

# NuGen's Moorside Project Preliminary Consultation Report

July 2012

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Summary of Response by Consultee

## Executive Summary

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### The Moorside Project

NuGeneration Limited ('NuGen') has begun the process of preparing an application for a Development Consent Order ('DCO') to the Planning Inspectorate in respect of the Moorside Project - a new nuclear power generating station (up to 3.6GW) with ancillary and other associated development.

The proposed DCO relates to land ("the NuGen Site") located to the North West of (and near to) the existing Sellafield nuclear licensed site located in West Cumbria. The NuGen Site is located within the Sellafield nominated area of land identified in the National Policy Statement for Nuclear Power Generation (EN-6).

Consultation is a key part of the DCO preparation process. NuGen is committed to effective and inclusive consultation and engagement during the course of the preparation of the DCO application. Consultation enables stakeholders to engage meaningfully in the Project and play an active part in shaping the details of the proposal.

### Initial Section 42 Consultation

NuGen intends to conduct a multi-stage consultation process involving key stakeholders and the local community in accordance with statutory requirements and guidance. This Report focuses on the initial round of formal consultation with statutory consultees, as defined by Section 42 of the Planning Act 2008 and Regulation 3 and Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009.

The Section 42 Consultation was undertaken by NuGen between December 2011 and February 2012 and forms the first part of an on-going engagement process. The aim of the initial consultation was to provide an opportunity for statutory consultees to provide any information or initial comments they consider should be taken into account at this early stage. The information obtained will help inform the scheme proposals as well as the future engagement process with key stakeholders.

NuGen consulted **172** consultees as part of the initial stage of consultation. Those consulted at this initial stage included the "**Section 42 Consultees**" as defined in Section 42 of the Planning Act 2008. The consultees consisted of:

- "Prescribed Consultees" – the prescribed consultees defined in the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009);
- "Local Authorities" – the local authorities identified in accordance with Section 43 of the Planning Act 2008; and
- "Landowners" - the persons with an interest in land identified in accordance with Section 44 of the Planning Act 2008.

The consultees were sent an information pack containing: a letter outlining the Project; initial questions on possible key issues; a site location plan; and a site context plan. The questions sought comments on general, local and site-specific issues that consultees consider that NuGen should be aware of at this stage, as well as a question seeking feedback on the methods of future engagement that NuGen should consider undertaking as the Project progresses.

## The Consultation Responses

Of the organisations consulted:

- 56 responses were received.
- This equates to a 33% response rate.
- Within the 56 responses received, 428 comments were made.

The comments received fall into ten themes, these being as set out below (percentage of comments received in brackets):

- Environment (33%)
- Consultation and Engagement (20%)
- Water (12%)
- Socio-economic (11%)
- Transport (10%)
- Land and Property (3%)
- Safety and Emergency Planning (5%)
- Infrastructure (non roads) (3%)
- Regulations and Consents (2%)
- Site Investigation Works (1%)

A commentary for each of the themes is set out in section 3 of this report and includes a response from NuGen to the comments raised.

This is supplemented by Table 1 ‘Summary of Response by Issue’ in Appendix B and Table 2 ‘Summary of Response by Consultee’ in Appendix C for further detail on the responses received.

## Next Steps

The initial Section 42 consultation marks the beginning of an engagement process with prescribed consultees and key stakeholders. NuGen is currently preparing an Engagement Plan to set in place a process for working with those parties that have indicated how they wish NuGen to engage with them as the Project progresses. In addition, NuGen is developing a wider plan of stakeholder engagement with all Section 42 parties.

As the Project progresses, NuGen intends to conduct a multi-stage consultation process involving a large range of key stakeholders, local authorities and the local community. We anticipate that our next formal stages of consultation will cover:

- Consultation on **Issues and Options** for the development – at the next stage; and
- Consultation on a **Proposed Scheme** (i.e. on matters of detail) – at a subsequent stage.

As part of this process, NuGen will be preparing a Statement of Community Consultation (SoCC) which formally outlines how NuGen will consult with the local community under Section 47 of the Planning Act 2008 and will reflect the principles of stakeholder engagement which have been developed for the Project.

## Further Comments

Should you have any further comments to make then please register with our website at: [www.nugeneration.com](http://www.nugeneration.com)

# 1 Introduction

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## 1.1 The Development Consent Order and the Planning Process

The Planning Act 2008 introduced a new consenting regime requiring developers to obtain a new type of consent (which includes planning permission) known as a Development Consent Order (DCO) in order to develop nationally significant infrastructure Projects (NSIPs).

NuGen's proposals for a new nuclear power station and associated development constitute an NSIP and therefore NuGen will need to apply for a DCO to obtain permission to build and operate the power station.

### 1.1.1 UK Government Policy on Nuclear Energy

The Planning Act 2008 (Section 104) requires that the Secretary of State, in determining a DCO application, must decide the application in accordance with the relevant national policy statements, except to the extent that they are satisfied that the adverse impact of the proposed development would outweigh its benefits.

The Government has published National Policy Statements (NPSs) in relation to energy infrastructure which set national policy for energy infrastructure and planning policy in relation to NSIPs. The two most relevant NPSs to the Moorside Project are set out below.

Overarching the National Policy Statement for Energy (EN-1) sets out that:

- there is an “urgent need” for new (and particularly low carbon) generating capacity;
- it is in the public interest for energy companies to have the option of investing in nuclear power stations in principle new nuclear should be free to contribute as much as possible towards the new non-renewable capacity required; and
- when applications for a DCO are considered, substantial weight should be given to the contribution which the Project would make towards satisfying this need and establishes a presumption in favour of granting a DCO for energy NSIPs, including a new nuclear power station.

National Policy Statement for Nuclear Power Generation (EN-6) identifies NuGen’s option site as potentially suitable for the deployment of a new nuclear power station for operation before the end of 2025.

### 1.1.2 DCO Decision Making

A DCO application will be processed and assessed by Inspectors in the Planning Inspectorate who will report to the Secretary of State. The Secretary of State will then make his/her own decision on the DCO application (taking the Inspector’s report into account).

The DCO application will need to be assessed and decided in accordance with the policy and guidance set out in EN-1 and EN-6 (being the two most relevant NPSs).

## 1.2 The Role of Consultation in the DCO Process

Consultation is a key part of the Development Consent Order (DCO) preparation process. NuGen is committed to effective and inclusive consultation and engagement during the course of the preparation of the DCO application. Consultation enables stakeholders to

engage meaningfully in the Project and play an active part in shaping the details of the proposal.

DCLG<sup>1</sup> guidance on the pre-application stage states that it is the developer's responsibility to ensure that pre-application consultation fully accords with requirements of the Act, alongside relevant regulations and guidance. The Act sets out requirements for consultation for NSIPs which requires promoters to conduct pre-application consultation before submitting an application to the Planning Inspectorate.

The DCO regime and the accompanying guidance requires a DCO applicant to undertake pre-application consultation on the proposed application with Section 42 and 47 consultees.

"Section 42 Consultees" are defined in Section 42 of the Planning Act 2008 as consisting of:

- "Prescribed Consultees" – the prescribed consultees defined in the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009);
- "Local Authorities" – the local authorities identified in accordance with Section 43 of the Planning Act 2008; and
- "Landowners" - the persons with an interest in land identified in accordance with Section 44 of the Planning Act 2008.<sup>2</sup>

The "Local Community", those living in the vicinity of the development, are identified in accordance with Section 47 of the Planning Act 2008.

Consultation is a key part of the DCO process in which the important issues can be articulated and considered as far as possible in advance of submission of a DCO application. It gives stakeholders an opportunity to influence the way Projects are developed by providing feedback on potential options and influence the way in which the community develops.

Before a DCO application can be accepted for examination by the Planning Inspectorate, on behalf of the Secretary of State, the Planning Act 2008 requires that the applicant must have undertaken sufficient pre-application consultation. The applicant is required under Section 49 of the Planning Act to take account of all the responses received. Therefore, NuGen will also ultimately be required to give details of how it has taken account of consultation responses in its Section 37 Consultation Report, submitted with the DCO application.

### 1.3 NuGen's Consultation So Far and Next Steps

NuGen is committed to carrying out effective and inclusive consultation. Currently, NuGen is at the pre-application stage of the DCO, and as part of the development of initial ideas has started some informal engagement with key authorities and regulators.

NuGen recently undertook a formal early consultation exercise with the Section 42 Consultees in order to understand how these consultees wished to be engaged and what particular issues they wish NuGen to take into account during the pre-application process.

The development of the Project is at a very early stage and therefore the early consultation did not provide any substantive information about issues or options (or any detail scheme) to

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<sup>1</sup> Planning Act: Guidance on pre-application consultation (Published by the Department of Communities and Local Government (DCLG) September 2009)

<sup>2</sup> Names are used for landowners who are organisations. For the purposes of data protection, individual landowners are referred to as 'Private Individuals'.

consultees – such information will be provided in due course (see Section 4.2 Future Consultation).

Therefore it is not possible to identify how comments made in response to the initial Section 42 Consultation will be taken account in the final scheme and this report is therefore not a “Section 37 Consultation Report” within the meaning of the Planning Act 2008. The Section 37 Report will instead be included as part of the DCO submission.

NuGen will be considering the comments made in response to this Initial Section 42 Consultation as it brings forward the Moorside proposal and NuGen will be preparing a Section 37 Report as part of the DCO submission.

Full details on those consulted are provided in Appendix A of this report.

## **1.4 Commitment to Ongoing Engagement**

NuGen is committed to ongoing engagement (including under Section 42) throughout the pre-application stage. This includes both continuous engagement with statutory consultees and others through scheduled meetings as well as targeted consultation at specific stages of the Project.

A record of all stakeholder engagement will be kept. Through the ongoing engagement, NuGen will seek to establish long term relationships with both statutory consultees and the community.

## 2 Consultation Methodology

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### 2.1 Overview

The initial Section 42 consultation undertaken by NuGen ran from December 2011 to February 2012. The aim of this consultation was for consultees to provide any technical information or initial comments they feel should be taken into account at this early stage in the Project. The information obtained from the comments received during this period will help inform the scheme proposals as well as the future engagement process with key stakeholders.

### 2.2 Statutory and Non-Statutory Consultees

NuGen consulted 172<sup>3</sup> consultees as part of the initial stage of consultation. Those consulted at this initial stage included the "**Section 42 Consultees**" as defined in Section 42 of the Planning Act 2008 (see section 1.2 above)

NuGen took the view that it was appropriate to extend this initial stage of consultation by consulting with relevant non-Section 42 Consultees. These consultees consisted of:

- Relevant organisations not qualifying as Prescribed Consultees – these included organisations which have taken on or are likely to take on relevant functions and responsibilities of one or more Prescribed Consultees. For example, the Cumbria Local Enterprise Partnership (LEP) was consulted in addition to the North West Regional Development Agency due to the abolition of Regional Development Agencies; and
- Persons not qualifying as Landowners who expressed a desire to make a comment at this initial stage of consultation – these included local residents and nearby landowners who will be directly consulted at later stages of the consultation and engagement process, for example as part of the Section 47 consultation with local communities

NuGen recognises the importance and value of the comments made by these consultees at this stage and the comments have therefore been reviewed and included within this initial report and will be considered as the Project progresses.

A list of those consulted as part of the initial Section 42 Consultation, as well as the category under which they were consulted, is provided in Appendix A.

### 2.3 Consultation Material

The consultees were sent an information pack containing the following documents:

- A letter outlining the Project;
- Initial questions on possible key issues;
- A site location plan; and
- A site context plan.

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<sup>3</sup> Due to the means by which Consultees are defined in Section 42 of the Planning Act 2008, The North West Development Agency, The Environment Agency and Cumbria County Council have been consulted as more than one type of Section 42 Consultee as they undertake more than one role. For the purposes of this report, they have been counted as one Consultee in the total number of parties consulted.

The letter introduced consultees to the Project and NuGen's plans to build a nuclear power station and associated development in West Cumbria. Consultees were encouraged to contact NuGen with their initial feedback on a set of four questions.

These questions sought comments on general, local and site-specific issues that consultees consider that NuGen should be aware of at this stage, as well as a question seeking feedback on the methods of future engagement that NuGen should consider undertaking as the Project progresses.

The letter, questions and the other consultation materials sent to the consultees are provided in Appendix D.

## **2.4 Process for Considering and Responding to Consultee Comments Received**

Where a response was received, NuGen provided letters thanking consultees for their participation in the consultation and giving further information or clarification when required. Where certain concerns and questions were raised by local stakeholders, the NuGen stakeholder team ensured that follow up discussions were held.

## **2.5 This Report**

This Report sets out the responses received from this initial stage of Section 42 consultation.

As discussed in Section 2.3, 'Consultation Material', NuGen consulted on four questions. Questions 1 to 3 broadly covered potential general, local and site-specific issues that NuGen should consider at this stage.

NuGen received responses to these questions in a number of formats with a majority of respondents not structuring their response around the three questions. The responses within the Report have subsequently been categorised into themes to enable analysis and reporting.

Further detail in relation to the responses received, is provided in Section 3, 'Overview of Consultation Responses'. Question 4 which sought feedback on the methods of future engagement that NuGen should consider undertaking as the Project progresses, is covered within Section 3.5 'Consultation and Engagement' of this report.

Please also refer to Table 1 'Summary of Response by Issue' in Appendix B and Table 2 'Summary of Response by Consultee' in Appendix C for further detail on responses received. Please note, the responses in Table 1 Appendix B are a summary of the issues raised by all stakeholders with regard to detailed issues.

## 3 Overview of Consultation Responses

### 3.1 Overview

For this initial round of Section 42 consultation NuGen consulted with 172 organisations and individuals. Figure 1 below highlights the organisations and individuals who were consulted.

In order to make the statistics clear and easy to understand some of the data within this chapter has been displayed visually in the form of pie charts.

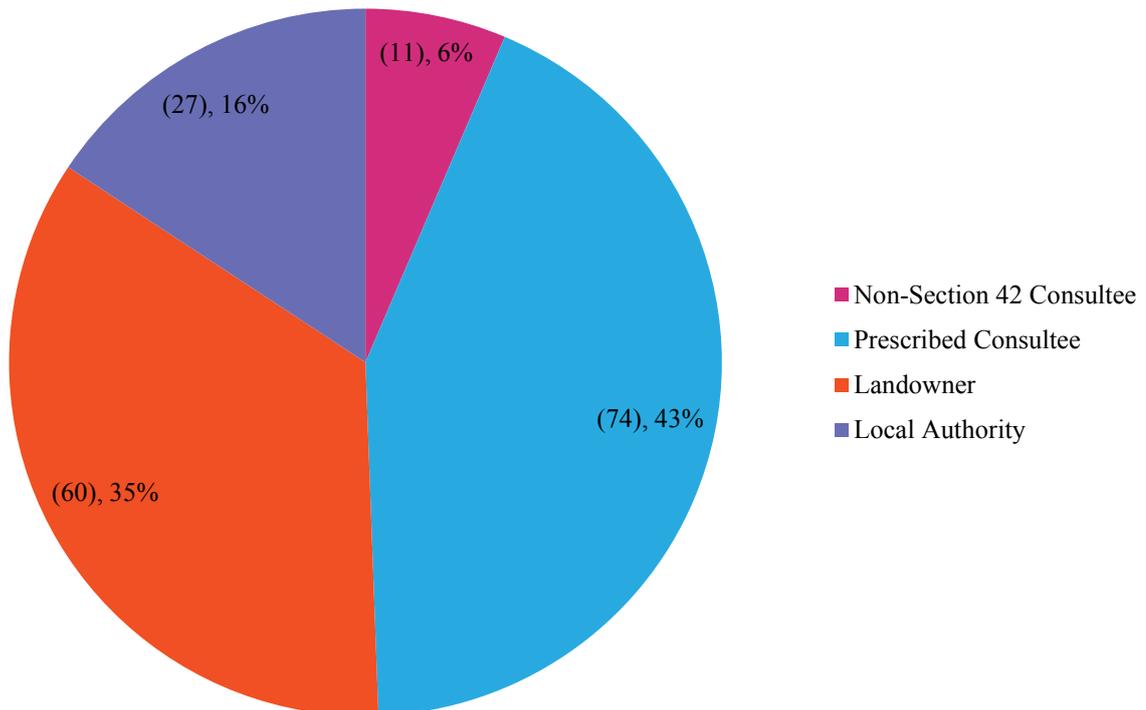


Figure 1: Consultee Types<sup>4</sup>

- Of those 172 organisations and individuals, 56 responses were received.
- This equates to a 33% response rate.
- Within the 56 responses received, 428 comments were made.

### 3.2 Type of respondent

Figure 2 highlights the responses received by respondent type. Please refer to Section 2 'Methodology' for further information on respondent types.

<sup>4</sup> Percentages have been rounded up to the nearest figure in the pie charts presented in this Report.

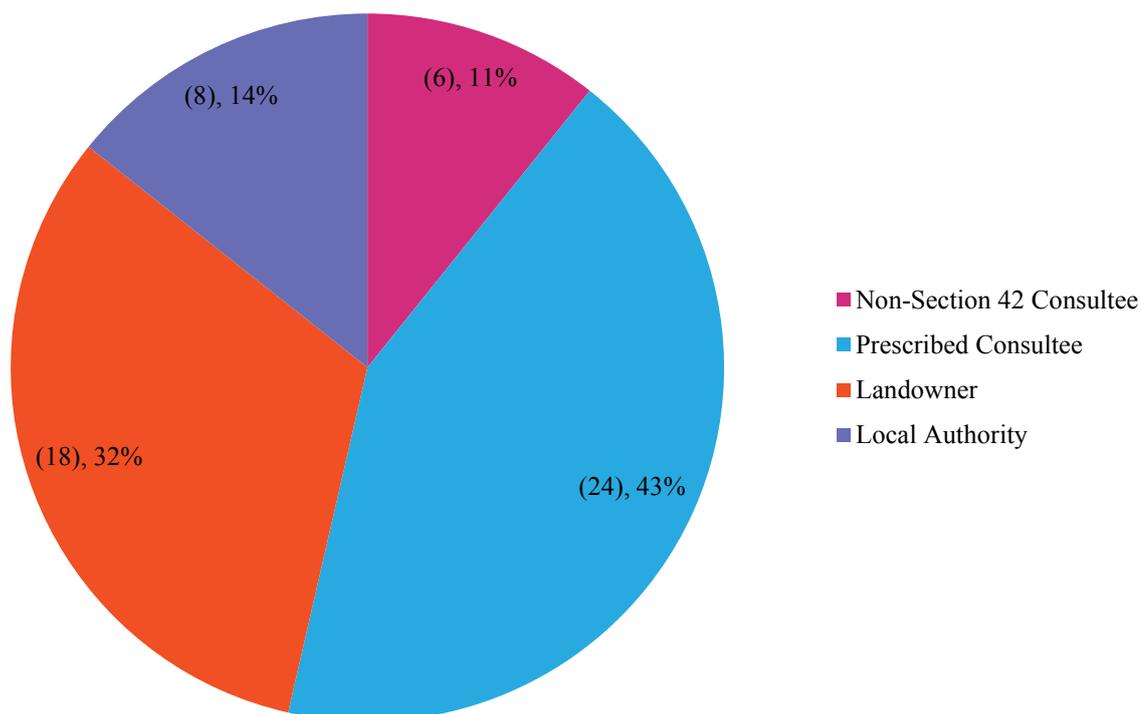


Figure 2: Respondent Types

### 3.3 Response themes

The comments received have been classified into ten themes, these being:

Theme	Definition
Environment	The Environment theme captures all of the comments made in relation to environmental topics, including aquatic and terrestrial ecology, noise and air quality. Comments made in relation to the Environmental Impact Assessment (EIA) are also captured here.
Consultation and Engagement	Comments in this section comprise those made in relation to the initial Section 42 consultation as well as the ongoing engagement process. Supportive and unsupportive comments on the adequacy of consultation are captured here as well as those regarding the Planning Performance Agreement.

Water	Comments in relation to surface water drainage, flood risk, abstraction and discharge, water quality and water resources and the Water Framework Directive are captured in this theme.
Socio-economic	Comments made in respect of economic sectors such as leisure and tourism are reported here. In addition issues such as the impact on population, accommodation, local services and investment are also included.
Transport	Comments made in relation to different forms of transport, such as rail, road and aviation are captured within this theme in addition to those made in respect of Transport Assessments.
Land and Property	This theme includes comments made in respect of the impact on the Project on land and property values, compensation, engagement with landowners and impact on surrounding land uses.
Safety and Emergency Planning	Comments made on this theme include consideration of the Weightman Report, the Office of Nuclear Regulation Site Licence Conditions and emergency planning arrangements.
Infrastructure (non roads)	This theme includes comments made in relation to utilities, the sewerage system and the electricity transmission networks.
Regulations and Consents	This theme captures comments made in relation to non-planning regulations and consents. This includes nuclear safety regulations and decommissioning requirements. In addition, comments regarding environmental permits and a felling license are reported here.
Site Investigation Works	Issues relating to the nature and impact of the site investigation

	works are captured within this theme.
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Figure 3 highlights the distribution of the 428 comments between the ten response type themes.

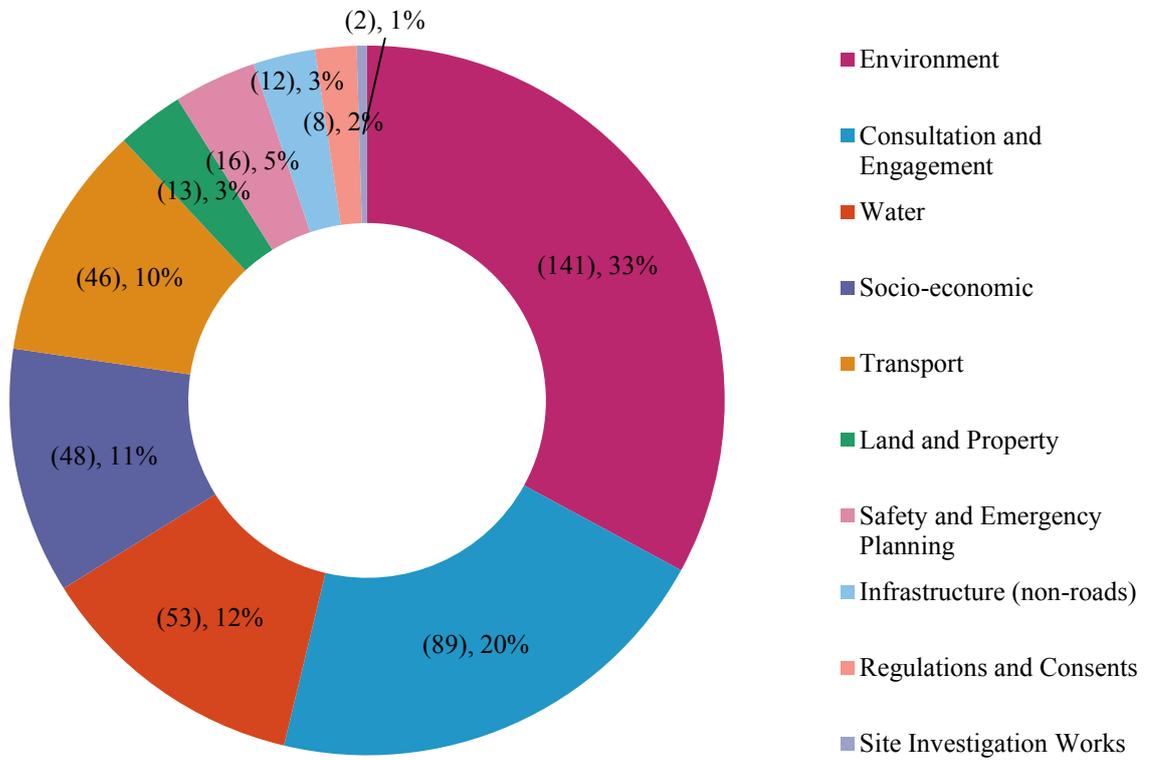


Figure 3: Distribution of comments amongst themes (% and total number)

The comments made in relation to the ten themes are discussed below.

### 3.4 Environment

The majority of comments received (141) were made in relation to the environment. Most comments were made regarding the Environmental Impact Assessment (22%, 31 comments) and the need to ensure that a full range of environmental impacts, mitigation and enhancement measures are included within the assessment. A large number of comments were also received in relation to aquatic ecology (19%, 27 comments) and landscape and visual impacts (15%, 21 comments). A further 8% (11 comments) were made in relation to designated sites, 7% (10 comments) were made concerning archaeology and cultural heritage and 6% (8 comments) were made in relation to geomorphology and the impact on the coastal environment. A smaller number of comments were made regarding terrestrial ecology (5%, 7 comments), waste (5%, 7 comments), noise (4%, 6 comments), lighting (4%, 5 comments), air quality (3%, 4 comments), the Habitats Regulation Assessment (2%, 2 comments) and land quality (2%, 2 comments). Figure 4 highlights visually the distribution of comments made in relation to the environment.

