedure the Agency will use during its re-examination of the authorisations, which is now open for public scrutiny. As Ian Parker conveys "We have published the document because we want all interested parties to be a part of the process right at the outset. The Agency needs to communicate complex issues in a simple way and we're keen to make this review process as understandable as possible" (Environment Action, March 2000 (Issue 24). The Agency's commitment to increasing public involvement and awareness is demonstrated here.

Aims of reviewing RSA authorisations for nuclear sites:

- The Agency needs to be satisfied that the Best Practicable Means (BPM) are being used to ensure that the creation of waste is minimised and that BPM is used to limit radioactive discharges, so that radiation exposure of the public is As Low As Reasonably Achievable (ALARA);
- Reassess the public radiation exposure from discharges to ensure it is within national and international limits
- Ensure that there is no excessive 'headroom' between discharges and the limits (i.e. That limits "closely reflect actual discharges").

The specific objectives of this particular case include convincing those parties who consider themselves to be stakeholders that the Agency operates in an open and consultative manner and is exercising tight regulatory but fair control over radioactive waste management operations and discharges at Sellafield.

The re-examination will be undertaken at a time of change in the nuclear industry (Privatisation, major incidents, OSPAR etc.). Emphasised is the importance of the Agency's reputation and credibility, it is essential that the Agency's role is made clear and that it is seen as an independent body. Furthermore, the necessity of the complete involvement of all interested parties in this high profile exercise is highlighted in that, there is a risk that the Agency may be the only visible organisation involved.

5.6.2 The process

The Agency plans to meet its proposed objectives by consulting on the project and process and on the review of authorisations; informing stakeholders of the decision the Agency intends to make and of its final decision and reassuring them that we have listened to their views and considered their responses.

Re-examination of the authorisations will be undertaken in a manner that is comprehensive, rigorous, forward looking and transparent. Scientific and legal rigour whilst giving appropriate consideration to Government policy, Ministerial concerns and public comment is essential here. It will be clearly conveyed to BNFL that there is no automatic assumption that the operations at Sellafield should lead to the generation and discharge of radioactive waste.

BNFL has indicated that it will not apply for revisions to its authorisations as it considers the current ones to be adequate for its needs. Hence, a modified version of the Selected Licence Procedure (SLP) is to be utilised in order to consult widely on:

- the process we will use to carry out the re-examination and its scope;
- the proposals the Agency is making for the limits and conditions in any revised authorisations.

The following stakeholders have been identified in advance of the consultation process: Agency employees, BNFL, NW REPAC, North and Central AEGs, statutory consultees, residents in West Cumbria and North Lancashire, Local authorities and other interested organisations (eg. Friends of the Earth, Greenpeace, Nuclear Free Local Authorities, MAFF, DETR, DoH, Health Authorities – W Cumbria and N Lancs, MPs/MEPs).

With regard to targeting stakeholders, the media involved will include: news releases (local media, national media, specialist press); public surgeries with exhibition materials; scope and methodology documents, an Explanatory document and a Decision document; the Agency web site, Grassroots, Focus and Environment Action (see below):

Target Audience(s)	*Selected License Procedure (SLP) Stage*	*Communication tool(s)* *Most appropriate media according to Target Audience*
Agency Employees	*Scope & Methodology*	*NW Grassroots article* *Focus article* *National Bulletin Board* *Cascade*
	Explanatory Document	*National Bulletin Board* *Focus article*
	Decision Document	*NW Grassroots article* *Focus article* *National Bulletin Board* *Cascade*
BNFL	*All*	*Share consultation plan* *Agree their participation (eg. at surgeries)*

Target Audience(s)	***Selected License Procedure (SLP) Stage***	***Communication tool(s)*** *Most appropriate media according to Target Audience*
NW REPAC, North and Central AEGs	*All*	*Presentation by Project Manager*
Residents in West Cumbria and North Lancs	*Scope & Methodology*	*News release to local media (mentioning Scope & Methodology document and where to get it)* *Public Surgeries (W Cumbria and North Lancs, early evening):* *"drop in " session, key project team members available to chat* *exhibition stands* *Scope and Methodology document available*
	Explanatory Document	*News release and media briefing by key Project team members to local medial explaining likely decision and giving details of public surgeries;* *Public surgeries (W Cumbria and North Lancs, early evening):* *Appointments with key Project team members* *Exhibition stands* *Explanatory document available* *NB invite those who responded to consultation to surgery.*
	Decision Document	*News release to local media explaining decision* *Letter to those who responded to the consultation.*
Other interested organisations	*Scope & Methodology*	*News release to specialist/national publications* *Web site (trailed on news release)* *Environment Action article* *NB mention web site in letter sent with Scope & Methodology document*
	Explanatory Document	*News release to specialist/national publications* *Web site (trailed on news release)* *Environment Action article* *NB mention web site in letter sent with Explanatory document*
	Decision Document	*News release to specialist/national publications* *Web site (trailed on news release)* *Environment Action article*

Table 1: Matching Media to Target Audience

5.6.3 Proposed outcome

The above communication tools are to be utilised in order to arrive at the following outcome regarding the message conveyed by the Agency:

- The Agency wants to conduct its three-yearly review of all its authorisations for the BNFL nuclear reprocessing plant at Sellafield;
- The Agency will consult widely and openly on the review;
- The authorisations granted to BNFL by the Agency prevent or minimise harmful discharges to the air, land and water;

Finally, having considered all the responses from the public and consultees, the Agency will publish and explain its decisions.

