

Stakeholder engagement in new nuclear build policy United Kingdom 2003 - 2011



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Cover Photo: The two nuclear power stations of Sizewell A and Sizewell B sit under a dark cloud alongside the local fishing craft on the Suffolk beach. © Billphilpot | Dreamstime.com

Executive Summary

At the start of this century it may have appeared that a tentative consensus had emerged, shared by both government and public alike: nuclear power was not a viable option for meeting the UK's future energy needs. However, since 2002, both the Labour and Coalition Governments have concluded that nuclear power represents an effective means of meeting the UK's future energy needs while meeting legally binding carbon reduction targets. In July this year, the Government ratified the National Policy Statements for Energy, which have opened the door to an expansion of the role of nuclear power in the UK's energy mix within the next few years.

The Environment Council has undertaken this review to understand how UK governments have engaged with stakeholders during this shift in governmental attitude towards the issue of nuclear power. The review describes and draws some conclusions from the recent history of stakeholder engagement in the development of current policy on new nuclear power stations.

Section one provides the chronology of the development of UK policy on new nuclear power stations over the last nine years. Section two reviews government consultation processes on nuclear energy policy. Section three analyses how different types of stakeholders have been involved and their influence on the policy-making process. Section four sets out our conclusions. These are summarised below.

The inadequate stakeholder engagement carried out for the 2006 Energy Review has caused lasting damage to the trust some stakeholders – the public and anti-nuclear Non-Governmental organisations (NGOs) – have in Government to tell the truth about nuclear power. Subsequent, much better, stakeholder engagement processes have not yet rebuilt this trust or convinced many stakeholders that their voices on this issue are heard by Government.

Many stakeholders continue to have fears over the safety, security, and economic practicality of nuclear power. The most prominent of these is the issue of waste disposal, which emerges time and again in the consultation responses, and it is clear that large groups of stakeholders are unconvinced by the Government's assurances that deep geological storage facilities will be sufficient to cope with new waste. They also remain fiercely critical of existing plans to meet the bulk of disposal costs from the public purse, with private energy companies only obliged to pay an as-yet-unspecified "fair share".

We acknowledge significant challenges for the future. Stakeholders' attitudes and opinions of nuclear power are deeply held and will strongly colour their experience of any engagement exercise or consultation. But this should not discourage Government from engaging stakeholders meaningfully on the difficult and complex issues of disposal, costs and managing safety, before new nuclear expansion begins.

It is arguable that the apparent consensus at the start of the century was not the result of an informed, open dialogue process. It is unsurprising that it did not last. We would assert that if you do not engage properly you will end up with a temporary solution which subsequently needs revision or abandonment.

With vital issues of the continued security, safety and economic validity of the UK's energy supply hanging in the balance, the need for authentic stakeholder engagement has never been more apparent.

This review was initiated, funded and carried out by The Environment Council. It involved document review and analysis, a web-based survey hosted on The Environment Council website and interviews with representatives from NGOs and public pressure groups, as well as academics working in the field of energy security. Some people and organisations declined to take part.

About The Environment Council

The Environment Council is an independent UK charity focused on engaging people for sustainable development. Its mission is to develop and promote good ways of engaging people in discussions and decisions to make sustainable development happen.

Introduction

Nuclear power has been a controversial topic in the UK ever since the construction of the UK's first nuclear power plant at Sellafield began in 1953. Yet at the turn of this century, it may have appeared that a tentative consensus had emerged, shared by both government and public alike: nuclear power was not a viable option for meeting the UK's future energy needs. Opinion surveys suggested that a majority of UK residents were opposed to an expansion of nuclear power – for example, a Populus Survey for the Times in July 2005 found that only 18% of respondents favoured new nuclear power stations¹ – and, in a 2003 white paper, the Labour Government concurred, stating that “current economic considerations make nuclear an unattractive option for meeting the UK's future energy needs”.²

However, over the last five years, both the Labour and Coalition Governments have reconsidered this earlier position and adopted a more pro-nuclear stance. Via legislative measures introduced over the last five years, the UK

¹ Sustainable Development Commission, *“The Role of Nuclear Power in a Low-Carbon Economy, Paper 7: Public Perceptions & Community Issues”* (2006). Available at www.sd-commission.org.uk/publications.php?id=344.

² Dept for Trade & Industry: *“Our Energy Future – creating a low carbon economy”* (2003) Cm 5761. Available at www.berr.gov.uk/files/file10719.pdf

government has moved to encourage private investment in nuclear power. With the ratification of the National Policy Statements for Energy in July 2011, which revised the assessment procedures for private sector applications to develop new energy infrastructure, the door has been opened to an expansion the role of nuclear power in the UK's energy mix within the next few years.³

The Environmental Council has undertaken this review to understand how UK governments have engaged with stakeholders during this shift in governmental attitude towards the issue of nuclear power, and the extent to which current nuclear policy enjoys stakeholder support.

1. Nuclear Power - A Developmental Chronology

The development of current UK nuclear policy has a fairly complex history with numerous different policy review papers, consultations, and stakeholder engagement processes running over the last few years. Before moving on to a more detailed analysis, it is necessary to sketch a quick history of how the current policy came about.

Early Consultations

In June 2001, the Prime Minister asked the Performance and Innovation Unit (PIU) at Number 10 to review the UK's future energy strategy. The PIU's findings were published as "*The Energy Review*" in February 2002, and recommended that environmental objectives should take preference over economic and social concerns when developing future energy infrastructure. However, it argued against government funding of new nuclear build, while tentatively suggesting that nuclear power could prove a useful source of low-carbon energy in the future if legitimate public concerns over waste management and security could be overcome.⁴

In May of 2002, the Labour Government began a stakeholder consultation on the PIU's findings, stating: "The Government's aim is that the consultation process should be as open and inclusive as possible. We believe that it is essential that we have people's views and inputs as we develop our energy policy."⁵ According to a later judicial review of the consultation process, the 2002 consultation was "thorough and well-informed, and the Government

³ Department of Energy and Climate Change: "*Overarching National Policy Statement for Energy (EN-1) Presented to Parliament pursuant to Section 5(9) of the Planning Act 2008*", (2011). Available at

http://www.decc.gov.uk/en/content/cms/meeting_energy/consents_planning/nps_en_infra/nps_en_infra.aspx