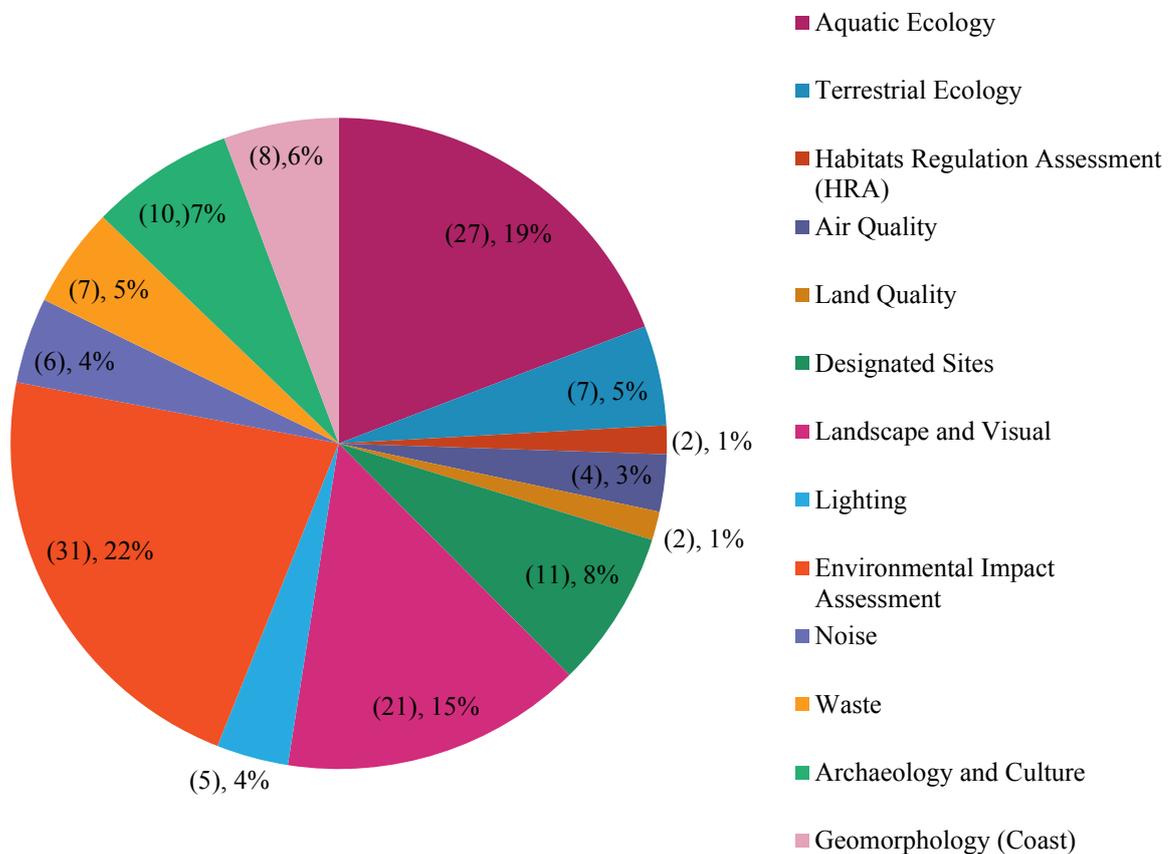


Figure 4: Distribution of comments made in relation to Environment.

### 3.4.1 Aquatic Ecology

#### 3.4.1.1 Baseline

Six consultees provided baseline information on aquatic ecology. This included comments on: the River Ehen's salmon, sea trout and freshwater pearl mussel populations; the variety of wildlife in the area including protected species such as Natterjack Toads; and referring NuGen to the Environment Agency's Eel Manual.

A landowner also commented on the past record of the nuclear industry, raising concerns about how river species were previously impacted on by caustic soda, diesel, abstraction and altering river courses.

#### 3.4.1.2 Impact

Twelve consultees made representations concerning the impact of the development on aquatic ecology. Comments were made on the potential impact on the rivers and local habitats, including:

- The impact on the River Ehen ecosystem (Copeland Borough Council, Allerdale Borough Council and Cumbria County Council; Landowner; Environment Agency; and Natural England);
- The impacts on the River Calder and River Irt (Environment Agency; two landowners);
- The impact on over sensitive riverine environments such as those with special protection status (Lake District National Park Authority and a Landowner);
- The need to consider the impact on the Irish Sea Conservation Zone 11 Cumbrian Coast and whether any liquid effluents would be passed to the Irish Sea (Copeland Borough Council, Allerdale Borough Council and Cumbria County Council; Landowner); and
- The need to consider that the site is adjacent to a lucrative and exploited Nephrops ground and Sabellaria reefs which can be found in the locality (Marine Management Organisation).

Comments also raised concern about the impacts on wildlife, including: on a range of species such as migratory fish (Public consultee; Landowner; Environment Agency; Marine Management Organisation; and Natural England); and European protected species Natterjack Toads and Great Crested Newts (Landowner).

#### 3.4.1.3 Assessment

There was consensus between the Environment Agency, the Lake District National Park Authority and the Marine Management Organisation that assessments on water dependent habitats and species should be undertaken. The Marine Management Organisation requested that these impacts be assessed in full and include the impact of construction, deposit or removal of material in the marine area.

In particular, the Environment Agency recommended the following assessments be carried out as part of the Environmental Impact Assessment and the Habitats Regulation Assessment:

- the impacts on the movements of migratory salmon and lamprey;
- the impact on migratory sea trout and eels;
- the risks of entrainment of fish in cooling water intakes; and

- the risks on fish from increased water temperatures at the outfall.

The Environment Agency noted that the scope of these studies will need to be agreed with the Environment Agency, Natural England, Marine Management Organisation and Inshore Fisheries Conservation Association.

In addition, the Lake District National Park Authority specified the ecological assets which should be assessed, including Drigg Coast Special Area of Conservation (SAC) and the River Ehen SAC. The types of surveys and assessments such as desktop and walkover surveys which should be undertaken were also identified.

#### **3.4.1.4 Mitigation**

With regards to mitigation, a public consultee commented that the Calder and Ehen rivers will need protection both during construction and after. In particular, it was noted by the Environment Agency that off site opportunities to restore the River Ehen SAC and its catchment should be sought.

Consideration of the development in relation to its ecological zone of influence, in both the construction and established phase of the development was requested by the Lake District National Park Authority. A landowner asked what safeguards would be in place to prevent damage to the marine environment and inhabitants. Both the Environment Agency and a landowner commented that mitigation will be needed for any disturbance to fish. The Environment Agency noted that mitigation for fish habitats will be particularly needed if a new port facility is constructed or there are seaward pipe laying activities.

#### **3.4.2 Terrestrial Ecology**

Baseline information on terrestrial ecology was provided by the Environment Agency and a landowner. The landowner commented on the variety of wildlife which inhabits the area, including badgers, deer and birds. The Environment Agency noted designated sites which are home to terrestrial animals, including the Sellafield disused railway line which is a Site of Invertebrate Significance. It was recommended that further details regarding these sites be obtained from the Tullie House Museum.

Five consultees made representations concerning impacts of the Project on terrestrial ecology. In particular, the joint response by Copeland Borough Council, Allerdale Borough Council and Cumbria County Council commented on the potential impacts on European protected species such as the Natterjack Toad and the Great Crested Newt. The local farmland which provides a habitat for a wide range of animals from bats to deer was highlighted by a public consultee and the presence of marine mammals offshore was raised by the Marine Management Organisation.

The Lake District National Park Authority also requested that the Project's ecological zone of influence, in both the construction and established phase of the development, be considered. In addition, the Environment Agency noted that opportunities for off-site biodiversity enhancements should be examined.

#### **3.4.3 Habitats Regulation Assessment**

The Habitats Regulation Assessment (HRA) was noted by two consultees. Natural England specified that as the proposed development is located within an area of significant environmental assets, proposals will need to be tested against the requirements of the Habitats Regulations 2010 and relevant EU directives. Natural England stated submission to the

Infrastructure Planning Commission (IPC) will need to include sufficient information, including mitigation measures, to enable a HRA to be undertaken. The Environment Agency requires that up to date conservation objectives for each protected site be used for the HRA.

### 3.4.4 Air Quality

The necessity for an air quality impact assessment was raised by Natural England, the Environment Agency, the Lake District National Park Authority and the joint response from Copeland Borough Council, Allerdale Borough Council and Cumbria County Council. The Lake District National Park Authority added that this should discuss likely changes in environmental effects arising from start-up, shutdown, abnormal operating conditions or a change in operating arrangements.

The Environment Agency also recommended that air quality impacts should be assessed in combination with the existing Sellafield site.

### 3.4.5 Land Quality

Land quality was raised by the Environment Agency. With regards to assessment, they identified that proposals for foundation design and below ground structures would need to assess the environmental impact of the works. In addition, they specified that the Sellafield Tarn infill would require an assessment for remediation and validation of remedial works for any works under the land. It was noted that mitigations for contaminated soil should be implemented through an Environmental Management Plan.

### 3.4.6 Designated Sites

Six consultees made comments in relation to the impact of the Project on designated sites. The Environment Agency, a landowner and the joint response made by Copeland Borough Council, Allerdale Borough Council and Cumbria County Council noted some specific sites which they believe could be affected, including: Church Moss Site of Special Scientific Interest (SSSI); Sellafield Tarn County Wildlife Site; Marine Conservation Zone 11: Cumbria Coast; Starling Castle County Wildlife Site (CWS); and Seascale Dunes and Foreshore CWS. The joint response made by the councils also noted that the sites likely to be significantly affected were listed by Natural England in their comments on the National Policy Statement's designated sites. They also noted that there were no regionally important geological sites within the site or adjacent to it.

The Lake District National Park Authority, the Marine Management Organisation and Natural England raised the subject of undertaking an assessment of the impact of the Project on designated sites. It was noted that this should include:

- Direct and indirect permanent and temporary impacts (Natural England);
- Site investigations, construction, use and decommissioning of the Project and any associated development (National England);
- A range of designated sites including Drigg Coast SAC and the Marine Conservation Zone (Marine Management Organisation);
- The impact on ecological designations from freshwater abstraction from lakes or rivers (Lake District National Park Authority); and
- Suitable avoidance options, mitigation and compensation proposals (Lake District National Park Authority).

### 3.4.7 Landscape and Visual

Eleven consultees made comments concerning landscape and visual impacts. Beckermeth Parish Council, a public consultee and two landowners commented on the visual impact of the power station and any ancillary development. English Heritage noted the potential visual impact on heritage and the wider historic landscape and Dumfries and Galloway suggested that consideration of the Project and its impact on the Solway and adjacent coastline would be welcomed. One landowner raised a concern that NuGen is proposing a development which falls outside of approved planning policies. They stated that the Project will encroach on greenfield land designated as land of “local landscape value” rather developing the Project on land allocated for industrial development.

Further comments were made by Carlisle City Council, Beckermeth Parish Council and the Lake District National Park Authority on the visual impact of power lines and associated transmission network infrastructure on the landscape. The joint response from Copeland Borough Council, Allerdale Borough Council and Cumbria County Council commented on the cumulative impacts of the Project on the landscape, in addition to existing and new renewable energy infrastructure.

Five consultees provided baseline information on landscape and visual effects. The Lake District National Park Authority and the joint response made by Copeland Borough Council, Allerdale Borough Council and Cumbria County Council suggested documents which should be referred to in undertaking the landscape and visual impact assessment. These included the Cumbria Landscape Character Guidance, the Lake District Landscape Character Assessment and the Cumbria Historic Land Characterisation Project.

The need for an assessment of landscape and visual impacts was specified by five consultees who also recommended guidance documents to be followed. The Lake District National Park Authority requested that the assessment should include consideration of all aspects of the proposed development, such as buildings, transport infrastructure, parking, ground modelling and other significant features on the landscape. In addition, the zone of visual influence and a selection of viewpoints should be studied (including from the National Park).

Mitigation measures were raised by two public consultees who requested that: deforested areas are replaced by non-commercial woodland planting; suitable screening be used to protect land views; and the height of construction limited to protect sea views across the Irish Sea.

Requests for further information were made by two landowners. These included the type of power station planned; the scope of ancillary development; the height and quantity of structures; and views from the A595 between Calderbridge and Blackbeck.

### 3.4.8 Lighting

A public consultee and landowner discussed the impacts of light pollution during construction and operation. In particular, the public consultee raised concern over the proximity of the development to their property which would exacerbate the existing light pollution from Sellafield.

The joint response from Copeland Borough Council, Allerdale Borough Council and Cumbria County Council requested that key lighting elements be assessed. Minimising the detrimental effects of light and other disturbance from construction and operation was a key issue raised by Beckermeth Parish Council. In addition to this, a landowner wished to know whether there were regulations in place to protect residents from light disruption.

### 3.4.9 Environmental Impact Assessment

Five consultees provided baseline information on the Environmental Impact Assessment (EIA). The Environment Agency, the Highways Agency and Natural England gave directions to the location of further information resources on EIA.

Comments regarding the EIA were made by ten consultees, with specific comments which topics which should be considered as part of the process, these included:

- The overall environmental impact (Landowner);
- Any disturbance caused by the Project (Landowner);
- The impact on traffic and transport (Lake District National Park Authority);
- The impact on Beckermets Parish and the surrounding areas (Beckermets Parish Council); and
- The impact on local wildlife, biodiversity, habitats and designated sites (Copeland Borough Council, Allerdale Borough Council and Cumbria County Council; Dumfries and Galloway Council; Environment Agency; Natural England).

Five consultees also made comments on the methodology of the EIA. These included: a requirement that surveys, assessments and recommendations should be undertaken by suitably qualified and experienced people (Natural England); a desk based assessment, the identification of an ecological zone of influence and detailed habitat surveys (Copeland Borough Council, Allerdale Borough Council and Cumbria County Council); and that the EIA should be carried out in accordance with good practice guidelines published by Institute of Ecology and Environmental Management (Lake District National Park Authority). The Lake District National Park Authority also noted that if it is considered that some of the issues could be addressed in another manner outside of the EIA process, then they would be happy to provide comments in the form of a Local Impact Report.

### 3.4.10 Noise

The issue of noise pollution arising as a result of the development was raised by a public consultee and a landowner. The public consultee expressed concern over the cumulative effect of noise from both Sellafield and the Project. Minimising the effects of noise and other disturbance from construction and operation was an issue raised by Beckermets Parish Council.

The joint response from Copeland Borough Council, Allerdale Borough Council and Cumbria County Council requested that key noise elements be assessed. A landowner also wished to understand whether there were regulations in place to protect residents from noise disruption.

### 3.4.11 Waste

Transportation of waste was identified as a key consideration in Copeland Borough Council, Allerdale Borough Council and Cumbria County Council's joint response.

The Environment Agency commented that the generation of non radioactive waste would be significant and that there is a need to demonstrate that all waste streams will be dealt with correctly and without risk to the environment.

Six consultees requested further information on waste, including:

- The intended waste strategies to be used, both during construction and future development on the site (Environment Agency);
- A more detailed explanation of how Best Available Technology (BAT) will be applied, especially regarding Waste Management Plans and Materials Management Plans (Environment Agency);
- Details on the proposed strategy for foul sewage, including details of storage, treatment and disposal (Lake District National Park Authority);
- The estimated volumes of radioactive waste (Copeland Borough Council, Allerdale Borough Council and Cumbria County Council); and
- The location of construction, decommissioning and hazardous waste storage (Landowner).

### 3.4.12 Archaeology and Culture

The impact of the Project on heritage assets and local heritage sites was raised by English Heritage, Natural England and the joint response made by Copeland Borough Council, Allerdale Borough Council and Cumbria County Council.

Baseline information on archaeology and heritage was provided by five consultees. English Heritage highlighted part 5 of the National Policy Statement for Energy (EN-1) which discusses the potential impacts of development on the historic environment.

The joint response made by Copeland Borough Council, Allerdale Borough Council and Cumbria County Council noted that the area has potential for prehistoric habitation and ceremonial sites. It was recommended by the joint council response and the Lake District National Park Authority that an assessment and survey of the site be undertaken to determine any archaeological issues.

The joint council response also suggested that the mitigation strategy should consider the preservation of nationally important archaeological remains. In addition, English Heritage recommended that expert advisors with necessary specialist heritage knowledge should be employed.

### 3.4.13 Geomorphology (Coast)

The impact on the coastal environment was commented on by six consultees. In particular, Carlisle City Council discussed the potential impacts on the Solway Coast Area of Outstanding Natural Beauty and the Cumbria Coast which would need to be considered.

The joint response made by Copeland Borough Council, Allerdale Borough Council and Cumbria County Council also noted that extreme weather may increase coastal erosion and the coastal location of the site may make the site vulnerable to sea level rises. Furthermore, they noted that the railway may be closed in the future so coastal erosion may increase.

Copeland Borough Council, Allerdale Borough Council and Cumbria County Council's joint response discussed the need to consider the Shoreline Management Plan (SMP) (2010) for the area. The councils commented that a key policy of the SMP is "no active intervention", however, this policy does allow intervention should the railway continue to operate.

Natural England specified the need for more information on whether the nuclear plant would involve coastal defences, coastal harbour or jetty works, other flood defence or alleviation works or any off shore coastal management works. The joint response made by Copeland

Borough Council, Allerdale Borough Council and Cumbria County Council suggested an assessment of the requirement for sea defences.

### **NuGen response to initial environment comments**

Consultees raised a variety of issues concerning environmental issues and these comments will be considered as the Project progresses as follows:

- The information provided in respect of baseline information (for example, ecology, air, noise and land quality) and the local areas of designations in the vicinity of the site are welcomed. NuGen will work with consultees to carefully assess any potential impacts which may arise and where appropriate agree mitigation measures.
- NuGen will also work closely with stakeholders to progress the Habitats Regulation Assessment.
- The concerns raised regarding landscape and visual impact are noted, NuGen will work closely with stakeholders to assess any potential impacts and agree any mitigation that may be required.
- NuGen will consider the various topics that stakeholders have indicated should be considered as part of the Environmental Impact Assessment as it develops the baseline and methodology.
- The comments raised in regard to waste, including those relating to radioactive waste, are noted. Further information will be provided on this matter as the Project progresses.
- NuGen notes the comments made in respect of the potential impact on the Project arising from changes to the coastal area as well as the possible impact the Project might have on the coastal area itself. As the Project progresses NuGen will work closely with stakeholders on this issue which would also include providing information on any temporary or permanent coastal structures (jetties, sea defences etc.) which are considered as part of the Project.

## 3.5 Consultation and Engagement

Eighty nine comments were in relation to consultation and engagement. Of these, 40% (35 comments) were made regarding future consultation, including those specifying consultation methods and asking to be kept informed as the Project progresses. 22% (20 comments) expressed that they had no comments to make at this particular stage of the Project and 17% (15 comments) commented on the role and responsibilities of their organisation. A further 5% (4 comments) were made in relation to the adequacy of the consultation process so far. Of these, two comments were explicitly supportive of the approach taken to consultation and two comments were made in relation to the Section 42 letters sent out to the consultees. 8% (7 comments) explicitly stated their overall support for the Project, 1% (1 comment) were unsupportive and 5% (4 comments) required further information on the Project. 2% (2 comments) were also made in relation to the Planning Performance Agreement and its signatories, the programme and resources. Figure 5 illustrates the distribution of comments made in relation to Consultation and Engagement.

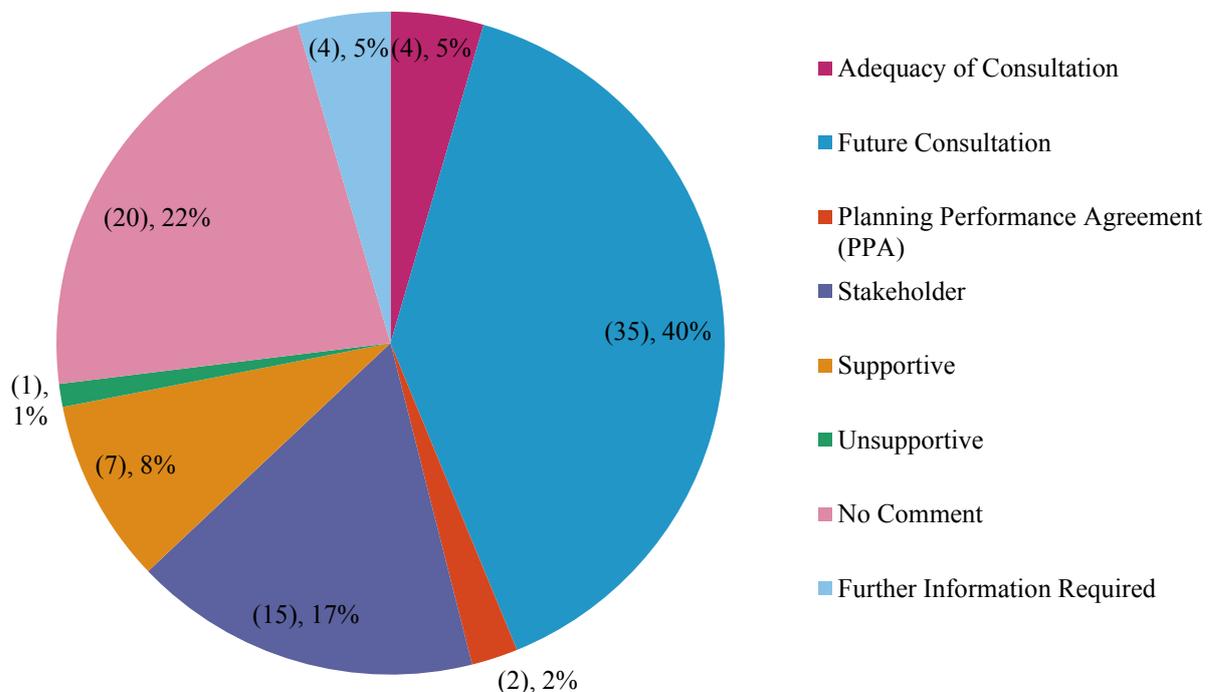


Figure 5: Distribution of comments made in relation to Consultation and Engagement

### 3.5.1 Support for the Project

Electricity North West Limited, two landowners and one public consultee explicitly noted support for the Project. Comments received included support for the Project's location and of the benefits that the Project will create for the local area.

Direct Rail Services appreciated the help given by NuGen so far and the NDA are content that the matters they raised will be dealt with as a natural part of the development of the

Project. The joint response made by Copeland Borough Council, Allerdale Borough Council and Cumbria County Council also welcomed the opportunity to provide initial comments.

One landowner did however raise concern that the Project could potentially have limited support as the energy produced is for export and the area has had no government infrastructure finance.

### **3.5.2 Adequacy of consultation**

The Environment Agency welcomed the structuring of the initial Section 42 consultation questions around the topics as set out in National Policy Statement (NPS) EN-6 Nuclear Power Generation.

One landowner and one public consultee expressed concern as to the process used to select those consulted in the initial Section 42 consultation.

### **3.5.3 Planning Performance Agreements (PPAs)**

The joint response made by Copeland Borough Council, Allerdale Borough Council, Cumbria County Council and the Highways Agency noted the need for a Planning Performance Agreements (PPA) and that an effective PPA which involves regular dialogue with NuGen is welcomed. A further comment noted that appropriate PPA resources need to be agreed with Copeland Borough Council, Allerdale Borough Council and Cumbria County Council.

### **3.5.4 Future consultation**

Eight consultees highlighted that they would provide further comments as the Project progresses and when more details of the proposals are available, including Dumfries and Galloway Council, English Heritage, the Office for Nuclear Regulation (ONR), the Civil Nuclear Constabulary and the joint response by the three Councils. They also welcomed the opportunity to be engaged as the Project progresses. Sellafield Limited noted it is already engaging with NuGen on a number of issues.

The Environment Agency, the joint response made by the three Councils, the Marine Management Organisation, Natural England, Network Rail, Direct Rail Services, the Design Council and three landowner were positive about early involvement in the Project and welcomed early dialogue with NuGen.

Further the joint response made by the three Councils welcomed a discussion regarding community consultation and community benefit contributions.

Twenty four consultees made comments in relation to future consultation methodology. These included comments from Sustrans Limited, Network Rail, Barrow Borough Council, the Environment Agency, the Rail Passengers Council, the Design Council, the Marine Management Organisation, the Lake District National Park Authority and the joint response made by the three Councils,. The suggestions made included:

- Meetings (for both the residents and stakeholders);
- Small working parties to interface with NuGen; and
- A presentation to be made to local Councillors.

The Environment Agency, the joint response made by Copeland Borough Council, Allerdale Borough Council, and Cumbria County Council and the Rail Passengers Council

recommended other organisations to be consulted. These included: relevant DEFRA Organisations (for example, the Environment Agency, Natural England and the Marine Management Organisation); the local water provider, United Utilities; Sellafield Limited; local groups such as Copeland Rail Users Group and Cumbrian Coast Community Rail; and the Town and Country Planning Association.