5.6.4 Success criteria

> *"The Agency consulted with me, gave me an opportunity to air my views and listened to me; their decision is fair."*

If stakeholders feel that the Agency has made this review process understandable and that they have been given an opportunity to air their views which are in turn taken into account then the consultation process is fair. The process will be a success if the Agency is perceived as being a firm and fair regulator that ensures the protection of the public and the environment as a whole. Stakeholders need to have an understanding of the challenging role of the Agency as an independent public body (one of the largest and most powerful environmental protection and regulation agencies in Europe).

Feedback in the form of accurate news items in the target media and positive feedback on briefings will help evaluate whether or not the success criteria and objectives have been met in this case. Generally a neutral/positive reception of the Decision document will signal that a successful consultation process has been undertaken.

6 CAMPAIGNS TO RAISE AWARENESS

6.1 Flood Awareness Campaign (Head Office - *Liz Cook*)

6.1.1 Background and objectives

On 18 October 1999 the Agency launched a major ongoing public awareness campaign on the issue of flooding funded through committees and central government. The initial £2 million campaign used national advertising on radio and billboard posters for the first time in the Agency's history.

As part of its response to the Easter 1998 floods, the Agency pledged to mount a high profile public information campaign to raise awareness of flooding. This included roles of the Agency and other organisations; and practical steps the public can take to protect themselves, families and possessions.

Research showed that many people in flood risk areas are unaware of the Agency's role in flood warnings and do not understand what to do before, during or after a flood.

Hence, the objectives of the campaign were to:

- raise awareness among people who live, work or travel in flood risk areas (England and Wales);
- encourage and support people to take a more proactive approach to protecting themselves;
- explain what the Agency can and cannot do;
- improve public perception of the Agency.

6.1.2 The process

The Agency launched its 1999 Flood Awareness Campaign with "Flood Awareness Week" starting 18 October (timed to coincide with the anniversary of the October 1998 Floods). The campaign theme, which appeared in all publicity, was –*"floods don't just happen to other people"*. This was part of a three-year programme to raise awareness of floods and flood warning. National advertising was used to communicate to 1.3 million homes and businesses in the flood plains across England and Wales and direct mail plastic flood kits to homes and businesses in known high risk areas.

At the heart of the campaign is a new national telephone information line –*Floodline (0845 9881188)*. This facility incorporates and builds upon the Agency's former Floodcall service and uses the same telephone number. In addition to hearing flood warnings in force it offers callers access to further options including the opportunity to speak to a live operator between 8am and 8pm weekdays and between 10am and 4pm at weekends. BT operates Floodline for the Agency.

The following methods were utilised in order to target the message:

- The campaign was based on sound independent research into public attitudes and awareness and international best practice;
- 1.3 million homes and businesses were identified in the floodplain;
- Flood Awareness Week 18-25 October 1999. National launches in London and Cardiff and seventy five local PR events in regions;
- Internal Communications Programme (roadshows – September 1999) involved briefings to hundreds of managers and staff on the campaign and its implications for the Agency;
- £1 million of national advertising comprising 2000 outdoor posters and radio commercials on 50 local stations;
- Flood kit mailed direct to 311,000 homes and businesses. The kit comprises a plastic bag designed to hold key documents, medication and other emergency items, local flood warning information leaflet, free promotional key ring with Floodline logo/telephone number and set of stickers;
- Floodline branded fact sheets giving practical advice and information (free fact sheets available through telephoning Floodline or in response to enquiries direct to the Agency – translated into 9 languages);
- New Flood Directory piloted in Southern Region – five publications produced on a county basis, supported by local authorities and emergency services.

The Campaign adopted a simultaneous 'top-down' and 'bottom-up' strategic approach. At a national level floods were put on the agenda (rather than something that happens to other people – in other countries – in freak conditions). The campaign pushed for the view that floods need to be seen in the same context as fire (just as life threatening). Locally, advise and support was offered to those at risk, active citizenship was encouraged and people's desire to protect others was recognised and responded to accordingly.

6.1.3 Costs

The National Audit Office which is conducting a review of flood defence, has complimented the Agency on the breadth of activity accomplished within the 1999/00 £2 million campaign budget and stated that it represented 'good value for money' (NAO presentation, December 1999). More precisely, 65p was spent per adult resident in a flood risk area, this translates to 1% of the Flood Defence annual budget!