⁴ Performance & Innovation Unit, "*The Energy Review*" (2002), available at www.gci.org.uk/Documents/TheEnergyReview.pdf

⁵ Quoted in *The Queen on the Application of Greenpeace Limited v Secretary of State for Trade and Industry*, [2007] EWHC 311.

received a great deal of detailed evidence from a significant number of consultees”.⁶

Following the consultation, in February 2003 the Government published the Energy White Paper “*Our Energy Future – Creating a Low Carbon Economy*”. In the chapter on “Low Carbon Generation”, Paragraph 4.3 stated:

Although nuclear power produces no carbon dioxide, its current economics make new nuclear build an unattractive option and there are important issues of nuclear waste to be resolved. Against this background, we conclude it is right to concentrate our efforts on energy efficiency and renewables. We do not, therefore, propose to support new nuclear build now. But we will keep the option open.⁷

In addition, the 2003 White Paper stressed the need for the fullest possible public consultation:

“Before any decision to proceed with the building of new nuclear power stations, there would need to be **the fullest public consultation and the publication of a white paper setting out the Government's proposals.**”⁸ (emphasis as in original)

In November 2005, the Prime Minister announced a review of the 2003 White Paper.⁹ Speaking to a meeting of the CBI on the 29th of November 2005, Tony Blair stated that the review “will include specifically the issue of whether we facilitate the development of a new generation of nuclear power stations”.¹⁰ The 2005 review was a far smaller operation than the 2003 White Paper, conducted in-house by a small team of civil servants and to a tighter timescale.¹¹

As part of the review, a new consultation process was begun on the 23rd of January 2006, calling for responses by April of that year. Two consultation questionnaires were published, one for expert/industry stakeholders,¹² and a less technical version for the general public.¹³ Having noted that “fossil fuel prices have risen sharply, and projected prices are now much higher than at the time of the White Paper”, the industry consultation document continued:

⁶ Comments of Mr Justice Sullivan, *ibid.*

⁷ Dept. Trade & Industry, “*Our Energy Future – creating a low carbon economy*” (2003), para 4.3

⁸ *ibid.*, para 4.68

⁹ It should be noted that the review covered all aspects of energy production and supply, not just nuclear; however, for the purposes of this paper we shall focus exclusively on the elements of the review concerning nuclear energy.

¹⁰ Quoted in the Times, 29th Nov 2005. Available at <http://www.timesonline.co.uk/tol/news/uk/article597782.ece>

¹¹ Hansard: Archive report of the Trade and Industry Committee of the House of Commons, 6th Feb 2006

¹² Dept of Trade & Industry: “*Our Energy Challenge – Securing Clean, Affordable Energy for the Long Term*” (2006), available at fire.pppl.gov.uk_energy_review_2006.pdf

¹³ Dept of Trade & Industry: “*Our Energy Challenge – Have Your Say*” (2006), available at www.berr.gov.uk/files/file25078.pdf

The 2003 Energy White Paper recognised that replacement nuclear build might be necessary if we are to meet our carbon targets, but concluded that its then current economics made it unattractive and that there were also important issues of nuclear waste to be resolved. The Review will examine whether recent changes in energy prices have changed that assessment.¹⁴

The consultation document was also keen to stress that no nuclear power stations were being proposed at that time. The Government's commitment to a full consultation was reaffirmed in both documents:

The government is clear that, in making important decisions about energy policy including nuclear power, there should be the fullest public consultation. This consultation paper is part of that process. The government is not at this stage bringing forward policy proposals.¹⁵

The document did include a significant break with previous governmental policy regarding nuclear new build assuming that any future nuclear plant would be built and run entirely by the private sector, within the regulatory framework set by Government.

During this consultation process, as well as the questionnaires, there were seminars, conferences, receptions and other meetings around the country, with one of the nine seminars devoted exclusively to the issue of "Nuclear Regulation". In addition, on the 6th March 2006, the Minister for Energy¹⁶ had a round-table meeting with representatives of Green Alliance, Royal Society for the Protection of Birds (RSPB), WWF-UK, Friends of the Earth and Greenpeace, at which nuclear power was one of the issues considered.

Before the consultation was officially concluded, however, there were already indications that several stakeholders were less than happy with the procedures being followed. Greenpeace argued in a public letter to the DTI that "the current consultation process is wholly inadequate, hasty, uninformed, and its outcome apparently pre-judged".¹⁷ The Parliamentary Environmental Audit Committee expressed concerns that "...the nature of the current Energy Review is unclear... it does not appear to have resulted from a due process of monitoring and accountability".¹⁸

¹⁴ Ibid, Executive Summary.

¹⁵ DTI: "Our Energy Challenge" (2006), Executive Summary.

¹⁶ Mr Malcolm Wicks, MP.

¹⁷ Quoted in *Greenpeace v Secretary of State for Trade and Industry*, [2007] EWHC 311.

¹⁸ House of Commons, Environmental Audit Committee: "Keeping the lights on: Nuclear, Renewables and Climate Change" (2006) HC584. Available at: www.publications.parliament.uk/pa/cm200506/cmselect/.../584/584i.pdf

The 2006 Energy Review

In July 2006 year the Department of Trade and Industry published “*Energy Challenge Energy Review Report*”. It concluded that:

Our assessment is that higher projected fossil fuel prices and the introduction of a carbon price to place a value on CO₂ have improved the economics of nuclear as a source of low carbon generation. We have concluded that new nuclear power stations would make a significant contribution to meeting our energy policy goals.¹⁹

The overall finding of the 2006 review was that nuclear power was a viable option for meeting the UK’s energy goals, particularly with regard to the decarbonisation of the electricity supply. However, an expansion of nuclear energy would not stem from state investment in new build, but rather from deregulating the industry to allow private energy companies a freer hand in expanding their nuclear operations:

It will be for the private sector to initiate, fund, construct and operate new nuclear plants and to cover the full cost of decommissioning and their full share of long-term waste management costs. But in view of the potential benefits for our public policy goals, the Government proposes to address potential barriers to new nuclear build.²⁰

The Greenpeace Legal Challenge

The publication of the 2006 Energy Review was met with alarm from anti-nuclear campaigners, who felt not only that they had been misinformed during the consultation process, but also that the Government had already made up its mind on the issue of nuclear power and that the consultation was “mere window dressing”.²¹

On this basis, in the summer of 2006 Greenpeace challenged the legality of the Government’s conclusion that nuclear power had a “role to play” in the UK’s future energy supply. On 15th February 2007 Mr Justice Sullivan found in favour of Greenpeace and ruled that the Government’s pro-nuclear decision was “unlawful.” Mr Justice Sullivan’s specific criticisms of the 2006 consultation process are worth setting out in detail as they are also relevant to the discussion of subsequent consultation procedures. The following conclusions are quoted from the judge’s ruling:

¹⁹ Dept. of Trade & Industry, “*The Energy Challenge: Energy Review Report*” Cm 6887 (2006), Executive Summary. Available at <http://www.bis.gov.uk/files/file31890.pdf>

²⁰ *ibid*, Executive Summary.

