

The Progress Power (Gas Fired Power Station) Order

5.3 Consultation Report Non-Technical Summary

Planning Act 2008

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

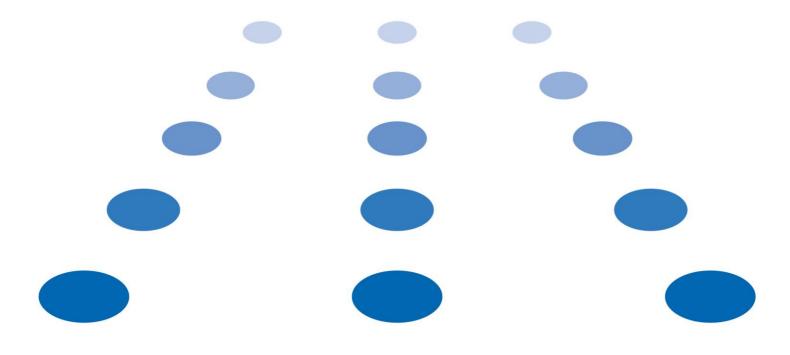
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Glossary

A140 Junction: means the new junction from the A140 (Work No. 7 in the draft DCO);

A140 Junction Site: means the site of the A140 Junction (Work No. 7 shown on the Works Plan):

Above Ground Installation (AGI): means the above ground installation incorporating the minimum offtake and the PIG trap launching facility together (Work No. 3A in the draft DCO) with the access as (Work No. 3B in the draft DCO);

AGI Site: the site of the AGI and access (Work No. 3A shown on the Works Plan);

Access Road: means the access road following the Electrical Connection Route Corridor (Work No. 7 in the draft DCO);

Access Road Route: means the route of the Access Road (Work No. 7 shown on the Works Plan);

Act: means the Planning Act 2008;

APFP Regulations: means the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009;

Application: means the application for a DCO made to the Secretary of State under s37 of the Act in respect of the Project, required pursuant to s31 of the Act because the Project constitutes a Nationally Significant Infrastructure Project under s4(1)(a) and s15 of the Act by virtue of being an onshore generating station in England or Wales of 50 MWe capacity or more;

Cable: means the cable circuit connecting the Electrical Connection Compound and the Power Generation Plant (Work No. 6 in the draft DCO);

The Developer: means PPL;

DCO: means a development consent order made by the Secretary of State pursuant to the Planning Act 2008 to authorise a nationally significant infrastructure project. A draft of the DCO for the Project, The Progress Power (Gas Fired Power Station) Order, is submitted with the Application at Document Reference 3.1;

Electrical Connection Route Corridor: means the corridor in which the Cable is located (Work No. 6 shown on the Works Plan);

Electrical Connection: means the Cable, the Electrical Connection Compound, the Access Road and the A140 Junction;

Electrical Connection Compound: means the substation and the sealing end compound (Work No. 5 in the draft DCO);

Electrical Connection Compound Site: means the site of the Electrical Connection Compound (Work No. 5 shown on the Land Plan);

Electrical Connection Site: means the site of the Electrical Connection (Works No. 5, 6 and 7 shown on the Works Plan);

Gas Connection: means the Pipeline and the AGI;

Gas Connection Route Corridor: means the corridor in which the Pipeline is located (Work No. 4 shown on the Works Plan);

Gas Connection Site: means the site of the Gas Connection (Works No. 3A, 3B and 4 shown on the Works Plan);

Guidance: means the Department of Communities and Local Government guidance, 'Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land' (September 2013);

Land Plans: means the plans showing the land which is to be the subject of compulsory acquisition and submitted with the Application at Document Reference 2.6;

MWe: means Megawatts electrical;

NTS: means National Gas Transmission System;

Order Land: means the land shown on the Land Plans which is within the Order Limits and which is to be the subject of compulsory acquisition;

Order Limits: means the limits shown on the Works Plans within which the Project may be carried out;

PIG: means Pipeline Inspection Gauge

Pipeline: means the gas pipeline (Work No. 4 in the draft DCO);