### 3.5.5 Information requests

Comments received noted that the Project should provide more detail on the following topics and consult upon them as the Project progresses:

- Environment (including landscape and drainage impacts) (the Environment Agency and Sellafield Limited);
- Infrastructure (non-roads) (including power transmission, the sewerage infrastructure and nuclear infrastructure) (the Environment Agency and a landowner);
- Transport infrastructure (Sellafield Limited and Sustrans Limited);
- The management of spent nuclear fuel (the joint response made by Copeland Borough Council, Allerdale Borough Council and Cumbria County Council);
- Waste and environment permits (including marine licensing requirements) (the Environment Agency); and
- Project Programme (Natural England).

### NuGen response to initial consultation and engagement comments

Consultees raised a variety of issues concerning consultation and engagement and these comments will be considered as the Project progresses as follows:

- NuGen welcomes the support for the Project and notes the concern regarding the level of electricity for export and will work with stakeholders to ensure the wider benefits of the Project are set out.
- The comments made in respect of other organisations to be consulted have been noted. NuGen will seek to engage with these stakeholders as the Project progresses where appropriate.
- NuGen is preparing an engagement strategy which will consider the most appropriate manner to engage with the various groups of stakeholders as the Project progresses through the planning and initial design phases up to DCO determination. Many of the stakeholders who responded provided details as to how they wish to be engaged with as the Project progresses and NuGen will consider these requests when preparing its engagement strategy.
- In addition, NuGen is already working closely with Copeland Borough Council and Cumbria County Council to develop a PPA and a constructive working relationship going forward. The PPA will ensure that the Councils directly affected by the Project are adequately resourced to undertake essential planning work related to the Moorside Project.
- Although NuGen is at an early stage of its engagement process, the NuGen website has been updated with a dedicated section on the planning process and an external link to the Planning Inspectorate's website, taking into account the responses made in relation to future consultation methods. As the Project progresses further information will be released to stakeholders when appropriate.

- NuGen responded to the public consultee advising them that whilst their land interests did not fall within the consultation categories set out in the Planning Act, that, NuGen was consulting them as important stakeholders and was still keen to receive any comments that they might have. The comments received have been considered in this report.

## 3.6 Water

Fifty three comments were made regarding water. The majority (47%, 25 comments) were made in relation to surface water flood risk which included comments on hydrology and drainage. A further 26% (14 comments) discussed abstraction and drainage and 19% (10 comments) commented on water quality. A smaller number of comments were made in relation to water resources (6%, 3 comments) and the Water Framework Directive (2%, 1 comment). Figure 6 highlights visually the distribution of comments made in relation to Water.

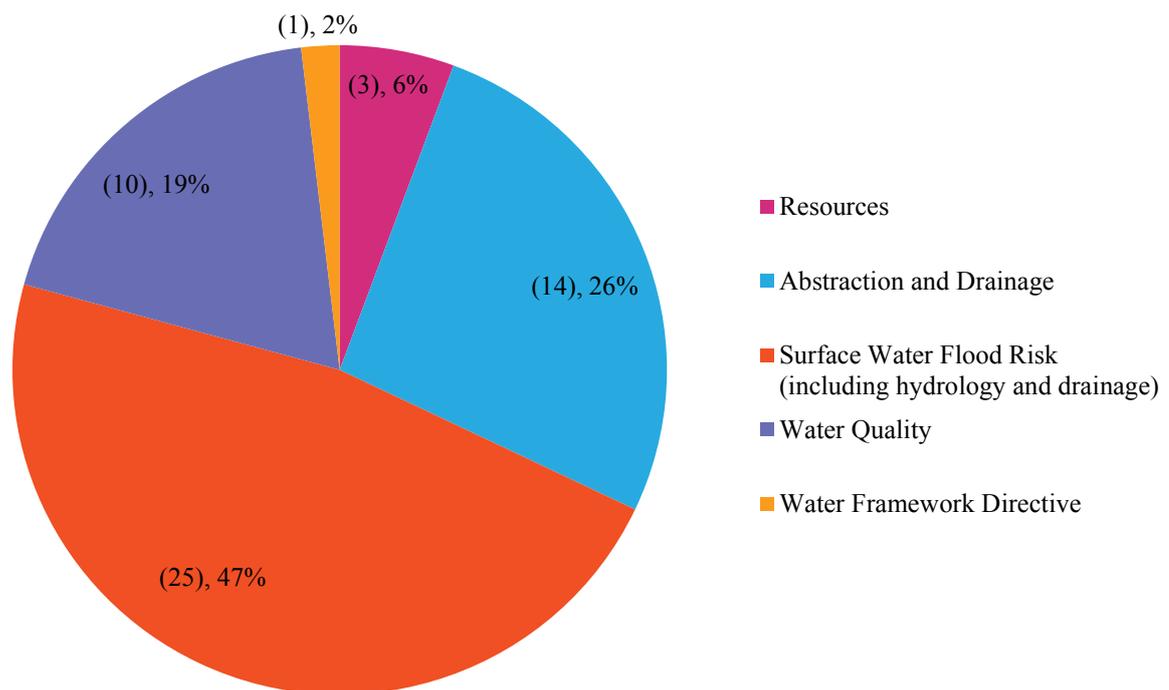


Figure 6: Distribution of comments made in relation to Water

### 3.6.1 Resources

Three consultees made comments in relation to the impact of the Project on water resources. The Environment Agency and Dumfries and Galloway Council noted the potential implications of an increased population on the demand for water resources. In addition, Natural England highlighted that the site is located within the West Cumbria Water Resource Zone.

### 3.6.2 Abstraction and Discharge

Six consultees noted the potential impacts of abstraction and discharge on the environment. The joint response made by the three Councils highlighted the potential impact of heating and radioactive discharges on water. In addition, the joint response made by the three Councils, the Lake District National Park Authority, Natural England and the Marine Management

Organisation also commented on the potential effects of abstraction and discharge on the hydrology of the surrounding area, including the marine environment.

An assessment of the potential discharges and their impacts was noted as a requirement by the Environment Agency. In addition, they highlighted that environmental permits are required for all discharges to controlled waters. The Environment Agency confirmed that the West Cumbria Sherwood Sandstone aquifer has water available for abstraction.

Four landowners requested further information with regard to:

- Safeguards that will be put in place to prevent damage to the local rivers, aquifers and water table;
- The water abstraction locations; and
- Disruption to the local community caused by laying water infrastructure as well as discharge from the power station.

### **3.6.3 Surface Water Flood Risk (including hydrology and drainage)**

The Environment Agency highlighted that the site currently has a low probability of flooding (Flood Zone 1, as defined in Planning Policy Statement 25: Development and Flood Risk). They also noted that they have information on groundwater monitoring.

The joint response by the three councils, the Environment Agency, the Lake District National Park Authority, Sellafield Limited, a landowner and a public consultee, highlighted that parts of the site are susceptible to flooding and therefore potential impacts upon the hydrogeology of the area (which would have a subsequent effect on local properties) should be considered.

Six consultees, including the joint response made by the three councils, the Environment Agency, the Lake District National Park Authority and Sellafield Limited, noted the requirement for NuGen to undertake a Flood Risk Assessment (FRA). Further, Carlisle City Council noted that the Project is unlikely to have a direct impact on local flood risk in the Carlisle area. Suggestions as to what the FRA should contain included: the impact on groundwater, surface water, ordinary watercourses; an assessment of all flood risks; and the potential impacts and mitigation measures of surface water disposal, both in and outside the site.

The Highways Agency helpfully noted they can provide information on the impact of flooding to local transport infrastructure.

Concern was raised by ten consultees regarding the potential impact of the Project on surface water flood risk. Six consultees discussed mitigation measures to manage surface water flood risk. The joint response made by Copeland Borough Council, Allerdale Borough Council, and Cumbria County Council stated that a SUDS strategy could be a potential mitigation measure. The Environment Agency noted SUDS may not be feasible and suggested incorporating development free zones and watercourses within the site layout, in addition to grey water re-use. In addition, one landowner requested further information on the proposed mitigation measures and how NuGen intend to deal with surface water runoff from non-permeable surfaces. A landowner suggested the construction of the power station on a “plinth” in order to manage flood risk.

Further, three public consultees highlighted the need to avoid land drains in close proximity to residential accommodation.

### 3.6.4 Water Quality

Four consultees, including Dumfries and Galloway Council, the Environment Agency, the Lake District National Park Authority and a landowner, raised concern regarding the impact of the scheme on water quality. The comments included the potential for below ground structures and on site industrial uses to contaminate the water. The Environment Agency noted the need to assess the potential risks of corrosion and biocides in the cooling water system.

The joint response made by the three Councils confirmed noted that United Utilities have information on water quality.

Mitigation measures were discussed by three consultees. The Environment Agency stated a contingency plan will be required to mitigate the effects of below ground structures. In addition, they suggested the use of peripheral boreholes to monitor groundwater flow and contaminant plumes. Two landowners highlighted that NuGen must prevent contaminants entering watercourses via the reactor cooling water system.

### 3.6.5 Water Framework Directive

The Environment Agency noted the need for a Water Framework Directive Assessment and set out what should be assessed within this.

### NuGen response to initial water comments

Consultees raised a variety of issues concerning water issues and these comments will be considered as the Project progresses as follows:

- The need for an assessment of the potential impacts on resources, abstraction and discharge has been noted. NuGen will seek to mitigate any potential impact of an increased demand for water resources. As further information becomes available NuGen will work closely with stakeholders to assess the implications for such issues as safeguards, locations and disruption.
- The concerns raised regarding flood risk are noted and NuGen welcomes the information provided on this topic. The various comments that stakeholders have indicated are of importance will be considered through the flood risk assessment.
- NuGen appreciates the importance of maintaining water quality in the local area and will engage with stakeholders to agree any mitigation that may be required.
- The need for a Water Framework Directive Assessment is noted and will be discussed with the Environment Agency and other relevant stakeholders as the Project progresses.

### 3.7 Socio-economic

Forty seven comments were made in relation to socio-economic aspects of the Project. Of these, 19% (9 comments) were made in relation to population, 19% (9 comments) in relation to investment, 17% (8 comments) were made regarding the local economy, 15% (7 comments) in relation to employment and 12% (6 comments) in relation to human health and well being. A further 10% (5 comments) were made concerning residential accommodation, including the impact of increased population on the housing market. A small number of comments were made in relation to potential impacts on tourism (4%, 2 comments) and leisure activities (4%, 2 comments). Figure 7 highlights the distribution of comments made in relation to Socio-economic.

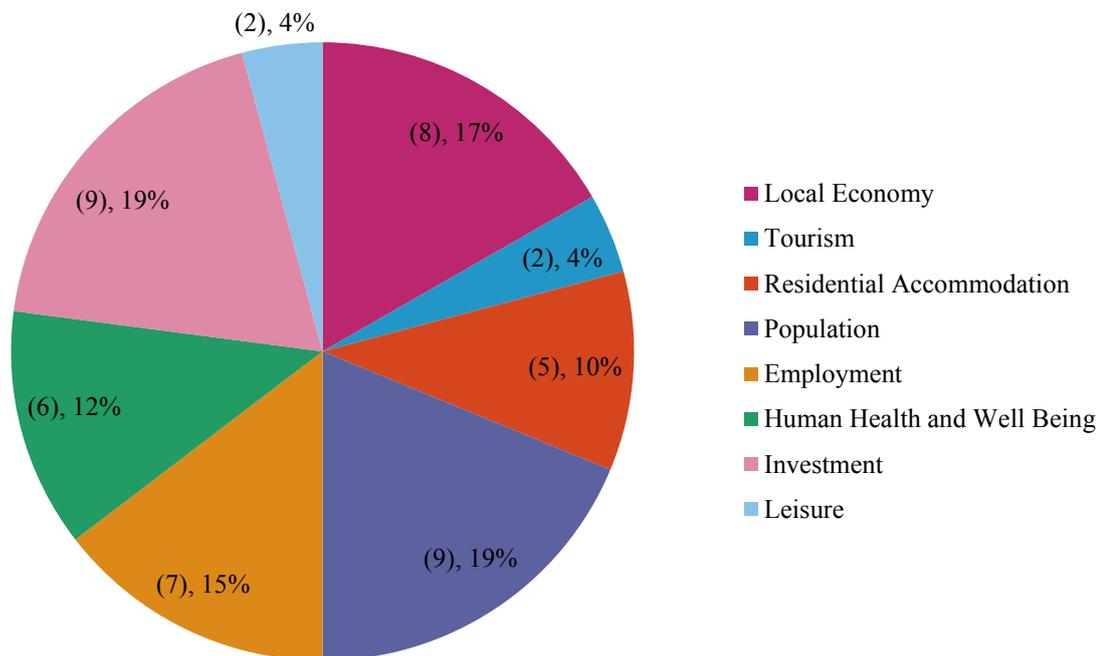


Figure 7: Distribution of comments made in relation to Socio-economic

#### 3.7.1 Local Economy

Carlisle's role in the Cumbrian economy was raised by Carlisle City Council. The council endorsed the potential additional benefits of the Project which may have positive impacts locally. Beckermeth Parish Council emphasised the need to ensure that the locality derives benefits from the money that will be spent in the area.

Baseline information on the local economy was provided by two consultees. The National Cycle Network Route's impact on the local economy including spend in the locality and the creation and safeguarding of jobs was noted by Sustrans Limited. The Nuclear Decommissioning Authority also requested that appropriate recognition of the Energy Coast Masterplan be undertaken.

The Nuclear Decommissioning Authority (NDA) and the Marine Management Organisation commented on the cumulative impact of the Project. The high density of workers at Sellafield which could be exacerbated by the Project was raised by the NDA. The Marine Management Organisation requested that any socio-economic assessment should include the impacts on

the local fishing industry and consider cumulative effects of the impacts on the industry from other developments in the area.

The Lake District National Park Authority highlighted the potential impact of the demand for additional employment premises and housing, and the availability of suitable sites to support the Project (both greenfield or previously developed land). They requested that NuGen undertake an assessment of this, both during construction and operation.

### **3.7.2 Employment**

Copeland Borough Council, Allerdale Borough Council and Cumbria County Council stated that skills, businesses and employment need to be established and assessed as part of the socioeconomic assessment.

Representations were made by five consultees on the availability of a local workforce for the construction and operation of the power station. Beckermeth Parish Council recommended that recruitment should be undertaken locally where possible and the joint response made by Copeland Borough Council, Allerdale Borough Council and Cumbria County Council suggested that local resources should be used in the supply chain. The joint council response further suggested that the provision of graduate and apprenticeship opportunities would help to deliver sustainable employment in the area.

The Lake District National Park Authority highlighted the potential impact of the demand for additional employment premises and housing, and the availability of suitable sites to support the Project (both greenfield or previously developed land). They requested that NuGen undertake an assessment of this, both during construction and operation.

### **3.7.3 Investment**

Eight consultees including the Highways Agency, Copeland Borough Council, Allerdale Borough Council and Cumbria County Council made representations concerning investment in local infrastructure. A landowner noted that they would like to see an improvement in local infrastructure, including hospital services. They also commented that the lack of infrastructure in the area caused limited economic development to replace former industries. In addition, a public consultee commented that they would like to see these improvements without deterioration in landscape and lifestyle. It was acknowledged by the public consultee that the Project needs to ensure that sustained economic development occurs and that there is investment in infrastructure.

The need for investment in transport infrastructure was raised by three consultees. There was consensus among the Highways Agency and two landowners who raised the topic that the capacity and management of the road network needed to be improved if it is to cope with the impacts of the proposal. A further information request was made by a landowner concerning plans to improve and invest in local services.

Copeland Borough Council, Allerdale Borough Council and Cumbria County Council requested that the provision and improvements to local facilities and infrastructure should leave a positive and lasting legacy. Long term sustainable, and in some cases alternative uses, for the buildings and land should also be considered.

With regards to community benefit contributions, the council's joint response stated that they expect early dialogue with NuGen on an appropriate community benefits package.

### 3.7.4 Tourism

The joint response made by Copeland Borough Council, Allerdale Borough Council, Cumbria County Council and the Lake District National Park Authority raised tourism as a particular area requiring consideration. It was recommended that the impacts on tourism should be considered in the socioeconomic assessment. The Lake District National Park Authority noted the value of tourism to the economy of the National Park.

### 3.7.5 Leisure

Two landowners highlighted the potential impacts of the proposal on their activities, making comments about access and fishing rights that they have had to the river and surrounding area for many years. Both landowners are concerned that the Project may have an impact on recreational fishing.

### 3.7.6 Residential Accommodation

Accommodation was raised by five consultees. The joint response by Copeland Borough Council, Allerdale Borough Council and Cumbria County Council commented that the housing market could be distorted as a result of the Project and that the location of accommodation needs to be established.

English Heritage highlighted the potential impact on historic settlements from accommodation for construction workers. In addition, the Lake District National Park Authority noted the impact on the demand for housing for permanent workers. They commented that this would have an impact in the area in terms of requiring land for housing purposes which may include greenfield sites or previously developed land.

The Lake District National Park Authority specified the need for a study of existing housing availability, the potential number of temporary and permanent workers, where housing can be provided, the type of housing required and the impact of the Project on house prices for the local community. The joint response by the councils commented that they have detailed assessments of housing issues through their Local Development Framework evidence base.

### 3.7.7 Population

Representations concerning the impact of increased population on local services were made by six consultees, including the joint response made by Copeland Borough Council, Allerdale Borough Council and Cumbria County Council and Cumbria and the Lancashire Health Protection Unit. Consultees noted the impact of a larger population on the economy, schools, healthcare, housing, transport and local infrastructure.

The joint council response and the Lake District National Park Authority also raised the issue of the ability of local communities to cope with the increase in population without adverse impacts on cohesion and identity.

Four consultees made comments in relation to an assessment of the population impacts. The joint response made by Copeland Borough Council, Allerdale Borough Council and Cumbria County Council specified the need to assess demographic changes and the effects on local services in the socioeconomic assessment. The Lake District National Park Authority also supported an assessment of the impact of the Project on existing local services and the potential expansion in capacity or retention of under threat services.

### 3.7.8 Human Health and Well Being

The need to liaise with the National Health Service (NHS) on baseline health information was noted in the joint response made by Copeland Borough Council, Allerdale Borough Council and Cumbria County Council. They also stated that a health impact assessment is required and health and social care requirements need to be established.

Impacts on human health and well being were raised by six consultees. In particular, concerns relating to the increase in electricity pylons in the area and the connection between nuclear and childhood leukaemia, adult cancers and high profile accidents were made by two landowners. A landowner did however state that they had no concerns about the minimal risks of modern Pressurised Water Reactors (PWRs).

#### NuGen response to initial socio-economic comments

Consultees raised a range of issues concerning the socio-economic theme and these comments will be considered as the Project progresses as follows:

- NuGen will work closely with local stakeholders to seek to minimise the impacts of the Project in the local area which may be caused as a result of population increase.
- NuGen is aware of the increase in demand for temporary and permanent residential accommodation which will arise as a consequence of the Project. Through working closely with key stakeholders NuGen will develop a residential accommodation strategy for the Project.
- The various topics (including tourism, employment and local economy) that stakeholders have indicated should be part of the socio-economic assessment will be considered as the baseline and methodology is developed.
- NuGen will work closely with stakeholders to ensure that local resources and labour are considered in line with European procurement regulations.
- NuGen considers issues related to health and well being to be of high importance and will carefully consider the points raised and engage further with stakeholders on this issue as the Project progresses.
- The comments made by stakeholders in respect of the contribution that the Project may make towards investment in local infrastructure and services have been noted. NuGen will enter into dialogue on such issues with relevant stakeholders as the Project progresses.
- NuGen will work closely with stakeholders in respect of the impact the Project may have on leisure activities, including recreational fishing, in due course.

## 3.8 Transport

Forty six comments were made in relation to transport. Of these, 24% (11 comments) were made regarding road transport, 24% (11 comments) in relation to the transport assessment and 24% (11 comments) in relation to access (including site access and the railway station access). Further, 11% (5 comments) raised comments in relation to footpath and cycle ways, including onsite and offsite routes. A small number of comments (9%, 4 comments) were made in relation to aviation, rail capacity (6%, 3 comments) and the impact of river transport on the marine environment (2%, 1 comment). Figure illustrates the distribution of comments made in relation to Transport.

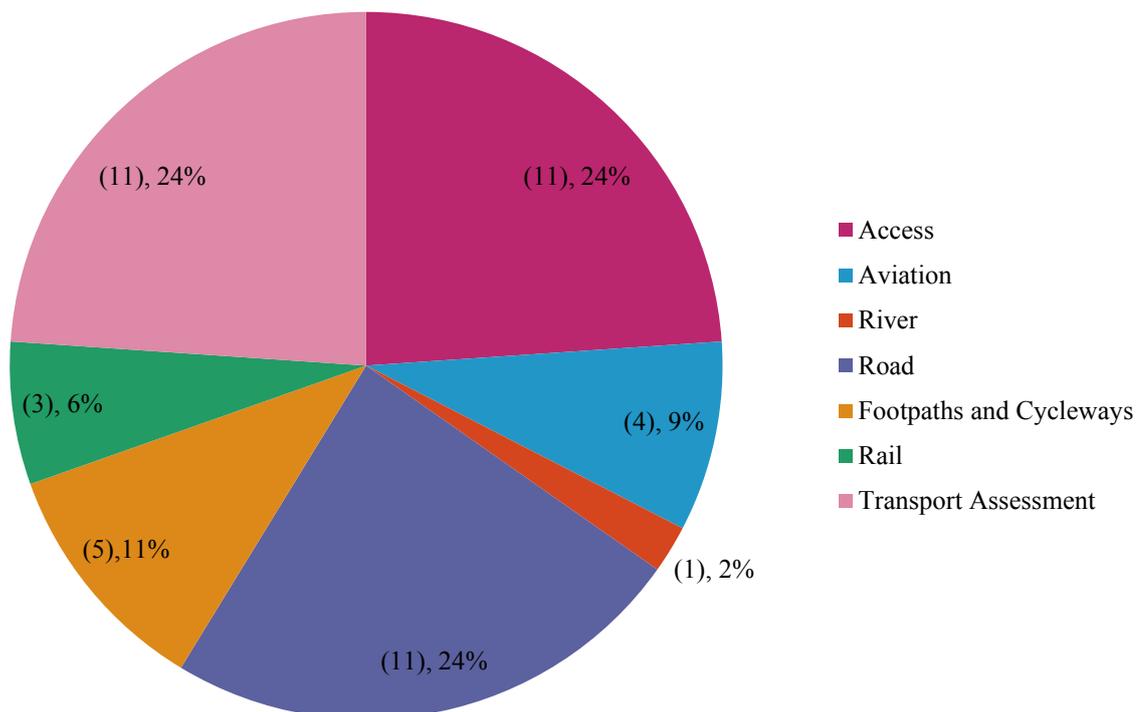


Figure 8: Distribution of comments made in relation to Transport

### 3.8.1 Road

Comments were raised by the Highways Agency, Beckermest Parish Council, Carlisle City Council, two landowners and two public consultees on the potential impacts on the road system, including the impact of an increase in road traffic and congestion on the current road transport network, both during the construction phase as well as during the operation of the power station.

Six comments noted that the road network is already at full capacity at certain times of the day. A further comment indicated concern regarding the inability of large vehicles to drive beneath the bridge on Nursery Road. The impact on parking, in particular during construction, was also raised by Sellafeld Limited.

Finally, a comment was made by the Highways Agency indicating that there are existing transport studies which NuGen is welcome to use.

### 3.8.2 Transport Assessment

Carlisle City Council, the Lake District National Park Authority, Copeland Borough Council, Allerdale Borough Council and Cumbria County Council commented on the need for a transport assessment. They indicated the topics that were considered necessary to cover within the Transport Assessment:

- impacts of the location of accommodation on transport;
- shift patterns of workforce;
- commuting patterns;
- travel to work behaviour; and
- proposed method of transportation required for construction materials.

It was noted by the Lake District National Park Authority that the Transport Assessment must be undertaken in accordance with *Planning Policy Guidance 13- Transport*.

The need for the production of a site specific Travel Plan to allow for the identification of required mitigation was also suggested by the Lake District National Park Authority, and in the joint response made by Copeland Borough Council, Allerdale Borough Council and Cumbria County Council. In addition, the joint response made by the three councils noted that NuGen will need to financially support the transport assessment and travel plan and associated financial contributions.

### 3.8.3 Access

Sustrans Limited, the NDA, the Lake District National Park Authority and two landowners made comments in relation to the potential implications of accessing the site and maintaining the access to the railway station, including: access arrangements during construction; access from centres of population; and the impact of access arrangements from the sea (including ecological implications). Comments were also raised regarding the potential implications of the Project on the National Cycle Network route, Sellafield railway station and public footpaths.

Five comments requested that further information be provided with regard to access arrangements, including access to the railway station, coastal paths and cycleways.

### 3.8.4 Footpaths and Cycleways

Two comments were made by Sustrans Limited and a landowner in relation to the potential impact of the Project on National Cycle Network Route 72 and other cycle routes surrounding the site, including the route from Sellafield railway station to Calder Bridge. Sustrans Limited noted that the National Cycle Network Route 72 should be retained or an alternative route found.