²¹ Greenpeace UK Ltd, “*Talking Nonsense - The 2007 Nuclear Consultation*” (2007). Available at <http://www.greenpeace.org.uk/files/pdfs/nuclear/2007-consultation-nuclear-dossier.pdf>

- the lack of detailed policy proposals in the consultation document misled stakeholders over what exactly they were being consulted upon. Participants were invited to comment on the issues surrounding the construction of new nuclear plants, rather than the more substantive issue of whether or not new plants should be built at all.
- the length of the 2006 consultation (12 weeks) was the minimum required under law and thus not consistent with the Government's promise for "the fullest possible public consultation"
- The consultation gave participants no chance to comment upon waste management proposals, as the findings of a separate consultation on nuclear waste management were not published until after the conclusion of the Energy Review consultation
- The Government failed to provide adequate economic data to justify its axiomatic assumption that nuclear was now economically viable
- The Government effectively withheld said economic data from stakeholders by publishing it only after the consultation process had finished
- The Government misrepresented the position of the Committee on Radioactive Waste Management (CoWRM) by stating that dealing with new build waste was "technically feasible in principle", thereby downplaying CoWRM's reservations.

In his Judgment, Mr Justice Sullivan described the consultation as "seriously flawed" and "manifestly inadequate and unfair". The information made available to consultees in the survey documents, he concluded, had been "wholly insufficient to enable them to make an intelligent response... the information was not only wholly inadequate, but also seriously misleading". Finally, he ruled that "the decision in the Energy Review that nuclear new build has a role to play was unlawful".²²

The 2007 Judicial Review did not change the UK's basic position on the desirability of nuclear power. However, it did force the Government to reconsider its approach to stakeholder engagement. Beginning in May of that year, the Government embarked on a much lengthier and more detailed series of consultations. These included a meticulous re-consultation of the issues surrounding the 2006 Energy Review; a fresh consultation on BERR's siting criteria for new nuclear build; and two consultations over the various versions of the NPS drafts, including EN-6. Since these consultations form the major part of the Government's attempt to engage and include stakeholders in the decision making process, we shall consider each in detail.

²² *Greenpeace v Secretary of State for Trade and Industry*, [2007] EWHC 311.

2. Consultations 2007-2011: “The Future of Nuclear Power”

In May 2007, one month after the Sullivan ruling, the Department of Trade and Industry published a new nuclear consultation, called “*The Future of Nuclear Power*”²³. Acknowledging the impact of the recent legal challenge, the document set out the government’s views on nuclear power and invited stakeholders to respond, with specific regard to questions of energy security and climate change mitigation. The document stated that the Government was of “the preliminary view that it is in the public interest to give the private sector the option of investing in new nuclear power stations as part of our strategy to tackle the challenges of climate change and security of energy supply”.²⁴ The 20-week consultation, therefore, was “designed to test this view and its underlying reasoning with the public and stakeholders.”²⁵ This consultation process engaged many more stakeholders and provided them with opportunities to consider issues in greater depth.

The consultation document included a summary of the Government’s views on nuclear new build, and contained 18 detailed questions for stakeholders. These covered all aspects of nuclear energy, from site allocation, the supply and disposal of nuclear fuel, the skills chain, and the security, economics and ethics of nuclear new build. Crucially, question 16 dealt with Mr Justice Sullivan’s chief criticism of the previous consultation, by explicitly asking stakeholders: “In the context of tackling climate change and ensuring energy security, do you agree or disagree that it would be in the public interest to give energy companies the option of investing in new nuclear power stations?”²⁶

In addition to the paper copies, a dedicated website was established to allow online responses. In total, 2728 people responded to the survey portion of the consultation, the majority using the online questionnaire. A breakdown of the respondents by sector is presented below.

Sector	Respondents
Academic or consultancy	173
Energy Industry	306
Government Agency	27
Individual	1784
Local or regional government	112
Other	109
Other business	91

²³ DTI, “*The Future of Nuclear Power: The Role of Nuclear Power in a Low-Carbon Economy*” (2007). Available at www.bis.gov.uk/files/file39197.pdf

²⁴ DTI, “*Meeting the Energy Challenge: A White Paper on Energy*” (2007), CM7124, p.180. Available at www.dti.gov.uk/files/file39387.pdf

²⁵ Department for Business Enterprise and Regulatory Reform: “*The Future of Nuclear Power: Analysis of Consultation Responses*” (2008), p.5. Available at www.bis.gov.uk/files/file43206.pdf

²⁶ DTI, “*The Future of Nuclear Power*”, p. 29

Trade Union	17
Voluntary or Environmental Organisation	109
Total	2728

A program of deliberative events and stakeholder meetings was organized to take account of opinion at the local level:

9 Deliberative Events were held in Edinburgh, Newcastle, Liverpool, Leicester, Norwich, Cardiff, London, Exeter and Belfast. A series of programs and presentations outlined the different sides of the nuclear argument, with participants then invited to discuss and debate the issues raised. The presentations were created with the participation of industry and NGO stakeholders, including the Environmental Agency, EDF Energy, the Nuclear Industry Association, Unite, the Confederation of British Industry, and so on.

However, Greenpeace and other green lobby groups withdrew from the deliberative events shortly before they were due to begin, denouncing the process as “nothing more than an expensive and time-consuming sham... little different from the Government’s previous attempt”.²⁷ In the absence of the main anti-nuclear NGOs, the event managers (Opinion Leader and 3KQ) were forced to present the anti-nuclear arguments themselves, stating that “it was not possible to film another stakeholder from the green lobby to replace the Greenpeace contribution, so a voiceover was used instead to reflect the Greenpeace position.”²⁸ The discussion participants were drawn from the general public so as to provide a demographically representative sample of the UK population. In total, 949 people attended the deliberative events, and their discussions were observed and recorded by a team of facilitators from Opinion Leader.