Other details of costs include:

- Paid-for Advertising (cost £800k: radio, poster, tactical);
- Direct Mail to 311,000 homes and businesses (cost £300k);
- Core materials – floodline fact sheets, leaflets, internet, special needs, education, case studies (cost £200k).

6.1.4 Outcome

The 1999 flood awareness campaign has marked a turning point in the Agency's approach to communications with the public. Significant efforts have been made by many staff throughout the organisation to communicate the Agency's roles and responsibilities more effectively. This has been rewarded by largely positive press coverage and public response.

6.1.5 Success criteria

Awareness of the Agency continues to grow (an increase from 59% in 1997 to 79% in November 1999). Furthermore, 27% of respondents were aware of Floodline, rising to 53% among those who received the flood kit – this is recognised as a good score for a new brand and service. According to BMRB, *"Given the levels of publicity, this is an encouraging result"*.

Direct mail and use of outdoor posters proved to be highly effective and the flood kit was hugely successful in that:

- 61% of those who received it read it;
- it reduced confusion between the role of local councils and that of the Agency;
- there was largely positive media coverage (93%) and public response.

6.1.6 Key lessons

Social changes such as increased mobility, and therefore lack of knowledge of the local area, lead to increased passivity and the tendency to blame an organisation or person. Furthermore, the public has an enormous faith in modern technology and there is a reluctance to think about the unpredictability of nature. Generally, flooding is not taken seriously as an issue and many do not understand what to do before, during or after a flood.

Statistics reveal that:

- Only half the population in flood risk areas are spontaneously aware that they lie in a flood risk area (53%) – half the awareness job remains undone;
- We are not at the level of Fire codes/drill or Road Safety Codes and *only 4% of households have made any special preparations for floods.*

Very few people take any action to prepare for a flood, even when they are purportedly aware of what to do. Emphasised here is the need for a continuing and jolting education process. To further complicate the issue, public perception of the link between the Agency and flooding is confused by the 'Multi-Agency approach'. If the public is to gain a clear understanding of the role of the Agency, it is important that internal staff have clear roles, responsibilities and direction. Such clarity will gain internal support and 'buy in'.

In summary, key lessons that should be applied in future campaigns include:

- The need to be even harder hitting in terms of messaging, maximizing the 'human interest' element of flood victims would have an impact. "If the Agency, as a learning organisation, is able to shift the balance of its responses from engineering towards human solutions, there is a greater probability that more people will be better protected from a major environmental threat" (Bye Speech – 7th May, 1999 – Leamington Spa);
- The Agency should not rule out the restricted and careful use of television to generate PR. Furthermore, partnership needs to be developed with broadcasters, the insurance industry and the commercial sector;
- Direct mail is highly effective – regional mapping is critical if the audience is to be targeted successfully;
- Any awareness activity must be underpinned by the service.

6.1.7 Future directions

A huge shift in attitude is still required to convince those living in flood risk areas to take positive action in preparation for future flooding – this will be the continuing goal of the campaign as it progresses.

A full campaign evaluation is to be undertaken through BMRB independent market research consultants, by BT in response to Floodline call volumes and by Echo Media Evaluation Company.

The 2000 campaign will focus on communicating the new flood warning codes *Floodwatch, Flood Warning and Severe Flood Warning* to the key audiences – Agency staff, professional partners, the media and general public in targeted flood risk areas. A national project team has been set up to co-ordinate the operational and communications programme and to deliver the new code system and a specialist agency as been appointed to design the new codes.

7 OVERVIEW AND FUTURE DIRECTIONS

This section summarises key lessons gained from the case studies and provides recommendations for future approaches. It is important to consider how these lessons can be applied to current public involvement initiatives being undertaken by the Agency.

7.1 Stakeholders (Perception and Attitude)

Current research conveys how members of the public are willing to take part in decision-making processes. We find that members of the public are able to handle uncertainty in that, "they are willing to balance information from different sources, are able to deal with complex science if given sufficient time, understand uncertainty if openly acknowledged, and are happy to balance risks and benefits" (Petts, 2000).

Once the public has become involved in an initiative, it is vital to ensure that all interested parties are both informed and up to date on project development, otherwise uncertainty may lead to amplification/exaggeration of the slightest 'risk' involved in a project (Pidgeon, 1997; ILGRA, 1998)[6]. Furthermore, if stakeholders feel that they are kept in the 'dark' trust in the Agency can easily be eroded.

The flood awareness campaign conveys the necessity of changing people's perceptions regarding flood risk. Flooding is not taken sufficiently seriously as an issue hence, a huge shift in attitude is still required to convince those living in flood risk areas to take positive action in preparation for future flooding - this will be the continuing goal of the campaign as it progresses. In this case, it appears that the public has attenuated/underestimated the risk of flooding (Pidgeon, 1997; ILGRA, 1998).

