

DCO Stage Two Consultation: Section 42 Consultation. Summary Responses

NuGen and the Moorside Project are the subject of a strategic review which may affect how the Moorside Project is taken forward. This could mean a potential change to the shareholders of the company, the technology that may be used and consequently the details of the development proposals.

As a result, it is not possible at present to set out definitively how NuGen will take account of (or “have had regard to”) the consultation responses received, as required by section 49 of the Planning Act 2008. For more detail, please refer to the main report.

The summary of issues below is not intended to be a comprehensive digest of all the representations received under Section 42. It is a summary of the responses received, which highlights themes that have emerged. It has 142 entries. The number of issues raised by these consultees in all was over one thousand. The Statutory Consultation report submitted with the DCO application will cover will cover the themes and issues under each theme.

There is a section at the end of each theme for local organisations that NuGen has voluntarily included in this section for the purpose of recording and reporting information. They are non-statutory consultees. In addition, the parish councils consulted with include both those that are statutory consultees, and those that NuGen has voluntarily consulted because they are in relatively close proximity to its proposals.

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Main Moorside Site and Environs

#	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
Parish Councils		
1	There was concern about potential impacts from the site buildings. This included suggesting changes to the proposed location and/or arrangement of the reactors, specifically moving them to the south of the site and using a 'L' shaped configuration and setting the reactors on lower bases. The suggestion was made that the Yottenfews car park should be moved elsewhere to allow more scope to move the reactors away from Beckermet.	<p>A study of ground conditions and technological and safety requirements led to the conclusion that the optimum solution was the current reactor arrangement. The Moorside site is constrained as it is located in a narrow developable strip between the A595 and the River Ehen flood plain. Immediately to the south is Sellafield and to the north Beckermet. The geology of the Moorside Site and the need to manage the excavated material on the site remove any other potential options.</p> <p>Consideration of reactor locations was specifically excluded from the Stage Two Consultation for this reason - the location is determined based on geology, technological and safety assessments and requirements.</p> <p>As the strategic review continues, the feasibility and requirement for the use of Yottenfews will be reviewed and assessed, including any opportunities and alternatives, which will be summarised in in any future consultation.</p>
2	Also suggested moving the substation to the east and suggestion that extending the required underground cabling northwards would allow for more flexibility with the mound design.	<p>NuGen's project review exercise has identified the potential of adjusting the position and ground level of the substation allowing the potential for improved screening. Should this be taken forward, this revision will form the next design phase of the Moorside Project. NuGen has worked with Electricity North West to optimise the position and undergrounding of its lines, one of which will be removed.</p> <p>The route of National Grid's lines is a matter for consideration under National Grid's North West Connections Project.</p>

#	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
3	There were concerns about the noise from the facility, specifically the turbine hall and the substation.	<p>As part of the forthcoming Environmental Impact Assessment, a noise assessment will be carried out and the results presented within the Environmental Statement, which supports the DCO application. The preliminary results of which, if different from that set out in the Stage Two Consultation, will be made available at any future consultation.</p> <p>Any emissions from the turbine hall and substation will comply with the relevant guidance and legislation, and will also be a matter for the applicable permits and licences.</p>
4	A number of councils expressed concerns for the use of Blackbeck / Sellafield Road for the Moorside Site and traffic management around the site. It was suggested that Sellafield will require a dedicated new access for traffic management and maintenance.	Following consultation on Sellafield access / train station road options at Stage Two, NuGen is now only considering the option of a new route to the west of the A595. Further detailed work will be required to optimise the route which is proposed to run close to the A595.
5	Requests for involvement in the architectural and landscape design in addition to a request that these are sympathetic to the surrounding area. This included concern for wide impact on tourism in the area and the visibility of the substation.	These comments have been noted and will be taken into account. NuGen will involve stakeholders in the landscape design development.
6	There were some concerns that the lack of specific information made it difficult to comment in more detail.	NuGen intends that there will be further consultation on the details of the Moorside Project.
7	Concerns about the impact on tourism in the area.	Care will be taken in design to minimise adverse significant effects on tourism during the construction phase. The Moorside Project will be a generator of local tourism during operation from both business-related travel and trips generated to the proposed visitor centre.
8	Concern about the visibility of the substation.	See the response to issue 2.

#	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
9	<p>There was support from three parish / town councils for re-using waste heat from the facility. It was suggested that the residents of Beckermeth could benefit specifically.</p>	<p>NuGen will keep under review the possibility of achieving a district heating solution, depending on feasibility.</p> <p>Under the stage two proposals, feasibility was assessed for using waste heat from the Moorside for community or local commercial benefit, or for Moorside itself.</p> <p>The report concluded that opportunities were constrained by the then-choice of technology, though this is subject to the outcome of the strategic review.</p>
10	<p>It was hoped that the design of the railway viaduct would be sympathetic to the surrounding area, with tourism considerations in mind, and impact on the wider rail route. One parish council expressed concern that the viaduct should not impede water flow.</p>	<p>NuGen notes the comments on the importance of aesthetic design. The Environmental Impact Assessment will include a visual impact assessment. If different from that set out in the Stage Two Consultation, it will be made available at any future consultation.</p> <p>NuGen is also carrying out Flood Risk Assessment for the development area which will assess the impact of any bridge crossings to water flows.</p>
11	<p>Copeland Borough Council (CBC) submitted a comprehensive and detailed response. It stated a preference for the design of the site to be as sympathetic as possible to the landscape and requested that they be involved with the development of the detailed designs.</p>	<p>CBC will be consulted on the detailed design, which may be subject to requirements attached to any DCO.</p>

#	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
County and District Councils		
12	CBC had a number of questions about the rationale of the mounding strategy, particularly the extent to which the mounds may or may not provide screening for local communities.	<p>NuGen recognises that the nature of the profiling and screening of the Moorside Site is important for consultees. There is a range of views, and stakeholders in different locations are affected in different ways.</p> <p>The design of the screening is also heavily dependent the final design of the nuclear island, NuGen's waste strategy and the requirement for screening from multiple views.</p> <p>NuGen recognises that additional work is required on reconciling these issues, particularly following the strategic review, in order to design a landscape solution which best provides the appropriate balance.</p> <p>NuGen will have regard to the consultation responses received to date on this issue, and will present its proposal on the mounds at any future consultation.</p>
13	CBC wishes to see detailed mitigation proposals for the area north of the site close to Beckermet.	The mitigation measures will be developed through the results of the environmental assessment and having regard to stakeholder feedback. NuGen will discuss the appropriate level of mitigation with CBC, and with community representatives, such as the parish council and RAM.
14	CBC requested NuGen consider local feedback carefully.	NuGen will consider all the local consultation feedback, and will continue to work with local authorities, and community representatives, such as the parish council and RAM, to incorporate local views as much as possible into the final design.
15	CBC commented on what it believed to be a lack of information about the railway infrastructure, marine off-loading facility and beach infrastructure.	The extent of any railway infrastructure, MOLF and beach infrastructure is dependent on the outcome of the strategic review. Following which, NuGen will finalise its proposed rail and marine infrastructure and present the proposed solutions at any future consultation.