Sustrans Limited also suggested that provision should be made for good quality cycle routes into the site from key residential areas. They noted that recent studies at Sellafield have found that a number of workers would like to cycle to work but are discouraged by traffic on the road and a lack of direct routes.

### 3.8.5 Aviation

The Ministry of Defence and Carlisle City Council highlighted the potential impact of a new air exclusion zone around the nuclear power station on both military and commercial air

traffic. In addition, the joint response made by Copeland Borough Council, Allerdale Borough Council and Cumbria County Council noted that information should be gathered on civil aircraft movements.

The use of air navigation warning lights on the buildings of the nuclear power station and the construction cranes was also raised as an issue by the Ministry of Defence.

### **3.8.6 Rail**

The joint response made by Copeland Borough Council, Allerdale Borough Council, and Cumbria County Council endorsed the use of rail for both freight and passengers. They and the Rail Passengers Council made comments in relation to the potential impact on the Cumbria Coast Railway, with a particular focus on issues relating to capacity and the need for the Project to provide additional capacity to accommodate its requirements.

Sustrans Limited noted that an extra train service to Sellafield has been provided by rail operator DRS but that it was their view that this can only cope with current numbers of workers on the site.

The joint response from Copeland Borough Council, Allerdale Borough Council, and Cumbria County Council stated that the issue of rail capacity has already been assessed and that regard should be had to that assessment.

### **3.8.7 River**

The Marine Management Organisation made a comment in relation to the potential impact that an increase in river transport might have on the marine environment.

## **NuGen response to initial transport comments**

Consultees raised a variety of issues concerning the transport aspects of the Project and these comments will be considered as the Project progresses as follows:

- Issues relating to the potential impacts on the road and rail networks including the impact on train services and road congestion will be considered by NuGen as it determines the Transport Strategy for the Project. NuGen will progress the Transport Strategy in discussion with the County Council, Copeland Borough Council, the Highways Agency and other key transport stakeholders. NuGen has already held initial discussions with the key transport stakeholders to start the process.
- NuGen will continue working with Sellafield Limited to ensure that transport impacts of both sites are understood and assessed as the Moorside scheme is brought forward.
- NuGen will consider the various topics that stakeholders have indicated should be part of the Transport Assessment as it develops the baseline and methodology for the Transport Assessment.
- A number of consultees raised the need to maintain access to and across the site, including to Sellafield railway station and the Sellafield Limited site. In particular comments were made concerning the importance of National Cycle Network Route 72 which crosses the site. NuGen will consider access to and across the site as well as to Sellafield Station and the Sellafield site as it progresses the design of the Moorside site and any temporary construction works.

- NuGen will consider the issues raised on the potential impact of the Moorside Project on aviation and the airspace around the site in response to the comments raised. In addition, “proximity to civil aircraft movements” is one of the “Flags for local consideration” identified in The National Policy Statement for Nuclear Power Generation (EN-6 )which will be considered by the Planning Inspectorate and will therefore be an issue for NuGen to have regard to in progressing the application.
- NuGen will develop a transport plan dealing with the method of construction materials and workers.

## 3.9 Land and Property

Thirteen comments were raised regarding land and property. Of these, 38% (5 comments) were made in relation to compensation, with 23% (3 comments) concerned with the effect of the development on the value of their land and properties. 22% (4 comments) were made in relation to landowners and 8% (1 comment) was made in relation to mineral rights. Figure 9 illustrates the distribution of comments made in relation to Land and Property.

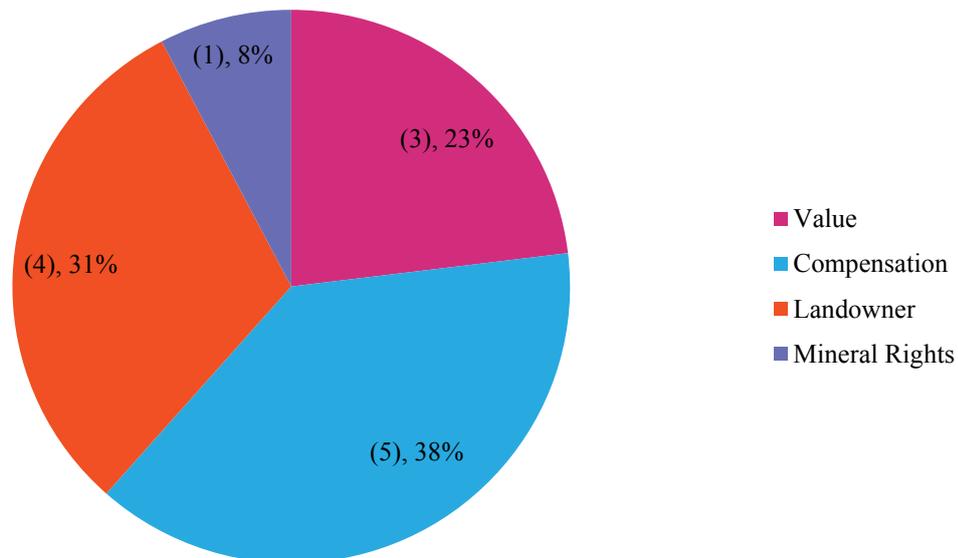


Figure 9: Distribution of comments made in relation to Land and Property

### 3.9.1 Property and Land Value

One landowner and one public consultee made comments in relation to the impact on land and property values and “saleability” (both during and after construction). The landowner further acknowledged the need for NuGen to carry out intrusive and non intrusive surveys on their land, however highlighted their concern regarding the effects of such activities and blight on their property.

### 3.9.2 Compensation

Five comments were raised regarding compensation, including: information requests on the compensation arrangements for loss of value as well as the compulsory purchase process being considered by NuGen; whether NuGen or the NDA would consider the purchase of the freehold of land owned by the landowner; and that compensation should be paid due to the potential intrusive nature of the NuGen structures.

A comment was made by a landowner who was made aware of the need for future ecology surveys and stated that access permission would not be agreed until appropriate compensation was agreed.

### **3.9.3 Landowners**

The NDA highlighted that NuGen need to ensure planning consents and conditions facilitate the ability to better use land and assets in order to help reduce the impact of the NDA's combined operations.

The need to engage early with local authorities who own land in close proximity to the proposed development (both on and off site) was raised in the joint response made by Copeland Borough Council, Allerdale Borough Council and Cumbria County Council.

### **3.9.4 Mineral Rights**

The joint response made by Copeland Borough Council, Allerdale Borough Council and Cumbria County Council specified the need to verify that all the mineral rights have been acquired or negotiated.

### **NuGen response to initial land and property comments**

Consultees raised a variety of issues concerning land and property and these comments will be considered as the Project progresses as follows:

- NuGen notes the comments made in response to the impact on land and property values. NuGen will work with affected and potentially affected landowners throughout the preparation of the DCO and the design of the Moorside Project with regard to the impacts of the scheme. Any impacts on property will be dealt with in accordance with the Compulsory Purchase and related regulations.
- NuGen is aware that mineral rights to the site have been claimed and is in discussion with the landowners in question.

## 3.10 Safety and Emergency Planning

A total of 16 comments were made in relation to safety and emergency planning. All 16 of these were concerned with strategy and included comments on emergency access, compliance, the impact on local communities and Sellafield Site Limited.

### 3.10.1 Strategy

Copeland Borough Council, Allerdale Borough Council and Cumbria County Council suggested that the scoping of issues with regard to safety and emergency planning needs to be considered early. They requested that this includes compliance with the Weightman Report and the Office of Nuclear Regulation's (ONR) Site Licence Conditions and arrangements to minimise and control the impact on the local community.

The Environment Agency, the Highways Agency, the Nuclear Decommissioning Authority (NDA), a public consultee and landowner made representations concerning emergency access arrangements. Comments were raised regarding the importance of considering access for emergency services and preserving the NDA's access rights in the event of an incident. The Highways Agency raised the issue of the role of the strategic road network as part of the emergency evacuation route.

Representations were also made concerning current emergency arrangements in the area. A public consultee noted that existing arrangements at Sellafield were inadequate which has been recognised post-Fukushima. A landowner also highlighted that a written report to the Fukushima incident requires the separation of control rooms and reactors which could have a potential to impact the layout of the site. The Environment Agency commented that the last recent significant flood event was in November 2009 and it had a major impact on infrastructure. They suggested that the Flood Risk Assessment considers access and egress to the site in exceptional circumstances.

Copeland Borough Council, Allerdale Borough Council, Cumbria County Council and a landowner discussed the emergency and safety arrangements for the local community. The councils explained that emergency planning arrangements should consider evacuation centres and sensitive establishments such as schools, nurseries and caravan sites in the event of an incident. A landowner sought clarification on whether there were any plans at present to protect the local community from a nuclear incident. Beckermeth Parish Council commented that the security of Sellafield and the NuGen site should be maintained without detriment to local residents.

A comment was raised by Sellafield Limited regarding the potential impact of the Moorside Project on their site and operations. The Ministry of Defence also noted that the development of intake and outfall pipes in the sea may encroach on the Danger Area (D406) which contains a firing range. This should therefore be taken into account in the design of the Project.

### NuGen response to initial safety and emergency planning comments

NuGen recognises the importance of safety and emergency planning with regards to the Project and the need to work closely with Sellafield and the Nuclear Decommissioning Authority.

NuGen will have regard to the ONR Site Licence Conditions and emergency planning requirements and will work closely with other stakeholders on this aspect of the Project.

### 3.11 Infrastructure (non-roads)

Twelve comments were made in relation to infrastructure other than roads. 75% (9 comments) of these were concerned with electricity transmission networks, 17% (2 comments) were made in relation to the sewerage system and 8% (1 comment) was made regarding utilities. Figure 10 highlights the distribution of comments made in relation to Infrastructure.

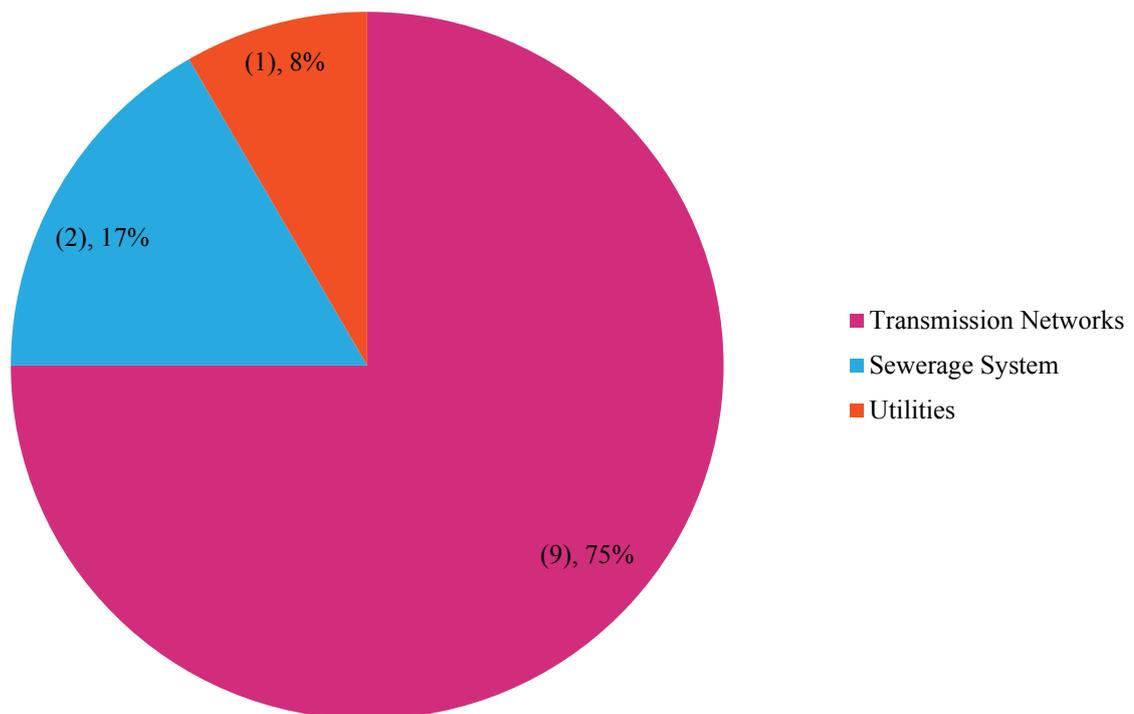


Figure 10: Distribution of comments made in relation to Infrastructure (non-roads)

#### 3.11.1 The Transmission Network

The infrastructure required for the transmission of the electricity generated by the proposed nuclear power station was raised by consultees.

Five consultees made comments in relation to the impact of the electricity transmission network on the local area. English Heritage noted the impact of linking the power station to the transmission network on historic infrastructure (such as bridges). The joint response made by Copeland Borough Council, Allerdale Borough Council and Cumbria County Council highlighted the potential visual impact of North West Coast Connection's (NWCC) on-site grid connections to the landscape. Carlisle County Council noted the existing transmission network will have to be upgraded due to a substation for the network being located in close proximity to Carlisle.

Six consultees, including the joint response made by Copeland Borough Council, Allerdale Borough Council and Cumbria County Council, made representations on the routing options of the transmission network. Two landowners and one public consultee raised concerns in relation to defining and funding a suitable route to transmit the power. The comments

included: the least intrusive and most popular National Grid connection route would be underground; and over head (i.e. above land) connection routes would be unpopular with concern raised that the Project would have a visual impact on the landscape. The joint response by the three Councils also noted the impact of technology choice for the power station on the NWCC and strategic routes.

The joint response made by Copeland Borough Council, Allerdale Borough Council and Cumbria County Council specified the need to generally consider synergies with the NWCC Project, in particular on issues such as programme and consultation. A similar point was raised by Natural England who stated that would welcome early discussions with both NuGen and National Grid to discuss the interdependency of the two proposals.

### **3.11.2 The Sewerage System and Other Utilities**

The Lake District National Park Authority highlighted the potential impact of development upon the existing water and sewerage infrastructure with the Environment agency suggesting an assessment of this should be undertaken. In addition, Sellafield Limited raised a general concern regarding the impact of the Project on existing utility routes.

#### **NuGen response to initial infrastructure (non-roads) comments**

Consultees raised a range of issues concerning the Infrastructure theme and these comments will be considered as the Project progresses as follows:

- National Grid is responsible for progressing the NWCC Project which will connect the Project to the wider electricity network. The impact of the NWCC Project will be for National Grid to consider.
- NuGen is working closely with National Grid on their NWCC Project to minimise impact in the immediate locality of Moorside where the impact on the powers lines may be influenced by localised Moorside factors. NuGen will work with National Grid and other key stakeholders in this regard.
- NuGen will consider the impact on new and existing utility infrastructure, including water and sewerage, as the Project progresses.

### 3.12 Regulations and Consents

A total of eight comments were made concerning regulations and consents. Consultees raised comments on environmental consents and permits (63%, 5 comments), safety regulations (13%, 1 comment), decommissioning (12%, 1 comment) and a felling licence (12%, 1 comment). Figure 11 sets out the distribution of comments made in relation to Regulations and Consents.

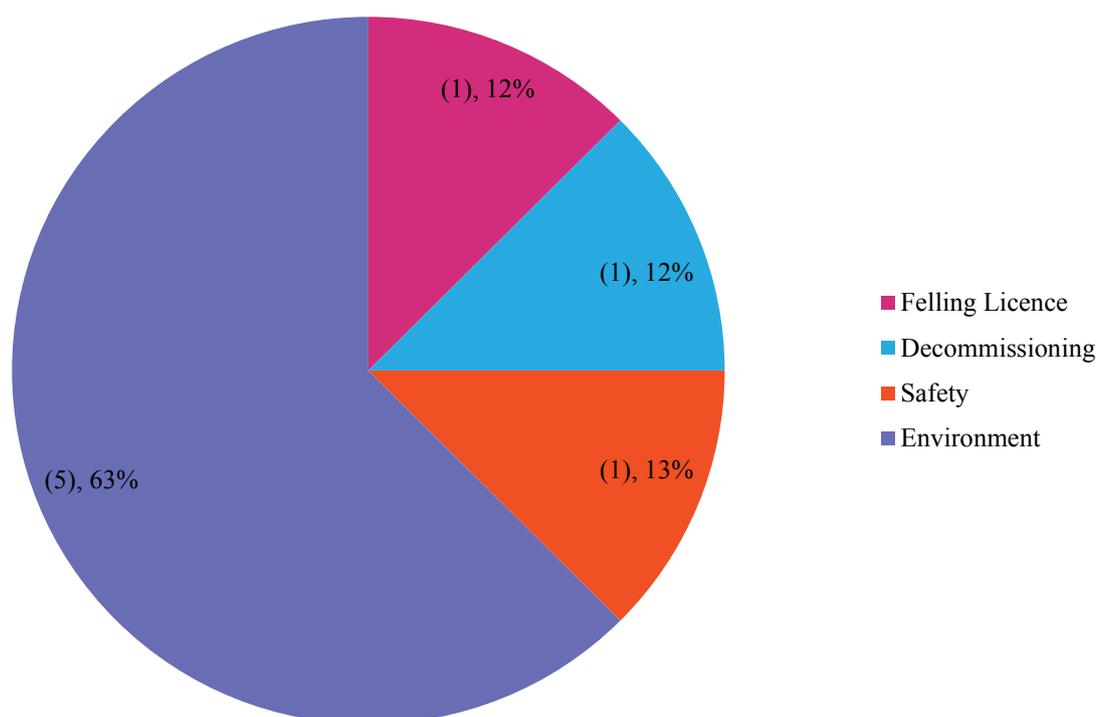


Figure 11: Distribution of comments made in relation to Regulations and Consents

The joint response made by Copeland Borough Council, Allerdale Borough Council and Cumbria County Council requested that further information be provided in relation to decommissioning requirements. They highlighted that NuGen should learn from Sellafield's experience of decommissioning, particularly in relation to site access and design.

Information was provided by six consultees on environmental permits and consents. Natural England, the Environment Agency and the Marine Management Organisation recommended that an assessment of licences and consents should be considered at an early stage. Natural England suggested that any environmental permits should be applied for in parallel with the application to the Infrastructure Planning Commission (IPC).

Further information providing regulations and consents included:

- Abstraction from coastal waters may require a licence (Environment Agency);
- Environmental permits are likely to be required for waste (Environment Agency);

- Proposals for foundation design and below ground structures will need to obtain the necessary permits (Environment Agency);
- The Lead Local Flood Authority will likely adopt the Environment Agency's anti-culverting policy when considering consent applications (Copeland Borough Council, Allerdale Borough Council and Cumbria County Council);
- The Radiation (Emergency Preparedness and Public Information) Regulations 2001 should be considered early on (Copeland Borough Council, Allerdale Borough Council and Cumbria County Council); and
- The Environment Agency's Derwent and West Cumbria Catchment Abstraction Management Strategy (CAMS) are relevant to the proposal (Environment Agency).

The Forestry Commission discussed the impacts of regulations and consents on scheme design and the issue of restocking. In particular, they noted that a felling licence for woodland within Sellafield was granted to the NDA on the condition that an alternative area of 3.1ha be restocked with 1,110 trees per hectare by 30th June 2017. The Forestry Commission would welcome further dialogue on an alternative restocking area.

### **NuGen response to initial regulations and consents comments**

NuGen is aware of the need for other consents and regulations and will have regard to environmental and emergency planning regulations.

The Forestry Commission has provided details of the felling licence and NuGen will enter into dialogue with the Forestry Commission and Nuclear Decommissioning Authority with regards to alternative restocking areas as the Project progresses.

## **3.13 Site Investigation Works**

Two comments were made in relation to site investigation works, both comments discussed boreholes.

### **3.13.1 Boreholes**

The topic of boreholes was raised by the Environment Agency and a landowner. The Environment Agency recommended that long-term, peripheral boreholes be placed in the superficial and deep aquifer system adjacent to the Sellafield boundary. A request for further information was made by a landowner on the potential environmental impacts of the Project and details of any measures to ameliorate the impacts of boreholes on Church Moss Site of Special Scientific Interest (SSSI).

#### **NuGen response to initial site investigation works comments**

NuGen will consider the Environment Agency's advice and the details they have provided as the Project moves forward.

NuGen has provided the landowner with the Preliminary Risk Assessment, the Site Investigation Planning Application Supporting Statement and the planning permission decision letter. NuGen will ensure that best practice measures are undertaken to mitigate impacts on the SSSI.

## 4 Next Steps

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### 4.1 Engaging with Statutory Bodies and the Local Community

The initial Section 42 consultation marks the beginning of an engagement process with prescribed consultees and key stakeholders. The initial consultation has allowed consultees to provide comments and share technical information which could assist NuGen in the future.

An Engagement Plan is currently being developed to set in place a process for working with those parties that have indicated how they wish NuGen to engage with them as the Project progresses. In addition, NuGen is developing a wider plan of stakeholder engagement with all Section 42 parties.

NuGen intends to conduct a multi-stage consultation process involving a large range of key stakeholders, local authorities and the local community.

As part of this process, NuGen will be preparing a Statement of Community Consultation (SoCC) which formally outlines how NuGen will consult with the local community under Section 47 of the Planning Act 2008. The SoCC will assist NuGen in preparing an inclusive and meaningful consultation strategy prior to the commencement of formal public consultation.

The process of preparing a SoCC can be summarised as follows.

- consult the relevant local authority on what should be in the SoCC;
- have regard to the local authority's response to that consultation in preparing the SoCC;
- publish the SoCC in a locally circulating newspaper, and as required by secondary legislation; and
- carry out consultation in accordance with the SoCC.

The SoCC will contain the following information:

- Purpose of the SoCC;
- Overview of the scheme;
- Outline of the consenting process;
- Consultation commitments;
- How and where consultation will be undertaken;
- Who is being consulted;
- Where responses to the consultation should be sent to; and
- Where further information can be found.

### 4.2 Future Consultation

This early consultation exercise with Section 42 Consultees forms part of a multi stage pre-application consultation process (most likely we will hold two further stages of formal

consultation with the Section 42 Consultees. Section 47 Consultees (i.e. the Local Community) will also be included at both these stages).

In due course, these rounds of consultation will provide an opportunity to formally comment on our proposals as they advance and we would welcome involvement throughout the process. We anticipate that our next formal stages of consultation will cover:

- Consultation on **Issues and Options** for the development – at the next stage; and
- Consultation on a **Proposed Scheme** (i.e. on matters of detail) – at a subsequent stage.

### 4.3 Commitment to Ongoing Engagement

NuGen is committed to on-going engagement (including under Section 42) throughout the pre-application stage, including in terms of continuous engagement with statutory consultees and others through scheduled meetings and in terms of targeted consultation at specific stages of the Project.

NuGen has developed the following principles of stakeholder engagement which have been adhered to throughout the initial Section 42 consultation and will be form the basis of future engagement as the Project progresses.

- Represent NuGen in West Cumbria;
- Build engagement as a long term relationship;
- Maintain a record of all stakeholder engagements;
- Help underpin community support for the DCO process;
- Management of expectations;
- Help resolve issues; and
- Develop NuGen profile and positioning in the community as a local developer.