Power Generation Plant: a SCGT gas fired 'peaking' power generating plant capable of providing up to 299 MWe together with the maintenance area (Work No. 2 in the draft DCO);

Power Generation Plant Site: the site of the Power Generation Plant (Works No. 1A, 1B, 1C, 1D and 2 shown on the Works Plan);

PPL: a special purpose vehicle which has been set up to develop the proposed Project and has been established by Watt Power Limited (WPL). WPL has been established to develop flexible gas fired generation assets to support the UK Government drive to a low carbon economy. WPL has its project dedicated personnel sourced through an experienced management company, Stag Energy, founded in 2002:

Project: means the Power Generation Plant, Electrical Connection and Gas Connection located on the Project Site;

Project Site: the entire area covered by the Project corresponding to the Order Limits of the draft DCO;

SCGT: simple cycle gas turbine; and

Works Plans: means the plans showing the numbered works referred to in the draft DCO and submitted with the Application at Document Reference 2.7.

WPL: means Watt Power Limited, established to develop flexible gas fired generation assets to support the UK Government drive to a low carbon economy. WPL has set up Progress Power Limited, a Special Purpose Vehicle to develop the Project;

Acronyms

AQMA Air Quality Management Area. An area that a local authority has

designated for action, based upon predicted exceedences of Air

Quality Objectives.

AGI Above Ground Installation Situated within the Gas Connection site

(Work No 4A) and containing the MOC and PTF. *The other 'above ground installation' comprising the natural gas receiving station and compound is part of the Power Generation Plant site

(Work No 2B).

APFP Regulations Infrastructure Planning (Applications: Prescribed Forms and

Procedures) Regulations 2009. Sets out the detailed procedures which must be followed for submitting and publicising applications

for Nationally Significant Infrastructure Projects

CEMP Construction Environmental Management Plan. Strategic

document setting out best practice methods to minimise

environmental impacts (including dust) during construction.

CHP Combined Heat and Power. A cogeneration power station capable

of supplying power to the National Grid and also heat to local heat users (such as industry or leisure) through a direct connection to

waste heat / steam produced as part of the combustion process.

Design and Access Statement. A short report accompanying and supporting a planning application. It provides a framework for

applicants to explain how a proposed design is an appropriate response to the site and its setting, and demonstrate that it can be

adequately accessed by prospective users.

DCO Development Consent Order. Consent by a UK Government

Minister for a Nationally Significant Infrastructure Project. A DCO can incorporate or override the need for a variety of consents which would otherwise be required for a development. A DCO can

also include rights of compulsory acquisition.

DECC Department for Energy and Climate Change. UK Government

department responsible for policy and maintaining international and industry relations to support a continuous UK energy supply,

reduce greenhouse emissions and adapt to climate change

EfW Energy from Waste, A power plant which generates energy in the

form of electricity and/or heat from the incineration or pyrolysis of

waste products.

EIA Environmental Impact Assessment. The body of work which

evaluates the potential likely significant environmental effects of the Project. Undertaken in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009.

EΑ

Environment Agency. A Regulatory Authority and main environmental advisor to the English Government.

EPS

European Protected Species are animals and plants that receive protection under the Conservation of Habitats and Species Regulations 2010, in addition to the Wildlife and Countryside Act 1981 (as amended).

ES

Environmental Statement. The final document which provides a comprehensive discussion on the Environmental Impact Assessment.

GTG

A type of internal combustion engine using compressed air and igniting gas to rotate the turbine to create electricity. The GTGs may be aero-derivative gas turbine generator(s) (i.e. turbines derived from the aeronautical industry) which are suitable for frequent start-ups, flexible, highly efficient and give high availability. To achieve up to a combined nominal gross electrical output of 299 MWe, PPL envisage using 3, 4 or 5 individual aero-derivative GTGs. 'Industrial' type units can also be used which are typically larger and often more suited to longer operational hours. They offer more efficiency but less flexibility. Industrial gas turbines differ from aeronautical designs in that the frames, bearings, and blading are of heavier construction. To achieve up to 299 MWe, HPL would propose to use 1 or 2 individual industrial GTGs.