#	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
16	CBC suggested relocating the substation to reduce impact on local residents. CBC also expressed a desire to see the waste heat reused.	See the responses to issues 2 and 9.
17	Cumbria County Council (CCC) expressed no preference for the Sellafield Road options.	See the response to issue 4.
18	CCC expressed concern for the potential impact on Beckermet.	See the responses to issues 1, 2, and 13.
19	CCC considers that, if a visitor centre is sited in this location, it should integrate with the potential future use of the mounds for habitat creation, recreation and public open space. However, the council would prefer to see the visitor centre located elsewhere for a number of reasons. Firstly, a visitor centre within a nearby settlement would encourage visitors to the town, bring visitor spend and support economic regeneration. Secondly, the Council has concerns about the logic of siting a visitor facility close to operational nuclear sites, which has implications for emergency planning. Lastly a visitor centre here is likely to generate additional traffic, which would place further demand on the highway network and is not easily served by public transport.	The comments are noted and will be considered when further work is carried out into the location of the visitor centre. The concept for the proposed facility incorporated a range of facilities for different kinds of visitors including VIPs and corporate visitors to the Moorside, acting as a reception and media centre for the site. Further consideration will be given to this as the project moves forward.
Statutory and Prescribed Consultees		
20	Cumbria Constabulary (CC) commented that there was a lack of detail in some areas.	NuGen has carried out two rounds of consultation to-date. In addition, NuGen has carried out regular meetings with statutory stakeholders to keep them up to date on the proposals and to have regular feedback. NuGen recognises that stakeholders will want to know more about the Moorside Project, and therefore a future round of consultation will take place prior to submission of the DCO application.
21	Highways England supports the reuse of spoil on site.	This comment has been noted.

#	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
22	<p>Historic England expect design of site buildings and layout, the impacts on the St Bridget's and the related ancient monuments to be fully assessed within the environmental impact assessment. Nothing should be done to compromise the World Heritage Status of the Lake District National Park. In view of this status NuGen should adopt the ICOMOS methodology for a Heritage Impact Assessment. This should be incorporated as a chapter in the Preliminary Environmental Impact Report and will need to consider the cumulative impact of Moorside and the National Grid's North West Coast Connections Project.</p>	<p>HE's views are noted and will be taken into account as the Moorside Project moves forward.</p>
23	<p>The National Trust (NT) stated that it wishes to see details of the rail viaduct, including construction.</p>	<p>Proposals for any rail viaduct are in development and will be made available when available.</p>
24	<p>Natural England has submitted detailed comments but have highlighted the following:</p> <ul style="list-style-type: none"> • Concern with regard to landscape and visual impacts • impacts on Nursery Wood, Low Church Moss SSSI, and coastal protection • absence of detail on marine ecology issues; and • a belief that there is an opportunity to secure significant bio diversity 	<p>Comments noted and will be taken forward into the next assessment and design phase.</p>
25	<p>The Environment Agency (EA) has provided detailed comments on each of the consultation documents. Its response outlined the information that it considers is required.</p>	<p>The EA's comments have all been noted and NuGen will have regard to the comments as it progresses its assessment and development of the Moorside Project.</p>

#	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
Non-Statutory Organisations		
26	Residents Affected by Moorside (RAM) raised a number of points in relation to this topic; specifically, on the layout of buildings within the site and the proposed pylons on site. In addition, they expressed concern over for the loss of the southern exit via Nursery Road.	<p>See responses to issues 1,2, and 3.</p> <p>Recognising the importance of the Nursery Road route to local people, following Stage Two Consultation NuGen has undertaken a review of access to the Moorside Project to seek ways to retain this route or, at the very least, retain a revised route from Beckermet south-westwards to the A595.</p> <p>The final proposal is dependent on the final mound designs and the outcome of a wide range of other factors. However, in reaching its final scheme design, NuGen will have regard to consultee comments and the desire to retain such a link to the A595 if possible.</p>
27	The group also expressed concerns about the design of the buildings on site and were eager to be involved with the development of the design.	NuGen is committed to good design of buildings and infrastructure. NuGen has engaged consultant master planners to help produce the design for the Moorside Site. To demonstrate their commitment to ensuring the design aspects are both appealing and sympathetic to the surrounding area, NuGen conducted an international design competition, to identify preferred architectural and landscape design contractors who could help them achieve this.
28	With regards to pylons, RAM ideally wishes to see the connection underground but requested more details of the designs. There was also a concern about the visual impact of converging transmission lines / pylons.	See response to issue 2.
29	Egremont Anglers group raised specific concerns about loss of access to fishing and fish stocks. Would like further discussions.	NuGen will engage further on this matter following the outcome of the strategic review.

Accommodation Sites (General)

#	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
Parish Councils		
30	Four parish / town councils had comments about this section. There were concerns that the proposals are based on the assumption on 'single' workers, not families, and the temporary nature of the development. One parish council commented that this was a missed opportunity to assess and improve the area's housing stock.	<p>NuGen is preparing a legacy strategy to set out its intent to maximising the legacy provided to the community from the Moorside Project. There have been varying views on whether temporary accommodation sites should have long term uses to make good use of the investment NuGen provides. The decision on the suitability of the sites for future use is not, however, NuGen's. This is a matter for Copeland Borough Council, the local planning authority.</p> <p>NuGen is committed to working with the local authorities to facilitate the future use of the temporary accommodation sites where the local authority has supported the permanent use of the sites.</p>
County and District Councils		
31	Allerdale Borough Council (ABC) said that it was unclear if workers would be contractually obliged to use the accommodation sites.	The temporary accommodation sites will be provided solely for the construction phase. Where workers are employed for the construction phase it is anticipated that workers would be obliged to use this accommodation unless they already live in the local area. This is position is subject to the outcome of the strategic review.
32	Copeland BC prepared a detailed response to this topic, and has set out a legacy summary aspiration for each of the sites. It was note that possible Corkickle layout was not in accordance with their legacy master plan.	<p>NuGen notes the comments and the role of Copeland Borough Council in determining appropriate long-term uses on the accommodation sites. NuGen will maintain engagement with Copeland and any relevant development partner in developing further the concepts on these sites.</p> <p>Please also see NuGen's response to issue 30.</p>