13 Regional Stakeholder Meetings were held, one in each of the English regions and devolved administrations. Local authorities, businesses, NGOs, unions and other community-based organisations were invited to participate. Approximately 3,350 invitations were sent out and over 400 attended the meetings. BERR officials gave short presentations on the Government’s nuclear views and participants were then invited to discuss their views, with their responses recorded by facilitators. In their subsequent analysis of the consultation, BERR noted that “participants from Greenpeace and Friends of the Earth who had registered did not attend any of the [Regional Stakeholder] meetings. Other stakeholders registered their disappointment that these groups were not present. Their absence from some of the meetings meant that a more vigorous opposing view was only present in a very limited form.”²⁹

9 Site Stakeholder Meetings were held with community groups located near currently existing nuclear facilities. The meetings adopted the same format

²⁷ Greenpeace UK Ltd, *“Talking Nonsense - The 2007 Nuclear Consultation”* (2007)

²⁸ BERR, *“The Future of Nuclear Power”*, p. 13

²⁹ *Ibid*, p.17

and agenda as that of the regional stakeholder meetings in the regions. 528 invitations were sent out and in total approximately 200 attended.

Other Meetings were held to raise awareness of the consultation and to present the government's views on the issue of nuclear generation. These included speaking at the Annual Sitting of the Youth Parliament; speaking at a stakeholder event organised by the Energy Institute; a presentation to the Prospect trade union; a lunch with representatives from banking and finance companies; and a meeting in Whitehaven, West Cumbria with local community representatives. In addition key stakeholders (unnamed in any Government source) were invited to a ministerial roundtable meeting with the Secretary of State where they were invited to discuss the issues in the consultation document.³⁰

In addition, two secondary consultations were organised. A separate consultation on the safe management of radioactive waste was organised between June and November 2007, designed to assess stakeholder opinion of current proposals for the geological disposal of nuclear waste. 181 responses were received, and an analysis and summary document produced.³¹ In addition, a consultation on the Justification procedures to be followed by Energy companies, ensuring under EU legislation that the benefits of a new practice involving ionising radiation outweigh any detriments to health.³²

In total, over 4,000 individuals and groups responded to the 2007 consultation survey or attended one of the events. In its analysis of consultation returns, the Government stated that it was "satisfied that we have met our goal of conducting the fullest public consultation on nuclear energy in line with the commitment we made in 2003".³³

After collating the data from the consultation survey and analysing the qualitative returns from the stakeholder meetings, the Department for Business Enterprise and Regulatory Reform published two documents in January 2008: its analysis of the consultation responses, "*The Future of Nuclear Power: Analysis of Consultation Responses*",³⁴ and an official Government response to the consultation, framed as a White Paper, "*Meeting the Energy Challenge: A White Paper on Nuclear Power*"³⁵.

Meeting the Energy Challenge opened with a foreword from then-Prime Minister Gordon Brown, who announced that

³⁰ *ibid*, p.18

³¹ DEFRA, "*Managing Radioactive Waste Safely: A Framework for Implementing Geological Disposal*" (2008), Cm 7386. Available at www.official-documents.gov.uk/document/cm73/7386/7386.pdf

³² DECC, "*The Justification of Practices Involving Ionising Radiation Emissions*", (2008), available at www.bis.gov.uk/files/file49349.pdf

³³ BERR, "*Meeting the Energy Challenge*", p.41

³⁴ Available at www.bis.gov.uk/files/file43206.pdf

³⁵ BERR, "*Meeting the Energy Challenge: A White Paper on Nuclear Power*" (2008) CM 7296, available at www.berr.gov.uk/files/file43006.pdf

the Government has today concluded that nuclear should have a role to play in the generation of electricity, alongside other low carbon technologies. We have therefore decided that the electricity industry should, from now on be allowed to build and operate new nuclear power stations.³⁶

The White Paper went on to establish the Government's basic position, that "it would be in the public interest to allow energy companies the option of investing in new nuclear power stations; and that the Government should take active steps to facilitate this".³⁷ It laid out a detailed summary of the reasoning behind this decision, while noting that "it is clear from responses to the consultation that there are also genuine concerns about nuclear power which need to be properly addressed". These concerns, which included safety, waste management, climate change mitigation, siting procedures, the appropriateness of relying on the private sector, and the belief that better alternatives to nuclear exist, are detailed individually in Paragraphs 19-88 of the White Paper, alongside the Government's rebuttal of the issues raised.

Many of the Government's responses to stakeholders' concerns agreed in principle with their factual basis, but disagreed over their interpretation.. For example, on the issue of waste, the Government noted that many consultees had felt that insufficient progress had been made towards a permanent solution even for existing waste, let alone any fresh waste produced by a new generation of reactors, and agreed that the construction of long-term geological disposal facilities remained "many years in the future". While many consultees felt that this fact precluded any expansion of nuclear plant, the Government disagreed, stating "we are satisfied that it is reasonable to proceed with allowing energy companies the option of investing in new nuclear power stations in advance of a geological disposal facility being available".³⁸

The White Paper outlined the Government's future strategy to implement its stated goal of encouraging private investment in nuclear new build. This included introducing a Generic Design Assessment so that new reactor designs could be approved in general and not on a site-specific basis; improving the planning system under the 2007 Planning Bill so that planning applications "do not reopen policy and regulatory issues that have already been subject to debate and consultation at a national level"³⁹; and publishing a National Policy Statement on Nuclear Power that would lay out "siting criteria which the Government considers should be used to assess the suitability of potential sites for nuclear power stations, and [indicate] certain locations that met these criteria".⁴⁰

³⁶ *ibid*, p.4

³⁷ *ibid*, p.7

³⁸ *ibid*, p. 24

³⁹ *ibid*, p. 135

⁴⁰ *ibid*, p.138

Choosing Potential Sites: 2008-2009

Following the publication of the 2008 White Paper, the Government set about scoping sites for potential new nuclear development. This process required extensive consultation and engagement with stakeholders, as resistance was anticipated from local community groups at proposed sites. In July 2008, BERR began a combined consultation on the procedures for selecting suitable sites for potential future nuclear build (the SSA criteria) and assessing the environmental impact of new build reactors (the SEA criteria)⁴¹.