### 4.4 Further Comments

Should you have any further comments to make then please register with our website at: [www.nugeneration.com](http://www.nugeneration.com)

## Appendix A

### Table of Consultees

## A1 Table of Section 42 Consultees and other relevant stakeholders

Type of Consultee	Organisation Name	Consultee ID
Prescribed Consultee	The Welsh Ministers	SC001
Prescribed Consultee	The Scottish Government	SC002
Prescribed Consultee	Department of the Environment (Northern Island)	SC003
Prescribed Consultee	North West Development Agency	SC004
Prescribed Consultee	Health and Safety Executive Carlisle and Bootle	SC005
Prescribed Consultee	North West Strategic Health Authority	SC006
Prescribed Consultee	NHS Cumbria	SC007
Prescribed Consultee	Natural England North West Planning Consultation Service	SC008
Prescribed Consultee	English Heritage	SC009
Prescribed Consultee	Cumbria Fire and Rescue	SC010
Prescribed Consultee	Cumbria Constabulary	SC011
Prescribed Consultee	Environment Agency	SC020
Prescribed Consultee	Scottish Environment Protection Agency Corporate Office	SC021
Prescribed Consultee	The Design Council	SC022
Prescribed Consultee	The Equality and Human Rights Commission (Manchester Office)	SC024
Prescribed Consultee	The Scottish Human Rights Commission	SC025
Prescribed Consultee	Solway Coast Area of Outstanding Natural Beauty (AONB) Partnership	SC026
Prescribed Consultee	Royal Commission on Ancient and Historical Monuments of Wales	SC027

Prescribed Consultee	The Countryside Council for Wales	SC028
Prescribed Consultee	The Homes and Communities Agency	SC029
Prescribed Consultee	The Joint Nature Conservation Committee	SC030
Prescribed Consultee	The Commission for Rural Communities	SC031
Prescribed Consultee	Scottish Natural Heritage	SC032
Prescribed Consultee	The Maritime and Coastguard Agency	SC033
Prescribed Consultee	The Marine Management Organisation	SC034
Prescribed Consultee	Marine Scotland	SC035
Prescribed Consultee	The Civil Aviation Authority	SC036
Prescribed Consultee	The Highways Agency	SC037
Prescribed Consultee	Transport for London	SC040
Prescribed Consultee	The Rail Passengers Council	SC041
Prescribed Consultee	The Disabled Persons Transport Advisory Committee	SC042
Prescribed Consultee	The Coal Authority	SC043
Prescribed Consultee	The Office of Rail Regulation	SC044
Prescribed Consultee	The Gas and Electricity Markets Authority (Ofgem)	SC045
Prescribed Consultee	Ofwat (The Water Services Regulation Authority)	SC046
Prescribed Consultee	The Water Industry Commission for Scotland	SC047
Prescribed Consultee	The British Waterways Board North West	SC049
Prescribed Consultee	Trinity House	SC050
Prescribed Consultee	Cumbria & Lancashire Health Protection Unit	SC051
Prescribed Consultee	Cumbria Local Resilience Forum	SC052
Prescribed Consultee	Crown Estate	SC053

Prescribed Consultee	Forestry Commission North West England Regional Office	SC054
Prescribed Consultee	Network Rail	SC087
Prescribed Consultee	Northern Rail Limited	SC089
Prescribed Consultee	Associated British Ports (HQ)	SC090
Prescribed Consultee	Associated British Ports (Barrow)	SC091
Prescribed Consultee	Port of Whitehaven	SC092
Prescribed Consultee	Port of Workington	SC093
Prescribed Consultee	British Waterways North West	SC094
Prescribed Consultee	NATS (En Route) plc	SC095
Prescribed Consultee	Royal Mail Group Limited	SC096
Prescribed Consultee	Ofcom	SC097
Prescribed Consultee	British Sky Broadcasting Limited	SC098
Prescribed Consultee	Gamma	SC099
Prescribed Consultee	Northern Gas Networks Limited	SC100
Prescribed Consultee	British Gas	SC101
Prescribed Consultee	Npower	SC102
Prescribed Consultee	EON UK	SC104
Prescribed Consultee	Transco PLC	SC105
Prescribed Consultee	United Utilities Group PLC	SC106
Prescribed Consultee	Energetic Electricity Limited	SC107
Prescribed Consultee	BT Group plc	SC108
Prescribed Consultee	GTC (Gas Transportation Company Limited)	SC109

Prescribed Consultee	UK Power Networks (IDNO) Limited	SC110
Prescribed Consultee	ESP Electricity Limited	SC111
Prescribed Consultee	Independent Power Networks Limited	SC112
Prescribed Consultee	Electricity Network Company Limited	SC113
Prescribed Consultee	ECG (Distribution Limited)	SC114
Prescribed Consultee	Cable and Wireless	SC115
Prescribed Consultee	Colt	SC116
Prescribed Consultee	Orange (May Gurney)	SC117
Prescribed Consultee	Scottish and Sothern Electricity	SC118
Prescribed Consultee	Virgin Media	SC120
Prescribed Consultee	Sustrans Limited	SC123
Local Authority	Allerdale Borough Council	SC056
Local Authority	Cumbria County Council	SC057
Local Authority	Barrow Borough Council	SC058
Local Authority	South Lakeland District Council	SC059
Local Authority	Carlisle City Council	SC060
Local Authority	Eden District Council	SC061
Local Authority	Lake District National Park Authority	SC062
Local Authority	Northumberland County Council	SC063
Local Authority	Durham County Council	SC064
Local Authority	North Yorkshire County Council	SC065
Local Authority	Richmondshire District Council	SC066

Local Authority	Craven District Council	SC067
Local Authority	Lancashire County Council	SC068
Local Authority	Lancaster City Council	SC069
Local Authority	Dumfries and Galloway Council	SC070
Local Authority	Scottish Borders Council	SC071
Local Authority	Northumberland National Park Authority	SC072
Local Authority	Yorkshire Dales National Park Authority	SC073
Local Authority	Gosforth Parish Council	SC012
Local Authority	Seascale Parish Council	SC013
Local Authority	Ponsonby Parish Council	SC014
Local Authority	Beckermet Parish Council	SC015
Local Authority	Lowside Quarter Parish Council	SC016
Local Authority	Haile and Wilton Parish Council	SC017
Local Authority	Egremont Parish Council	SC018
Local Authority	Ennerdale and Kinniside Parish Council	SC019
Local Authority	Copeland Borough Council	SC055
Landowner	Nuclear Decommissioning Authority (NDA)	SC074
Landowner	Private individual	SC075
Landowner	Private individual	SC076
Landowner	Private individual	SC077
Landowner	Private individual	SC078
Landowner	Private individual	SC079

Landowner	Private individual	SC080
Landowner	The Highways Authority	SC081
Landowner	BRB Residuary Limited	SC088
Landowner	National Grid	SC103
Landowner	Electricity North West Limited	SC119
Landowner	Private individual	SC121
Landowner	Private individual	SC122
Landowner	NDA Properties Limited	SC124
Landowner	Sellafield Limited	SC125
Landowner	Ministry of Defence	SC126
Landowner	United Kingdom Atomic Energy Authority	SC127
Landowner	United Utilities	SC128
Landowner	Private individual	SC129
Landowner	Private individual	SC130
Landowner	Private individual	SC132
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Landowner	Private individual	SC169
Landowner	Private individual	SC170
Landowner	Private individual	SC171
Landowner	Civil Nuclear Constabulary	SC161
Non-Section 42 Consultee	Cumbria Local Economic Partnership	SC082
Non-Section 42 Consultee	Cumbria Chamber of commerce	SC083
Non-Section 42 Consultee	Britain's Energy Coast	SC084
Non-Section 42 Consultee	West Cumbria Business Cluster	SC085
Non-Section 42 Consultee	Cumbria Association of Local Councils (CALC)	SC086
Non-Section 42 Landowner	Private individual	PC001
Non-Section 42 Landowner	Private individual	PC002
Non-Section 42 Landowner	Private individual	PC003
Non-Section 42 Landowner	Private individual	PC004
Non-Section 42 Landowner	Direct Rail Services	PC005
Non-Section 42 Landowner	Private individual	PC006

## Appendix B

### Summary of Response by Issue

## B1 Table of Summary of Response by Issue

### Environment

Sub-Category	Detailed Issue	Summary of combined issues	Number of respondents raising these issues	Respondent numbers
Aquatic Ecology	Baseline	The nuclear industry has a poor record in conserving flora and fauna in river environments. A variety of aquatic wildlife inhabit the area and information on biodiversity can be provided.	6	SC055; SC056; SC057; SC020; SC148; SC144
	Assessment	Assessment of the impacts on water dependent species, habitats and designated ecological sites is needed.	3	SC020; SC062; SC034
	Impact	Construction, deposit or removal in the marine area may have impacts. Impacts on the hydrology of the area, sensitive riverine environments, designated sites and species in surrounding waters, such as the River Calder, Irt and Ehen should be considered. Direct habitat loss and net loss of biodiversity is an issue and wider sites need to be considered for biodiversity value.	12	SC055; SC056; SC057; PC001; SC143; SC020; SC171; SC062; SC034; SC008; SC143; SC144

	Mitigation	<p>Details of mitigation, compensation and enhancement for affected habitats are required. Rivers Calder and Ehen will need protection during construction and operation. Opportunities for offsite biodiversity habitat enhancement should be considered. Consideration of the development in relation to its ecological zone of influence, in both the construction and established phase of the development is required.</p>	5	PC001; SC143; SC020; SC062; SC144
Terrestrial Ecology	Baseline	<p>A variety of terrestrial wildlife inhabit the area and information on biodiversity can be provided. Further details should be obtained from the Tullie House Museum.</p>	2	SC020; SC148
	Assessment	<p>An assessment of ecological resources and the ecological value of the biodiversity within the zone of influence are necessary. This should include a variety of different methods and details of future biological monitoring and reporting for the site should be considered.</p>	1	SC062
	Impact	<p>Impacts on local wildlife, habitats and protected species, including European protected species are an issue which requires consideration.</p>	5	SC055; SC056; SC057; PC001; SC034
Habitats Regulation	Mitigation	<p>Opportunities for offsite biodiversity habitat enhancements should be considered.</p>	1	SC020
	Assessment	<p>Requirement for a Habitats Regulation Assessment to be undertaken.</p>	1	SC008

Assessment (HRA)	Methodology	<p>Up to date conservation objectives for each protected site must be used for the HRA and water quality data used to support the HRA must be in line with the requirements of the conservation objectives.</p> <p>The proposed development is located within an area with significant environmental assets. Some of these are internationally important and the proposals will therefore need to be tested against the requirements of the Habitats Regulations 2010 and relevant EU directives. The submission to the IPC will need to include sufficiently detailed information, including proposed mitigation measures, to allow the competent authority to undertake a Habitats Regulations Assessment (HRA) of the proposals.</p>	2	SC020; SC008
Air Quality	Assessment	<p>Impacts of the development on air quality, including dust during construction and in combination with the existing Sellafield site should be assessed. This should discuss likely changes in environmental effects arising from start-up, shutdown, abnormal operating conditions or a change in operating arrangements.</p>	6	SC055; SC056; SC057; SC020; SC062; SC008
Land Quality	Assessment	<p>Proposals for foundation design and below ground structures will need to assess the environmental impact of the works. Sellafield Tarn infill will require assessment for remediation and validation of remedial works for any works under the land.</p>	1	SC020

	Methodology	Mitigations for contaminated soil should be implemented through an Environmental Management Plan. The Plan should conform to the Management of Contaminated Land Framework (Defra and EA, 2004).	1	SC020
Designated Sites	Baseline	No regionally important geological sites within the site or adjacent to it.	3	SC055; SC056; SC057
	Assessment	Assessment to include any impact on ecological designations from freshwater abstraction from lake or river, including avoidance options, mitigation and compensation proposals. Direct, indirect permanent and temporary impacts on designated sites would need to be assessed. These should cover site investigations, construction, use and decommissioning of the proposal and any associated developments.	3	SC062; SC034; SC008
	Impact	Impact on designated sites and landscapes is of concern. This includes Drigg Coast SAC; Church Moss SSSI; Sellafield Tarn County Wildlife Site; Starling Castle CWS; Seascale Dunes and Foreshore CWS; European Wildlife Sites; and the Solway Coast Area of Outstanding Natural Beauty. The surrounding area is also currently being considered as a Marine Conservation Zone under the Irish Sea Conservation Zones group.	6	SC055; SC056; SC057; SC020; SC171; SC008

	Methodology	<p>Designated sites and all other habitats, features and species of importance should be identified. The sites that are likely to be significantly affected were listed by Natural England in their comments on the National Policy Statement's various designated sites.</p> <p>This part of the coast is included within the Marine Conservation Zone 11: Cumbria Coast and should be taken into account.</p>	4	SC055; SC056; SC057; SC020
Landscape and Visual	Baseline	<p>Information on landscape and visual impacts can be provided.</p> <p>Baseline information should include Lake District Landscape Character Assessment and the Cumbria Historic Land Characterisation Project.</p> <p>Cumbria Landscape Character Guidance designates the site as character type 5B (Low Farmland).</p> <p>Cumbria Historic Landscape Characterisation designates the site in the Sellafield Character Area.</p>	5	SC055; SC056; SC057; SC037; SC062

	Assessment	<p>Assessment should include consideration of all aspects of the proposed development, such as buildings, transport infrastructure, parking, ground modelling and other significant features on the landscape.</p> <p>The zone of visual influence (ZVI) and a selection of viewpoints should be studied, including from the National Park.</p> <p>The assessment must be undertaken in line with the Institute of Environmental Management and Assessment's Guidelines for Landscape and Visual Impact Assessment (2002) and using Cumbria Landscape Character Guidance.</p>	5	SC055; SC056; SC057; SC062; SC008
Impact		<p>The visual impact of cranes during construction, the type of power station and power lines, re-landscaping, the scope of ancillary development and infrastructure improvements (including transport, the transmission network and new renewable energy) should be considered.</p> <p>Landscape and visual impacts as viewed from Dumfries and Galloway (if applicable) and the National Park are a key consideration.</p> <p>Landscape and visual impacts of the Project on the surrounding landscape, in relation to the Solway and the adjacent coastline and on heritage and the wider historic landscape need to be considered.</p> <p>Concern that the Project will intrude onto land designated as being of 'local landscape value'.</p>	12	SC055; SC056; SC057; SC015; SC060; PC001; SC070; SC009; SC062; SC148; SC138; SC171

	Mitigation	Areas that are deforested must be replaced by appropriate non-commercial woodland planting. Concern about land views which should be mitigated by suitable screening and sea views which should be mitigated by limiting the height of construction.	2	PC001; PC004
	Further information request	More information is required on the type of power station planned, the scope of ancillary development, the height and quantity of structures and the impact on views from the A595 between Calderbridge and the Blackbeck roundabout.	2	SC148; SC144
Lighting	Assessment	Key lighting elements to be assessed.	3	SC055; SC056; SC057
	Impact	Issue of light pollution during construction should be considered.	1	SC138
	Cumulative impact	The extent of the development close to properties will exacerbate the existing light pollution from Sellafield.	1	PC001
	Mitigation	Minimise the detrimental effects of light and other disturbances from construction and operation.	1	SC015
	Further information request	Further information is required on whether there will be time constraints for light disruption.	1	SC148

<p>Environmental Impact Assessment (EIA)</p>	<p>Baseline</p>	<p>Information sources need to be considered which can be obtained from the North West River Basin Management Plan, Cumbria County Council and Natural England, including SSSIs and other statutory designated sites. Need for appropriate surveys to establish if, and to what extent, a site is used by protected species.</p> <p>The nuclear industry has a history of causing damage to the environment and given the industry's poor environmental protection record, there is no confidence that NuGen will be able to successfully limit the impact of its activities on the environment.</p>	<p>5</p>	<p>SC020; SC037; SC171; SC144; SC008</p>
	<p>Assessment</p>	<p>A number of issues should be considered as part of the Environmental Impact Assessment (EIA). These include traffic and transport both during construction and operation, disturbance in a peaceful rural location, the impact on Beckermet Parish and the surrounding areas, the impact on local wildlife, habitats and protected species, the impact on designated sites and overall environmental impacts on the Project.</p> <p>The assessment should provide a review of existing information, utilising literature searches and drawing upon local and, where appropriate, national expertise.</p>	<p>10</p>	<p>SC062; SC015; SC055; SC056; SC057; SC070; SC020; SC171; SC157; SC008;</p>

	Methodology	<p>The Environmental Statement is expected to contain the information required by Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999. It should include information on the likely nature of impacts of the development on the environment (including the impact on the National Park), the likely impacts of development and the worst case scenarios which could result and cumulative impacts with regard to the existing Sellafeld nuclear power station adjacent, alternatives (site and design) and mitigation measures. Transport during operation and construction should also be considered.</p> <p>The Environmental Impact Assessment should be carried out in accordance with good practice guidelines published by Institute of Ecology and Environmental Management. It should allow for a desk based assessment, the identification of an ecological zone of influence and detailed habitat surveys of the site and adjacent site, considering the timing of construction and operation phases on biodiversity interests.</p> <p>Notification from the IPC on a screening statement has been received and the Consultee looks forward to commenting on a scoping report in due course.</p> <p>The use of suitably qualified people is a key issue.</p>	5	SC055; SC056; SC057; SC062; SC008
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	Mitigation	NuGen need to make clear its sustainability commitments. Details of mitigation, compensation and enhancement for the effects of the construction and operation of the Project are required in the Environmental Impact Assessment (EIA). This should include mitigation for lost habitats and the contamination of soils and water resources (which should also be managed through Environmental Management Plans).	5	SC055; SC056; SC057; SC020; SC008
Noise	Assessment	The Environmental Statement should consider the issue of noise on nearby residential properties and the amenity of nearby public rights of way, including those within the National Park. Consideration should be given to advice contained in PPG24 (Planning and Noise). Issue of noise during construction should be considered.	4	SC055; SC056; SC057; SC062
	Impact		1	SC138
	Cumulative impact	The extent of the development close to the Consultee's property will exacerbate the existing noise pollution from Sellafield.	1	PC001
	Mitigation	Minimise the detrimental effects of noise and other disturbances from construction and operation.	1	SC015
Waste	Further information request	Further information is required on whether there will be time constraints for noise disruption.	1	SC148
	Transportation	Consideration of transportation of waste is required.	3	SC055; SC056; SC057
	Impact of non-radioactive waste	The generation of non radioactive waste will be significant.	1	SC020

	Mitigation	Need to demonstrate that all waste streams will be dealt with correctly and without risk to the environment. Further information is required on the management of waste (both during construction and future development on the site), the estimated volumes of radioactive waste, hazardous waste storage and the storage, treatment and disposal of foul sewage. The use of BAT is required by the EA and a more detailed explanation of how this will be applied would be useful, especially regarding Waste Management Plans and Materials Management Plans (CLAIRE).	1	SC020
Archaeology and Cultural Heritage	Further information request	Part 5 of the National Policy Statement for Energy (EN-1) discusses the impact on the historic environment. The area has potential for prehistoric habitation and ceremonial sites and a desk based assessment and walkover survey of the site will provide baseline data of any archaeology on the site.	6	SC055; SC056; SC057; SC020; SC062; SC144
	Baseline	Need for assessment and survey of the site to determine archaeology issues, including an assessment of existing and historic land use. Further survey work may be needed if archaeology is discovered.	5	SC055; SC056; SC057; SC009; SC062
	Assessment	The impact on listed buildings, local heritage sites and scheduled ancient monuments, historic infrastructure (e.g. bridges) caused by the transport of construction materials and of construction on heritage assets within and	4	SC055; SC056; SC057; SC062
	Impact		5	SC055; SC056; SC057; SC009; SC008

		outside of the application site should be considered.			
	Mitigation	The mitigation strategy needs to consider the preservation of nationally important archaeological remains. Suggest that expert advisors are employed with necessary specialist knowledge to deal with each aspect of the historic environment.	4		SC055; SC056; SC057; SC009
Geomorphology (Coast)	Baseline	Need to consider the Shoreline Management Plan (SMP) (2010) for the area.	3		SC055; SC056; SC057
	Assessment	An assessment of the requirement for sea defences and the consequence of constructing defences are required.	3		SC055; SC056; SC057
	Impact	Construction may affect coastal processes and the impact on the coastal environment would need to be considered along the Cumbria Coast and the Solway Coast Area of Outstanding Natural Beauty. Modelling may be required. The coastal location of the site may make the site vulnerable to sea level rises. Coastal erosion may be increased by extreme weather and the closure of the railway in the future.	6		SC055; SC056; SC057; SC060; SC070; SC034
	Mitigation	A key policy of the Shoreline Management Plan is "no active intervention", however, this policy does allow intervention should the railway continue to operate.	3		SC055; SC056; SC057
	Further information request	Unclear whether the nuclear plant will involve any coastal works such as a harbour or jetty.	1		SC008

**Consultation and Engagement**

<b>Sub-Category</b>	<b>Detailed Issue</b>	<b>Summary of combined issues</b>	<b>Number of respondents raising these issues</b>	<b>Respondent numbers</b>
Adequacy of consultation	Inadequate	The consultation strategy is ineffective. Only some neighbours have received a letter.	2	PC001; SC148
	Adequate	Welcome the opportunity to provide initial comments. The EA supports NuGen's approach of structuring the investigations around the topics set out in the National Policy Statement EN-6.	4	SC055; SC056; SC057; SC020
Future Consultation	Further comments will be made as the Project progresses	Further comments will be made as the Project progresses.	8	PC005; SC070; SC005; SC125; SC055; SC056; SC057; SC009
	Methodology	Future engagement tools should comprise: meetings (for both the residents and stakeholders); small working parties to interface with NuGen; and a presentation to be made to local Councillors. Further, comments that NuGen should consult on the following topics as the Project progresses: <ul style="list-style-type: none"> <li>• Environment (including landscape impacts);</li> <li>• Infrastructure (non-roads) (including power transmission and sewerage infrastructure);</li> <li>• Transport infrastructure</li> <li>• The management of spent nuclear fuel;</li> <li>• Socioeconomic (including housing and employment);</li> <li>• Waste and environment permits; and</li> </ul>	23	SC058; SC055; SC056; SC057; SC022; SC143; SC020; SC062; SC034; PC004; SC148; SC144; SC157; SC138; SC008; SC087; SC041; SC125; SC123; SC070; SC126; SC015; SC008

Planning Performance Agreement (PPA)	Need	<ul style="list-style-type: none"> <li>Design.</li> </ul> <p>An effective PPA programme which involves regular dialogue is required. Resources need to be agreed but early involvement and formal roles within the PPA will help to deliver robust solutions.</p>	4	SC055; SC056; SC057; SC037
Stakeholder	Responsibilities	Clarification of the roles and responsibilities of some of the organisations consulted.	15	SC008; SC030; SC055; SC056; SC057; SC028; SC051; SC009; SC020; SC037; SC034; SC138; SC005; SC046; SC041
Support	General support for the Project	General support for the Project.	6	PC001; SC119; PC005; SC143; SC138; SC074
Unsupportive	General lack of support for the Project	General lack of support for the Project.	1	SC171
No Comment	No comment at this stage	No comments or specific issues to raise at this stage of the Project.	19	SC058; SC161; SC043; SC028; SC119; SC111; SC099; SC109; SC030; SC117; SC126; SC095; SC087; SC046; SC021; SC127; SC120; SC001; SC005
Further Information Required	Specific information required Specific Project details	Unable to locate the property, further details need to be submitted. Further Project details are required on the siting of the new buildings, the extent of the boundary fence and the number of reactors that there will be and the order they will be built in.	1 4	SC164 SC171; PC003; SC138; SC132

		<p>Requests to be supplied with Environmental Impact Assessment, Preliminary Risk Assessment and Method Statement for site investigation works and a clear plan of the proposed land to be used for the Project.</p>		
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**Water**

<b>Sub-Category</b>	<b>Detailed Topic</b>	<b>Summary of combined issues</b>	<b>Number of respondents raising these issues</b>	<b>Respondent numbers</b>
Resources	Impact	The site is located within the West Cumbria Water Resource Zone. A key consideration is water resources, including those relating to the Solway. Impacts of increased population on the demand for water resources need to be considered.	3	SC070; SC020; SC008
Abstraction and Discharge	Environmental Permit	Environmental permits will be required for all discharges to controlled waters.	1	SC020
	Assessment	Potential discharges need to be assessed in terms of their potential impact on specific pollutants, priority substances and priority hazardous substances, including river, groundwater and coastal modelling where required. There are a number of pathways of impact, including sea water and fresh water abstraction and discharges (including water movement, temperature and chemistry) which will need to be considered.	4	SC020; SC055; SC056; SC057
	Impact of radioactive discharges	Impact of radioactive discharges on water should be considered.	3	SC055; SC056; SC057
	Impact of heating	Impact of heating on water.	3	SC055; SC056; SC057
	Impact	Impact of abstraction of water from the marine area and the impact on the hydrology of the surrounding area. Impact of discharge of substances into the marine area, especially if the discharge has an elevated temperature and/or contains chemicals.	3	SC062; SC034; SC008

	General comment	West Cumbria Sherwood Sandstone aquifer has water available for abstraction. Further information is required on abstraction from the River Calder and Ehen and what the discharges from the reactors would be and if there would be any detrimental effect to leisure activities. Further information is also required on how water will be redirected from Ennerdale, whether the River Ehen will be severely depleted, what safeguards will be in place to prevent damage to the sandstone aquifer and water table and whether the laying of large numbers of drainage pipes will interfere with water for local residents.	1	SC020 SC143; SC144; SC157; SC148
Surface Water Flood Risk (including hydrology and drainage)	Baseline	The site is within Flood Zone 1 as defined in PPS25, and therefore has a low probability of flooding; however this is likely to change at coastal sites in the future. Information on flooding instances to the road network can be provided. The Environment Agency's policies on groundwater and information on groundwater monitoring are available on their website.	2	SC020; SC037
	Assessment	A Flood Risk Assessment (FRA) is required with all aspects of flooding investigated, including groundwater, surface water and ordinary watercourses, development free zones, noting potential increases in floodplains over lifetime of development. The FRA should be undertaken in accordance with the guidance in PPS25 and using the	6	SC055; SC056; SC057; SC020; SC062; SC125