#	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
33	CCC stated that the lack of detailed evidence on workforce numbers made it hard to comment on the proposals	NuGen has used workforce numbers that it considers to be a reasonable estimate for planning purposes. The outline plans for the accommodation and related transportation has allowed for a degree of flexibility and will be designed and developed using a reasonable, worst case envelope. In addition, the strategic review outputs will have a bearing on workforce numbers and profile.
Statutory, Prescribed and Key Organisational Consultees		
34	Cumbria Constabulary (CC) expressed concern about the limited parking provision and asked about where workers from outside the country will be housed. CC also raised a concern about crime on construction sites.	Detailed accommodation management policies will be developed to allocate workers of different circumstances to the most appropriate accommodation. Looking ahead over a number of years it is not possible to be precise about numbers of workers from outside the UK that will be required. NuGen intends to have a carefully managed housing allocation policy that would monitor changes in employees types and allocate rooms and car parking spaces to achieve the best fit at the time whilst achieving its overall strategy. This will be aligned with the construction schedule.
35	The Coal Authority (CA) stated that the Mirehouse and Corkickle sites fall within a high-risk area, which will require further assessment.	The appropriate assessments will be carried out as part of the environmental impact assessment.
36	United Utilities (UU) stated that until clarity about the legacy use of the sites was confirmed they could not advise on future requirements. In addition, UU highlighted the need to pay capital contributions for the extension of water mains to the new sites.	Comments noted and will be taken into account. NuGen is in discussion with UU about planning for the future needs of the accommodation sites.

#	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
Non-Statutory Bodies		
37	Regeneration North East Copeland suggested that Cleator Moor has a number of suitable locations for future development.	In relation to its own direct development, NuGen included an associated development search area proposal in its Stage One Consultation. Cleator Moor was the least supported of the sites put forward. Subsequent meetings with local stakeholders and issues related to access and traffic resulted in a decision not to proceed with the Cleator Moor search area. NuGen will consider opportunities for encouraging indirect or related development to Cleator Moor such as job opportunities for the local population; improved coach / bus and cycle connectivity to rail stations and the Moorside Site; businesses preparing themselves to compete for supply chain opportunities; skills and training opportunities and leisure and recreation facilities.

Accommodation Sites (Corkickle)

#	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
Non-Statutory Bodies		
38	St Begh's Parish and Catholic Junior School raised a number of specific concerns and objections. They were specifically concerned about the widening of Coach Road and the potential impact this could cause via vibrations. They also stated that the consultation did not include enough information.	NuGen recognises that the highways network is more constrained at Corkickle as it is close to Whitehaven Town Centre. NuGen will consider these issues in finalising its development proposals and any potential adverse effects in this area. From the Stage One Consultation, NuGen noted that a significant number of people were concerned that NuGen might have proposals to widen Coach Road with consequential effects on the church, school and residential properties. However, NuGen currently has no plans to widen Coach Road and did not include any such plans with the DCO Stage Two consultation.

Accommodation Sites (Mirehouse)

#	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
Parish Councils		
39	Only St Bees Parish Council commented in relation to the proposals at Mirehouse, and this was to request better consideration for integration with the existing community.	<p>NuGen will employ local people wherever possible. Where it is necessary to import a temporary construction workforce it will work with local partners to achieve social cohesion. NuGen will be looking at a careful balance between the provision of dedicated and shared social and leisure facilities that:</p> <ul style="list-style-type: none"> • provide integration; • provide for the needs of the workforce; • support the maintenance and provision of local facilities for local benefit; and • do not undermine or unduly compete with existing or proposed local facilities. <p>There is likely to be positive effects in the local community from the construction and operational workforce in the area that will lead to economic gains. There will be the need to create and manage facilities and the spend of the workforce will support many local businesses and jobs.</p>

Accommodation Sites (Egremont)

	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
Parish Councils		
40	Beckermet with Thornhill Parish was concerned about the proximity of the Egremont site to Thornhill village boundary and general issues regarding impact on existing residents (noise, traffic, etc.). There was also a concern that plans showed a new cycle path cutting through existing gardens.	This comment has been noted and impacts and appropriate mitigation will be considered as the Moorside Project design evolves.

	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
41	Egremont Town Council believes that the plans lack detail, limiting the amount of feedback that can be provided. They have some concerns about the layout as shown particularly in relation to road layout and links to the town.	Further detail will be provided as the Moorside Project and accommodation requirements evolve - this will be provided at any future consultation.

Corkickle to Mirehouse Railway

#	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
Parish Councils		
42	42. Bootle Parish Council supports the east side platform at Corkickle station.	This comment has been noted and will be had regard to.
43	43. Parton Parish Council wanted specific assurances that buttressing in the area will be carried out.	NuGen is in discussion with Network Rail regarding the resilience of the rail line.
44	St Bees had concerns about the new loop in the village, additional traffic and the impact on parking at their station.	This comment has been noted and will be taken into account.
County and District Councils		
45	CBC raised a number of specific concerns about this section of rail infrastructure, including concerns about the impact on the character of the existing railway station.	NuGen notes these concerns and will engage with CBC on the developing plans for the railway station.
Non-Statutory Organisations		
46	45. Community Rail Cumbria (CRC): This group made a number of general comments in relation to the project, but specifically stated a preference for the eastern option for a new platform in relation to the Corkickle to Mirehouse Railway proposals.	CRC comments have been noted and will be considered in future design phases.