When engaging with stakeholders, never assume that the absence of militant action groups – or even an immediate response - means acquiescence. Dormant or suppressed opinion can erupt violently at an embarrassingly late stage of the project (eg. River Sowe case study).

7.2 The Process

A number of key criteria important to consider in the development of public involvement processes emerged from the workshop, the case studies and the current literature. These are summarised below:

7.2.1 Fairness

Fairness criteria include:

- agreement by all participants regarding the agenda (a means of dispute resolution);
- choice of facilitator by participants;
- opportunities to participate in discussions in order to express views/concerns.

[6] The Social Amplification of Risk Model offers the most comprehensive explanation to date of how people's perceptions of works or disturbance don't always match reality. A collaborative project co-funded by the Agency, HSE, DoH, MAFF, DETR, ESRC and the Cabinet Office is currently investigating the application of this model to the UK context (see Appendix 2).

Adoption of these criteria ensures that participants do not feel excluded from the process and by becoming involved at the various stages, a feeling of ownership of decisions is enhanced (Petts, 2000, in comm.).

7.2.2 Purpose

A process that has clear purpose will involve:

- explicit definitions/terms (clear and unambiguous, use simple language);
- provision of access to both technical and intuitive knowledge (yet 'consultation overload' must be avoided);
- an ability to check and clarify factual and normative claims;
- avoidance of misunderstandings (Ibid.).

7.2.3 Competency

The Wey, Loddon and Mole LEAPs highlight the need for all parties involved in managing the environment to work together to overcome shared concerns (partnership approach). As an example, the issue of striking a balance between the needs of river users and the environment can only be addressed through improved communication and understanding. To do this well, it was important to use experienced facilitators. This was an effective means of improving communication and understanding and contributed to the success of the Wey Day. Problems arose during the initial Loddon and Mole LEAP Issues Workshops where experienced facilitators were not used. This highlights the need not to underestimate the skills required to facilitate partnerships and consensus. Similarly, if a different process is being used e.g a public meeting it is vital that there is a strong chairperson and a well-advertised venue. Overall, it is important to recognise the skills required to run an effective process.

7.2.4 Inclusiveness

The River Sowe case illustrates the consequences of not considering all the parties involved and ensuring increased communication and understanding. Highlighted here is the fact that local politics carry risk and can affect normal decision making processes. If local councillors had become part of the process at an earlier stage, it is likely that they would have sided with the Agency's decision rather than go against it due to the protest of one individual. This case conveys how a response should be sought from all individuals who may have an interest (depending on the size of the scheme). Considering all stakeholders at the outset can save problems further on in the process. Also, as highlighted in 7.1, never assume that the absence of an immediate response means agreement with the proposal, it should be checked out.

7.2.5 Planning and early involvement

Early community involvement work, which makes people aware of the benefits of a project, should generally ensure a balanced outcome. Furthermore, early consultation in the process is a good thing in theory and should continue, taking account of the positive and negative aspects of previous exercises. However, at this early stage, it important not to make binding commitments as commitments made in haste may be difficult if not impossible to overturn at a later stage when a more balanced appraisal of the issues can be made. Further, consultation carried out too early can be thought of as waste of time by participants.

The key is to be sensitive to the context of the consultation (e.g. what else is happening at that time) and to be clear about the objectives of the consultation.

7.2.6 Developed over time

Generally speaking, there is a need to build long-term relationships with the community. In doing so, the Agency can get to know the 'local' culture of the community and participation techniques can then be applied appropriately (eg. Cornwall LEAP). A long-term relationship will reveal the unique concerns of a particular community which will lead to an understanding of stakeholder perceptions. Once the Agency has an understanding of a local culture and its corresponding perceptions, steps can be taken to ensure that stakeholder perceptions are realistic.

7.2.7 Flexible

Although it can be time consuming, frustrating and costly, it *is* possible to manage change in a well planned project. Once acknowledged, damage is limited (River Sowe). This requires that the process has a certain amount of *flexibility* built into it so that changes can be taken on board and responses can be made to the different stakeholder requests.

7.2.8 Support

Ultimately, the process will only be a success if there is a high degree of internal (Agency) support. Senior management needs to be convinced of the benefits of involving the general public in key environmental decisions. Furthermore, it needs to be made aware of the skills required in order to meet the above criteria sufficiently. Gaining senior management 'buy-in' to the process will ensure accountability for implementing the outcomes of an initiative. It is essential that internal staff genuinely consider stakeholder concerns and prove this through implementation (after the process) if the Agency is to maintain credibility in the eyes of stakeholders.

7.3 Evaluation (Success Criteria)

The following criteria are some that people in the case studies used to judge whether participation was effective or not. Petts (2000) conveys how the criteria selected to evaluate PI need to be defined with public input, which was not the case with these processes. Furthermore, feedback from stakeholders on the participation process itself, rather than on the final decision/outcome will convey whether it has been a success or not.

