



Stage 2 Consultation Strategy

NU'GEN



Contents

1. Introduction	3
1.1. Background	3
1.2. Strategic objectives	3
1.3. Project context.....	4
2. Section 42 – Duty to consult	6
2.1. Requirements.....	6
2.2. How NuGen is proposing to consult under s42?	6
3. Section 47 – Duty to consult local community	8
3.1. Requirements.....	8
3.2. Statement of Community Consultation	9
3.3. Lessons learned from Stage 1 Consultation.....	9
3.4. Definition of ‘local’ community.....	10
3.5. Hard to Reach groups.....	11
3.6. Young people	16
3.7. Additional representatives.....	17
4. Section 48 – Duty to publicise.....	18
4.1. Requirements.....	18
4.2. How NuGen is proposing to consult under s48	18
5. Section 49 – Duty to take account of responses to consultation and publicity	19
5.1. Requirements.....	
5.2. Regard to relevant responses	20

1. Introduction

1.1. Background

NuGeneration Limited (NuGen), supported by its parent companies, is currently working on the 'Moorside Project' including detailed plans for constructing and operating a new nuclear power station which, when operational, will be called the 'Moorside Power Station'. This will be located on land (referred to in this document as the site), which is to the west and north of the existing Sellafield Site, in Cumbria.

The land for the future Moorside Power Station has been identified by the Government in a national policy statement as potentially suitable for a new nuclear power station. As the Moorside Project is a nationally significant infrastructure project, NuGen will need to make an application to the Secretary of State for Energy and Climate Change (referred to in this document as Secretary of State) for permission to build the power station, known as a Development Consent Order (DCO), as defined in the Planning Act 2008 (the 'Act').

Before a DCO application is made, NuGen is required to consult with those living in the vicinity of the land proposed for development (under Section 47 of the Act), statutory consultees such as key local authorities, persons with an interest in the land and prescribed statutory bodies (under Section 42 of the Act), as well as publicising our proposed application nationally (under Section 48 of the Act).

NuGen's consultation process involves two formal stages.

- Stage 1 – Strategic Issues Consultation which was carried out in May to July 2015
- Stage 2 – Proposed Scheme Consultation which will run from May 2016 to July 2016

The two stages of consultation will help to shape the Moorside Project prior to the DCO application being submitted in April 2017.

This document provides the context for the second stage of consultation, how this aligns with our strategic objectives for consultation, and provides details of how the consultation will be implemented.

This document provides a context for the information presented in the Statement of Community Consultation (SoCC).

This consultation strategy is subject to ongoing development as NuGen's experience of the project, feedback from consultees and experience of the success of delivery of these consultation processes locally.

1.2. Strategic objectives

NuGen aspires to engage positively with stakeholders and communities. NuGen understands the importance and value in involving stakeholders and communities effectively in our work and recognise the benefits of doing so. In order to achieve this we have set ourselves overarching objectives for the Stage 2 Consultation.

NuGen will seek to:

General objectives

- I. Ensure that the requirements of the Act are met, specifically sections 37, 42-49 as relate to pre-application consultation.
- II. Ensure that best practice identified in DCO Guidance is followed. This guidance can be found here: <http://tinyurl.com/jbgqa8r>

Approach to consultation

- III. Recognise the positive contribution consultees can make towards the project, including the identification of way the project could (without unreasonable cost), contribute to the strategic objectives of host communities and authorities.
- IV. Respect that local expertise, knowledge and experience may challenge various technical and environmental studies
- V. Make information available through a number of methods, to increase ease of access for the communities engaged.
- VI. Ensure that information is provided at different levels of detail in order to enable consultees to engage at the level they find appropriate.
- VII. Offer appropriate and convenient methods of providing feedback to help make it easy for consultees to respond to the consultation.
- VIII. Take reasonable steps to engage Hard to Reach Groups.

After consultation

- IX. Before submitting an application for a DCO, publish the findings of consultations.
- X. Respect that engagement and communications with communities does not end with the statutory pre-application consultation under the Act. NuGen will continue to communicate with local stakeholders throughout the lifespan of the application and subsequent project.

1.3. Project context

An overview of the proposed Moorside project can be found in the update Stage 2 SoCC. This section of the Consultation Strategy provides additional context to the project which we have taken into account when developing our approach to Stage 2 Consultation.

Our plans for consulting people in the vicinity have been developed with consideration to the local context in West Cumbria, and Cumbria as a whole. Cumbria is a geographically large county with a relatively small dispersed population. Physically it is dominated by its mountainous centre, which is recognised for its environmental and landscape quality by its designation as the Lake District National Park and the importance of the tourism economy in its area.