83 written responses to the consultation were received before the November 2008 deadline. These came from a wide range of stakeholders, including companies involved in the nuclear industry, NGOs, regulators such as the Nuclear Installations Inspectorate and Environment Agency, local authorities and individual members of the public.

Three stakeholder engagement events were also held during the consultation in London Bristol and Manchester. These events were attended by over 100 individuals including nuclear operators, vendors and developers, local authorities, law firms, NGOs and private individuals. Participants were given the opportunity to ask questions and to make comments in plenary sessions and during more detailed table discussions. An additional industry stakeholder event was held in London on 20 October 2008.⁴² Following the consultation, the siting procedures were finalized, and a public call for nominations for potential sites to be considered under the new SSA procedures was announced in January 2009.

The NPS Consultations: 2009-2011

The final series of consultations concerned the proposed National Policy Statements. Under the 2008 Planning Act, an NPS is a statement of national policy that the independent Infrastructure Planning Commission (IPC) uses as the framework for its decision on an individual application for development consent. In other words, the nuclear NPS contains the guidelines under which an energy company's proposal for a specific new nuclear development will be either accepted or rejected.

In November 2009, the Department of Energy and Climate Change published the first draft of the Energy NPS (including a section on new nuclear infrastructure, EN-6), and organized a three-month consultation to gather

⁴¹ BERR, "Towards A National Nuclear Policy Statement: Consultation on the Strategic Siting Assessment Process and Siting Criteria for New Nuclear Power Stations in the UK", (2008), available at www.bis.gov.uk/files/file47136.pdf

⁴² DECC, Office for Nuclear Development: "Government response to consultations on the Strategic Siting Assessment process and siting criteria for new nuclear power stations in the UK; and to the study on the potential environmental and sustainability effects of applying the criteria" (2009). <http://www.berr.gov.uk/files/file49865.pdf>

stakeholder feedback.⁴³ 3,120 responses were received for the written survey section, with 1,980 responses to the questions concerning EN-6.⁴⁴ Six national events were organized in Peterborough, York, London, Cardiff, Exeter, and Manchester, with eleven further local stakeholder engagement events held near proposed new sites.

Over 70% of respondents were local residents, with a far smaller response from the energy industry and local authorities. 42% of the total responses received were on behalf of local anti-nuclear campaign groups, primarily opposed to nuclear new build on local concerns such as aesthetic and ecological impact. Of the ten proposed new sites, only five were felt to be suitable by a majority of respondents. In addition, 56% of consultees believed that EN-6 should not be approved by Parliament.⁴⁵

In its response to the consultation, the Government stressed that the purpose of the consultation was not to re-open the discussion of whether or not nuclear power should form part of the UK's energy mix. This issue, it felt, had already been settled by the BERR consultation of May 2007 and the January 2008 Energy White Paper, and was not open to further debate. The purpose of the NPS consultations, it was stated, was to determine how nuclear development could best proceed.

With regard to the consultation's finding that half of consultees felt that the NPS should not be signed into law, the Government stated that even if it wasn't approved by Parliament, nuclear development would still go ahead:

If the Nuclear NPS was not designated this would not necessarily prevent new nuclear infrastructure from being consented. What it would mean is that the Secretary of State, after a recommendation from the [Infrastructure Planning Commission], would make the decision as to whether or not to grant development consent for any particular project application, rather than the IPC making this decision itself.⁴⁶

The Government published a revised draft of the NPS in October 2010 which, it felt, reflected the concerns raised by stakeholders during the initial consultation.⁴⁷ The substantive changes to EN-6 between the Original and Revised Draft were as follows:

⁴³ <http://webarchive.nationalarchives.gov.uk/20110302182042/https://www.energynpsconsultation.decc.gov.uk/home>

⁴⁴ Office for Public Management, "*National Policy Statements for Energy - Consultation Summary Report to DECC*" (2009), <http://www.opm.co.uk>

⁴⁵ Statistics calculated by the author from tables available in the OPM report

⁴⁶ DECC, "*The Government Response to the Consultation on the draft NPSs for Energy Infrastructure*" (2010), p. 87. <http://www.decc.gov.uk/assets/decc/11/meeting-energy-demand/consents-planning/nps2011/1945-govt-resp-consultation-on-nps.pdf>

⁴⁷ DECC, "*Planning for new energy infrastructure: Consultation on revised draft NPS for Energy Infrastructure*" (2010), <http://www.decc.gov.uk/assets/decc/11/meeting-energy-demand/consents-planning/nps2011/1948-hra-for-nps.pdf>

- the Government's case for new nuclear development was moved into the opening sections of the overall NPS (EN-1), thus according them more relative importance and immediate impact;
- the Government's conviction in the viability of long-term geological disposal of waste was re-stated in stronger terms;
- 3 potential sites for new build (Braystones, Dungeness, and Kirkstanton) were deemed to be unsuitable and thus removed from the revised draft;
- the wording of the impact assessment for the remaining sites was updated to reflect health, security, economic and other issues raised during the consultation.⁴⁸

A second consultation was organized along the same lines as the first, running from October 2,010 until January 2011, to gather stakeholder opinion on the Revised Draft. 2,554 responses were received from the survey portion; 3 national events were held at Manchester, Bristol, and London; six local events were held near the potential sites; and there was a meeting of industry stakeholders in London.

The chief concern arising from the consultation regarded the issue of waste management, specifically the Government's continued belief in the efficacy of long-term geological storage. Questions were raised regarding the safety, security, cost and effectiveness of such facilities. Some correspondents were especially worried by the NDA's indicative timeline, which indicates the UK's first geological disposal facility (GDF) coming online sometime around 2130, and questioned where new wastes would be stored in the interim. Others pointed out that successful geological disposal has yet to be implemented anywhere in the world. Finally, some were concerned that the public had not been involved in proposals for onsite interim storage of spent fuel, and that there would not be any further opportunity for debate on the waste issue. The Government acknowledged these criticisms in its analysis of consultation responses, but maintained its assertion that geological disposal was the most practical of all available options.⁴⁹

The Government's response to the consultation was published in June 2011, and the final version of the NPS was simultaneously submitted to Parliament for ratification. Despite the Fukushima Daiichi nuclear disaster on the 11th March 2011, the Government decided that no further consultation was necessary, although the final draft of the NPS did incorporate some feedback from the Chief Nuclear Inspector's interim report into the Fukushima meltdown⁵⁰, recommending a strengthening of flood risk provisions.