The following outcomes illustrate a successful PI process:

- The acknowledgement of external partners that the Agency is willing to listen to their views *and act upon them* in an open and transparent way, rather than listening and saying "yes, but....". In other words, allow the wider consultation exercise to decide the merits of a particular issue;
- Internal support and 'buy-in' from senior management and hence accountability for the implementation of agreed actions;

- A sense of partnership among the Stakeholder Group, that everyone is working towards a common goal, even though there may be slight disagreements on exactly how to do it;
- That the process actually makes a tangible difference to final documents. There is little point conducting such exercises if the end result is only cosmetic changes;
- An acceptance among internal staff that external partners have a lot of quality to add to the process;
- An acceptance among senior Agency management and AEGs that this approach has merit and should be supported, even if individual projects do not always run exactly to plan (eg. North West Norfolk Stakeholder Process); and
- Finally, a willingness amongst participants to do it all again! The following response from participants reflects a successful process: '*The Agency consulted with me, gave me an opportunity to air my views and listened to me; their decision is fair*'.

7.4 Agency Requirements

Feedback obtained from the Workshop reveals a great need for training and guidance in this field. Agency guidance on standard techniques, their practical use and when and where they could be employed is an overwhelming request. This publication is a first step in the direction of preventing Agency staff from making the same mistakes that have been made by many before in that it represents a sharing of Agency expertise and practical experience in the field. Guidance on standard techniques is irrelevant without evidence of their practical use, one can never adopt a 'text book' approach in this field. Further examples of practical experience are required before this publication can be considered as accurately representing public involvement in Agency activities (hence, it is to be updated). There are many more 'innovative' techniques that are not used in the cases presented and for which we need further practical evidence (need to be tested out by Agency staff in the field). Hence, the requirement of further sharing of information and expertise with regard to public involvement techniques is emphasised.

Other specific requirements arising out of the case studies include:

- A Chairman with experience of handling public meetings who understands the workings of the Agency and has local credibility. A suitable member of one of the Agency's advisory committees would be ideal.
- National experts who could attend such events to give a National and International perspective which complements the local knowledge and expertise of the Site Inspector and other Area and Regional staff. (The Castle Cement (Ketton) case illustrates how the local Agency staff only had experience of other sites in the UK whilst one of the Castle Cement Managers had visited sites across Europe burning similar wastes).
- Sub-groups must be managed by trained facilitators to ensure that outputs are achieved.

7.5 Costs

A consistent concern is resource implication. Agency staff often resort to the strategy of getting as much done in relation to policy and direction as is feasible in order to avoid the risk of paralysing themselves with consultation over lots of relatively minor regulatory issues. Public participation does take resources but it is better to proactively use these than be forced to do so anyway but reactively. Where resources are limited, techniques can be used that do not require a lot of resources (as illustrated in the case studies). Be flexible about what is needed, a mixture of techniques might help – each case is unique. A lack of resources is not an excuse not to involve the public. In the long term, public involvement will often save more resources (in terms of: money, time, staff & facilities) than it requires undertaking the exercise. For a typical EIA and mitigation scheme, a nominal 5% of the project cost is allocated to public participation although it varies from 2% to 7% of the total costs for the whole scheme (Liz Galloway 1999, in comm.). The Agency needs to involve partners in sharing burdens such as unexpected costs.

7.6 Conclusion

The Case Studies convey how one can pull together different techniques to tailor the solution to what is wanted, providing that the basic principles behind why a particular technique is chosen at a particular time are understood (e.g. build consensus, then disseminate further information through environmental reports etc.). When properly managed, public participation may shorten the consultation exercise and the drafting of policies by improving stakeholder involvement in its development. If not managed or designed properly, public involvement initiatives can increase time spent on consultation as well as the policy production.

8 GLOSSARY

AEG ..... Area Environment Group
AONB ..... Area of Outstanding Natural Beauty
AGM ..... Annual General Meeting
ALARA ..... As low As Reasonably Achievable
BMRB ..... British Marketing & Research Bureau
BNFL ..... British Nuclear Fuels
BPM ..... Best Practicable Means
BSE ..... Bovine Spongiform Encephalopathy
EIA ..... Environmental Impact Assessment
EN ..... English Nature
ESRU ..... Environment and Society Research Unit (UCL)
(UCL) ..... (University College, London)
IDBs ..... Internal Drainage Boards
IPC ..... Integrated Pollution Control
LEAPs ..... Local Environment Agency Plans
MAFF ..... Ministry of Agriculture, Fisheries and Food
MBM ..... Meat and Bone Meal
MEP ..... Member of the European Parliament
NAO ..... National Audit Office
NGO ..... Non Government Organisations
OSPAR ..... Oslo Paris Commission
OTMS ..... Over Thirty Months Scheme
PIR ..... Process Industry Regulation
REPAC ..... Regional Environment Protection Advisory Committee
RSA ..... Radioactive Substances Act
RSR ..... Radioactive Substances Regulation
SFTAP ..... Substitute Fuels Technical Advisory Panel
SLAT ..... Selected Licence Application Team
SLF(s) ..... Substitute Liquid Fuel(s)
SSSI ..... Site of Special Scientific Interest
STW(s) ..... Sewage Treatment Works