Highways

#	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
Parish Councils		
47	The most common comment was to request more details on worker flows / transport assessment / modelling, or statements that the lack of these details made it difficult to respond to the consultation (seven parishes).	Transport assessment work is continuing, NuGen will continue to engage with the relevant stakeholders over transport as the Moorside Project evolves.
48	Six parish/town councils commented that the proposed improvements did not go far enough. There were also observations that all improvements are directed to the north of the site with comments that studies and improvements need to be extended south (two parishes).	<p>NuGen recognises the significant concerns that exist in relation to the road networks in west Cumbria. The DCO Stage Two Consultation proposals set out NuGen's preliminary assessment of the road improvements that are likely to be required. Additional assessment work on traffic generation, mitigation and traffic management will continue. The comments NuGen has received are helpful in ensuring that it gives full consideration to the specific issues that concern people. The objective is to ensure that measures are provided that, as far as possible, mitigate any adverse effects caused by the Moorside Project. Overall the west Cumbrian transport network already has perceived inadequacies that are unconnected to the Moorside Project, and while is not the intention to rectify these existing problems, NuGen continues to work with local partners, in particular the Cumbria Local Enterprise Partnership (LEP), and the Cumbrian Rail Board to lend support to the case to Government for wider infrastructure improvements in the area to complement the work that NuGen will need to do to manage its own impacts.</p> <p>NuGen's transportation and accommodation strategies as set out in the Stage Two Consultation indicate that there will be no impacts on the road network south of Moorside that would trigger the need for road improvements to be implemented by NuGen.</p>

#	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
49	There was general concern regarding traffic in the area especially during peak times (4 parishes) and the impact this will have on communities. Details about car parking plans and provisions were also requested (4 parishes).	NuGen will be continuing to model the traffic implications of the Moorside Project and ensuring construction phase traffic is appropriately managed. The Stage Two Consultation provided information on NuGen's initial assessment of highway improvements required. NuGen will be continuing traffic modelling work to finalise the necessary improvements in due course. Whilst the bulk of NuGen's infrastructure investments will cater for the temporary workforce these improvements will provide a legacy benefit to the community long-term.
50	Beckermet with Thornhill Parish Council had many questions about road proposals, (e.g. HGV use), construction, and a range of detailed issues and questions.	NuGen will continue to engage with the parish councils following the outcome of the strategic review.
51	Six parish/town councils also raised general concerns about the impact of proposals including on the A595 and from rat-running.	The points made are noted and will be taken into account.
52	There was detailed criticism of the level of detail / modelling available.	Transport assessment work is an on-going process and is continuing. Any future consultation will provide an update on the transport assessment work.
53	Two parish/town councils cited opposition to the closure of Nursery Road	Recognising the importance of the Nursery Road route to local people, following Stage Two Consultation NuGen has undertaken a review of access to the Moorside Project to seek ways to retain this route or, at the very least, retain a revised route from Beckermet south-westwards to the A595. The final proposal is dependent on the final mound designs and the outcome of a wide range of other factors. However, in reaching its final scheme design, NuGen will have regard to consultee comments and the desire to retain such a link to the A595 if at all possible.

#	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
54	Ponsonby PC does not like either of the options for a new Sellafield route. The east splits a farm and the west is too near houses. NuGen should look again at its road proposals.	Public opinion received at the Stage Two Consultation has supported the western route. Therefore, NuGen has withdrawn the eastern option, and is considering optimising the western route. This is likely to be different to the western route option at Stage Two Consultation following further assessment and design work. This new proposal, which has been formed having had regard to consultation to date, will be set out in any future consultation.
County and District Councils		
55	CBC stated it was not possible to comment given the limited modelling information provided. They did not express an opinion in respect of Nursery Road.	Transport assessment work is an on-going process and is continuing. Any future consultation will provide an update on the transport assessment work.
56	CCC stated that the current plans for the realignment of Nursery Road were not acceptable and that the construction will have a very significant impact on highways.	Please see the response to issue 53.
Statutory, Prescribed and Key Organisational Consultees		
57	CC, Highways England, Lake District National Park Authority (Lake District National Park Authority) the Nuclear Decommissioning Authority (NDA), and the NHS - Transport Enabling Group for West, North & East Cumbria (WNEC) Success Regime all had a number of specific questions and concerns about the transport proposals. This included specific concern about the ability of the proposals to handle traffic effectively during the construction period.	NuGen is aware of the importance of the transport and traffic planning to key stakeholders and will continue to develop its transport modelling and management information as the Moorside Project moves forward. NuGen will continue its engagement with key stakeholders.
58	57.LDNP not confident that the character of the National Park will not be affected by east to west transport of construction workers.	<p>The completion of traffic modelling will allow the development of a detailed transport management plan aimed at minimising the use of private vehicles to the benefit of east-west roads.</p> <p>NuGen is aware of the importance of the transport and traffic planning to key stakeholders and will continue to develop its transport modelling and management information as the Moorside Project moves forward. NuGen will continue its engagement with key stakeholders as this work moves forward.</p>

#	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
59	<p>Highways England...</p> <ul style="list-style-type: none"> • supports the aims of the draft transport strategy - particularly the reuse of spoil on site and the use of sea and rail; • suggests that more highways analysis required; • believes that completion of transport analysis will identify additional improvements required; • want to see a number of transport scenarios tested through West Cumbria transport model before it can agree mitigation measures; • believes that significant road infrastructure will need to be constructed in advance; and • wishes to see the provision of a railhead as soon as possible. 	<p>These comments have been noted. and NuGen will have regard to the comments as it progresses the Moorside Project.</p>
60	<p>Cumbria Constabulary would like further discussions on issues related to road safety, emergency access and traffic disruption.</p>	<p>Further engagement on these issues will take place.</p>
Non-Statutory Organisations		
61	<p>RAM raised a number of concerns regarding the knock-on effects of alterations to the highways network, specifically as it would impact access to and from the village. These comments included specific junctions/areas of concern. There was a recognition of the additional traffic the project would inevitably cause, and challenged the ability of the transport strategy to overcome people's behaviour. Concern was also expressed over 'professional judgement' rather than modelling.</p>	<p>NuGen is aware of the importance of the transport and traffic planning to key stakeholders and will continue to develop its transport modelling and management information as the Moorside Project moves forward. NuGen will continue its engagement with key stakeholders as this work progresses.</p>
62	<p>West Cumbria Sites Stakeholder group expressed disappointment there are no major road schemes proposed.</p>	<p>NuGen's current transport strategy is based on prioritising the use of sea and rail. In recognising that there will be some residual use of the roads, detailed highway assessments have begun but are not yet completed. NuGen's consultation documents included its initial thoughts about junctions improvements that may be needed. This will be reviewed following the strategic review and, where necessary, will be updated.</p>

Public Rights of Way (PROW) Amenity Routes

#	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
Parish Councils		
63	Criticism of the significant closure / diversion of routes (including Sustrans Route 72) for five years including requests that a better and more imaginative alternative be considered.	<p>NuGen will seek to minimise as much as possible disruptions to foot and cycle paths. This will need to be done whilst retaining acceptable health and safety standards during construction and without unacceptably compromising the safety and efficiency of the operating site.</p> <p>Sustrans route 72 runs through the proposed Moorside Site and must be diverted permanently. NuGen recognises the concerns about the diversion proposed and will examine the opportunity for further improvements to the route in future design reviews whilst recognising the security required for an operational nuclear site.</p>
64	63. Egremont Town Council commented that a clear rationale for these long-term closures was required.	Please see the response to issue 63.
65	64. Gosforth Parish Council suggested that a cycleway between Gosforth and Seascale could alleviate challenges if funding could be found. Gosforth Parish Council also suggested cycle access from the south of the site.	This comment has been noted. NuGen will consider this suggestion in the next project design phase.
County and District Councils		
66	CBC said that there needs to be a clear rational set out, and full consideration of community views for, longer term closures	This comment has been noted. This consultation has provided information on community views that NuGen will have regard to and will be part of the clear rationale in the final proposals.
Statutory Organisations, Prescribed and Key Organisational Consultees		
67	National Trust pointed out the need to be clear about the timescales re PROW preparation and diversion when any application under the Town and Country Planning Act is submitted.	This comment has been noted. This consultation has provided information on community views to which NuGen will have regard, and will be part of the clear rationale in the final proposals.