⁴⁸ DECC, "Government Response" (2010), pp. 76-83

⁴⁹ DECC, "The Government Response to the Consultation on the Revised draft NPSs for Energy Infrastructure" (2011), p. 52,

⁵⁰ Office for Nuclear Regulation: "Japanese earthquake and tsunami: Implications for the UK Nuclear Industry Interim Report" (2011). <http://www.hse.gov.uk/nuclear/fukushima/interim-report.pdf>

Between the revised and final drafts, only a few changes were made. The urgency of the need for new nuclear plants was clarified and re-emphasized, along with the Government's belief that short-term life extensions to existing plant are not sufficient to meet future energy needs. Flood risk provisions were tightened, in that an applicant must now identify impacts of flooding under the maximum credible scenario of projected sea level rises and demonstrate that adaptation to such sea levels is possible in principle. Finally, the final draft emphasized that the IPC did not need to consider the Chief Nuclear Inspector's findings with regards to Fukushima when considering applications for new build.

On the 18th July 2011, the House of Commons voted overwhelmingly to ratify the NPS, and the Government's legislative programme to deregulate nuclear development was complete.

3. Stakeholder Engagement: Analysis

Over the last eight years, the Government has involved a number of different groups of stakeholders in its consultations regarding the future of nuclear policy in the UK. The chief stakeholders are: the energy industry, local government, environmental NGOs, unions representing energy workers, local residents of regions affected by nuclear policy decisions, and finally the general public at large.

The Energy Industry

The energy industry is far from homogenous, and contains many different private companies which cover all aspects of energy provision, from utility management, electricity infrastructure, power generation and so on. It would be a mistake to paint the industry as being uniformly pro-nuclear, as there are a number of firms and lobby groups who have been strongly opposed to new nuclear build throughout the consultation proceedings, such as Renewable UK (formerly the British Wind Energy Association), UK Alternative Energy Ltd, Spirit Solar and so on. Many of these firms responded to the numerous consultations which ran between 2003 and 2011, and have expressed their opinions in their written responses to the consultation surveys and in person at stakeholder events around the country.⁵¹

⁵¹ <http://www.bwea.com/ref/consultation-responses.html>

Obviously, energy companies and pro-nuclear lobby groups from within the industry (such as the NIA and BNFL) were free to respond to the Government's call for consultation responses, and most did so.⁵²

Following the publication of the 2008 White Paper, the establishment of the Nuclear Development Forum (NDF) and the Office for Nuclear Development (OND) strengthened the links between government and industry. The OND was created in September 2009, with the aim of "removing potential barriers to investment, and signalling clearly to the industry the serious intent of the Government to push forward nuclear new build".⁵³ Its supporting arm, the NDF, aims to "build and maintain the UK as the best market in the world for companies to invest in nuclear power. By bringing together Government with key industry stakeholders, the Forum ensures there is regular and high-level contact between all parties on the issues that matter the most to potential investors and operators."⁵⁴ Chaired by the Secretary of State for Energy and Climate Change, the Forum meets three times a year, and includes senior representatives from Areva, EDF, E.ON, Centrica, nPower, Westinghouse, and others.⁵⁵

Non-Governmental Organisations (NGOs)

NGO stakeholders have been involved in the nuclear decision-making process primarily through the surveys and deliberative events organised during the 2007, 2008, 2010 and 2011 consultations. Dozens of NGOs completed survey forms, and many were invited by Government to participate in or give presentations at stakeholder meetings at both a local and national level.

However, Greenpeace and several other green NGOs played little role in the 2007 White Paper consultation, arguably the most significant of the Government's stakeholder engagement exercises. Greenpeace and others chose to withdraw from the 2007 consultation. Friends of the Earth's Director, Tony Juniper called the consultation "deeply flawed" and said, "It is clear that the government has essentially made up its mind... we are not prepared to take part in this latest government farce."⁵⁶ In the absence of the main anti-nuclear NGOs, the event managers hired by Government were forced to

⁵² For example, http://www.eon-uk.com/downloads/Delivering_secure_low_carbon_electricity_response.pdf

⁵³ http://www.decc.gov.uk/en/content/cms/meeting_energy/nuclear/new/office/office.aspx

⁵⁴ http://www.decc.gov.uk/en/content/cms/meeting_energy/nuclear/forums/develop_forum/develop_forum.aspx

⁵⁵ DECC, "NDF: List of Attendees, 17th March 2011", <http://www.decc.gov.uk/media/viewfile.ashx?filetype=4&filepath=What%20we%20do/UK%20energy%20supply/Energy%20mix/Nuclear/1444-nuclear-dev-forum-170311-attendees.pdf&minwidth=true>

⁵⁶ <http://www.britishtscienceassociation.org/NR/exeres/B6FC0AA6-895F-4CA4-9BE9-A6F4828E943D.htm>

present the anti-nuclear arguments themselves.⁵⁷ Although the Government expressed regret that the anti-nuclear NGOs had declined to participate, it was “satisfied that the environmental arguments both for and against nuclear power were thoroughly explored during the consultation”.⁵⁸ In early 2010 the Office for Nuclear Development at DECC established a Non-Governmental Organisation Forum (NGOF), in order to

facilitate a schedule of stakeholder meetings with the NGO sector operated under a co-operative and collaborative regime which, it hopes, will lead to transparency, ability to scrutinize and, hence, a more robust programme around the issue of new build, associated waste management and associated concerns.⁵⁹

The aim of the Forum is to bring together NGOs, Nuclear Regulators, and Government, in order to “ensure there is regular and high-level contact between all parties on the issues that matter the most to NGOs”. The meetings are organised on an ad hoc basis, and three have been held so far, with the most recent on 29th March 2011. Unlike the industry-led NDF, which is chaired by the Secretary for DECC himself, the NGOF is chaired by “representatives” from the OND, with the commitment a DECC minister may attend some of the meetings.⁶⁰ The scope of debate within the NGOF is framed within current UK policy.⁶¹