9 REFERENCES AND BIBLIOGRAPHY

Public Domain References:

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ILGRA (1998). *Risk Communication: A Guide to Regulatory Practice.* London: Health & Safety Executive (Risk Assessment & Policy Unit).

- Pidgeon, N. (1997) *Risk Communication and the Social Amplification of Risk - Phase I Scoping Study.* London: Health & Safety Executive (Risk Assessment & Policy Unit).

- Royal Commission on Environmental Pollution (1998) *Setting Environmental Standards.* 21st report. London: HMSO.

Internal References:

- *CEST (2000) *The Stakeholder Engagement Programme: 1998 –1999,* R & D Technical Report E2-032. Bristol: the Environment Agency (to be released in July).

- Environment Agency (2000) *Environment Action (March 2000, Issue 24).*

- Environment Agency (2000) 'Public Involvement in Agency Activities: Case Studies Workshop' *Focus (March 2000, Issue).*

- Environment Agency (1998) *Consensus Building for Sustainable Development.* SD12. Sustainable Development Publication Series. Bristol: the Environment Agency.

- *Petts, J. (2000) *Participation and Consultation by The Environment Agency: Literature Review,* R & D Technical Report E2-030. Bristol: the Environment Agency.

- Twigger-Ross, C. (2000) 'Innovations in Public Participation' response to DETR request for information. Unpublished.

- Twigger-Ross, C. (1999) 'Paper to OMT – Improving Public Involvement'. Unpublished.

- Twigger-Ross, C. (in prep.) 'Draft Guidance on the Use and Evaluation of methods for Public Consultation on Licence Applications'. Unpublished.

* A High Profile Technical Summary is to be released on the Intranet in August 2000.
* This literature review will be available on the Intranet near at the end of August 2000.

APPENDIX 1: CASE STUDY CONTACTS

CONTACTS:	*REGION*	*AREA OF FOCUS:*
Project Level Issues:		***Flood Defence Schemes:***
Liz Galloway, Regional Environmental Assessment Co-ordinator	*Midlands*	*River Sowe Rehabilitation* *Cone Pill*
		Licence Applications:
Martin Weiler, PR Manager	*South West*	*Burning of Tyres at Blue Circle*
Gordon Holland, PIR/RSR *Aidan Whitfield, PIR/RSR Inspector*	*Anglian*	*Burning of Tyres, SLF and Processed Fuel at Castle Cement*
Jackie Willems, PIR/RSR *John Collins PIR/RSR Team Leader*	*Midlands*	*Incineration of Meat and Bone Meal at Glanford Power Station*
Ian Parker, PIR/RSR Team Leader	*North West*	*PR Plan: Review of BNF, Sellafield Authorisations*
Local Environment Agency Plans		
Juliette Chan, LEAPs Team Leader *Nicola Pinnington, Environmental Assessment Team*	*Thames*	*Stakeholder Dialogue in LEAPs*
Rona Chellew, LEAPs Team Leader *Adam Nicholls, LEAPs Officer*	*Anglian*	*North West Norfolk Stakeholder Process*
Cathy Doidge, LEAPs Team Leader	*South West*	*West Cornwall Leap Annual Review Forum)*
Strategic Level Issues		
John Pygott, FER Manager *Philip Winn, Principal Project Manager*	*North East*	*Humber Estuary Flood Defence Strategy: Planning for the Rising Tides*
Campaigns To Raise Awareness		
Liz Cook, Flood Warning Campaign	*Head Office*	*Flood Awareness Campaign*

APPENDIX 2: CURRENT INITIATIVES IN THE AGENCY RELATING TO SOCIAL ISSUES

1. Operational

LEAPS

LEAPs in three regions (Thames, Southern and Anglian) have experimented with limited forms of participatory process. Two were carried out by University College London as pieces of consultancy: New Forest LEAP and the Norfolk LEAP. Three were carried out using stakeholder dialogue methods jointly with The Environment Council: the Wey, Mole and Loddon LEAPs. These all used the basic model of getting key stakeholders around a table and working through the issues to arrive at a consensus about priorities. This will input into the thinking on the next stage of LEAPs. This provides some practical feedback on the use of different techniques for engagement.

Procedure for Selected Licence Applications

Clare Twigger-Ross is leading the task group to develop "Guidance on the use and evaluation of consultation mechanisms". This guidance is one of a set of four. The other three include guidance on: selection criteria, decision documents and organising public meetings/surgeries etc. John Grayson(EPNS) is project managing this.