#	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
Non-Statutory Organisations		
68	RAM was critical of the proposed alternative to the coastal route, which RAM asserts is unsafe, unsuitable and would have a negative impact on a large number of landowners. RAM states that the route fails Natural England 'Coastal Access' guidelines and would significantly reduce the ability of the local community to access Seascale.	Further engagement on these issues will take place, particularly with Natural England, before the proposals are finalised.
69	Criticisms are made about the proposed new cycleways. It was highlighted that there are some sections where the road will remain the fastest route for cyclists, which will mean that it fails to encourage people to leave the road.	Further engagement on these issues will take place before the proposals are finalised.
70	Lake District Area Ramblers supported a number of specific proposals but expressed disappointment about the 8+ year diversion of the coast path.	Further engagement on these issues will take place before the proposals are finalised.

Common Land

	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
County and District Councils		
71	CBC stated that a separate application to the Secretary of State would be required to deregister a piece of land as 'Common Land', requiring further consultation. It also requested that the proposals should complement mitigation plans.	The de-registration process and securing new land as Common Land can be achieved through the DCO application and eventual DCO (should it be made). NuGen intends to use the DCO for this process, which the Stage Two Consultation material made clear.
72	CC stated that the land transfer would have to be supported by a maintenance subsidy.	These comments have been noted and will be taken into account.
Statutory, Prescribed and Key Organisational Consultees		
73	Natural England (NE) stated that replacement common land does not automatically replace public rights of way to common land in the vicinity, which needs to be taken into account.	This issue will be taken into account when drafting the DCO to ensure suitable provision is made.

Site Preparation TCPA Application(s) to Copeland BC

#	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
Parish Councils		
74	Egremont Town Council stated that the Town Council would be likely to support an application.	This support has been noted.
75	Millom Without Parish Council stated that commitment to reinstatement is required before a future planning application.	Should NuGen proceed with advanced site preparation and seek approval for early works through an application to Copeland BC, it would be subject to an agreement that if the full project did not proceed reinstatement of the previous condition would be required.
County and District Councils		
76	CBC stated that any application would have to be considered on its own merits, and would require its own consultation and EIA.	This comment has been noted.
77	CCC stated that it believed an application was required and should dovetail with the DCO application. It also suggested that NuGen should demonstrate how an application would accord with the local policy framework.	This comment has been noted.

Benefits and Legacy that NuGen Wants to Leave

#	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
Parish Councils		
78	Desire to see wider reaching benefits / include communities to the south - this included expression of disappointment from a number of councils that their area has not been included.	<p>The Moorside Project is a multi-billion-pound inward investment that will create more than a thousand, high quality long-term jobs, and many thousands more jobs during the construction period. These, in turn, will create a wave of spending through the locality that adds many further jobs to the local economy. NuGen will make a considerable investment in up skilling local people carry out the jobs being created.</p> <p>These benefits will extend over a wide area including all of Cumbria.</p> <p>In addition to these clear and obvious benefits, NuGen is committed to maximising the local benefit of everything it does particularly the huge investment that will occur during the construction phase. A large part of that investment will create transport infrastructure improvements to cater for Moorside's short-term requirements but will provide long-term benefits for the community.</p> <p>In addition to this, NuGen is keen to maximise benefits in a wide range of areas and has set out the ways in which it proposes to provide legacy and benefits in its DCO Stage Two Consultation proposals. NuGen is preparing a legacy strategy to make clear its intentions in relation to maximising benefit and guide the actions it develops.</p> <p>The full extent of these benefits has not been determined at this stage in the project evolution.</p> <p>NuGen has expressed its commitment to entering into a Section 106 legal agreement which will provide a basis for its local support across a wide range of activities through the necessary mitigation required for the Moorside Project.</p>

#	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
79	Comments welcomed and requested greater education and skills support, and for this to be delivered as soon as possible (4). There were also specific calls to see improvements to community facilities (3).	<p>NuGen will make a considerable investment in up-skilling local people to carry out the jobs being created. NuGen is already working with local schools.</p> <p>It is important that the necessary training is timed to align with the programme for employing people locally. It would be undesirable for training to be completed too far in advance of job opportunities becoming available. NuGen is committed to employing as many local people as possible.</p>
80	There were also a number of highly specific suggestions including sites for redevelopment and suggested methods of supporting the community.	<p>In addition to identifying benefits for the local main population centres, NuGen's Stage Two Consultation made it clear that specific proposals are being developed for the local communities immediately adjacent to the Moorside Site and the Accommodation Sites, and the closest main local population and service centres. The communities adjoining the Moorside Site and Accommodation Sites are:</p> <ul style="list-style-type: none"> • Beckermeth and Braystones; • Mirehouse; • Corkickle; and • Egremont <p>NuGen is grateful for the large number of suggestions made and will give consideration to them all when it develops proposals for the local community.</p>
County and District Councils		
81	ABC welcomed the statements related to legacy, maximising local employment and business opportunities, but stated there was a lack of detail in order to properly assess their suitability.	Further detail will be developed as the Moorside Project moves forward.
82	Carlisle CC stated that it was important for local skills and businesses to be the forefront of plans.	NuGen is committed to working with partners to maximise the employment of local people and assist local businesses prepare for the opportunities that will arise.