	<p>Impact</p>	<p>Environment Agency's guidance and supported by accurate modelling. There are a number of pathways of impact, including sea water and fresh water abstraction and discharges (water movement, temperature, chemistry) which will need to be considered.</p> <p>Drainage, surface water runoff and ground water is a concern.</p> <p>Flood risk to property and land from construction is also a key concern.</p> <p>Huge excavation will be required to reach bedrock suitable for the build to commence, the impact of this needs to be considered.</p> <p>The site is located above the Principal Aquifer of the Sherwood Sandstone and potential impacts upon the hydrogeology of the area should be considered, including the hydrological zone of influence around Low Church Moss SSSI.</p> <p>Flood risk from climate change from sea level changes and increased rainfall is an issue.</p> <p>Carlisle's water catchment area covers Eden and East Cumbria and therefore, with regard to flood risk, water quality and resources the proposal is unlikely to have a direct impact on that area.</p>	<p>9</p>	<p>SC055; SC056; SC057; PC001; SC020; SC062; SC148; SC125; SC060</p>
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	Mitigation	<p>Surface water and run-off from the site needs to be managed in order to avoid flooding on nearby land and properties. Surface water could be disposed of via infiltration to the ground or reused for onsite activities. Post development surface water runoff rates should match existing greenfield rates.</p> <p>Current watercourse infrastructure should be mapped and considered within the context of the site layout. Rather than culverting watercourses, it is suggested that the site layout incorporates development free zones.</p> <p>The design needs to address parts of the site that can become periodically very wet, perhaps by construction on a plinth.</p> <p>Development will have to conform to new national Sustainable Urban Drainage Systems (SUDS) standards. Although SUDS may not be appropriate in this instance.</p>	5	SC020; PC004; SC138; PC002; PC006
Water Quality	Further information request	Further information is required on proposals to manage the surface water runoff from concrete and tarmac, where drains will take runoff water to and what safeguards will be in place to ensure that water run-off does not enter watercourses, particularly the River Calder, Ehen and their tributaries.	1	SC144
	Baseline	United Utilities have information on water quality.	3	SC055; SC056; SC057;
	Assessment	Assessment of risks from corrosion and biocides in cooling water systems on the area and in correlation with Sellafield is required.	1	SC020

	Impact	<p>A key consideration is water quality, in particular relating to the Solway. Below ground structures may constrain groundwater flow, introduce contamination and change hydrochemistry. The likely impact and significance of water pollution issues as a result of proposed industrial uses on site needs to be assessed. Inability of contractors and regulators to ensure protection of watercourses from industrial activity is a major environmental concern.</p>	4	SC070; SC020; SC062; SC171
Methodology		<p>Mitigation for contaminated groundwater should be implemented through an Environmental Management Plan. Peripheral boreholes can be used to monitor groundwater flow and contaminant plumes.</p>	1	SC020
Mitigation		<p>Care should be taken not to spread contamination via the reactor cooling water needs. A contingency plan will be required to mitigate the effects of below ground structures.</p>	2	SC020; SC138
Further information request		<p>Further information is required on what safeguards will be in place during and after contamination to prevent contaminants entering watercourses and the underground water system.</p>	1	SC144
Water Framework Directive	Assessment	<p>Water Framework Directive Assessment required.</p>	1	SC020

**Socio-Economic**

<b>Sub-Category</b>	<b>Detailed Issue</b>	<b>Summary of combined issues</b>	<b>Number of respondents raising these issues</b>	<b>Respondent numbers</b>
Local Economy	Baseline	Appropriate recognition of the Energy Coast Masterplan should be given. Findings from a study on the National Cycle Network route have been provided.	2	SC074; SC123
	Assessment	Skills and training should be assessed in the socio-economic assessment. The impact of the demand for additional employment premises and the availability of suitable sites should be assessed.	4	SC055; SC056; SC057; SC062
	Impact	The proposal may have a positive “knock on” economic impact outside of the immediate local area.	1	SC060
	Cumulative impact	The high density of workers at Sellafield will be exacerbated by the Project. The socio-economic assessment should consider the cumulative effects on the fishing industry from other developments in the area.	2	SC034; SC074
Tourism	Mitigation	Need to ensure that the immediate Sellafield area derives benefits from the money that is being spent locally.	1	SC015
	Assessment	Tourism should be assessed in the socio-economic assessment.	1	SC055; SC056; SC057
	Impact	The impact on the value of the tourism sector to the National Parks should be considered.	1	SC062
Residential Accommodation	Baseline	Local authorities have detailed assessments of housing issues through their Local Development Framework evidence base.	1	SC055; SC056; SC057

	Assessment	Study required of the potential number of temporary and permanent workers, existing housing availability, locations where additional housing can be provided, types of housing required and the impact on house prices locally for the local community.	1	SC062
	Impact	Impact on historic settlements from accommodation for construction workers as well as the housing market.	4	SC055; SC056; SC057; SC009;
	Strategy	The location of accommodation needs to be established.	3	SC055; SC056; SC057
Population	Assessment	Local services and demographic changes should be considered in the socio-economic assessment, including a review of the adequacy of existing services and the potential expansion or retention of “under threat” services.	4	SC055; SC056; SC057; SC062
	Impact on local services	Impact (e.g. capacity) on local services such as healthcare, schools and other existing local services. Simultaneous construction will put a strain on the national provision of resources and local infrastructure.	6	SC055; SC056; SC057; SC051; PC004; SC138
	Impact on local communities	Impact on cohesion and identity of communities.	4	SC055; SC056; SC057; SC062
	Impact on infrastructure	Impact on transport in the Sellafield area will require careful planning.	1	SC051
Employment	Assessment	Businesses, skills and employment to be assessed in the socio-economic assessment. Additional employment premises and available sites should be assessed.	4	SC055; SC056; SC057; SC062
	Workforce	Local expert workforce is readily available for construction and operation of the plant.	5	SC055; SC056; SC057; SC015; PC001

	Supply chain	Use of local resources in the supply chain.	3	SC055; SC056; SC057
	Training	Apprenticeship and graduate opportunities would help to deliver sustainable employment.	3	SC055; SC056; SC057
Human Health and Well Being	Baseline	Need to liaise with the NHS on baseline health information.	3	SC055; SC056; SC057
	Assessment	A health impact assessment is required and health and social care requirements need to be established.	3	SC055; SC056; SC057
	Impact	Human health and wellbeing is a key consideration. Increase in electrical pylons in the area (which are known to be a health hazard) is of concern. No issues regarding the minimal risks of modern Pressurised Water Reactors (PWRs). Concerns regarding the connection between nuclear facilities and childhood leukaemia, adult cancers and high profile accidents.	4	SC070; SC148; SC144; SC138
Investment	Community Benefit Contributions	The Project needs to ensure that sustained economic development and investment in infrastructure underpins the short term boom and does not lead to deterioration in landscape and lifestyle. There is a need for prior reinforcement in underfunded infrastructure such as local hospitals. In the past a lack of investment in infrastructure caused limited economic benefits and development to replace former chemical, mining and steel-making industries. Dialogue is required between NuGen and local Councils to discuss community benefit contributions.	5	SC055; SC056; SC057; PC001; SC171

	Transport infrastructure	Investment is needed in the local road and transport network in order to mitigate the impacts of increased level of traffic.	3	SC037; SC171; SC148
	Further information request	Further information is required on whether there are plans to improve and invest in local services.	1	PC004
	Legacy	The provision and improvements to local facilities and infrastructure should leave a positive and lasting legacy. Long term sustainable, and in some cases alternative uses, for the buildings and land should be considered.	3	SC055; SC056; SC057
Leisure	Impact on activities	Impact on local angling associations and their members who presently have unrestricted access for fishing was raised as a concern.	2	SC143; SC144

**Transport**

<b>Sub-Category</b>	<b>Detailed Issue</b>	<b>Summary of combined issues</b>	<b>Number of respondents raising these issues</b>	<b>Respondent numbers</b>
Access	Site Access	Issues of access and egress routes during construction and limited access to the site from centres of population. This includes access from the highway, and for cyclists (particularly the National Cycle Network route which is a key commuting route).	5	SC062; SC157; SC138; SC074; SC123
	Railway Station Access	Adequate access to Sellafield station needs to be maintained for the public and workers.	1	SC138
	Further information request	Further information is required concerning access to Sellafield railway station, the River Calder's estuary, the beach south of the Calder estuary, the coastal way path, the cycleway and the main road to Sellafield.	5	PC001; SC143; SC148; SC144; SC138
Aviation	Baseline	Information should be gathered on civil aircraft movements.	3	SC055; SC056; SC057
	Air-exclusion zone	Carlisle Airport's location should be taken into account, even though the fly zones which place development restrictions on sites are confined mainly within the Carlisle district. The potential effect of a new air exclusion zone around the nuclear power station upon the use of Danger Area D406 by military air traffic.	2	SC060; SC126
	Safety	May need air navigation warning lights on buildings and construction cranes due to military low flying activities.	1	SC126
River	Impact on the marine environment	An increase in boat traffic and shipping may impact the marine environment, species and other users, for example the fishing industry.	1	SC034

Road	Baseline	The Highways Agency is working with Cumbria County Council to review traffic flow and road capacity and have studied the future impact on traffic network from nuclear new build.	1	SC037
	Impact	Concern about the impact of construction traffic on the local road network. Local roads are already congested, particularly at peak times and the adverse impacts of traffic may compromise the local economy.	7	SC015; SC060; PC001; SC037; PC004; SC148; SC138
Footpaths and Cycleways	Parking	Transport and parking may be an issue, in particular during construction.	1	SC125
	Further information request	Further information is required on any planned changes to the road network and time restrictions on the movement of particularly large loads.	1	SC148
	Baseline	Recent studies at Sellafield have showed a desire by many workers to cycle to work but many are discouraged by traffic on the road and lack of direct routes.	1	SC123
	Impact	Concern about the route from Sellafield Railway Station to Calder Bridge and movement along the West Coast, as well as minor roads and cycle tracks to the North and North West of Sellafield.	1	PC003
	Mitigation	Suggestion for improved cycle facilities and routes which will offer sustainable travel options for the new workforce and will ease road traffic. The National Cycle Network Route 72 is important for the local economy and tourism in the future; if necessary, an alternative route will need to be found.	1	SC123
	Further information request	Further information is required on how the National Cycle Network Route will be provided for in future.	1	SC138

Rail	Impact	Concerns raised over rail capacity, overcrowding, the amount of rolling stock and the impact on the movement of freight and workforce.	4	SC055; SC056; SC057; SC041
	Mitigation	The railway links to the site are at capacity. An extra service has been provided by Direct Rail Services (DRS) but this will only cope with current numbers of workers on the Sellafeld site.	1	SC123
Transport Assessment	Travel Plan	A site specific travel plan should be produced to mitigate transport impacts.	5	SC055; SC056; SC057; PC001; SC062
	Assessment	The transport assessment should discuss likely impacts and significance of the development on local and primary route networks in the area and beyond, including existing “bottlenecks” within the National Park. A number of nuclear new build development scenarios should be developed to assess travel-to-work scenarios.	4	SC055; SC056; SC057; SC062
	Methodology	A transport assessment which assesses the mitigation of transport impacts and why and where new or upgraded transport infrastructure is required should be prepared in accordance with the guidance of PPG13. Need to consider the impacts of the location of accommodation on transport, the shift patterns of workforce, commuting patterns, travel to work behaviour and the proposed method of transportation required for construction materials.	5	SC055; SC056; SC057; SC062; SC060
	Mitigation	NuGen will need to financially support the transport assessment and travel plan and associated contributions arising from them.	3	SC055; SC056; SC057

	Further information request	Further information is required on future travel options.	1	PC003
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**Land and Property**

<b>Sub-Category</b>	<b>Detailed Issue</b>	<b>Summary of combined issues</b>	<b>Number of respondents raising these issues</b>	<b>Respondent numbers</b>
Value	Impact	Concerned about property devaluation during and after development. In addition, an acknowledgment of the need for NuGen to carry out intrusive and non intrusive surveys on the land which the Consultee holds on a tenancy from the NDA but has major concerns about the effects on the property.	2	PC001; SC078
Compensation	Provision	Difficulty in selling property with plans for compensation and compulsory purchase unclear. Access terms to undertake ecological surveys need to be agreed.	5	SC171; SC129; SC148; SC138; SC078
Landowner	Impact	A landowner has drainage rights from their septic tank into the field which is NDA owned estate. Need to ensure that planning consents and conditions facilitate but do not prevent the ability to better use land and assets, in order to reduce the impact of NDA's combined operations.	2	PC001; SC074
	Methodology	Need to engage early with local authorities where the local authorities own land in close proximity to the proposed development (on and off site).	3	SC055; SC056; SC057
	General comment	Landowner's property does not fall within the site boundary.	1	SC169
Mineral Rights	Further Information Request	Need to verify that all the mineral rights have been acquired or negotiated.	3	SC055; SC056; SC057

**Safety and Emergency Planning**

<b>Sub-Category</b>	<b>Detailed Issue</b>	<b>Summary of combined issues</b>	<b>Number of respondents raising these issues</b>	<b>Respondent numbers</b>
Strategy	Emergency Access	Need to consider access for emergency services in the event of an incident, including preserving NDA's rights of access for emergency arrangements and egress and access to the site in exceptional circumstances such as flooding. Emergency planning requires early consideration, particularly the role of the strategic road network as part of the emergency evacuation route. Existing emergency arrangements at Sellafield are inadequate and Sellafield has recognised this post-Fukushima.	5	PC001; SC020; SC037; PC004; SC074
	Weightman Report	The Weightman Report needs to be considered.	4	SC055; SC056; SC057; SC138
	ONR Site Licence	Impact of Office of Nuclear Regulation (ONR) Site Licence Conditions.	3	SC055; SC056; SC057
	Local communities	Emergency planning must include arrangements to minimise and control the impact on local communities of an off-site incident.	4	SC055; SC056; SC057; SC148
	Baseline	Scoping of issues needs to be considered early. The impact of intake and outfall pipes in the sea and on the Ministry of Defence's existing firing range will need to be considered.	4	SC055; SC056; SC057; SC126
	Sellafield Site Limited	Opportunity to share resources with Sellafield and maintain the security of Sellafield and the NuGen site without detriment to local residents. The potential impact of the Project on the Sellafield site and its operations.	2	SC015; SC125

	General comment	Security and emergency arrangements should be considered.	2	PC001; SC125
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**Infrastructure (non roads)**

<b>Sub-Category</b>	<b>Detailed Issue</b>	<b>Summary of combined issues</b>	<b>Number of respondents raising these issues</b>	<b>Respondent numbers</b>
Transmission Networks	Impact on local area	Visual impacts, access and impacts on historic infrastructure are all raised as issues. Potential consequences for Carlisle as the existing network have to be upgraded.	5	SC055; SC056; SC057; SC060; SC009
	Routing options	Impact of technology choice on NWCC and on strategic routes. Need to overcome the issue of defining and funding a suitable route, including the issues of crossing the Lake District National Park, the unpopularity of overland pylons, undersea connections and underground routes.	6	SC055; SC056; SC057; PC001; SC171; SC138
Sewerage System	Relationship with the North West Coast Connections Project (NWCC)	Need to consider synergies with the NWCC Project and need an alignment of Project programmes and consultation. Importance of dialogue with National Grid.	4	SC055; SC056; SC057; SC008
	Assessment	Assessment of sewerage infrastructure within existing and new accommodation development. A Water Cycle Study is required to be undertaken.	1	SC020
Utilities	Impact	Impact of development upon existing water and sewerage infrastructure.	1	SC062
	Supply routes	Utility supply routes are likely to be an issue.	1	SC125

**Regulations and Consents**

<b>Sub-Category</b>	<b>Detailed Topic</b>	<b>Summary of issue</b>	<b>Number of respondents raising this issue</b>	<b>Respondent numbers</b>
Felling Licence	Impact on scheme design	The felling licence for woodland within Sellafield was granted on the condition that an alternative area of 3.1ha be restocked with 1,110 trees per hectare by 30th June 2017.	1	SC054
Decommissioning	Further information request	Further information is required on decommissioning requirements.	3	SC055; SC056; SC057
Environment	General information	Environmental permits are likely to be required for the Project, including permits and licences for waste, abstraction from coastal waters and foundation design and below ground structures. NuGen should discuss these various permits and consents with the Environment Agency and apply for them in parallel with the application to the IPC. It is recommended that marine licensing requirements and licences and consents from Natural England are also considered at an early stage.	6	SC055; SC056; SC057; SC020; SC034; SC008
Safety	REPPIR Regulations	REPPIR regulations need to be considered early.	3	SC055; SC056; SC057

**Site Investigation Works**

<b>Sub-Category</b>	<b>Detailed Issue</b>	<b>Summary of combined issues</b>	<b>Number of respondents raising these issues</b>	<b>Respondent numbers</b>
Boreholes	Monitoring	Long-term, peripheral boreholes into the superficial and deep aquifer system adjacent to the Sellafield boundary are recommended.	1	SC020
	Further information request	Further information required on the impact of drilling on Church Moss Site of Special Scientific Interest (SSSI).	1	SC171

## Appendix C

### Summary of Response by Consultee

## C1 Summary of Response by Consultee

Respondent	Respondent Reference	Category	Issue
Barrow Borough Council	SC058	Consultation and Engagement	Barrow Borough Council has no comments for questions 1 to 3.
			Barrow Borough Council requested to be consulted as the Project progresses and that a presentation is given to Councillors at the appropriate time.
Beckermet Parish Council	SC015	Transport	Local roads are already congested and in poor condition.
		Socio-economic	Recruit locally wherever possible.
			Ensure that this locality derives benefits from the money that is being spent locally.
		Environment	The Project will have a considerable impact on Beckermet Parish and the surrounding areas and this needs to be assessed and mitigation put in place as necessary.
			Regard needs to be had to the visual impact of both the stations and any power lines that may be required.
			NuGen need to minimise the detrimental effects of noise, light and other disturbances from construction and operation.
		Safety and Emergency Planning	NuGen need to maintain the security of Sellafield and the NuGen site without detriment to local residents.
		Consultation and Engagement	Encourage local residents to use the Parish blog to express their views about the Project.
Carlisle City Council	SC060	Transport	Some residents from Carlisle commute to Sellafield and the impact on commuting patterns needs to be considered.
			Carlisle Airport's location should be taken into account even though the fly zones development restrictions are confined mainly within the Carlisle district.

			<p>The transport network is a significant consideration, particularly during the construction phase. The routes of construction traffic and their localised impacts need to be considered if directed through Carlisle and the A595.</p> <p>Carlisle has a significant role to play in the Cumbria economy and the knock on consequences of this development may have positive impacts locally.</p> <p>Potential impacts on the coastal environment such as the Solway Coast Area of Outstanding Natural Beauty and the Cumbria Coast need to be considered.</p> <p>Any changes to the network, for example strengthening of existing lines and reconstruction, will have landscape and visual impacts.</p> <p>Carlisle's water catchment comes from the Eden and East Cumbria and therefore with regard to flood risk, water quality and resource it is unlikely to have a direct impact.</p> <p>Access to transmission networks is a significant issue for Cumbria and there are potential consequences for Carlisle as the existing network has to be upgraded. Carlisle has one of the main substations for the transmission network nearby and improvements will be required.</p> <p>Nothing to feedback on Questions 1 to 3 at this stage.</p> <p>Civil Nuclear Constabulary would like to be kept informed as the Project progresses.</p> <p>The site does not fall within the defined coalfield and therefore coal mining issues do not need to be considered as part of the proposal.</p> <p>Information should be gathered on civil aircraft movements.</p> <p>With regard to rail capacity: it is important to consider the impact on the movement of freight; and the significant potential for the movement of workforce and freight. The issue of the capacity of the existing network has been assessed by the Councils. Rail utilisation for both freight and passengers is a key element to be considered.</p> <p>A site specific travel plan is required.</p> <p>A number of focussed nuclear new build development scenarios should be developed to assess travel-to-work scenarios.</p>
	Socio-economic		
	Environment		
	Water		
	Infrastructure (non-Roads)		
Civil Nuclear Constabulary	Consultation and Engagement	SC161	
Coal Authority	Consultation and Engagement	SC043	
Joint response made by Copeland Borough Council, Allerdale Borough Council and Cumbria County Council	Transport	SC055; SC056; SC057	

		<p>Within the Transport Assessment, NuGen will need to consider:</p> <ul style="list-style-type: none"> <li>• The impacts of the location of accommodation on transport;</li> <li>• Travel to work behaviour;</li> <li>• The proposed method of transportation for construction materials;</li> <li>• The impact of shift patterns of workforce; and</li> <li>• Different scenarios.</li> </ul> <p>A transport assessment based approach to the investigation, understanding and mitigation of transport impacts which demonstrates why and where transport infrastructure is required will enable scoping with the Councils for a work package programme.</p> <p>NuGen will need to financially support the transport assessment and travel plan and associated contributions.</p>
	<p>Socio-economic</p>	<p>Skills and training to be assessed in the socioeconomic assessment.</p> <p>Tourism to be assessed in the socioeconomic assessment.</p> <p>NuGen need to have regard to the Local authorities detailed assessment of housing issues which has been prepared as part of their Local Development Framework evidence base.</p> <p>Housing market could be distorted as a result of the Project.</p> <p>Location of accommodation needs to be established.</p> <p>Demographic changes and local services to be assessed in the socioeconomic assessment.</p> <p>NuGen need to establish the impact on existing local services, including the capacity of schools.</p> <p>NuGen need to have regard to the impact on cohesion and identity of communities.</p> <p>Skills and employment requirements need to be established and businesses and employment need to be assessed in the socioeconomic assessment.</p> <p>NuGen need to have regard to the use of local resources in supply chain.</p> <p>An expert workforce is available.</p> <p>Graduate and Apprenticeship opportunities would help to deliver sustainable employment.</p>

		<p>A Health Impact Assessment is required and health and social care requirements need to be established.</p> <p>NuGen need to liaise with the National Health Service (NHS) on baseline health information.</p> <p>The provision and improvements to local facilities and infrastructure should leave a positive and lasting legacy of great importance. Long term sustainable, and in some cases alternative uses, for the buildings and land should be considered.</p> <p>The Local Authorities expect early dialogue with NuGen on an appropriate package of community benefits.</p> <p>The Project may have a significant impact on the River Ehen ecosystem.</p> <p>The River Ehen is an active salmon and sea trout area.</p> <p>NuGen need to consider the impact on the Irish Sea Conservation Zone MCZ 11.</p> <p>The impacts on the European Protected Species Natterjack Toads and Great Crested Newt should be assessed, as should impacts on a range of other species e.g. Migratory eels, otters and bats.</p> <p>List of key elements to be assessed, in particular relating to dust. This includes:</p> <ul style="list-style-type: none"> <li>• The impacts on residential properties and use of public amenities in the area (including public rights in the Lake District National Park).</li> </ul> <p>NuGen to have regard to the sites that are likely to be significantly affected which were listed by Natural England in its comments on the National Policy Statement's assessment of the various designated sites.</p> <p>The Project may impact on European Wildlife Sites, the Church Moss SSSI and Sellafield Tarn County Wildlife Site which are features which need to be protected.</p> <p>NuGen need to identify all other habitats, features and species of importance when identifying designated sites potentially impacted by the Project.</p> <p>The Councils confirmed that there are no regionally important geological sites within the site or adjacent to it.</p>
	<p>Environment</p>	

			<p>The Cumbria Landscape Character Guidance states the site is designated as character type 5B (Low Farmland). In addition, the Cumbria Historic Landscape Characterisation states the site is designated in the Sellafield Character Area.</p> <p>Landscape and visual impact are key issues which need to be considered. The Landscape Institute, the Institute of Environmental Management and Assessment and the Cumbria Landscape Character Guidance should be followed.</p> <p>Need to consider the cumulative landscape and visual impact of the Moorside Project on the surrounding landscape, in addition to existing and new renewable energy infrastructure.</p> <p>List of key elements to be assessed with regard to noise and lighting. This includes:</p> <ul style="list-style-type: none"> <li>• The impacts on residential properties and use of public amenities in the area (including public rights in the Lake District National Park).</li> <li>• The rural nature of the area particularly the low levels of background noise and light at night must be considered.</li> <li>• Any use of additional rail travel and sidings</li> <li>• Control of other off site noise related to construction – for example quarrying at Heskett quarry</li> </ul> <p>Impacts on sites may be through impacts on species for which the sites are designated when those individuals/populations are away from the designated site itself, e.g. mobile species such as lampreys, salmon and birds.</p> <p>Wider sites need to be considered for biodiversity value.</p> <p>The EIA should allow for a desk based assessment, the identification of an ecological zone of influence and detailed habitat surveys of the site and adjacent site. In addition, the EIA needs to consider the timing of construction and operation phases on biodiversity interests. There should be no net loss of biodiversity features.</p> <p>Project needs to assess the cumulative impact of the ongoing and future activities associated with the Sellafield site and other major Project proposals.</p>
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		<p>NuGen need to make clear sustainability commitments. Mitigation for lost habitats is required and there is a need to consider compensatory habitat where appropriate.</p> <p>Consideration needed to provide for appropriate mitigation for the effects of the construction and operation of the Project.</p> <p>Further information on the management of waste and estimated volumes of radioactive waste are required.</p> <p>NuGen need to consider how waste will be transported.</p> <p>Need for assessment and survey of the site to determine archaeology issues.</p> <p>Mitigation strategy needs to consider the preservation of nationally important archaeological remains.</p> <p>Area has potential for prehistoric habitation and ceremonial sites.</p> <p>The Project has the potential to impact on listed buildings and Scheduled Ancient Monuments.</p> <p>Need to consider the Shoreline Management Plan (SMP) (2010) for the area.</p> <p>A key policy of the Shoreline Management Plan is "no active intervention", however, this policy does allow intervention should the railway continue to operate.</p> <p>Extreme weather may increase coastal erosion and the coastal location of the site may make the site vulnerable to sea level rises. Further, the railway may be closed in the future so coastal erosion may increase.</p> <p>An assessment of the requirement for sea defences and the consequence of constructing defences is required.</p> <p>NuGen needs to consider the impact of radioactive discharges on water.</p> <p>NuGen needs to consider the impact of heating on water.</p> <p>A flood risk assessment (FRA) will need to be prepared. Accurate modelling of flood risk is required. The FRA should consider groundwater and ordinary watercourses.</p> <p>Impact on groundwater hydrology should be assessed using EA guidance.</p>
	<p>Water</p>	