DETR Aarhus Convention seminar

In early December 1999, Clare Twigger-Ross co-ordinated Agency input into a DETR organised international seminar on best practice in public participation at the local level as laid out in The Aarhus Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters. This is a UN Economic Commission for Europe initiative which was agreed in Aarhus, Denmark in 1998 and is now in the process of being signed up to, and ratified by different countries. The UK will ratify it by the end of 2000. Clare Twigger-Ross was rapporteur for one stream with Liz Galloway, (Midlands region) and Juliette Chan (Thames region) presenting papers on their experience of public participation. An article appeared in February's edition of Focus and DETR are producing a handbook.

Research into the Anglian REPAC

Clare Twigger-Ross had a placement student with her for a month and he has carried out a piece of social research examining the role and opinions of the Anglian REPAC. NCRAOA Report No. 19 provides some useful insights into how the REPAC in Anglian region views its roles and responsibilities. Although not directly related to engagement processes, it does address another aspect of representation. It has been considered by the REPAC chairs and was received well.

2. Research and Development

ESRC – Deliberative and Inclusionary Processes Conferences

Agency involvement in ESRC funded series of conferences on Deliberative and Inclusionary Processes run jointly by UCL, UEA and Lancaster University. These conferences bring together key researchers and practitioners in the field. Clare Twigger-Ross has been involved with these conferences which are enabling her to gather information about best practice and key issues from academics and practitioners. Other Agency staff have attended the conferences as well (3 of have been held to date).

Key issues emerging are:

- Which method is appropriate for which context?
- Relationship between method and institutional framework;
- Evaluation of methods – what criteria, how to evaluate?
- Development of a typology of methods for clarity.

These are all key questions that the Agency will need to answer in order to intelligently use these methods.

CEST – Engaging the Stakeholder Programme 1998-1999

The Agency is involved in this partnership programme which is again focussed on sharing best practice, this time from the business and industry sector. So far presentations have been made from Shell, Eastern, The Environment Council. The project aims to produce some sort of typology suggesting when which methods might be best used. Clare Twigger-Ross is representing the Agency on this project, although there is room for involvement of other staff. A report and fact sheet is being published for July (R & D Outputs, Project E2-032). The fact sheet will go on the NCRAOA Intranet.

Social Amplification of Risk project

This is a collaborative R&D project co-funded by the Agency, HSE, DoH, MAFF, DETR, ESRC and the Cabinet Office. Four projects have been funded and they are looking into how and why some hazards are "amplified" and others "attenuated" by social processes, with quite an emphasis on the media. Clare Twigger-Ross is on the project board for this and attended a workshop in early September which brings together key experts in the area of social amplification of risk (papers available from CTR). The rest of the projects will be finishing in 2000. A fact sheet summarising the key issues and the relevance of the research to the Agency will be produced toward the end of the projects (Sept/October 2000).

Evaluating methods for public participation and consultation by the Agency

This is an R&D project that started in December 1999. Clare Twigger-Ross is managing this project and is let to ENTEC, Judith Petts and PDA. It has as its objectives the following:

- To critically review existing literature on approaches to consultation, including issues of embedding methods into institutional structures and identify gaps in the current research literature to inform the research;
- To critically evaluate existing approaches to public consultation on "contentious" issues within the Agency to establish a "baseline" of public consultation;
- To develop a framework for evaluation of consultation processes;
- To compare two methods of public consultation (one traditional and one more deliberative) using an experimental design in order to establish the pros and cons of those methods;

- To compare two methods of public consultation (one traditional and one more deliberative) using an experimental design in order to establish the pros and cons of those methods;
- To carry out a case study of one or more selected licence application procedure(s);
- To produce guidance on consultation for selected licences for Agency use which includes a simple method for evaluation of choice of method as well as the effectiveness of the chosen method together with training materials for staff involved in public consultation for selected licence application procedures.

The first two tasks will build substantially on existing work carried out by the Agency on methods of consultation and participation both in general (e.g. Consensus Building for Sustainable Development SD12) and specifically (eg. Stakeholder Decision Analysis, UCL). The literature review will be finalised by the end of June 2000 and the simulation phase written up by the end of Sept 2000. The final report is due in 2001.

RISCOM – European Vth Framework proposed dialogue project
The Agency (through Roger Yearsley NCRAOA, with advice from Clare Twigger-Ross) has put together a proposal with NIREX and European partners (co-ordinated by Kijell Anderson, Sweden) to look at different methods of engaging the public on radioactive waste. This has received European funding and is hoped to start in October 2000.

Industrial Pollution Communication Research
A project managed by Kate Hinton examining different perspectives (Local Government, Industry & Communities) on industrial pollution concerns and ways of creating ongoing dialogue. The first stage of this project is to produce a literature review report at the end of June 2000 and then a decision will be taken as to whether a second stage of social research will be undertaken.