HGV

Heavy Goods Vehicle. A mechanically propelled road vehicle that is of a construction primarily suited for the carriage of goods or burden of any kind and designed or adapted to have a maximum weight exceeding 3,500 kilograms when in normal use and travelling on a road laden.

Ha

Hectare. A unit of area (10,000 m² / 2.471 acres)

HIA

Health Impact Assessment. An assessment of the health effects of the development based on a range of structured and evaluated sources of qualitative and quantitative evidence. The approach is particularly concerned with the distribution of effects and therefore how health and social inequalities might be reduced or widened by particular proposals, in this case the Progress Power Project.

PPL

Progress Power Limited. A subsidiary business of Watt Power Limited (WPL). WPL has been established to develop flexible gas fired generation assets to support the UK Government drive to a low carbon economy. WPL is resourced through Stag Energy, a company founded in 2002.

HRA

Habitats Regulation Assessment. A recognised step by step process which helps determine likely significant effect and (where appropriate) assess adverse impacts on the integrity of a European site, examines alternative solutions, and provides justification for imperative reasons of over-riding public interest.

HSE

Health and Safety Executive. The national independent watchdog for work-related health, safety and illness. It acts in the public interest to reduce work-related death and serious injury across Great Britain's workplaces. HSE is an executive non-departmental public body of the Department for Work & Pensions

IED

Industrial Emissions Directive. European legislation recasting seven existing European Directives including the IPPCD and the LCBD.

IPC

Infrastructure Planning Commission (Now abolished and references to "IPC" should be read as "Examining Authority" or "the Secretary of State", as appropriate).

LDP

Local Development Plan. The set of documents and plans that sets out the local authority's policies and proposals for the development and use of land in their area, adopted in accordance with the Planning and Compulsory Purchase Act 2004.

LTS

Local Transmission System. The LTS transports gas from NTS offtakes towards and between urban areas, in addition, a number of large industrial gas users and power stations are supplied directly. Gas fed from the NTS is fed into the LTS steel pipeline network at pressures typically in the range 38barg to 70barg.

MSDC

Mid Suffolk District Council, the lower tier local authority for the Project Site.

MOC

Minimum Offtake Connection. A connection that will offtake gas directly from the National Transmission System. Part of the AGI within the Gas Connection site

MW

Mega Watt. A measurement of power.

MWe

Mega Watt Electrical.

NETS

National electricity transmission System.

NGC

National Grid's principal operations are the ownership and operation of regulated electricity and gas infrastructure networks in the UK and the US, serving around 19 million consumers directly and many more indirectly. The company also has interests in related markets, including electricity interconnectors, metering services, liquefied natural gas (LNG) facilities and property in the UK, LNG storage and transportation and non-regulated gas transmission pipelines in the US. The company has over 27,500 employees located in the UK and the US. In the UK the company's principal regulated businesses are:

The transmission of electricity and gas in the UK as owner and operator of the high voltage electricity transmission network (NETS) in England and Wales, the gas national transmission system (NTS) in Great Britain, the electricity interconnector with

France and storage facilities for LNG. Operator of the electricity transmission networks in Scotland.

The distribution of gas in England as owner and operator of four of Great Britain's eight gas distribution networks.

 NO_x

Nitrous oxides. Gases produced during combustion including nitric oxide (NO) and nitrogen dioxide (NO₂).

NPS

National Policy Statement. Overarching legislative policy concerning the planning and consenting of NSIPs in the UK.

NSIP

Nationally Significant Infrastructure Project. The Project constitutes a Nationally Significant Infrastructure Project (NSIP) by virtue of s.14(1)(a) and s.15 of the Planning Act 2008 (PA 2008) which include within the definition of a NSIP any onshore generating station in England or Wales of 50 MWe capacity or more.

NSR

Noise Sensitive Receptor. Principally houses (existing or for which planning consent is being sought / has been given) and any building used for long-term residential purposes (such as a nursing home).

NTS

National Transmission System. A network of gas pipelines throughout the United Kingdom that supply gas to power stations from natural gas terminals situated on the coast, and also gas distribution companies which lead indirectly to homes.