Many NGOs continue to feel that their views have not been adequately taken into account during the nuclear consultations. Mike Childs, Head of Science, Policy and Research at Friends of the Earth, dismissed the Government’s attempts at consultation as “not genuine” and suggested that “we would have wasted our time and supporters’ money by engaging”.⁶² Greenpeace, meanwhile, believe the consultation processes to have been so flawed that they have launched a string of legal challenges questioning the validity of the consultation process in court. Their campaign for a judicial review in 2006 is but one example. In October 2008, long after the consultation had concluded and the White Paper been published, the Market Research Standards Board upheld a complaint lodged by Greenpeace, judging that the 2007 consultation document had contained information which was inaccurately or misleadingly presented, or was imbalanced, which gave rise to a material risk of respondents being led towards a particular answer”.⁶³ Finally, in August 2011 Greenpeace launched an appeal for a Judicial Review of the NPS, arguing

⁵⁷ BERR, “*The Future of Nuclear Power*”, p. 13

⁵⁸ *ibid*, p. 41

⁵⁹ http://www.decc.gov.uk/en/content/cms/meeting_energy/nuclear/forums/non_gov_org/non_gov_org.aspx

⁶⁰ “DECC/NGO Forum: Terms of Reference”, p.2, <http://www.decc.gov.uk/assets/decc/What%20we%20do/UK%20energy%20supply/Energy%20mix/Nuclear/non-gov-org-forum/989-ngof-terms-reference.pdf>

⁶¹ *ibid*, p.1

⁶² Correspondence with the author, 14th September 2011

⁶³ Market Research Standards, “*Greenpeace Vs Opinion Leader Complaint*” (2008), available at <http://www.greenpeace.org.uk/files/pdfs/nuclear/MRSfindings.pdf>

that the Government had unlawfully failed to consult over the implications of the Fukushima nuclear disaster in the formation of EN-6.⁶⁴

It would be a mistake to conclude that NGOs have been “frozen out” of decisions over nuclear policy. Greenpeace and others chose not to be fully involved in the 2007 consultation, having withdrawn from the deliberative events at the last minute (they did still submit detailed consultation responses). In addition, the Government has gone some way to establishing official channels for exchanging views with NGOs via the creation of the NGOF. However, issues clearly still remain, as a large number of NGOs clearly feel that they have been ignored or marginalised, and regard the Government’s stakeholder engagement with considerable cynicism. The attitude of many green NGOs is that the Government effectively made an executive decision sometime during 2005 to pursue nuclear deregulation, and has subsequently failed to adequately consult on a whole range of connected issues, including the balance of private to state funding of new build, and the financing of waste management procedures.

Local Communities

Residents of areas close to existing nuclear sites, and proposed new build sites under the NPS guidelines, have been recognised by government as crucial stakeholders and engaged accordingly. Specialised, separate site stakeholder meetings were organised as part of the 2007, 2009, and 2010 consultations, and BERR and DECC officials made special efforts to register the views of local community groups in sites such as Hinkley Point, Sellafield and so on. Local resident views have had a significant impact on the revised draft of NPS EN-6, by raising ecological and safety issues which were addressed more fully in subsequent drafts. In the case of Kirkstanton, 94% of consultees deemed it to be unsuitable for new nuclear development, and the site was subsequently removed from consideration in the final draft.

However, it should also be recognised that the consultation responses of local residents at almost all of the communities in question were overwhelmingly negative. In the NPS consultation, 56% of consultees believed that EN-6 should not be approved by Parliament, while 61% believed that the proposed NPS did not satisfactorily cover the potential impact of new nuclear build.⁶⁵ The Government acknowledged this in its analysis of the consultation findings, but few substantive changes to policy have been made.⁶⁶

⁶⁴ <http://www.greenpeace.org.uk/media/press-releases/greenpeace-takes-government-court-over-nuclear-power-expansion-20110826>

⁶⁵ Statistics calculated by the author from tables available in the OPM report

⁶⁶ Office for Public Management, “*National Policy Statements for Energy - Consultation Summary Report to DECC*” (2009), <http://www.opm.co.uk>

General Public

Opportunities for the general public to engage with the decision making process have largely been the survey and stakeholder meeting components of the 2007, 2009 and 2010 consultations. To encourage participation, the Government set up processes to engage UK citizens with the deliberative process, producing non-technical summaries of the consultation documents and advertising the consultation procedures in local government offices, libraries, community centres and on government websites.

However, the general public has had a number of other opportunities through polls and surveys to express its views on nuclear energy. Public opinion with regard to nuclear seems, at present, to be somewhat in flux. The results of these polls and surveys can be interpreted in a number of ways depending on one's viewpoint. Indeed, the same survey results have been used as evidence of both strong public support and strong public opposition to nuclear power, by the NIA and the EEN respectively.⁶⁷

What does seem clear is that public opinion of nuclear power seems to have become more positive over the last few years. A 2004 IPSOS-MORI survey for BNFL found that only 28% of respondents had a positive impression of nuclear power, while 59% felt that the issue of nuclear waste made it irresponsible to build new plant.⁶⁸ However, two studies published in 2005 suggested that attitudes were improving, with opposition to new build having dropped from 60% in 2001 to around 30% by 2005.⁶⁹ This is probably largely due to the increasing recognition of nuclear power as a low-carbon technology in the public eye. A survey by the Tyndall Centre in 2006 found that 54% of all respondents would accept new nuclear power plants if they helped fight climate change, with 48% feeling that renewables alone could not meet the UK's energy needs.⁷⁰ This accords with the findings of Poortinga, Pidgeon and Lorenzoni (2006), who demonstrated that renewable energy is preferred by respondents over nuclear energy when costs are comparable, but that this preference is markedly less pronounced if nuclear power is presented as being part of a low-carbon energy mix (as it consistently has been in the Government's consultation documents).⁷¹

More recent surveys confirm this positive shift in public attitudes, despite fluctuations following the accident at Fukushima. Two IPSOS-MORI polls conducted on behalf of the Nuclear Industry Association in 2010 and 2011 demonstrate the wavering attitudes of the British public. Respondents' overall

⁶⁷ <http://www.energyefficiencynews.com/i/3963/>; <http://www.niauk.org/NIA-Press-Releases/Industry-poll-shows-continuing-support-for-nuclear.html>

⁶⁸ SDC, *"The Role of Nuclear Power in a Low-Carbon Economy"* (2006)

⁶⁹ Knight (2005), Murray-Watson (2005)

⁷⁰ Tyndal Centre, *"Attitudes to Nuclear Energy and Climate Change"* (2006). <http://www.ipsos-mori.com/researchpublications/researcharchive/576/Attitudes-Towards-Nuclear-Energy-And-Climate-Change.aspx>

⁷¹ Poortinga, W; Pidgeon, N F; Lorenzoni, I: *"Public perceptions of nuclear power: climate change and energy options in Britain"*, (2006)

impression of nuclear power became slightly more unfavourable following the Fukushima meltdown, down to 28% approval from a peak of 40% in 2010, but there remained strong and consistent consensus that the UK needed a mix of energy sources including nuclear, with 68% in agreement. Only 24% agreed, however, with the statement that “the nuclear industry has done its best to inform and educate the public about the hazards of nuclear power”.⁷² Research conducted by Pootinga and Pidgeon (2003) found a similarly widespread lack of public trust in industry and national government to tell the truth or take responsibility if something goes wrong at a nuclear site.