This feature has a large influence on the functional areas of the county. The site sits on the coast in West Cumbria in the western extremity of the county. West Cumbria forms a coastal strip between the central highland core and the sea. Its transport links have developed north-south along the

coastal strip and its economic and social links reflect this. The coastal strip has historically a higher concentration of industrial activity, which has included shipping, coal, iron and steel, chemicals and more recently the nuclear industry. This activity was supported by sea based transport. The functional area of West Cumbria includes Copeland and Allerdale Borough Council areas. Barrow to the south has a similar industrial background but is geographically separated by the Duddon Estuary.

Data from the Cumbria Intelligence Observatory indicates that international inward migration has had little impact on the character of the West Cumbrian and Cumbrian communities. 96% of Cumbrian residents and 97% of West Cumbrian residents were born in the UK compared to 86% of UK residents.

There has been a trend of young people leaving the area to develop their careers and, compared to the national average, West Cumbria has a lower proportion of people in the age range 0-44, a higher proportion of people in the age range 45-84, and a similar number of people in the 85 and over category.

Acorn statistics show that the greatest proportion of Cumbria's residents (35.5%) live in 'Comfortable Communities'; this is much higher than the national average. The second greatest proportion of Cumbria's residents (29.1%) lives in 'Financially Stretched' areas; again, this is higher than the national average.

Acorn statistics also show that there are concentrations of people in 'urban adversity' in the main towns in West Cumbria. The population scarcity and poor transport and broadband facilities in more rural parts of the area means that some of the population is remote from services and information. A recent survey on attitudes to infrastructure revealed that 50% of employed people are 'fairly interested' in getting involved in discussions about planning in their local area, however experience that this category tends to reflect those who are interested to hear about developments and plans locally but may not wish to engage in formal discussions.

Direct mail/letters were cited in the survey as the preferred method of keeping people informed about infrastructure projects (47%) followed by articles in local newspapers (41%) and a specific project website (38%).

This data has helped us shape the Stage 2 consultation with the community by focusing activity on identified deprived communities, unemployed people, time-poor people and by utilising a variety of engagement methods.

2. Section 42 – Duty to consult

2.1. Requirements

Section 42(1) of the Act states;

42. Duty to consult

The applicant must consult the following about the proposed application—

(a) such persons as may be prescribed,

(aa) The Marine Management Organisation, in any case where the proposed development would affect, or would be likely to affect, any of the areas specified in subsection (2)

(b) each local authority that is within section 43,

(c) the Greater London Authority if the land is in Greater London, and

(d) each person who is within one or more of the categories set out in section 44

For the purposes of section 42(1)(a) of the Act, the persons prescribed are those listed in Schedule 1 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009.

Section 42(1)(b) local authorities are defined as those within which the land to which the proposed development relates is located (referred to as section 43(1) local authorities). It also includes those local authorities that share a boundary with that authority (referred to as section 43(2) local authorities). The Localism Act 2011 brought in changes to the Act which included the addition of section 43(2)(A) relating to upper tier and lower tier district council.

Section 42(1)(d) persons within section 44 of the Act are those persons who own, lease, tenant or occupy land to which the proposed development relates. It also includes those persons that are interested in the land or have power to sell and convey the land or to release the land. The third category is those persons entitled to make a relevant claim if the Order sought by the proposed development were to be made and fully implemented.

NuGen will need to notify consultees under s42 the deadline for receipt of comments to the consultation. This must be a minimum of 28 days, commencing on the day after the day on which the person receives the consultation documents. Consultation material must also be supplied to the person by NuGen for the purposes of the consultation. These requirements are set out in s45 of the Act.

Section 46

In addition to consultation under section 42, NuGen is required to notify the Secretary of State (SoS) of the application under section 46 of the Act. This must be done on or before start consultation under s42 and the SoS must be supplied with the same information as is being consulted on.

2.2. How NuGen is proposing to consult under s42?

Local authorities

Under the Planning Act 2008, NuGen has a duty to consult with local authorities directly affected by its proposals. For the Moorside project this includes the following Copeland Borough Council – the site is in Copeland and ‘Associated Development’ may also take place there

- Allerdale Borough Council – ‘Associated Development’ may also take place in Allerdale

- Cumbria County Council – the site and any ‘Associated Development’ would be located within Cumbria
- Eden District Council – ‘Associated Development’ may take place in Eden
- Barrow Borough Council – ‘Associated Development’ may also take place in Barrow
- Carlisle City Council – ‘Associated Development’ may also take place in Carlisle.