PEIR

Preliminary Environmental Information Report, a document which contains information compiled by the applicant for a DCO and which is reasonably required to assess the environmental effects of the development. This is a statutory required document, which must be published during statutory consultation.

PPE

Personal Protective Equipment. Protective garments or equipment designed to protect the wearer's body from injury.

PM_{10/2.5}

Particulate Matter. Airborne particle size, PM10 particles (the fraction of particulates in air of very small size (<10 μ m)) and PM2.5 particles (<2.5 μ m) are pollutants. They are small enough to penetrate deep into the lungs and so potentially pose significant health risks. The principal source of airborne PM10 and PM2.5 matter in European cities is road traffic emissions, particularly from diesel vehicles.

PTF

PIG Trap Facility. PIG traps allow PIGs to be inserted into and removed from a pipeline which is to undergo a 'pigging' program and which is likely to be under pressure.

SCC

Suffolk County Council, the upper tier local authority for the Project Site.

SCGT

Simple cycle gas turbine.

SoS Secretary of State. The decision maker for a NSIP application and

head of a government department.

Socc Statement of Community Consultation. A statement describing

how the promoter (applicant) proposes to consult the local

community about the proposals.

SoCG Statement of Common Ground. A written statement prepared

jointly by the applicant and another party or parties, setting out any

matters on which they agree.

SPG Supplementary Planning Guidance. Non-statutory guidance which

supplies supporting information in respect of policies in a current or emerging local plan or national policy. It is a means of setting out more detailed thematic or site-specific guidance on how these

policies will be applied.

SPV Special Purpose Vehicle. A legal entity created to fulfil the specific

purpose of developing a power project.

TA Transport Assessment. An assessment of the availability of, and

levels of access to, all forms of transportation, to support a

planning application.

TCPA Town and Country Planning Act 1990. An act of the British

Parliament regulating the development of land in England and

Wales

UK United Kingdom. The territory of the United Kingdom.

WPL Watt Power Limited. WPL is an independent company established

to develop flexible gas fired generation assets to support the UK

Government drive to a low carbon economy.

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1 Introduction

1.1 The Project

- 1.1.1 Progress Power Limited (PPL) is seeking to construct, operate and maintain a gas-fired electricity generation project at the former Eye Airfield in Suffolk. The main elements of the proposed Project comprise:
 - a thermal generating station (the "Power Generation Plant") on land at the former Eye Airfield located in Eye, Mid Suffolk;
 - an underground gas pipeline ("Pipeline") with an Above Ground Installation ("AGI") (together the "Gas Connection") to provide fuel to the Power Generation Plant:
 - an underground cable circuit (the "Cable") connecting the Electrical Connection Compound and the Power Generation Plant; and
 - a substation and sealing end compound (the "Electrical Connection Compound").
- 1.1.2 The Application also seeks consent for an access road to the Electrical Connection Compound (the "Access Road") and works enabling the Access Road to link into the A140 (the "A140 Junction").
- 1.1.3 Together, all of these elements in paragraphs 1.1.1 and 1.1.2 are termed the "**Project**".
- 1.1.4 The Electrical Connection Compound, Access Road and the A140 Junction constitute the associated development elements of the Project. The Power Generation Plant, Gas Connection and Cable constitute the NSIP. Under the Act, a DCO is required to construct, operate and maintain the Project. Under s37 of the Act this can only be granted if an application is made for a DCO to the SoS. PPL's Application will be administered and examined by the Planning Inspectorate who will make a recommendation to the SoS prior to final determination.

1.2 This Non-Technical Summary

1.2.1 This NTS summarises the consultation activities that have been undertaken during the pre application phase of the Project, and summarises the key feedback which has influenced the proposals. More detailed information can be found in the full Consultation Report (Document Reference 5.1), from which this NTS is derived and which is also submitted as part of the Application.