#	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
83	CBC stated that the level of detail was not sufficiently progressed in order to comment fully. They expressed disappointment at the absence of proposals for wider community benefits.	As the Moorside Project moves forward, more detail will be available. NuGen will also engage in detailed discussions with the relevant local authorities over mitigation and any future benefits.
84	CCC prepared detailed comments on maximising the project legacy for Cumbria. This includes a recognition of the economic benefits of the project and an expectation of legacy benefits. It expressed concerned about the lack of detail and the lack/limit of infrastructure proposals.	CCC will be engaged in future discussions on the development of the legacy benefit package. Please also see the response to issue 83.
Non-Statutory Bodies		
85	Cumbria Action: This group criticised the focus on the current benefits package focusing on larger settlements in the region, and suggests that NuGen expand their package to support rural communities.	The benefits of the Moorside Project will be felt far and wide in Cumbria including smaller rural settlements. In its Stage Two Consultation, NuGen set out some priorities that included communities close to the various areas of development required for the Moorside Project. NuGen will always be interested to hear about particular initiatives in rural area that fit in with NuGen's community support strategy at any given time.
86	RAM was sceptical about the value of the benefits and legacy proposed by NuGen. This is partially due a perceived lack of ability for the benefits to deliver what Beckermets needs, which would primarily be only for Moorside's employees. Services were highlighted as an area that needed investment - specifically around health and transport.	NuGen has identified, health, transport and Beckermets as priority area for directing mitigation and any community benefits and NuGen community investment.
87	RAM thought that benefits need to be personal, and discussed in detail with local residents. Community cohesion was praised as an ideal but one that required significant investment.	NuGen will direct benefits at community needs as discussed previously. However, the most important personal benefits will come in the form of employment and training opportunities. Personal circumstances will also be taken into account in the administration of the proposed Voluntary Property Support Scheme for the area close to the Moorside Site.

#	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
88	RAM understood the potential supply chain benefits, but felt that there should be clarity on how NuGen will ensure that actually benefits the local supply chain. There was a similar concern about employment, wishing to see how locals would be able to benefit.	<p>NuGen will work with partners and industry bodies to promote the development of existing businesses in the local communities so that they are aware of, and prepared to compete for, opportunities to supply services to NuGen, and to promote opportunities for new business ventures to be based locally to support the Moorside Project.</p> <p>Employment: NuGen's objective is to maximise employment opportunities for local people and will develop a Skills and Employment Strategy. Specific opportunities will be identified for local community residents for suitable jobs at the adjacent Accommodation Sites and the Moorside Site, with NuGen publicising opportunities clearly and accessibly. NuGen will consider, based on expert evidence about the numbers of workers that can be recruited locally, targets for local employment, subject to legal advice.</p> <p>Advanced notification of job specifications and training requirements and assistance with training programmes will be provided.</p>

How NuGen's Design for the Moorside Project has Evolved

#	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
Parish Councils		
89	Beckermeth with Thornhill Parish felt the justification for the location of reactors is not clear.	Please see the response to issue 1.
90	Egremont Town Council commented that it would like to see the rationale for the site design, including long term closures, or not, of Sellafield Road, location of substation, etc.	The DCO application will contain the alternatives that NuGen considered throughout its design, assessment and consultation process.

#	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
91	Askam and Ireleth Parish Council expressed disappointment that issues previously discussed were discounted during meetings.	Whilst NuGen fully understands the parking situation near Askham Station, it was felt that, as a result of the transport and accommodation strategies being adopted by NuGen, there was not a case for providing a dedicated NuGen parking facility at Askam and Ireleth. The current problem related to Sellafield-generated traffic and parking charge policy in Barrow and would need to be resolved through their processes. The provision of a private NuGen parking facility was not needed and would not resolve the local problem.
92	Duddon Parish Council welcomed the thought that had gone into parts of the plans.	NuGen appreciates DPC's positive comments.
County and District		
93	CBC raised a number of detailed comments in relation to national policy. It also noted the Principal Search Criteria but stated legacy propositions should be considered over a wider area.	Comment noted and will be taken into account as the Moorside Project is developed.
Non-Statutory Organisations		
94	RAM expressed surprise about the significant change to the project proposals since Stage 1 consultation. The significantly increased impact on Beckermeth of the revised plans was highlighted.	The Stage One Consultation, in summer 2015, was a Strategic Issues consultation. Detailed layouts were not available at the time. The plans included the boundary of the Moorside Site that had already been allocated in National Policy. This boundary has not changed and will contain the Moorside Nuclear Power Station. In addition, the plans indicated search areas that would be considered for Associated Development including temporary construction activities and species relocation. The Stage Two Consultation provided more detail of site layouts and building envelopes, including heights and massing, and landscaped mounding proposals.

Landscape Strategy

	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
Parish Councils		
95	There were suggestions to meet with local residents to discuss the specifics of the plan and that alternatives should be considered. It was felt that various important views should be protected as much as possible.	This comment has been noted. NuGen intends to engage local stakeholders in considering the detailed landscape options in a future design phase and will have regard to these suggestions.
96	There were a number of other concerns including opposition to the section that necessitates closing Nursery Road and seeking assurances that the mounding is not creating permanent scar for the sake of cost / convenience.	See the response to issue 4. NuGen has examined extensively the option of taking spoil off the site. Unfortunately, studies have shown that there are no alternative locations that could receive excavated material from the Moorside Site and that the implications of transporting the volume of material involved would have unacceptable environmental impacts.
County and District Councils		
97	CBC and CCC requested more detail on the mounding strategy and design.	This comment has been noted. Work on mound design is continuing Any design changes will be the subject a future consultation.
98	CCC highlighted the lack of information about the MOLF and requested alternative options.	The extent of any railway infrastructure, MOLF and beach infrastructure is dependent on the outcome of the strategic review. Following which, NuGen will develop its proposals for rail and marine infrastructure, and present the proposed solutions at any future consultation.
Statutory, Prescribed and Key Organisational Consultees		
99	Cumbria Constabulary expressed concern that the main site mounding could interfere with police communication systems.	This comment has been noted. Further discussions will take place with Cumbria Constabulary on the design of the mounds.
Non-Statutory Organisations		
100	RAM expressed scepticism regarding the environmental / landscape benefit of mounding. RAM expects to be consulted on the final proposals with a clearer indication of how it can protect the village.	Please see the response to issue 96.