A poll by Populus for the British Science Association in August 2011, meanwhile, drew similar conclusions. Of the 2500 people interviewed at the British Science Festival, only 19% favoured nuclear power as the best source of investment to meet the UK’s future energy needs. 37% held a favourable opinion of nuclear power, but only 6% of respondents felt that they could trust members of the industry, and a paltry 4% trusted the Government to tell the truth about nuclear power. 46% felt unconfident about the UK’s readiness to handle a major nuclear accident, yet 41% felt that the benefits of nuclear power outweighed its potential risks. 54% stated that they would be willing to accept new nuclear build if it helped tackle climate change.⁷³

Finally, the results of The Environment Council’s own informal web-based survey, conducted between July and September of 2011, are also relevant. About half of the 570 respondents felt that they had at least some understanding of the issues surrounding nuclear power, and 65% felt they’d like to learn more – a sign of public interest and engagement with the issues. However, 77% of respondents felt that they had had no influence over UK nuclear policy at all over the last few years.⁷⁴

4. Conclusions

It is the role of governments to set the direction of public policy. The Labour and Coalition Governments have both concluded that nuclear power represents an effective means of meeting the UK’s future energy needs while meeting legally binding carbon reduction targets and they are supported in this conclusion by many well-respected independent ecologists and economists from both sides of the political spectrum.⁷⁵ Since the very

⁷² <http://www.ipsos-mori.com/researchpublications/researcharchive/2834/Public-attitudes-to-the-nuclear-to-the-nuclear-industry.aspx>

⁷³ <http://www.populus.co.uk/british-science-association-attitudes-on-nuclear-power-290811.html>

⁷⁴ TEC Nuclear Survey Report: “*Clear on Nuclear?*”; <http://envcouncil.wufoo.eu/reports/nuclear-report/>

⁷⁵ <http://www.theccc.org.uk/blog/2011/08/09/confused-about-costs-of-nuclear-v-renewables-read-on/>

beginning of the 2007 *Future of Nuclear Power* consultation, successive UK governments have been open and honest about their pro-nuclear position, and have launched multiple consultations with the public to test this position and its underlying reasoning. The consultations have highlighted that stakeholders remain concerned about several aspects of proposed policy – especially regarding waste disposal and siting procedures – and the Government has attempted, where possible, to address these issues. That these concerns have not been sufficient to halt the entire process of nuclear expansion is not evidence that the Government is ignoring stakeholders, or that there is some sort of pact between industry and government to push nuclear forward no matter the cost.

However, there are legitimate criticisms to be made of the processes to engage stakeholders in the development of nuclear policy. The 2006 Energy Review was rushed and failed to live up to previous commitments to be open and inclusive. The lack of authentic stakeholder engagement was regarded as inadequate and unfair in the High Court and the policy decisions made in light of this consultation were thus deemed to be illegal. The Government was forced to return to the drawing board and run another series of consultations from scratch, a costly and time-consuming process that might have been avoided if the initial stakeholder engagement had been up to par.

The inadequate consultation damaged the Government's reputation on nuclear power in the eyes of many and provided campaign opportunities for anti-nuclear NGOs. A British Science Association survey in 2011 reported a shocking lack of public faith, with barely 4% reporting that they would trust the Government to tell the truth about nuclear power. Such public cynicism may in part be due to the poor stakeholder engagement of the 2006 Energy Review.

Finally, it has been seen repeatedly that large numbers of stakeholders – especially members of the public and communities located close to proposed sites – have very real fears over the safety, security, and economic practicality of nuclear power. Although anxiety over anthropocentric climate change has led many UK citizens to reassess the benefits and risks of nuclear, deep concerns remain. The most prominent of these is the issue of waste disposal, which emerges time and again in the consultation responses, and it is clear that large groups of stakeholders are unconvinced by the Government's assurances that deep geological storage facilities will be sufficient to cope with new waste. They also remain fiercely critical of existing plans to meet the bulk of disposal costs from the public purse, with private energy companies only obliged to pay an as-yet-unspecified "fair share".

These stakeholder fears are not going away, and neither are they likely to any time soon. It is clear that the Government's existing stakeholder engagement has not allayed public fears. It has so far consisted of asking people for their views on geological disposal but has not yet been able to provide answers to their concerns. Many stakeholders have expressed frustration that their concerns over GDF appear to be falling on deaf ears. We believe that Government must provide an honest appraisal of the merits of different forms

of waste disposal, and endeavour to engage stakeholders in an open discussion of how best to manage nuclear waste.

Ultimately, stakeholders' experiences of governments' consultation processes for nuclear decision-making have varied widely. Recent research carried out at the University of Stirling into stakeholder management in nuclear decision-making found a clear correlation between respondents' attitude towards nuclear power and their experience of the engagement process. All of the respondents who were identified as being in favour of nuclear power found the process to be extremely positive. Equally, all of the respondents who disagreed with nuclear power found the process to be extremely negative.⁷⁶ For the Stirling results to show such a clear interrelationship is striking. It suggests that attitudes and opinions of nuclear power are deeply held.

Stakeholder's existing beliefs will strongly colour their experience of any engagement exercise or consultation. But this should not discourage stakeholder engagement. It is arguable that the apparent consensus at the start of the century was not the result of an informed, open dialogue process. It is unsurprising that it did not last. We would assert that if you do not engage properly you will end up with a temporary solution which subsequently needs revision or abandonment. With vital issues of the continued security, safety and economic validity of the UK's energy supply hanging in the balance, the need for authentic stakeholder engagement has never been more apparent.

⁷⁶ D. Livingstone, *"Stakeholder Engagement in the Nuclear Industry"*, (2011)