From the outset of the project we have worked with these affected local authorities to support the development of our project before its submission to the Planning Inspectorate. NuGen has signed a Planning Performance Agreement (PPA) with the local authority’s areas in which the development is proposed, Copeland Borough Council and Cumbria County Council. Planning Performance Agreements are a means by which local planning authorities affected by Nationally Significant Infrastructure Projects can participate and engage in a positive way with developers and reach a fully informed view on the local impacts of proposals. A PPA does not fetter the participating authorities in the view they take on the merits of a proposal. It does allow them however to be properly resourced to ensure the views and concerns of local communities are given voice within the planning process, which is essential given that the ultimate decision on the proposals will be made at a national level.

In addition we have agreed to support the resources required for the engagement and technical input from the adjoining authorities of Allerdale Borough Council, the Lake District National Park Planning Board and the Cumbria Association of Local Councils representing parish and town councils.

We recognise the key role that local authorities play in helping to develop our application. In addition to regular meetings with local authority officers, a number of other methods of engagement are being used on the NuGen Project.

The Moorside Technical Group (MTG) has been set up by NuGen to bring together key technical, planning and operations stakeholders in an effective, productive and collaborative multi-party working environment to ensure that they are fully informed about the Moorside project and able to inform NuGen’s choices over aspects of the engagement process and proposed developments. MTG members are nominated representatives of statutory and non-statutory organisations and groups with a demonstrable interest in an issue or issues within the scope of the MTG. In addition there are four streams of engagement and work that feed into the MTG. These are transport, EIA, sites, and skills and supply chain. Each of these has their own informal working arrangements.

Parish councils

As representatives of local communities potentially impacted by our proposals it is important that we engage and consult with all parish councils within the Consultation Zone. However, it is also a statutory requirement for NuGen to consult these bodies. Representatives of parish councils closest to the Moorside site, and of Cumbria Association of Local Councils, are also invited to attend MTG meetings.

We will ensure all parish councils and the Cumbria Association of Local Councils are consulted at Stage 2 of the project.

Landowners

Section 44 of the Act sets out various categories of people with an interest in land (PILs) who need to be consulted on our proposals. NuGen has carried out a detailed land referencing process to identify the PILs who may be directly affected by the proposed development. This includes not only owners,

but also tenants, occupiers and mortgagees, or anyone who exercises rights over the land in question, such as private rights of way or sporting rights.

PILs will be contacted in order to make them aware of the project and its implications, and ensure that they understand their rights and role in the ongoing process. This will include supplying them with copies of all the documents available during Stage 2 Consultation.

Statutory consultees

Section 42 of the Planning Act 2008 requires ‘promoters’ of NSIPs to consult with a range of statutory bodies and organisations. We will ensure all relevant bodies are consulted as part of Stage 2 Consultation. It should be noted that there is an overlap between statutory consultees and the public. For example councillors at local authority and parish levels (by being part of their respective councils) are statutory consultees but also (by virtue of representing local people) intrinsically linked to the public. Therefore some activities undertaken as part of public consultation will include statutory consultees.

Statutory consultation

To ensure fulfilment of the requirements of the Act each stakeholder identified under Section 42 of the Act will receive an information pack before the start of consultation on 13 May 2016. This pack will include a summary document and a USB/DVD containing all of the documents for Stage 2 consultation.

This pack will be sent to consultees using the Royal Mail’s “Trace & Trace” service.

3. Section 47 – Duty to consult local community

3.1. Requirements

Section 47 of the Act states;

47. Duty to consult local community

(1)The applicant must prepare a statement setting out how the applicant proposes to consult, about the proposed application, people living in the vicinity of the land.

(2)Before preparing the statement, the applicant must consult each local authority that is within section 43(1) about what is to be in the statement.

(3)The deadline for the receipt by the applicant of a local authority's response to consultation under subsection (2) is the end of the period of 28 days that begins with the day after the day on which the local authority receives the consultation documents.

(4)In subsection (3) “the consultation documents” means the documents supplied to the local authority by the applicant for the purpose of consulting the local authority under subsection (2).

(5)In preparing the statement, the applicant must have regard to any response to consultation under subsection (2) that is received by the applicant before the deadline imposed by subsection (3).

(6)Once the applicant has prepared the statement, the applicant must —

(za) make the statement available for inspection by the public in a way that is reasonably convenient for people living in the vicinity of the land;

(a) publish in a newspaper circulating in the vicinity of the land a notice stating where and when the statement can be inspected, and

(b) publish the statement in such manner as may be prescribed.

(7)The applicant must carry out consultation in accordance with the proposals set out in the statement.

3.2. Statement of Community Consultation

This consultation strategy support NuGen’s Statement of Community Consultation for the Stage 2 consultation. This SoCC will fulfil requirements set out in Section 47 above, along with all supporting guidance and advice.