Land and Property

	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
Parish Councils		
101	Beckermest and Thornhill Parish Council raised a number of detailed comments on the property support scheme and on the rights and loss of property value experienced by people living in Beckermest. Suggestions include that people forced to move are compensated for fees and costs, that a 'sell and rent' option should be employed, that people staying in the village are compensated, that the cut-off date be extended, and that people retain their right to enter into individual negotiations.	NuGen notes the comments made on the proposed voluntary support scheme and will consider the suggestions.
102	Egremont Town Council also stated that the process must be transparent and robust, and that community members are to be closely consulted on mitigation.	NuGen notes the comments and agrees.
103	CBC stated that it is yet to be consulted with regarding section 106 obligations and reiterated that it was important to consult with affected landowners. It stated that compulsory purchases should be treated as a last resort, as it was by EDF in relation to the Hinkley Point C project.	NuGen has commenced discussions with CBC over the section 106 agreement, and will continue these discussions throughout the pre-application and post submission stages. NuGen has, and will continue to, consult with affected landowners in order to seek voluntary agreements over land required.
County and District Councils		
104	Cumbria County Council believes the property support scheme should not be a substitute for other mitigation. It questions the 2008 reference date and suggests two valuations rather than one before determining the valuation.	See the response to issue 95.
Statutory, Prescribed and Key Organisational Consultees		
105	NDA and Network Rail requested full details of any land acquisition from the proposals as it may affect their operations in the area.	NuGen is in discussions with the NDA and Network Rail over any land acquisition requirements.
Non-Statutory Organisations		
106	RAM makes a number of highlighted criticisms of and suggestions regarding NuGen's current land and property proposals.	NuGen notes the comments made on the proposed voluntary support scheme and will consider the suggestions.

Health and Impacts

#	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
Parish Councils		
107	Concern about the impact on residents including quality of life, access to services, health and socio-economic concerns. Beckermet and Thornhill Parish Council raises specific concerns related to the construction phase including proximity, hours and timescales. The Parish Council criticises the lack of detail provided on these issues.	NuGen will undertake an environmental impact assessment, which involves collation of a wealth of baseline information and an assessment of the development proposals. This information will be used to inform project design by embedding mitigation where possible which seeks to minimise significant adverse effects. Where the removal of adverse effects cannot be embedded into the design of the Moorside Project itself, NuGen will implement mitigation measures wherever possible. As the project goes forward more detailed assessments and mitigation proposals will be available for consideration.
108	Bootle Parish Council and Cleator Moor Town Council raised specific concerns regarding the impact on assets supporting tourism.	Please see the response to issue 107.
109	Millom Parish Council was keen that local needs are not sacrificed for the national need. They also raised that without a Health Impact Assessment, they were not able to provide comment.	The Moorside Project meets national needs in terms of energy provision and local needs in terms of its positive impact on the local economy. Whilst the allocation of the Moorside Site is already determined at a national level, NuGen's objective is to deliver a viable project in a way that best meets local needs and provides the greatest local benefit. There will be further opportunities to comment on the finding of the Health Impact assessment when it is complete.
110	Weddicar Parish Council raised concerns related to the cumulative impact of multiple projects going on in their area.	NuGen has liaised with the other developers that have major plans for Cumbria throughout the project development process. Cumulative impacts are being considered especially in relation to traffic and transport issues.
County and District Councils		
111	ABC expressed concern that the HIA is lagging behind other work, limiting the opportunity to comment.	There will be further opportunities to comment on the finding of the Health Impact assessment when it is complete.
112	Carlisle CC stated that it was important to avoid impacting on tourism	Please see the response to issue 107.

#	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
113	CBC highlighted the lack of information, including a progressed HIA, as a limit in providing its feedback. CBC welcomed NuGen's commitment to invest in recreational facilities, new cycle and footpaths, and maximising support for local health care providers.	Please see the response to issues 107 and 111.
Statutory, Prescribed and Key Organisational Consultees		
114	Cumbria Constabulary raised a concern about a lack of mitigation measures for pressures on police resources. It also raised concerns about protests, communications, traffic incidents, offshore issues and community fears.	Further discussions will take place on community safety issues before the project proposals are finalised.
115	Lake District National Park Authority was concerned about the impact on tourism particularly the effects for users of the high fells and for the local housing market within the National Park.	<p>These comments have been noted. NuGen is aware of the environment in which the Moorside Project sits and the need for a good standard of design. Therefore, NuGen has engaged with master planners to optimise design.</p> <p>The Environmental Impact Assessment will include a visual impact assessment, the preliminary results of which have already been consulted on and, if anything changes, will be the subject of further consultation.</p> <p>NuGen's accommodation strategy seeks to manage housing demand. However, NuGen recognises that the boost in the economy as a result of the Moorside Project will contribute to housing demand overall and NuGen will work with all relevant stakeholders to minimise this impact.</p>
116	The NHS raised concerns about the pressure of additional workers on existing services but suggested that Public Health England may be best placed to engage in detailed discussions.	NuGen is aware of this issue and is carrying out a Health Impact Assessment that will inform NuGen's approach.

#	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
117	NHS Cumbria and the North East (on behalf of Local Health Resilience Partnership) also expressed concerns about the pressures of additional workers on a range of health services. It also requested demographic projections about the construction workforce and operational workforce to support its planning. It also requested discussions regarding emergency planning.	<p>NuGen continues to refine its projections on worker numbers and make-up. Some degree of flexibility will also need to be built into plans to allow for variance.</p> <p>NuGen has been engaging with the relevant bodies who have emergency planning responsibilities in devising its Emergency Plan.</p> <p>Please also see the response to issue 116.</p>
118	NHS Transport Enabling Group for West, North & East Cumbria (WNEC) Success Regime requested a joined-up approach to transport planning across Cumbria. In addition, they noted the challenge for those reliant on public transport to access health services.	NuGen regularly liaises with other transport bodies and other developers with Cumbrian plans to ensure a joined-up approach but is always open to suggestions as to how working arrangements can be improved.
Non-Statutory Organisations		
119	RAM believes that large numbers of residents will move away from the area because of the impacts. RAM wishes to see more detailed modelling and mitigation proposals.	NuGen is continuing its design and assessment of the Moorside Project, taking into account technology and business requirements, health and safety, regulatory and environmental impacts and the local population. As the Moorside Project moves into its next phase post the strategic review, NuGen will provide an update on the project and another opportunity for consultation.

Other Comments

#	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
Parish Councils		
120	Beckermet with Thornhill Parish Council raised a series of specific questions and comments about the Preliminary Environmental Impact Report and flood risk.	Liaison has taken place with Beckermet Parish Council about the approach to flood Risk. The flood risk assessment will be completed and provided as part of the DCO application for examination.