			<p>There is the potential for flood risk as parts of the site are susceptible to flooding. The EA Flood Map for Surface Water indicates localised surface water flooding across the site, in part due to the presence of a number of minor watercourses on site.</p> <p>The FRA should set out how the Project's impacts will be mitigated.</p> <p>Development will have to conform to new national Sustainable Urban Drainage Systems (SUDS) standards: Post development surface water runoff rates should match existing greenfield rates; and surface water should be disposed of via infiltration to the ground. The Lead Local Flood Authority (LLFA) could adopt and maintain SUDS but it may not be appropriate for the LLFA to do so in this instance. The SUDS strategy should consider options for adoption and maintenance.</p> <p>United Utilities has information on water quality.</p> <p>There are a number of pathways of impact, including sea water and fresh water abstraction and discharges (including water movement, temperature and chemistry) which will need to be considered.</p> <p>The recommendations of the Weightman Report need to be considered.</p> <p>The Office of Nuclear Regulation (ONR) Site Licence Conditions should be complied with.</p> <p>Emergency planning must include arrangements to minimise and control the impact on local communities of an off-site incident.</p> <p>Scoping of safety and emergency planning issues needs to be considered early.</p> <p>NuGen needs to consider The Radiation (Emergency Preparedness and Public Information) Regulations 2001 early in the design process.</p> <p>Welcome the opportunity to provide initial comments.</p> <p>Comments based on limited information and therefore not a comprehensive assessment. Provide an indication of the potential areas of scope for further work.</p> <p>Need to ensure effective engagement with Sellafield.</p> <p>Management of spent Nuclear Fuel need to be consulted on.</p>
		<p>Safety and Emergency Planning</p>	
		<p>Consultation and Engagement</p>	

			<p>Dialogue is required between NuGen and the local councils to discuss community benefit contributions.</p> <p>Existing stakeholder relationships should be retained, including working with the local authorities.</p> <p>Consultation comments also relevant to aspects of the Project which might come forward through the Town and Country Planning Act consent route.</p> <p>Seeking to agree an efficient and effective process of consultation. Early dialogue expected on community consultation.</p> <p>An effective PPA programme which involves regular dialogue is required. Resources for the PPA need to be agreed.</p> <p>From April 2012, Cumbria County Council is now the lead local flood authority (LLFA) and consenting authority for works affecting ordinary watercourses.</p> <p>Need to engage early with local authorities where the local authorities own land in close proximity to the proposed development (on and off site).</p> <p>Need to verify that all the mineral rights have been acquired or negotiated.</p> <p>Need to consider synergies with the North West Coast Connections (NWCC) Project, including programmes and consultation.</p> <p>Need to consider the impact of technology choice on the NWCC and on strategic routes.</p> <p>Visual impact of the NWCC on on-site grid connections, including potentially the Converter Station on the landscape.</p> <p>The Lead Local Flood Authority is likely to adopt the Environment Agency's "anti-culverting" policy when considering consent applications.</p> <p>Further information is required on decommissioning requirements.</p>
<p>Countryside Council for Wales (CCW)</p>	<p>SC028</p>	<p>Land and Property</p> <p>Infrastructure (non-Roads)</p> <p>Regulations and Consents</p> <p>Consultation and Engagement</p>	<p>Countryside Council for Wales (CCW) are advisers to the Welsh Government on natural heritage of Wales and its coastal waters. It is not CCW's role to comment on Projects proposed outside of Wales except those which might impact on Wales' natural heritage.</p> <p>Countryside Council for Wales (CCW) welcomes and appreciates notification of the proposals but has no comments to make at this stage.</p>



			<p>The extent of the development close to residential properties will exacerbate the existing noise pollution from Sellafield.</p> <p>Concern regarding the local drainage in the vicinity of Moss Side and regarding the potential impact of development in the northern most area of the site on residential and field drainage.</p> <p>Concern that a huge excavation will be required to reach bedrock suitable for the build to commence.</p> <p>Existing emergency arrangements at Sellafield are inadequate and Sellafield has recognised this post-Fukushima.</p> <p>The Project must have built in a huge element of self-support in terms of safe operation and emergency management. Further, there is an opportunity to share resources with Sellafield.</p> <p>Concern that some properties were consulted whilst neighbouring properties including the respondent didn't.</p> <p>The Consultee who has worked at Sellafield fully supports the New Build Project and believes that West Cumbria is the right location for it.</p> <p>Believes the community is in support of the Project.</p> <p>Concern regarding the cumulative effect on property value and saleability both during and after development.</p> <p>The Project needs to have regard to existing drainage systems which exist in the area including those located on the Nuclear Decommissioning Authority owned estate.</p> <p>The least intrusive National Grid Connection route is an undersea connection from Heysham. Overland pylons will be unpopular. Underground pylons are another possibility; however there will be difficulties with this option.</p> <p>Would like to discuss the proposal via telephone.</p> <p>Direct Rail Services are positive about being involved in the Project .Further, Direct Rail Services will be attending a forthcoming meeting with NuGen.</p> <p>Direct Rail Services appreciates the help given by NuGen so far with regards to the Project.</p> <p>Human health and wellbeing is a key consideration.</p>
	Water		
	Safety and Emergency Planning		
	Consultation and Engagement		
	Land and Property		
	Infrastructure (non-Roads)		
	Consultation and Engagement	SC022	
Design Council		PC005	
Direct Rail Services			
		SC070	

Dumfries and Galloway Council		Environment	<p>Coastal change is a key consideration.</p> <p>Biodiversity is a key consideration.</p> <p>The Project site is a considerable distance from the Dumfries and Galloway boundary; however consideration in relation to its impact upon the Solway and the adjacent coastline would be welcomed. Further, landscape and visual impact as viewed from Dumfries and Galloway (if applicable) would be a key consideration.</p> <p>A key consideration is water resources relating to the Solway.</p> <p>A key consideration is water quality relating to the Solway.</p> <p>Further stages of more detailed consultation will be happening in the future and it may be appropriate for Dumfries and Galloway Council to comment in more detail when a fully detailed consultation is underway.</p> <p>Wish to be kept informed during the progressing stages of this proposal.</p>
Landowner	SC143	<p>Transport</p> <p>Socio-economic</p> <p>Environment</p> <p>Water</p> <p>Consultation and Engagement</p>	<p>Noted the importance of the access to the railway station and the cycleway and requested an indication of whether these routes would be affected by the Project as the main road to the station passes through the planned site. Also requested details of any road networks/alterations planned?</p> <p>There are long established fishing rights adjacent to the proposed site and these need to be protected.</p> <p>The length of the River Ehen close to the proposed site is very important for migrating fish and is a sensitive area and a special type of habitat.</p> <p>Any disturbance on the migrating fish river habitat should be kept to a minimum.</p> <p>Any impacts on the river in terms of additional light pollution and noise should be kept to a minimum.</p> <p>Will there be any additional water abstraction from the River Ehen system?</p> <p>Local Angling group do not oppose the new nuclear reactor site in principle.</p> <p>Local Angling group would like to keep in touch with the process and further developments at all stages given the potential impact of the Project on angling and fishing, due to a few concerns about the site.</p>

Electricity North West Limited	SC119	Consultation and Engagement	<p>Electricity North West supports the development and is willing to work with all stakeholders to identify the optimum solution including any proposals to connect the development to the electricity transmission infrastructure that may have an impact on their own infrastructure. Electricity North West are already liaising with owners of the transmission infrastructure.</p> <p>There are no other site specific issues that need to be discussed at this stage.</p>
English Heritage	SC009	Socio-economic	Noted the potential impact on historic settlements from accommodation for construction workers.
		Environment	<p>Potential for visual impact on heritage and wider historic landscape outside of the application site.</p> <p>Noted that Part 5 of the National Policy Statement for Energy (EN-1) discusses the impact on the historic environment.</p> <p>Impact of construction on heritage assets both within and outside of the application site as well as the impact on historic infrastructure (e.g. bridges) caused by transport of materials to construction site.</p> <p>Recommended that NuGen employ expert advisors with necessary specialist knowledge to deal with each aspect of the historic environment.</p>
Environment Agency (EA)	SC020	Consultation and Engagement	<p>English Heritage is the statutory advisor to the UK government on the historic environment.</p> <p>English Heritage is the statutory advisor to the UK government on the historic environment and will comment further as the Project progresses, particularly on the extent and nature of the assessment of the historic environment, the impact upon it and mitigation measures which will form part of the Environmental Impact Assessment (EIA).</p>
		9. Infrastructure (non-Roads) Environment	<p>Impact on historic infrastructure by the linking of the power station to transmission networks.</p> <p>Referred NuGen to the Environment Agency "Eel Manual".</p> <p>River Ehen has the largest Freshwater Pearl Mussel Population left in England and is one of the largest populations left in Europe.</p>

		<p>The EA recommends the following assessments:</p> <ul style="list-style-type: none"> <li>• Impacts on water dependent habitats and species need to be undertaken (as part of the Environmental Impact Assessment and Habitats Regulation Assessment);</li> <li>• Movements of migratory salmon and lamprey;</li> <li>• The risks of entrainment of fish in cooling water intakes;</li> <li>• The Risks on fish from increased water temperatures at the outfall; dispersal modelling will be needed; and</li> <li>• Impact on migratory sea trout and eels.</li> </ul> <p>In addition, appropriately timed field based fish surveys will be required to support the Environment Impact Assessment. Scope of studies to be agreed with the Environment Agency, Natural England, Marine Management Organisation and Inshore Fisheries Conservation Association.</p> <p>The potential impacts on the River Calder, River Irt, River Ehen and other water features. In addition, the potential impacts of the associated development and associated infrastructure on salmon. Further, a need to investigate the risk of changes in coastal processes impacting on the River Ehen and its outfall, including potential impacts on salmon migration.</p> <p>Opportunities for offsite biodiversity habitat enhancement should be considered and discussed. In particular, off site opportunities to restore the River Ehen SAC and its catchment as the River Ehen SAC is currently in an unfavourable condition. In addition, mitigation will be needed for migratory salmon and lamprey if a new port facility is constructed or there are seaward pipe laying activities.</p> <p>The Sellafield disused railway line is a Site of Invertebrate Significance (SIS). In addition, the Braystones, River Ehen SIS and Seascale SIS are in close proximity to the site. Further details regarding this should be obtained from Tullie House Museum to support the EIA.</p> <p>Opportunities for offsite biodiversity habitat enhancement should be considered.</p>
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		<p>Up to date Conservation Objectives for each protected site must be used for the site based Habitats Regulations Assessment.</p> <p>Water quality data used to support the Habitat Regulation Assessment must be in line with requirements of the conservation objectives for protected sites.</p> <p>Air quality impacts during construction and in combination with the existing Sellafield site should be assessed and BAT (Best Appropriate Technology) should be considered.</p> <p>Proposals for foundation design and below ground structures will need to assess the environmental impact of the works. In addition, the Sellafield Tarn infill will require an assessment for remediation and validation of remedial works for any works under the land.</p> <p>Mitigations for contaminated soil should be implemented through an Environmental Management Plan. The Environmental Management Plan should conform to the management of contaminated land framework (Defra and EA, 2004).</p> <p>Sellafield Tarn County Wildlife Site (CWS), Starling Castle CWS and Seascale Dunes and Foreshore CWS could be impacted by this development. Advice from Cumbria Wildlife Trust should be sought.</p> <p>This part of the coast is included within the 'Marine Conservation Zone 11: Cumbria Coast' and should be taken into account in the assessment.</p> <p>There is information contained within the North West River Basin Management Plan of relevance to the Project.</p> <p>The Environment Impact Assessment should consider risks to priority biodiversity species and habitats located within and adjacent to the development.</p> <p>The Environmental Impact Assessment should consider further potential risks to priority biodiversity species and habitats located within and adjacent to the development site including otters, natterjack toads, floodplain grazing marsh, sabellaria reefs, marine turtles and harbour porpoise. The local records centre at Tullie House Museum should be contacted to supply up to date records</p>
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			<p>Contamination of soils and water resources can be mitigated through the Environmental Impact Assessment and managed through Environmental Management Plans.</p> <p>The generation of non radioactive waste will be significant and needs to be considered.</p> <p>Need to demonstrate that all waste streams will be dealt with correctly and without risk to the environment.</p> <p>Further information required on the intended waste strategies to be used, both during construction and future development on the site. In addition, the use of BAT is required by the EA and a more detailed explanation of how this will be applied is required, especially regarding Waste Management Plans and Materials Management Plans (CLAIRE).</p> <p>Implications of increased population on the demand for water resources.</p> <p>West Cumbria Sherwood Sandstone aquifer has water available for abstraction.</p> <p>Environmental permits are required for all discharges to controlled waters.</p> <p>Potential discharges need to be assessed in terms of their potential impact on specific pollutants, priority substances and priority hazardous substances, including river, groundwater and coastal modelling where required.</p> <p>The site is within Flood Zone 1 as defined in PPS25 and therefore has a low probability of flooding; however this is likely to change at coastal sites in the future.</p> <p>A Flood Risk Assessment (FRA) is required which investigates all aspects of flooding, noting an increase in floodplain over the lifetime of the development and the Copeland Strategic FRA. In addition, an assessment of impacts on surface waters and groundwater will need to be undertaken.</p> <p>The site is located above the Principal Aquifer of the Sherwood Sandstone and potential impacts upon the hydrogeology of the area should be considered. In addition, there is a potential impact on the hydrological zone of influence around Low Church Moss Site of Special Scientific Interest (SSSI).</p>
		<p>Water</p>	

			<p>Current watercourse infrastructure should be mapped and considered within the context of the site layout. The EA advise against culverting the watercourses and instead suggest the site layout incorporates development free zones. It is feasible to incorporate watercourses in site surface water management proposals.</p> <p>Issue of surface water on final development needs to be considered. SUDS may not be feasible however the reuse of grey water could offset requirement for onsite activities.</p> <p>The Environment Agency's policies on groundwater are available on the Environment Agency's website. In addition, the EA have further information on groundwater monitoring.</p> <p>Assessment of risks from corrosion and biocides in cooling water systems on the area and in correlation with Sellafield are required.</p> <p>Below ground structures may constrain groundwater flow, introduce contamination and change hydrochemistry.</p> <p>Peripheral boreholes can be used to monitor groundwater flow and contaminant plumes. Further, mitigation for contaminated groundwater should be implemented through an Environmental Management Plan.</p> <p>A contingency plan will be required to mitigate the effects of below ground structures.</p> <p>A Water Framework Directive Assessment will be required which should include an assessment of thermal discharges; hydro-morphology; protected areas; Bathing Water Directive; construction materials; and the potential for additional infrastructure.</p> <p>The last recent significant flood event was in November 2009 and it had a major impact on infrastructure. The FRA should consider access and egress to the site in exceptional circumstances.</p> <p>The EA is keen to work with NuGen on the Project.</p> <p>The Environment Agency suggest:</p> <ul style="list-style-type: none"> <li>• Consultation at an early stage with the local water provider, United Utilities, in relation to sewerage infrastructure;</li> </ul>
		<p>Safety and Emergency Planning Consultation and Engagement</p>	

		<ul style="list-style-type: none"> <li>• Consultation with Natural England on the hydrological zone of influence around Low Church Moss Site of Special Scientific Interest (SSSI);</li> <li>• Early pre-application discussions with the Environment Agency in relation to waste and environmental permits; and</li> <li>• A future meeting of relevant DEFRA organisations (e.g. EA, Natural England and Marine Management Organisation).</li> </ul> <p>From April 2012, Cumbria County Council is the Lead Local Flood Authority (LLFA) and consenting authority for works affecting ordinary watercourses. The EA supports NuGen's approach of structuring the investigations around the topics set out in the National Policy Statement EN-6.</p>
	Infrastructure (non-Roads)	Assessment of the impact on sewerage infrastructure provision within existing and new accommodation development. A Water Cycle Study is also needed.
	Site Investigation Works	Long-term, peripheral boreholes into the superficial and deep aquifer system adjacent to the Sellafield boundary are recommended.
	Regulations and Consents	Discussion will be needed with the EA about various permits and consents.
		The EA Derwent and West Cumbria Catchment Abstraction Management Strategy (CAMS) are relevant to this proposal. The River Ehen is over abstracted so no new consumptive licences are available. Abstraction from coastal waters may require a licence.
		In addition, environmental permits are likely to be required for waste and proposals for foundation design and below ground structures will need to obtain the necessary permits.
ESP Electricity Limited	SC111	ESP Electricity has no comments to make at this stage.
Forestry Commission	SC054	The felling licence for woodland within Sellafield was granted on the condition that an alternative area of 3.1ha is restocked with 1,110 trees per hectare by 30th June 2017.
Gamma	SC099	Gamma has no apparatus in the vicinity.

Gas Transportation Company Limited (GTC)	SC109	Consultation and Engagement	GTC has no apparatus in the vicinity.
Highways Agency	SC037	Transport	<p>The Project will have a material impact on network performance, particularly during the lengthy construction phase, with potential implications on the Highway's Agency future maintenance and improvement programmes.</p> <p>Adverse impacts of traffic may compromise the local economy if not properly managed and mitigated.</p> <p>Highways Agency is working with Cumbria County Council to review traffic flow and road capacity on the A595T, A66T and A5086. A model is being developed to help identify the potential future impact on the network of traffic associated with the Moorside Project. The model will complement the West Cumbria Transport Model. The Highways Agency is happy to share the findings of some high-level development scenarios they will be testing.</p> <p>Capacity and management of the road network needs to be improved to mitigate the short and long term traffic impacts.</p> <p>Highways Agency can provide information on biodiversity.</p> <p>Highways Agency can provide information on landscape and visual impacts.</p> <p>Highways Agency can provide information on flooding instances to the road network.</p> <p>Emergency planning is a matter which needs early consideration, particularly the role of the strategic road network as part of an emergency evacuation route.</p> <p>The Highways Agency operates and maintains England's Motorway and Trunk Road network. Within Cumbria this includes the M6, A66T, A590T and A595T north of Calder Bridge.</p> <p>The Highways Agency is a member of the Nuclear New Build Transport Steering Group (chaired by Cumbria County Council) and is currently discussing transport and access issues.</p> <p>The Highways Agency should be a signatory, with Copeland, Allerdale and Cumbria, to the Planning Performance Agreement (PPA). Having early</p>
		Socio-economic	
		Environment	
		Water	
		Safety and Emergency Planning	
		Consultation and Engagement	

			involvement and a formal role within the PPA will create good working relationships and deliver robust solutions.
Landowner	SC164	Consultation and Engagement	Property's mortgage provider wishes to engage with NuGen as the Project progresses at a detailed level.
Joint Nature Conservation Committee (JNCC)	SC030	Consultation and Engagement	The Joint Nature Conservation Committee (JNCC) is the statutory adviser to Government on UK and international nature conservation. JNCC co-ordinates nature conservation advice at a UK level and advises UK Government on scientific and policy matters relating to nature conservation internationally. JNCC also has responsibility for the provision of nature conservation advice in the offshore area.
			Joint Nature Conservation Committee (JNCC) have no comments to make as the development is not located within the offshore area or concerned with nature conservation at a UK level.
Landowner	SC171	Socio-economic	The area lacks proper dual carriageway connections to the national road network and therefore investment in infrastructure is needed.
			There is a need for prior reinforcement in the underfunded infrastructure. For example, part of the hospital serving West Cumbria has been demolished with rebuilding and the medical services to be retained uncertain.
			Lack of investment in infrastructure caused limited economic development to replace former chemical, mining and steel-making industries.
		Environment	Outfall from the site to a river which has international Special Area of Conservation (SAC) protection status is a key concern.
			Close proximity of the site to a Site of Special Scientific Interest (SSSI) is a key concern.
			Given the poor environmental protection record of the nuclear industry, there is no confidence that NuGen will be able to successfully limit the impact of its activities on the environment.
			There is concern about the disturbance caused by the Project in a peaceful, rural location.
			Previous local planning strategy documents, subject to public consultation and adopted by local democratically elected representatives, have required any nuclear development to be either on brownfield land within the Sellafield site

		boundary or on a minimal contiguous extension to the current nuclear licensed site. NuGen is now proposing a development which falls outside these democratically approved planning policies and will intrude into greenfield land designated as of 'local landscape value' not zoned for industrial development.
	Water	The inability of contractors and regulators to ensure protection of watercourses from industrial activity is a major environmental concern.
	Consultation and Engagement	There will be no public or political support as the energy produced is for export and the area has had no government infrastructure finance. The Consultee would like to be supplied with the Environmental Impact Assessment (EIA), Preliminary Risk Assessment (PRA) and Method Statement.
	Land and Property	There may be difficulty in selling the property and arrangements to compensate for loss of amenity and land value are inadequate and unclear.
	Infrastructure (non-Roads)	The direct impact of the associated power grid lines, which are larger than the existing 132kV pylons, will be significant if they follow the existing overhead route. To avoid sustained objections the alternatives of underground or undersea should be adopted at an early stage.
	Site Investigation Works	Further information is required on the impact of boreholes on Church Moss Site of Special Scientific Interest (SSSI).
	Transport	Consideration should be given to works to the access (including within the highway) and any proposed access from the sea which may have ecological implications. A site specific travel plan should be produced.
Lake District National Park Authority	SC062	

			<p>The Transport Assessment should discuss likely impacts and the significance of the development on local and primary route networks in the area and beyond, including existing bottlenecks within the National Park.</p> <p>The Transport Assessment should be compiled in accordance with the guidance of Planning Policy Guidance 13 (PPG13).</p> <p>The value of tourism to the economy of the National Park needs to be considered.</p> <p>A study of potential number of temporary and permanent workers, existing housing availability, locations where new housing can be provided, type of housing and the impact on house prices for the local community is required.</p> <p>An assessment of the impact on existing local services and adequacy of those services and potential expansion in capacity or retention of under threat services is required.</p> <p>There is concern about the ability of the local communities to absorb the increase in population without impact on cohesion and identity of communities.</p> <p>There is concern regarding the impact of the demand for additional employment premises and the availability of suitable sites. An assessment required detailing the impact on demand for business premises in the area and availability of suitable sites to support the Project, during both construction and operation. In addition, land for housing and employment purposes may require building on greenfield sites, and the redevelopment or extension of previously developed sites such as Greengarth and Wellbank Camp.</p> <p>The impact on hydrology of the area including the impacts on sensitive riverine environments such as the Drigg Coast SAC, River Ehen SAC, West Water SAC and River Derwent and Bassenthwaite Lake SAC.</p> <p>Consideration of the development in relation to its ecological zone of influence, in both the construction and established phase of the development should be given.</p>
		<p>Socio-economic</p>	
		<p>Environment</p>	