We published a SoCC for the Stage 1 Consultation in May 2015. We reviewed and updated this document ahead of the Stage 2 Consultation. In developing our updated SoCC we have taken account of our consultation principles and Government guidance which encourages early consultation with local authorities on the content of the SoCC prior to the period of formal consultation that is required by section 47(2) of the Planning Act 2008.

We informally consulted local authority officers on the updated SoCC on 12th Jan. The consultation draft SoCC was submitted to local authorities for statutory consultation on 5th February and responses have been requested by 7th March.

In addition to consultation with the local authorities, NuGen has refined its approach to consultation following Stage 1 consultation. This includes further developed approach to engaging with Hard to Reach groups (with a special consideration towards young people) and a refinement of who NuGen is engaging as the ‘local community’.

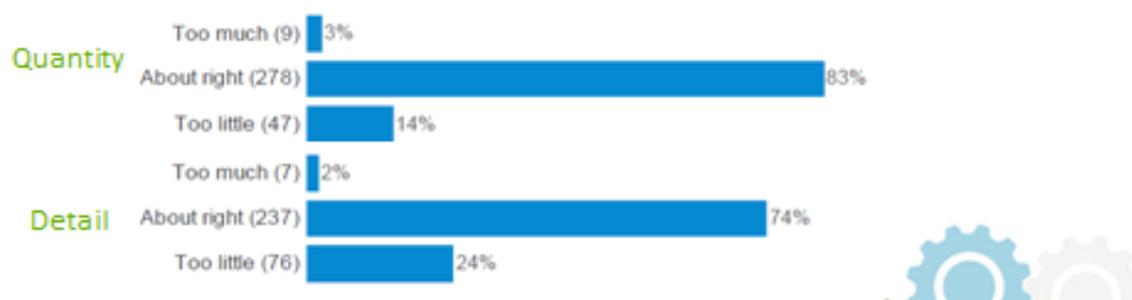
As required by section 47(6) of the Planning Act 2008, before undertaking section 47 consultation, adverts will be placed in local newspapers for two consecutive weeks advising of the publication of the SoCC and where it is available for inspection.

3.3. Lessons learned from Stage 1 Consultation

Our Stage 1 Consultation was generally well received by those who experienced it. We carried out 24 public events throughout Cumbria, received 1833 visitors and received 779 written responses. When asked whether they supported the development of a nuclear power station at Moorside, 73% of respondents said they did and 15% said they did not.

We included questions about the quality of the consultation itself. Of those people who responded to these questions a significant majority indicated that we had provided the right quantity of information and level of detail.

We asked: How did you find the quantity and detail of information provided during the consultation?



We also received a number of useful requests for consideration as part of the Stage 2 Consultation which included:

- Requests for locals to be kept better informed (17 responses)
- Requests for more detailed information (10)
- Requests for additional events – locations and types (10)
- Complaints about not receiving notification (9)
- Requests for more advertising (8)
- Requests for more engagement with parish councils (7)

Our Stage 1 Consultation therefore provided valuable information which we have used to make improvements for the Stage 2 Consultation. The detailed feedback received coupled with assessments carried out by NuGen itself, and the relevant local authorities identified a number of key areas where improvements to the consultation process can be made. These were:

- Aim more promotion and events at young people
- Aim more promotion and events at working People.
- Ensure better local signposting of the public events when they are taking place.
- Ensure that holiday home owners have more opportunities to engage in the consultation.
- Provide more very local promotion close to events themselves around the time they are occurring
- Increase the number of events and the length of the consultation period to facilitate this.

NuGen is keen to positively respond to these suggested improvements and has incorporated these into our proposals for the Stage 2 Consultation.

3.4. Definition of 'local' community

We are committed to consulting and engaging with people who live and work in the vicinity of our proposed developments. It is therefore important to ensure that any communications with local communities are both targeted and effective.

We recognise that the development will have the greatest impact on the people that live nearest to the Moorside Site and consequently they are likely to have the greatest interest in our proposals. However, this is a very large scale development with wide impacts and interest is likely to be widespread.

Near the Moorside Site, on the West Cumbrian coast, we will hold a number of public exhibitions. Locations have been selected so that the majority of people in Copeland will be within five miles of an event. We will hold public exhibitions at:

- Whitehaven
- Cleator Moor
- St Bees
- Egremont
- Beckermest
- Braystones
- Gosforth
- Seascale
- Bootle
- Ravenglass
- Distington
- Millom

Further out from the Moorside Site, we will hold further public exhibitions in larger population centres. These have been selected so that the majority of people in West Cumbria would be within eight miles of an event within the West Cumbria area:

- Workington
- Maryport
- Wigton
- Cockermouth
- Keswick
- Broughton in Furness
- Askham in Furness

To allow good access for working people we will also hold events specifically aimed at employees and students at a number of employment centres in West Cumbria, being:

- Sellafield
- Westlakes Science and Technology Park
- Lillyhall

In the wider sub-region, we will hold public exhibitions at the following key population centres:

- Carlisle
- Penrith
- Kendal
- Barrow in Furness

As the major population and economic centres in the sub-region these locations have better transport links so are accessible to many people who are interested in the proposals but not necessarily directly affected by them. We will therefore focus our consultation activities in these centres to cover the wider sub regional area.