Local Outreach Project
This project managed by Pete Grigory aims at establishing the meaning of "close and responsive relationships with local communities" and developing criteria to evaluate different methods for the development of those relationships. This project is reporting in Sept 2000.

Risk Communication for contaminated land – phase 1 and 2
This project reviewed literature on risk communication and developed a handbook on that subject with a focus on contaminated land. Phase 2 will develop workshops for awareness raising in this area. This is project managed by Sam Fishwick (Chemicals Policy, HO). It is due to start in July 2000 and finish in October 2000.

Other Agency documents of interest:

Clark, J. et al (1998) *Prioritising Issues in Local Environment Agency Plans Through Consensus Building with Stakeholder Groups.* R&D Technical Report W114. Bristol: Environment Agency

Dames and Moore (1997) *Literature Review on Risk Perception and Communication for Contaminated Land* R&D Technical Report P138. Bristol: Environment Agency

Downs, S.E.J (1997) *A Method for Community Involvement In LEAPs.* R&D Technical Report W32. Bristol: Environment Agency

Environment Agency (1998) *Consensus Building for Sustainable Development* SD12. Bristol: Environment Agency

SNIFFER (1999) *Communicating Understanding of Contaminated Land Risks* Stirling: SNIFFER (Scottish and Northern Ireland Forum for Environmental Research)

Teal, J and Twigger-Ross, C (1999) *The role of REPACs in fostering institutional trust in the Environment Agency.* NCRAOA Report No. 19: Environment Agency

APPENDIX 3: TRAINING MATERIALS AND PRACTITIONER GUIDELINES

Useful References to other Information Sources

The Institute of Public Policy Research's Public Involvement Programme (PIP)
A summary of different approaches to public participation, including case studies and theoretical contributions.
www.pip.org.uk
30-32 Southampton Street, London,
WC2E 7RA

Institute of Environmental Management and Assessment
Guidelines on Public Participation in Environmental Decision-making Draft published.
www.greenchannel.com/iea/
IEA, Welton House, Limekiln Way, Lincoln,
LN2 4US
Tel: 01522 540069

University College London Environment and Society Research Unit (ESRU)
Web site for the deliberative and inclusionary processes conferences. It gives information on the conferences that have taken place but needs updating.
www.goeg.ucl.ac.uk/esruwww/dip
ESRU, Dept of Geography, UCL, 26 Bedford Way, London, WC1H 0AP
Tel: 0207 504 5508

UK Centre for Economic and Environmental Development (UK CEED)
Web site on the Radioactive Waste consensus conference held last May at which Bob Smith from the Agency gave 'evidence'. The Winter 1998/99 edition of their 'Bulletin' has a special focus on Public Participation. bulletin@ukceed.org
www.ukceed.org/consensus
Suite E, 3 King's Parade, Cambridge,
CB2 1SJ. Tel: 01233 367799

Publicnet
A collection of papers and articles on public policy, including a theme of public participation. www.publicnet.co.uk

Key guides on methods:

Audit Commission (1999) *Listen Up! Effective Community Consultation* London: The Audit Commission. £15 from Audit Commission on 0800 502030

Democracy Network (1998) *Democratic Practice: A Guide* London: Local Government Association and Local Government Management Board. £15 from LGMB Publication Sales on 0171 296 6600, www.lg-net.lmgb.gov.uk

Department of the Environment, Transport and the Regions (1998) *Guidance on Enhancing Public Participation in Local Government* London: DETR www.local-regions.detr.gov.uk/epplg/index.htm

National Consumer Council, Consumer Congress, Service First Unit of the Cabinet Office (1999) *Involving Users: Improving the Delivery of Local Public Services* London: Cabinet Office. Available from Service First Publications Line on 0345 223242

Training:

The Environment Council runs a course entitled *Resolving Environmental Conflicts: Stakeholder Dialogue Training* and in 1999 ran a series of courses, including one five-day course, on issues relating to public consultation.
www.the-environment-council.org.uk/ercourse.htm
212 High Holborn, London, WC1V 7VW, Tel: 0207 836 2626

National Centre for Risk Analysis and Options Appraisal

ENVIRONMENT AGENCY

PUBLICATIONS: CUSTOMER FEEDBACK

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We are continually trying to improve Centre outputs. To assist us we would be grateful if you would take a few moments to complete this questionnaire.

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How useful did you find the material in the report?

Excellent	Good	Satisfactory	Poor

2. Presentation

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If you contacted NCRAOA staff about the report, how helpful was our response?

Excellent	Good	Satisfactory	Poor

Name (Optional) _____ Region: _____

If you have other comments you would like to add please do so overleaf.

COMMENTS:

Thank you for taking the time to complete this questionnaire which should be returned to:

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