#	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
121	Three parishes had concerns around evacuation and emergency plans.	<p>NuGen will ensure that it has robust plans for dealing with all safety issues including emergency preparedness. NuGen will have plans to deal with any emergency planning issues arising from the proximity to Sellafield. In due course, NuGen will also have agreed plans for requirements arising from Moorside's prospective status as a nuclear licenced site.</p> <p>These plans will be agreed with relevant key stakeholders and regulators - they are not planning matters for the DCO application.</p>
County and District Councils		
122	ABC and CCC made a large number of detailed comments in relation to the PIER, covering a broad range of topics. In general, its responses focus on identifying that need further information before they can provide a full response. Concerns was raised in relation to a number of issues about the level of detail or rationale available and the need for underpinning information in a number of areas before they could properly comment. These included EIA assessments, workforce profiles, mitigation plans, detail on legacy and benefits, traffic and transport etc.	The comments have been noted. Further work is being carried out and the information will be available as the Moorside Project moves forward.
123	ABC, CBC and CCC requested a further round of consultation to cover a number of issues including transport modelling and strategy, the Port of Workington's role, all rail infrastructure improvements, skills and employment plans, section 106 details, the MOLF, community benefit packages, and other topics. CCC also included a number of further groups it believes that NuGen should consult with.	NuGen intends to have another round of consultation that will cover the issues raised.
Statutory, Prescribed and Key Organisational Consultees		
124	Cumbria Constabulary raised a concern about housing additional staff during (scheduled) operational outages.	Concerns have been noted.
125	The Environment Agency provided detailed comments on each of the consultation documents. The response outlined the information that is required.	These comments have been noted.

#	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
126	Highways England stated it was not able to support the project until the transport assessments have been completed and further consultation has taken place.	HE comments have been noted.
127	Historic England, Lake District National Park Authority, and the National Trust note the that Lake District has been nominated for UNESCO World Heritage Site, and that this will be considered in June/July 2017. As such, the area should be treated as a World Heritage Site. The organisations expressed concern that the ICOMOS methodology has not been followed.	NuGen is aware that the Lake District National Park has been designated a UNESCO World Heritage Site. The landscape and visual assessment in the environmental impact assessment already assumed that this designation would occur during the consenting lifecycle of the Moorside Project.
128	Lake District National Park Authority believes the project should be considered cumulatively with the pylons and existing facility at Sellafield. It also requested further visualisations to aid assessment.	Sellafield forms part of the assessment baseline, and is therefore included in the assessment. National Grid's proposed connection will be included in the cumulative assessment.
129	The Marine Management Organisation provided a response to the chapters relevant to its remit in the Preliminary Environmental Information Report. More assessment is required before MMO can accept NuGen's conclusions.	This comment has been noted. The additional work will be scheduled as the project moves forward.
130	National Trust requested more information, particularly in relation to visual impacts asking for photo-montages. Also concerned about freshwater supplies not being resolved.	The requests are noted and will be taken into account as the project moves forward.
131	Public Health England raised a number of concerns and issues about potential hazards and emissions, and their impact on the project and people. Public Health England also stated it expected to see more information on a number of issues including waste disposal and emissions.	NuGen will undertake appropriate and necessary radiological exposure assessments and any atmospheric and marine discharges would be within acceptable limits, under a permit as granted and regulated by the Environment Agency.
132	Scottish Natural Heritage commented on the potential impact on the Solway Firth.	Please see the response to issue 131.
133	The Coal Authority prefers that remaining shallow coal is removed before developments go ahead. It also stated that any site investigation or intrusive activities will need its authorisation.	This comment has been noted. NuGen will have regard to these comments as the project moves forward.

#	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
134	The NDA has provided comments on range of issues including land, infrastructure, utilities and working arrangements that need to be considered as the project moves forward. They are also keen to understand emergency management plans and made comments in relation to the potential supply chain and human resource benefits that the project can deliver.	The issues raised will be considered as the project moves forward.
135	United Utilities advised on the order of priority for drainage options.	Comments noted and will be taken into account.
Non-Statutory Bodies		
136	Cumbria Wildlife Trust made a number of specific comments and observations regarding the Preliminary Environmental Impact Report, including the lack of assessment of cumulative effects. The Trust also stated that there are number of additional factors that should be considered or addressed.	Comments noted and will be taken into account.
137	The Duddon Estuary Partnership raised a number of concerns about the project but were generally positive about the proposals.	Comments noted and will be taken into account.
138	Friends of the Lake District is concerned about the cumulative impact of the project and the North West Coast Connections project, and that this needed to be accounted for in mitigation proposals. They also felt that there was a lack of detail in the consultation.	National Grid's proposed connection will be included in the cumulative assessment.
139	At present, RAM does not support NuGen's proposals. RAM expects to see more detail on environment issues in 2017. It also raises concerns around emergency planning and safety.	The maturity of the Moorside Project will continue to be enhanced as project development progresses. NuGen will ensure that it has robust plans for dealing with all safety issues including emergency preparedness. NuGen will have plans as an employer with a duty of care to deal with any emergency planning issues arising from the proximity to Sellafield. In due course, NuGen will also have agreed plans for requirements arising from Moorside's own status as a nuclear licenced site. These plans will be agreed with relevant key stakeholders and regulators, but these are not matters for the DCO application.

#	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
140	West Cumbria Site Stakeholder Group feels there should be more consideration of skills and supply chain issues which will affect other local nuclear sites as well.	Comments noted and will be taken into account. NuGen will develop the approach to supply chain in line with the timescale for the project.
County & Districts		
141	ABC, CBC and CCC requested a further round of consultation to cover a number of issues including transport modelling and strategy, the Port of Workington's role, all rail infrastructure improvements, skills and employment plans, section 106 details, MOLF, community benefit packages, and other topics	NuGen intends to have another round of consultation that will cover the issues raised.

Consultation

#	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
Parish Councils		
142	There were a significant number of requests for further information on various issues.	More detail on various issues will be available as the project moves forward.
Statutory, Prescribed and Key Organisational Consultees		
143	Cumbria Constabulary, Environment Agency, Highways England, Lake District National Park, Marine Management Organisation, National Trust, Natural England, NDA, NHS, NHS - Cumbria and the North East (on behalf of Local Health Resilience Partnership), Public Health England, Scottish Natural Heritage, SEPA, and United Utilities all either requested a further stage of consultation or stated that there was currently not enough information for them to fully inform their views.	NuGen intends to have another round of consultation that will include the issues raised.
Non-Statutory Bodies		
144	Cumbria Local Economic Partnership (LEP) made a number comments and suggestions about maximising the potential benefits of the project and were generally supportive of the proposals. The LEP however felt that more detail should be provided on some issues and further consultation carried out.	NuGen intends to have another round of consultation that will include the issues raised.

#	Summarised issue	NuGen preliminary comment, subject to outcome of the strategic review and iterative design process
145	RAM believes there are significant key areas of information not available during Stage 2 consultation.	NuGen intends to have another round of consultation that will include the issues raised.