3.5. Hard to Reach groups

‘Hard to reach groups’ are those groups within a community who, for a variety of reasons, are harder to engage and involve as part of the consultation process. NuGen has committed to ensuring their consultation is inclusive and everyone has an opportunity to understand the project and provide feedback.

This chapter sets out how Copper has engaged with hard to reach groups, in advance of Stage 2 Consultation, to seek their advice on how best to provide information on the project to the people they work with and represent. The feedback has been reviewed and each hard to reach category has a robust engagement technique to be implemented during consultation.

Process

Since the Stage 1 Consultation we have engaged with the local authorities about how best to ensure our consultation is inclusive, and to gain advice on the most appropriate methods and techniques for targeting 'hard to reach' individuals and groups. Hard to Reach groups within nine categories have been contacted by email, letter and telephone in order to establish how NuGen can more effectively engage with these groups.

Summary of contact:

Date	Type of correspondence	Number
07 January	Email sent	72
08 January	Letter sent	62
14 January	Letter sent	116
27/28 January	Phone calls – see section 6	87

Existing engagement methods

Many of NuGen's existing engagement methods are appropriate for supporting engagement with hard to reach groups. These methods are:

Plain English language: The newsletter and other correspondence will be written in clear and concise language to ensure groups can understand what is being proposed and why consultation is taking place.

Access: All meetings and events will take place in publicly accessible venues assessed for compliance with the Disability Discrimination Act. Meetings and events will take place at various times throughout the day and evening, and on different days of the week to ensure people have plenty of opportunity to visit at times convenient to them.

Posters: Posters advertising the events and the consultation will be sent to a range of different venues identified within the consultation zone, such as village halls, community centres, doctors' surgeries, job centre pluses etc.

Media coverage: NuGen will advertise the consultation in the media throughout the consultation period by issuing press releases to relevant local newspapers and publications.

Advertising: NuGen will place adverts in local newspapers and publications in the build-up to the start of the consultation period to promote the consultation.

Freephone number and Freepost address: A Freepost address and Freephone number will be publicised and operated throughout the consultation period. The phone line will be available between 09:00 and 17:00 during weekdays. Both the address and number will be published in all project documents and correspondence.

Newsletter mailing: The newsletter will be sent directly to people's homes in the Travel to Work Area and the addresses used will be taken from the most up to date Royal Mail Postcode Address File.

Document availability: Paper copies of documents and information will be available at the Moorside Information Centre, a permanent exhibition drop-in centre in Whitehaven town centre. The

documents will also be available on the project website and at the consultation events. Documents will also be placed in key local public locations including relevant Council Offices and Libraries.

Additional engagement methods

Alternative versions: We will offer the newsletter in alternative formats such as large print, Braille and Easy Read. NuGen will also prepare an audio recording of the newsletter as was available during the last stage consultation.

Alternative languages: Given the predominantly White British demographics of the area, translation of the newsletter into other languages will be considered as and when they are received.

Hard to Reach group categories

People in urban adversity: Using the Indices of Multiple Deprivation (IMD) the Cumbria Observatory found that: Copeland has five communities that rank within the 10% most deprived of areas in England; these communities are located in the wards Sandwith, Mirehouse, Harbour, Cleator Moor South and Frizington wards. Furthermore, one of Copeland's communities is classified as being within the 3% most deprived nationally (this community is located in the Sandwith ward). These groups can also be defined by those accessing council and charitable services addressing economic challenges and social deprivation.

Those without broadband: According to ONS statistics, there is significant overlap with lack of internet use and access with age. In 2014 28% of those over the age of 65 had never used the internet, and only 44% of those that had used it to find out information about goods and services. According to Think Broadband, broadband speeds are lower outside of Whitehaven, with the wards of Ennerdale and Distington having particularly low speeds.

Geographically isolated communities: Copeland has a population of approx. 70,000. Over half live in the towns of Whitehaven (23,810) Egremont (8,194) and Millom (7,829). The rest of the population lives in small towns and villages spread across the 282sq miles. There is no strict measure of geographic isolation, however those affected face issues of access to amenities, events, and services.

Young people: Those attending Schools, Colleges and Youth Clubs.