			<p>An assessment is required on the impact of the proposal on ecological assets (including the Drigg Coast SAC, the River Ehen SAC, the Wast Water SAC, the River Derwet and the Bassenthwaite Lake SAC), including information on suitable avoidance options, mitigation and compensation proposals. Further, assessment of the ecological value of the biodiversity identified within the zone of influence is required (including: desktop and walkover survey to identify potential interest; and baseline assessments of the relevant habitats and species). Details of future biological monitoring and reporting for the site will also need to be provided.</p> <p>NuGen must consider the development in relation to its ecological zone of influence, in both the construction and established phase of the development. An assessment of the ecological resources as well as the ecological value of the biodiversity identified within the zone of influence required. These should include: a desktop and walkover survey to identify potential interest; survey methodologies; and baseline assessments made of the relevant habitats and species.</p> <p>The Environmental Statement (ES) should consider the likely impact of development on air quality. This should discuss likely changes in environmental effects arising from start-up, shutdown, abnormal operating conditions or a change in operating arrangements.</p> <p>The assessment should include any impact on ecological designations from freshwater abstraction from lakes or rivers, including suitable avoidance options, mitigation and compensation proposals.</p> <p>Baseline information should include any relevant published information, particularly the Lake District Landscape Character Assessment and the Cumbria Historic Land Characterisation Project.</p> <p>An assessment of the likely changes should be undertaken in accordance with the Guidelines for a Landscape and Visual Impact Assessment. The assessment should include consideration of all aspects of the proposed development, such as buildings, transport infrastructure, parking, ground modelling and other significant features on the landscape. In addition, The</p>
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		<p>zone of visual influence (ZVI) and a selection of viewpoints should be studied (including from the National Park).</p> <p>Changes to the local road network, transport infrastructure and transmission network could have consequences for the landscape and visual impact on the Lake District National Park.</p> <p>The issue of traffic and transport should be considered as part of the EIA. This is because the local road and transport network is likely to require upgrading to take the increase in construction traffic at a time when the existing Sellafield site is operational or undergoing decommissioning. The impact of the development on the local transport network will extend far beyond the immediate environs of the site and into the Lake District National Park.</p> <p>The Environmental Statement (ES) should consider the likely transport impacts both during the operation and construction stages of the development.</p> <p>The EIA should include all relevant elements affected by the lifespan of the entire Project, including issues of traffic and transport.</p> <p>Any submitted Environmental Statement (ES) would be expected to contain the information required by Schedule 4. The ES should include information on: the likely nature of impacts of the development on the environment (this includes the impact on the Lake District National Park); the likely impacts of development and the worst case scenarios which could result; and cumulative impacts with regard to the existing Sellafield nuclear power station adjacent; alternatives (site and design); mitigation measures; and the likely transport impacts, both during the operation and construction stage of the development.</p> <p>The Environment Impact Assessment should be carried out in accordance with good practice guidelines published by Institute of Ecology and Environmental Management.</p>
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			<p>If it is considered that some of these issues should be addressed in another manner outside of the EIA process, the Lake District National Park Authority would be happy to provide comments in the form of a Local Impact Report.</p> <p>The Environmental Statement (ES) should consider the issue of noise on nearby residential properties and the amenity of nearby public rights of way, including those within the National Park. In addition, Consideration should be given to advice contained in Planning Policy Guidance 24 (PPG24: Planning and Noise).</p> <p>Details are required on the proposed method for the disposal of foul sewage, including details of storage, treatment and disposal. Further, full details of the impact of the development upon foul sewage in the area will be expected.</p> <p>A desk based assessment and walkover survey of the site will provide baseline data of any archaeology on the site.</p> <p>Should archaeology be discovered it may be necessary to undertake further survey work to assess its significance, and mitigation may be required to minimise the likelihood of detrimental impact.</p> <p>The Flood Risk Assessment (FRA) should be undertaken in accordance with guidance of PPS25. Details are required on the means and likely impacts both within and beyond the site of surface water disposal, including details of storage and treatment.</p> <p>The likely impact and significance of water pollution issues as a result of proposed industrial uses on site should be provided.</p> <p>There is concern about the flood risk from climate change from sea level changes and increased rainfall.</p> <p>Likely effects of any proposed water abstraction on the hydrology of the surrounding area should be provided. This may be linked to biodiversity issues.</p> <p>If some of these issues are considered outside the EIA process, the Park Authority would be happy to provide comments in the form of a Local Impact Report.</p> <p>The impact and effects of development upon existing water and sewerage infrastructure should be considered.</p>
		<p>Water</p>	
		<p>Consultation and Engagement</p>	
		<p>Infrastructure (non-Roads)</p>	

Landowner	SC129	Land and Property	Until access terms to undertake ecological surveys are agreed, the Agent is not authorised to grant permission for their respective clients. The Agent hopes that terms for an appropriate Option can be agreed so that such matters can be expedited.
Marine Management Organisation (MMO)	SC034	Transport	An increase in boat traffic and shipping may impact the marine environment, species and other users, for example the fishing industry.
		Socio-economic	Any socio-economic assessment should include the impacts on the local fishing industry and consider cumulative effects of the impacts on the industry from other developments in the area, where appropriate.
		Environment	The impact on species in surrounding waters, local fish stocks and the fishing industry should be considered. The waters are a nursery area for: cod; spurdog; tope; herring; mackerel; anglerfish; plaice; sandell; spotted ray; sole; thornback ray; and whiting. The surrounding waters are also a spawning ground for: ling; mackerel; sandeel; whiting; sole; plaice; cod and sprat. In addition, there is a presence of migratory fish species, which include: lamprey; salmon; and eels.
			The site is adjacent to a lucrative and exploited Nephrops ground and inshore potting and netting activity. Sabellaria reefs can be found in the locality.
			The impact on the marine environment must be assessed in full, including the impact of construction, deposit or removal in the marine area.
			Marine mammals can be found offshore.
			Drigg Coast Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) are just north of the development and the surrounding area is currently being considered as a Marine Conservation Zone under the Irish Sea Conservations Zones group. Any impacts on the interest features of these sites would need to be assessed.
			Construction may affect coastal processes and modelling may be required.
		Water	The impact of abstraction of water from the marine area and discharge of substances into the marine area should be considered, especially if the discharge has an elevated temperature and/or contains chemicals.

		<p>Happy to meet with NuGen to discuss any questions NuGen may have and would welcome an early meeting to discuss any marine licensing requirements of the Project.</p> <p>The Marine Management Organisation's (MMO) responsibilities include the licensing of construction works, deposits and removals in the marine area by a marine licence.</p> <p>Further information on licensable activities can be found on the MMOs website. Further information on the interaction between the IPC and the MMO can be found in their joint advice note.</p> <p>It is recommended that marine licensing requirements are considered at an early stage.</p>	<p>Consultation and Engagement</p>	<p>Happy to meet with NuGen to discuss any questions NuGen may have and would welcome an early meeting to discuss any marine licensing requirements of the Project.</p> <p>The Marine Management Organisation's (MMO) responsibilities include the licensing of construction works, deposits and removals in the marine area by a marine licence.</p> <p>Further information on licensable activities can be found on the MMOs website. Further information on the interaction between the IPC and the MMO can be found in their joint advice note.</p> <p>It is recommended that marine licensing requirements are considered at an early stage.</p>
Ministry of Defence (MOD)	SC126	<p>May need air navigation warning lights on buildings and construction cranes as part of military low flying activities.</p> <p>The potential effect of a new air exclusion zone around the nuclear power station upon the use of Danger Area D406 by military air traffic.</p>	<p>Transport</p>	<p>May need air navigation warning lights on buildings and construction cranes as part of military low flying activities.</p> <p>The potential effect of a new air exclusion zone around the nuclear power station upon the use of Danger Area D406 by military air traffic.</p>
		<p>The site does not occupy any MOD safeguarding zones, therefore defence interests do not need to be taken into consideration in the progression of this development scheme.</p> <p>The MOD wishes to be consulted further on the development of plans for this scheme relating to the issues they raised.</p>	<p>Consultation and Engagement</p>	<p>The site does not occupy any MOD safeguarding zones, therefore defence interests do not need to be taken into consideration in the progression of this development scheme.</p> <p>The MOD wishes to be consulted further on the development of plans for this scheme relating to the issues they raised.</p>
Public Consultee	PC004	<p>The development of intake and outfall pipes in the sea may encroach on the Danger Area D406 containing the existing firing range. The potential impact of maritime development and works upon the firing range will need to be taken into account in the design of the development scheme.</p>	<p>Safety and Emergency Planning</p>	<p>The development of intake and outfall pipes in the sea may encroach on the Danger Area D406 containing the existing firing range. The potential impact of maritime development and works upon the firing range will need to be taken into account in the design of the development scheme.</p>
		<p>The impact on local services such as healthcare and schools and housing should be considered.</p> <p>Are there plans to improve and invest in local services?</p>	<p>Socio-economic</p>	<p>The impact on local services such as healthcare and schools and housing should be considered.</p> <p>Are there plans to improve and invest in local services?</p>
		<p>Concern in relation to the land views north of Yottenfews Lane, 'High Sellafeld', across the Lake District and 'Scafell'; suitable screening should be used. In addition, concern in relation to the sea views across the Irish Sea to the Isle of Man and 'Sneafell'; height of construction should be limited.</p>	<p>Environment</p>	<p>Concern in relation to the land views north of Yottenfews Lane, 'High Sellafeld', across the Lake District and 'Scafell'; suitable screening should be used. In addition, concern in relation to the sea views across the Irish Sea to the Isle of Man and 'Sneafell'; height of construction should be limited.</p>

		<p>Water</p> <p>Safety and Emergency Planning</p> <p>Consultation and Engagement</p> <p>Transport</p>	<p>There is a need to take account of the land drain to avoid any backing up of surface water and flooding on properties.</p> <p>Access for emergency services in the event of an incident need to be considered.</p> <p>Wish to be included as consultees in the future.</p>
Landowner	SC148	<p>Will there be restricted access to the cycle track, bogholes and beach due to the coastal changes related to the building area?</p> <p>The road system is often gridlocked and residents find it difficult to exit or enter to their homes at certain times of day. Road traffic will increase due to construction. Further, large loads are not able to get under the bridge on Nursery Road.</p> <p>Will there be time restrictions on the movement of particularly large loads?</p> <p>Investment in the road system is needed.</p> <p>The increase in electrical pylons in the area, which are known to be a health hazard is of concern.</p> <p>A variety of wildlife inhabits the area, including: badgers; deer; birds; and protected species such as the natterjack toad.</p> <p>The type of power station planned, the scope of ancillary development and the height and quantity of structures will have visual impacts.</p> <p>Further information is required on the type of power station planned, the scope of ancillary development and the height and quantity of structures.</p> <p>Are regulations in place to protect from light disruption?</p> <p>Are regulations in place to protect from noise disruption?</p>	<p>Will there be restricted access to the cycle track, bogholes and beach due to the coastal changes related to the building area?</p> <p>The road system is often gridlocked and residents find it difficult to exit or enter to their homes at certain times of day. Road traffic will increase due to construction. Further, large loads are not able to get under the bridge on Nursery Road.</p> <p>Will there be time restrictions on the movement of particularly large loads?</p> <p>Investment in the road system is needed.</p> <p>The increase in electrical pylons in the area, which are known to be a health hazard is of concern.</p> <p>A variety of wildlife inhabits the area, including: badgers; deer; birds; and protected species such as the natterjack toad.</p> <p>The type of power station planned, the scope of ancillary development and the height and quantity of structures will have visual impacts.</p> <p>Further information is required on the type of power station planned, the scope of ancillary development and the height and quantity of structures.</p> <p>Are regulations in place to protect from light disruption?</p> <p>Are regulations in place to protect from noise disruption?</p>
		<p>Water</p>	<p>How will water be redirected from Ennerdale? Will the River Ehen (which serves an area of natural beauty and the bogholes) be severely depleted? In addition, an increase in water will involve laying large numbers of water and drainage pipes. How will this disrupt and interfere with water for local residents?</p> <p>Construction may cause flooding of private residences (fields behind properties are already waterlogged after heavy downpours).</p>

Landowner	SC144	Safety and Emergency Planning	Are there plans to protect the local community from nuclear incident?
		Consultation and Engagement	There is concern that the consultation strategy is ineffective. Consultee was only one of three properties to receive correspondence and has shared this with other properties who expressed shock and disappointment at the lack of communication.
		Land and Property	The Consultee would like to meet with a NuGen representative in the near future so they can have their questions answered and make an informed decision on how it will affect the community.
		Transport	Is compensation for loss of value or compulsory purchase being considered as the site may devalue the Consultee's property or may make it impossible to sell?
		Socio-economic	What provision will there be for access to Sellafield Station, the River Calder's estuary, the beach south of the Calder estuary and the Cumbria cycle path presently all accessed via Nursery Road? There are concerns regarding the connection between the nuclear industry and childhood leukaemia, adult cancers and high profile accidents. Calder Angling Association use Church House for fishing activities. Will there be any challenge to Calder Angling Association's access to its fishings, which is presently unrestricted between Calderbridge and Dukesway road bridge?
		Environment	The nuclear industry has previously removed all vegetation from the river environment within the site boundaries. They have also killed off river species previously by caustic soda, diesel, abstraction, disastrously altering the rivers course. Will any liquid effluents be passed to the Irish Sea? What safeguards will be in place to prevent damage to marine environment and inhabitants? What will the views from the A595 between Calderbridge and the Blackbeck roundabout be?

			<p>The nuclear industry has a history of causing damage to the environment, for example 'Windscale fire' and undetected leaks.</p> <p>Will there be construction, decommissioning and hazardous waste storage east of the River Calder and south of the Church House farm?</p> <p>What safeguards will be in place to prevent damage to the Sandstone aquifer and water table?</p> <p>Where will clean water be obtained? Through abstraction from River Calder?</p> <p>What are the proposals to deal with the surface run off from concrete and tarmac? Where will drains take runoff water to and what safeguards will be in place to ensure that water runoff does not enter watercourses, particularly the River Calder, River Ehen and their tributaries?</p> <p>During and after construction what safeguards will be in place to prevent contaminants entering watercourses and the underground water system?</p> <p>Sympathetic and honest engagement is required.</p>
	Water		
	Consultation and Engagement		
Public Consultee	PC003		<p>There are concerns about the route from Sellafield Railway Station to Calder Bridge and movement along the West Coast, as well as minor roads and cycle tracks to the North and North West of Sellafield.</p> <p>It is expected and appreciated that the land taken over would become a highly restricted zone. What are the future travel options going to be?</p> <p>A clear plan of the proposed land to be taken over for the build of the proposed nuclear power station would be appreciated.</p> <p>Access and egress problems that may curtail access to the site is a concern.</p> <p>Potential environmental impacts are a concern.</p> <p>What will the discharges from the reactors be and would there be any detrimental effect on member's activities?</p> <p>It is hoped that notice of any activities that impact the members of the organisation will be given. NuGen can be assured of the tenants complete co operation.</p> <p>Access routes need to be defined during construction.</p> <p>Adequate access to Sellafield station needs to be maintained for the public and workers.</p>
Landowner	SC157		
	Consultation and Engagement		
	Transport		
	Environment		
	Water		
	Consultation and Engagement		
Public Consultee	SC138		
	Transport		

			<p>In view of the enlarged footprint of the site, will access still be from the main road serving the existing main gate at Sellafield or will access be needed through Beckermeth?</p> <p>The impact of traffic during construction is a concern. In addition, whilst the network can normally just cope, roadworks, accidents and bad weather can quickly block off Cumbria. The authorities will therefore need to re-look at the road networks.</p> <p>Part of the national cycle network goes along the western boundary of the proposed site and it is not clear how this route will be provided for in future.</p> <p>Simultaneous construction will put a strain on the national provision of resources and local infrastructure.</p> <p>The Consultee has no concerns about the minimal risks of modern Pressurised Water Reactors (PWRs).</p> <p>The visual impact of cranes etc during construction.</p> <p>The impact of light pollution during construction.</p> <p>The impact of noise during construction.</p> <p>The western section of the site can periodically be very wet. Subsequently, run-off from the site needs to be managed. Perhaps design needs to address this by construction on a plinth.</p> <p>Care should be taken not to spread contamination via the reactor cooling water needs.</p> <p>The Fukushima Report demands the separation of control rooms and reactors themselves which will impact on site layout.</p> <p>The Consultee would like to be kept informed and involved. E mail or post would be satisfactory, with perhaps an occasional meeting (individually and/or via the Parish Council).</p> <p>The Consultee served on the Nuclear Safety Advisory Committee.</p> <p>The specified site seems to be adequate and the district will benefit substantially from this economic activity.</p>
		Socio-economic	
		Environment	
		Water	
		Safety and Emergency Planning	
		Consultation and Engagement	

			Further information is required on the total number of planned reactors, the order the reactors will be built or whether simultaneous construction will take place.
	Land and Property		The size of structures are intrusive and compensation should be paid to: a) people individually affected living close to the site; b) Beckermet village because of intrusion and general blight; and c) District level because of congestion effects etc.
	Infrastructure (non-Roads)		Defining and funding a suitable route to export the power is a problem. Issues include: the Lake District obstacle; undersea links needing huge land areas for equipment; no route being popular unless it is underground (which is expensive); and concern about transmission loss as Sellafield is remote from main centres of population.
Landowner	SC132	Consultation and Engagement	Are there plans for the siting of the new buildings and are there plans for the extent of the boundary fence to be erected?
Public Consultee	PC002	Water	There is a need to take account of the land drain to avoid any backing up of surface water and flooding on properties.
NATS (En Route) plc	SC095	Consultation and Engagement	Sellafield site already has no impact on NATS operations and the proposed development will have no impact on NATS.
Natural England	SC008	Environment	The River Ehen is close to the site and an important river for migratory fish. The proposed development is located within an area with significant environmental assets. Some of these are internationally important and the proposals will therefore need to be tested against the requirements of the Habitats Regulations 2010 and relevant EU directives. The submission to the IPC will need to include sufficiently detailed information, including proposed mitigation measures, to allow the competent authority to undertake a Habitats Regulations Assessment (HRA) of the proposals. Full assessment of the impacts of air emissions is required.
			The assessment of impacts on designated sites should include direct, indirect permanent and temporary impacts. The evidence presented should cover the site investigations, construction, use and decommissioning of the proposal and any associated developments.

		<p>There is a need to consider potential impacts on designated sites.</p> <p>The landscape and Visual assessment must be undertaken in line with the Institute of Environmental Management and Assessment's Guidelines for Landscape and Visual Impact Assessment (2002).</p> <p>Information sources need to be considered which can be obtained from Natural England and Cumbria County Council. This includes information on SSSIs and other statutory designated sites.</p> <p>There is a need for appropriate surveys to establish if, and to what extent, a site is used by protected species.</p> <p>Direct habitat loss is an issue which will need to be addressed.</p> <p>Impacts on protected or BAP species are issues which will need to be addressed (Natterjack Toads are near to the proposed site).</p> <p>The assessment should provide a review of existing information, utilising literature searches and drawing upon local and, where appropriate, national expertise</p> <p>Natural England has received notification from the IPC on a screening statement and look forward to commenting on a scoping report in due course.</p> <p>Natural England understands that there are different options under consideration for various parts of the overall proposal. These will have different impacts on the environment. Natural England would like to discuss with NuGen, at an early stage, what options are available and the scope of environmental impacts that may result.</p> <p>Surveys, assessments and recommendations for mitigation measures should be undertaken by suitably qualified and experienced persons.</p> <p>Details of mitigation, compensation, and enhancement are required.</p> <p>There is a need to identify and consider potential impacts on local heritage sites.</p> <p>It is unclear whether the nuclear plant will involve coastal defence, coastal harbour or jetty works, other flood defence or alleviation works or any off shore coastal management works.</p> <p>The site is located within the West Cumbria Water Resource Zone.</p>
		<p>Water</p>

		Consideration should be given to the impact of water abstraction and discharge.
	Consultation and Engagement	<p>Natural England would welcome an early meeting with NuGen to understand the proposed programme for building an application to the IPC with supporting environmental assessments and any required mitigation measures.</p> <p>Natural England's statutory purpose is to ensure that the natural environment is conserved, enhanced and managed for the benefit of present and future generations.</p> <p>They provide pre application advice on legally protected species for applications to the IPC. NuGen can contact them for further information.</p>
	Infrastructure (non roads)	Dialogue with National Grid is important. Natural England would welcome early discussions with both NuGen and the applicants for the grid connection work to discuss the interdependency of the two proposals, including technological choices for generation that may impact on grid connection options.
	Regulations and Consents	An early assessment of licences or consents from Natural England is required. Natural England recommends that NuGen apply for any environmental permit that may be required from the Environment Agency in parallel with the application to the IPC.
Network Rail	SC087	<p>It is expected that details will emerge at the meeting between the Cumbria-led group and NuGen on 23/02/12 and that this will be the start of a detailed liaison group.</p> <p>Network Rail has not been made aware of details regarding specific development and until these are specifically clear, any further comment is difficult.</p>
Nuclear Decommissioning Authority (NDA)	SC074	<p>There is limited access infrastructure to the site from centres of population.</p> <p>Ensure appropriate recognition of the Energy Coast Masterplan is undertaken.</p> <p>The high density of workers at Sellafield will be exacerbated by the Moorside Project.</p>

		Safety and Emergency Planning	There is a need to preserve NDA's rights of access for emergency arrangements.
		Consultation and Engagement	NDA are content that the matters they raised will be dealt with as a natural part of the development of the Project:
		Land and Property	There is a need to ensure that planning consents and conditions facilitate but do not prevent the ability to better use land and assets, in order to reduce the impact of NDA's combined operations.
	SC005	Consultation and Engagement	ONR has no substantive comments to make at this stage. There are other 'flags for local consideration' mentioned in the nuclear National Policy Statement that would be considered by ONR in the event of an application for the development of a specific nuclear installation on the Moorside site. The Office for Nuclear Regulation (ONR) deals with matters relating to the regulation of nuclear sites as an agency of HSE.
Office for Nuclear Regulation (ONR)			
	SC046	Consultation and Engagement	Ofwat is the economic regulator for water companies in England and Wales. This matter is a local one and local water and sewage companies should be contacted. Ofwat do not have any comments.
Ofwat			
	SC117	Consultation and Engagement	May Gurney do not currently hold any ORANGE PCS assets within the area.
Orange (May Gurney)			
	SC041	Transport	The potential impact on Cumbrian Coast railway is of interest, including the amount of rolling stock and overcrowding on some services on the Cumbrian Coast line.
Passenger Focus (Rail Passengers Council)			
		Consultation and Engagement	Existing relationships between stakeholders and local groups such as Copeland Rail Users Group and Cumbrian Coast Community Rail Partnership should be retained. Passenger Focus's role requires them to be kept up to date with anything that could have an impact on passengers. Subject to staff resources and time, they are always available to meet if required to discuss relevant issues. E-mail is the preferred method of contact.

			Passenger Focus is an independent public body set up by the Government to protect the interests of Britain's rail, bus (outside of London), coach and tram passengers.
Public Consultee	PC006	Water	Should any development planned for land behind the Consultee's property take place, it should take the necessary account of the land drain to avoid any backing of surface water and causing flooding on the property.
Santander UK PLC	SC169	Land and Property	The landowner's property does not fall within site boundary.
Scottish Environment Protection Agency	SC021	Consultation and Engagement	The Scottish Environment Protection Agency has no specific issues to raise at this stage but encourages any potential impacts on Scotland to be assessed as the Project progresses.
Sellafield Limited	SC125	Transport	Transport and parking may be an issue, in particular during construction.
		Water	Flood Risk Assessment (FRA) needed. The impact of water flow and drainage should be considered.
		Safety and Emergency Planning	Security and emergency arrangements should be considered.
		Consultation and Engagement	The Project's potential impact on the Sellafield site and its operations should be considered. Sellafield Limited is already engaged with NuGen on a number of issues associated with NuGen's interest in land adjacent to the Sellafield site. Sellafield Limited propose to establish a small working party to interface with NuGen on the following issues which include but are not limited to: transport and parking; potential impact on the Sellafield Limited Site and its operations; water flow; drainage and flood risk assessment and utility supply routes; and consideration of matters such as security and emergency arrangements. Anticipate the output of these meetings to help inform the progression of NuGen's proposals.
		Infrastructure (non-Roads)	Utility supply routes are likely to be an issue.

Sustrans Limited	SC123	Transport	<p>The National Cycle Network route is a vital commuting route for cycle users coming onto the current Sellafield site from Egremont, Thornhill, St Bees and Whitehaven, including a subway crossing to avoid the A595 traffic.</p> <p>The site boundary severs the National Cycle Network Route 72 and therefore an alternative route needs to be found to replace it, including details of how the National Cycle Network Route 72 will cross or go around the site. This is important for the future of the local economy and tourism.</p> <p>Provision of good quality cycle routes into the site from key residential areas will offer opportunities for healthy, sustainable travel for the new large workforce and will ease traffic on the road. It will also be good to see improved cycle facilities.</p> <p>Recent studies at Sellafield have showed a desire by many workers to cycle to work but many are discouraged by traffic on the road and lack of direct routes.</p> <p>The railway links to the site are at capacity. An extra service has just been put on by Direct Rail Services (DRS) but this will only cope with the current numbers of workers on site.</p>
		Socio-economic	<p>The National Cycle Network Route 72 generated £6,500,000 and created or safeguarded 105 full-time equivalent jobs.</p> <p>160,000 trips were made on the route in 2006. Of these 7,500 were end-to-end users.</p> <p>The number of end to end users has risen by over 5% since this study was undertaken in 2002.</p>
		Consultation and Engagement	<p>NuGen must engage with Sustrans on issues relating to: transport infrastructure planning; consultation on an alternative route for the National Cycle Network Route 72; and bike provision/behaviour change models facilitating the use of new cycle infrastructure and creating improvements to on site facilities.</p>
UK Atomic Energy Authority	SC127	Consultation and Engagement	<p>UK Atomic Energy Authority has no land holdings or property interests in Cumbria and asks to be removed from the consultee list.</p>
Virgin Media	SC120	Consultation and Engagement	<p>Virgin Media have no cabling or plants in the area and therefore have no comments to make with regards to the Project.</p>

Welsh Government	SC001	Consultation and Engagement	The Welsh Government has no comments to make at this stage, however would wish to see future papers.
Landowner		Land and Property	It is acknowledged that NuGen will need to carry out intrusive and non intrusive surveys on the land which the Consultee holds on a tenancy from the NDA but has major concerns about the effects on the property.
		Land and Property	There is concern that the proposed nuclear power station and associated development will blight the Consultee's property, and if the Consultee would like to sell Petersburgh Farm, the Consultee would be unable to do so.
		Land and Property	The Consultee would appreciate if NuGen and/or the NDA would consider a purchase of the freehold of the Consultee's land. The Consultee would prefer to do this by agreement but is prepared to go down a more formal route.