Older people: Those accessing local services for elderly care including; care homes, charities, local government programmes.

People with Disabilities: Defined under the Equality Act as people who have physical or mental conditions causing "substantial" and "long-term" (12 months or more) negative effect on their ability to do normal daily activities. The ONS includes people who self-define as disabled but do not fit the criteria of the Equality Act. At the last census, 21.4% of Copeland residents claimed that their ability to do normal daily activities was limited in some way (either "a little" or "a lot") by a disability or health condition.

Ethnic minorities: Self-defined by individuals, although ONS advises that the term usually refers to "ethnic groups other than White British (including White minority groups) or ethnic groups other than White." The ONS provides guidance as to how to categorise ethnic group in demographic surveys; these are the categories used in the 2011 census and can be seen at <http://ons.gov.uk/ons/guide-method/measuring-equality/equality/ethnic-nat-identity-religion/ethnic-group/index.html#8>. At the census, only 1.6% of Copeland residents identified as an

ethnic group other than White. This is very slightly higher than the overall average for Cumbria (1.5%) but much lower than the national average.

Holiday home owners, tourists and visitors: No "official" definition. Holiday home owners are usually classed as those who are resident outside of the area, but keep a property within the area to visit during free time: personal holidays, public holidays, weekends, etc. At the 2011 census, 2256 people (8 per 1000) reported owning a second home in Copeland. There are concerns throughout the Lake District that holiday home owners are the cause of houses becoming "unaffordable" to local residents; Copeland, however, is the exception and reported as the last remaining affordable borough in the Lake District. Anyone spending time in the area who is not resident there can be classed as a visitor. Any visitor taking part in tourist activity can be classed as a tourist: <http://www.cumbriatourism.org/> includes information on tourism statistics and tourist activity in the area.

Time poor/busy working people: People who work more than the limit of 48 hours a week (as specified by EU Working Time regulations) may be considered time poor. Prior to the introduction of the Working Time restriction, 2003 Crown statistics showed that in Cumbria 2602 men and 700 women of 16-74 in employment worked more than 48 hours a week; significantly higher than the national average. Working parents, single parents, and those with additional care responsibilities also lack time. At the 2011 census, 11.3% of Copeland residents (on a par with the national average for Cumbria) reported giving some level of unpaid care each week, of which 4.7% do so for 20 or more hours a week.

Summary of advice from groups received and engagement techniques

This section summarises the responses received from the hard to reach groups for each of the categories identified in the SoCC and the engagement techniques that will therefore be use during the consultation period.

Hard to reach category	Summary of the advice received on how best to provide information	Engagement techniques (in addition to standard promotion within the SoCC)
Older People	The majority of groups suggested that a pack of consultation materials would be the best way to engage. A pack of materials would enable both the organisation's staff and potentially people they represent to understand more about the project.	Pack of consultation documents to be provided to identified groups. Email groups to try and increase awareness as overall knowledge of the project was low.
Ethnic minorities	An email should be sent at the start of a consultation period as some groups had not heard of the project. Limited response to early engagement.	Email groups at the start of the consultation period to try and increase awareness of the project

Economically Challenged	Offers received from a number of social landlords who may be able to add information about the consultation to their newsletter and website.	Plain English pack of consultation documents, including a poster
Young people	<p>Various requests for presentations and to attend meetings.</p> <p>A more detailed strategy has been prepared for engaging with young people, which can be found in section Error! Reference source not found. of this document.</p>	<p>Email groups at the start of the consultation period and request that information be disseminated with other communication.</p> <p>A week has been set aside during the consultation for engaging with schools and groups representing young people.</p> <p>Pack of consultation documents and posters to be provided to identified groups and youth centre.</p> <p>Promote consultation and the project through social media</p>
People with disabilities	Requests were made for correspondence and consultation materials via email and the post. Packs of materials would enable both staff and visitors to view them.	<p>Pack of consultation documents and posters to be provided to identified groups.</p> <p>Email groups at the start of the consultation period</p> <p>Be aware that alternative format versions of the newsletter maybe required - Large print, Braille and Easy Read</p> <p>Audio recording of newsletter</p>
Those without broadband	There was no response from this group.	These groups will be contacted through direct posting of the consultation newsletter.
Geographically isolated communities	One response so far from ACTION with Communities in Cumbria. They have a Gazette newsletter quarterly that goes to approx. 4,000 contacts in the County.	Email groups at the start of the consultation period with information about the consultation.
Time poor / busy working people	Positive responses were received from the coordinator of five children's centres throughout Copeland offering to provide links on their website to the project.	<p>Details of the consultation will be provided to contacts for inclusion on the website.</p> <p>Check closer to the consultation if there is a notice for a poster and a plain English pack of consultation documents</p> <p>Email groups at the start of the consultation period</p>

Holiday homeowners, tourists and visitors	There was actionable advice from this group.	Email groups at the start of the consultation period
Other stakeholders	This group requires some further desktop research to find contact numbers. The responses we did get were positive as the libraries in Whitehaven, Kells and Hensingham are all happy to display consultation material.	Pack of consultation documents and posters to be provided to identified groups Email groups at the start of the consultation period to try and increase awareness of the project

3.6. Young people

Based on the evidence of the first stage of consultation, relatively few younger people visited NuGen’s consultation events unless they were specifically invited to an event organised for them. As a result, young people were under-represented.

The definition of ‘young people’ offered by the Stage Two Consultation Strategy is: “those attending schools, colleges and youth clubs”.

Strategy

1. Provide more specific opportunities for young people to attend consultation events; and
2. Ensure that young people have access to communication about the consultation.

Providing more opportunities

Making use of existing relationships with various community education stakeholders, NuGen will develop particular opportunities with particular groups of young people in mind.

Secondary Schools: NuGen has initiated an education programme with local schools about low carbon electricity, called Bright Sparks. One of the outcomes for the first year of Bright Sparks was that students involved (~180) from three schools nearest to the site, would take part in the consultation and provide feedback from a position informed by what they had learned through the programme. Each of the three schools has agreed to host consultation sessions taking place in the afternoons and evenings, which NuGen will arrange as part of its events programme.

Primary Schools: Through various environmental projects NuGen has good relationships with a number of local primary schools. NuGen will offer preview events to students and teachers at primary schools where possible, in order to give more opportunities to engage with students.

Energy Coast UTC & Gen2: NuGen is conducting work with students to understand better how to communicate with young people.

Third sector and local authorities: NuGen will seek guidance from its charity partner, Cumbrian Youth Alliance and local authorities as to how it can reach the young people from different backgrounds, where there are additional barriers to their involvement.

Youth Parliament: NuGen will seek to once again involve members from the various youth parliament structures set up in Cumbria.

Communication

Despite their generation being the most 'connected' in history, in the context of so much other communication in their every-day lives, young people are difficult to reach – particularly when the subject matter might not be of immediate interest to them.

The nature of social media is that generally only content which is within the young person's existing sphere of interest is likely to be shared.

In the second stage of consultation, NuGen will focus more on event-by-event communications planning which will utilise public relations, advertising and connecting with local stakeholder groups – including parish councils – in order to promote each event. In order to address the issue of young people's access to these events, this process will identify any youth groups nearby.

Using existing stakeholder relationships: Where NuGen has established relationships with local primary and secondary schools, colleges and organisations, such as Cumbria Youth Alliance; NuGen will ask for those groups to communicate directly with its students/members to invite them to events.

In addition, NuGen will seek to ensure youth centres, colleges and similar facilities near consultation events are sent posters to promote the events.

Social media: NuGen will review its usage of Twitter in order to better develop the existing relationships it has to help signpost information, as well as seeking to build new connections around young people focused events and groups.

3.7. Additional representatives

MPs and MEPs: As representatives of local communities NuGen has ensured that local MPs whose constituency boundaries lie within the Cumbrian sub region are kept updated on the project. The site lies within Copeland Constituency. The current MP for Copeland is Jamie Reed (Labour).

Other MPs who represent constituencies in the wider Cumbria sub-region are:

- Workington – Sue Hayman (Labour)
- Barrow and Furness – John Woodcock (Labour and Co-operative)
- Carlisle – John Stevenson (Conservative)
- Penrith and The Border – Rory Stewart (Conservative)
- Westmorland and Lonsdale – Tim Farron (Liberal Democrat)

The site lies within the North West England constituency of the European Parliament. This is represented by 8 MEPs:

- Theresa Griffin (Labour)
- Paul Nuttall (UKIP)
- Jacqueline Foster (Conservative)

- Afzal Khan (Labour)
- Louise Bours (UKIP)
- Julie Ward (Labour)
- Sajjad Karim (Conservative)
- Steven Woolfe (UKIP).

NuGen will ensure all politicians are provided with information about the Stage 2 Consultation so they can encourage their constituents to get involved.

Parish Councils: While Parish Councils are statutory consultees under Section 42 of the Act. They are also community representatives. In addition to contacting them in this statutory regard, NuGen will be engaging with Parish Councils to determine whether they can support NuGen in raising awareness of the consultation.

4.Section48 – Duty to publicise

4.1 Requirements

Section 48 of the Act requires;

- (1)The applicant must publicise the proposed application in the prescribed manner.*
- (2)Regulations made for the purposes of subsection (1) must, in particular, make provision for publicity under subsection (1) to include a deadline for receipt by the applicant of responses to the publicity.*

Section 4 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 sets out the requirements for fulfilling this Section of the Act.

According to these regulations the notice must include;

- (a) the name and address of the applicant*
- (b) a statement that the applicant intends to make an application for development consent to the Commission;*
- (c) a statement as to whether the application is EIA development;*
- (d) a summary of the main proposals, specifying the location or route of the proposed development;*
- (e) a statement that the documents, plans and maps showing the nature and location of the proposed development are available for inspection free of charge at the places (including at least one address in the vicinity of the proposed development) and times set out in the notice;*
- (f) the latest date on which those documents, plans and maps will be available for inspection (being a date not earlier than the deadline in sub-paragraph (i));*
- (g) whether a charge will be made for copies of any of the documents, plans or maps and the amount of any charge;*
- (h) details of how to respond to the publicity; and*
- (i) a deadline for receipt of those responses by the applicant, being not less than 28 days following the date when the notice is last published.*

.2 How NuGen is proposing to consult under s48

Notices fulfilling the requirements set out above will be placed in the following publications on the following dates:

Publication	Dates
The London Gazette	5 May 2016
The Times	5 May 2016
[Lloyd's List – if required]	5 May 2016
[List regional papers used]	5 May 2016 and 12 May 2016

This will fulfil the requirement to publish a notice with details of the proposed application. The deadline for responses is 28 days from the day after the second round of notices were published (12 May 2016). NuGen's consultation period

5. Section 49 – Duty to take account of responses to consultation and responses

5.1. Requirements

Section 49 of the Act states;

(1) Subsection (2) applies where the applicant—

(a) has complied with sections 42, 47 and 48, and

(b) proposes to go ahead with making an application for an order granting development consent (whether or not in the same terms as the proposed application).

(2) The applicant must, when deciding whether the application that the applicant is actually to make should be in the same terms as the proposed application, have regard to any relevant responses.

(3) In subsection (2) "relevant response" means—

(a) a response from a person consulted under section 42 that is received by the applicant before the deadline imposed by section 45 in that person's case,

(b) a response to consultation under section 47(7) that is received by the applicant before any applicable deadline imposed in accordance with the statement prepared under section 47, or

(c) a response to publicity under section 48 that is received by the applicant before the deadline imposed in accordance with section 48(2) in relation to that publicity.

DCLG Guidance

Supporting the requirements of the Act, DCLG has published guidance on the pre-application process including on what a Consultation Report should contain. The most relevant paragraph is included below.

80. *Therefore, the consultation report should:*

- *provide a general description of the consultation process undertaken, which can helpfully include a timeline;*
- *set out specifically what the applicant has done in compliance with the requirements of the Planning Act, relevant secondary legislation, this guidance, and any relevant policies, guidance or advice published by Government or the Inspectorate;*
- *set out how the applicant has taken account of any response to consultation with local authorities on what should be in the applicant's statement of community consultation;*
- *set out a summary of relevant responses to consultation (but not a complete list of responses);*

- *provide a description of how the application was in-formed and influenced by those responses, outlining any changes made as a result and showing how significant relevant responses will be addressed;*
- *provide an explanation as to why responses advising on major changes to a project were not followed, including advice from statutory consultees on impacts;*
- *where the applicant has not followed the advice of the local authority or not complied with this guidance or any relevant Advice Note published by the Inspectorate, provide an explanation for the action taken or not taken; and*
- *be expressed in terms sufficient to enable the Secretary of State to understand fully how the consultation process has been undertaken and significant effects addressed. However, it need not include full technical explanations of these matters.*

NuGen will draft the Consultation Report explicitly to adhere to this guidance. The Consultation Report will include a non-technical summary, which will highlight the key issues raised during the consultation and significant alterations to the project proposals as a result of the feedback.

. . Regard to relevant responses

Each piece of feedback received under Section 42, 47 and 48 will be reviewed individually. Each discrete relevant issue within the feedback will be identified, summarised and assigned a code. Where the same issue is repeated in multiple pieces of feedback, this will be recorded so that the number of times each summarised issue is mentioned is captured.

Summarised issues will be grouped into relevant topics, in line with those covered by the Environmental Assessment where possible but not excluding issues outside of those topics.

In the case of s42 responses, some responses may be dealt with as a whole rather than summarised in order to ensure detailed technical data is appreciated in context.

Having regard

NuGen will then demonstrate its regard to each summarised issue in the format below. This will produce a schedule of issues, confirmation of whether or not they have led to a change in the proposals, and the consideration NuGen has had of the issue.

Consultee	Summary of issue	Change Y/N?	Regard had (s49)