1.3 Approach

1.3.1 PPL invested considerable time and resources during the pre application phase of the Project in order to encourage meaningful involvement by the local community, those interested in the Project Site, local authorities and

- other prescribed consultees. Consequently, the Project has developed in a consultative and iterative manner, during successive stages of development.
- 1.3.2 The Project generated significant levels of interest and participation from a broad spectrum of consultees. PPL recognises that certain members of the local community expressed concerns about the Project, and its potential impacts. Nevertheless, both supporters and opponents of the Project have been able to contribute to its development. Significant design and Project decisions were either directly or indirectly influenced by consultation, and affected the way in which PPL undertook subsequent consultation activities. For example, consultation encouraged PPL to:
 - provide sufficient clarity to enable consultees to develop an informed view of the Project, despite future design uncertainties;
 - take into consideration and balance views on important Project design matters. Consultation ultimately influenced factors such as emission stack heights, Power Generation Plant and Electrical Connection Compound design and siting;
 - select a generating technology that would be more economical with water resource use;
 - commit to the deployment of appropriate lighting systems to reduce light pollution;
 - adopt Horizontal Direct Drilling (HDD) or similar methods to minimise disruption and environmental impacts, particularly on farming operations, ecology and transport;
 - choose an underground Cable, instead of one or more overhead lines supported by pylons to connect the Power Generation Plant to the national electricity transmission system;
 - develop and commit to the implementation of a suite of design principles formulated to minimise adverse impacts and maximise positive impacts;
 - identify, assess and then adopt the proposed dedicated A140 Access option to serve the Electrical Connection Compound, to avoid routeing construction traffic through Yaxley;
 - develop appropriate mitigation to reduce the impacts of the Project on local communities and the environment, including integrated landscaping and biodiversity measures; and
 - commit to the development of measures for socio-economic and educational improvements, enhancement and/or improvement of connectivity and landscape and visual amenity.

2 Guidance and Stages

Statutory Requirements

2.1.1 The pre-application consultation process has been carried out in accordance with the requirements of primary and secondary legislation, statutory guidance and non-statutory advice notes, including:

Primary and Secondary Legislation

- The Planning Act 2008 (as amended);
- Infrastructure Planning (Environmental Impact Assessment)
 Regulations 2009 (as amended) (the EIA Regulations); and,
- The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) (the APFP Regulations).

Statutory Guidance and Non-Statutory Advice Notes

- Department for Communities and Local Government, The Planning Act 2008, Guidance on the pre-application process (2013);
- Planning Inspectorate, Advice Note 14: Compiling the consultation report (Version 2: April 2012); and,
- Planning Inspectorate, Advice Note 16: The developer's preapplication consultation, publicity and notification duties (Version 1: April 2012)

Statutory and Non-Statutory Consultation

2.1.2 Figure 2.1 illustrates the various strands of consultation undertaken in relation to the project.

Figure 2.1 – The Strands of Consultation



 ^{*} s42(c) is not applicable as the project is not within the remit of the Greater London Authority

2.1.3 The 'EIA – Scoping' strand refers to consultation under the EIA Regulations on the scope of the assessments which should form part of the EIA. EIA assesses the likely significant environmental effects of a proposed project during construction, operation and decommissioning. The findings of the EIA are presented in an ES. The ES for the Project is submitted with the Application (Document References 6.1 and 6.2).

Consultation Programme

2.1.4 Table 2.1 presents a timeline of the key Project stages.

Table 2.1 Project Milestones

Stage	Description	Period				
Phase 1 Site Selection						
Stage 1	UK Site Search	2010-12				
Stage 2	Identification of potential site at the former Eye Airfield	2012				
Stage 3	Initial Meeting with Mid Suffolk District Council (MSDC)	2012				
Stage 4	Land assembly negotiations commence	2012				
Stage 5	Power Generation Site appraisals commence	Nov 2012				
Stage 6	Connections appraisals commence	Feb 2013				
Stage 7	PPL formed	Feb 2013				
Stage 8	Power Generation Plant Site Option signed	April 2013				
Phase 2 E	Phase 2 EIA Scoping and Non-Statutory Consultation					
Stage 9	Engagement with National Grid Electricity Transmission (NGET)	April 2013				
Stage 10	Environmental Surveys	May – Oct 2013				
Stage 11	Gas Connection Feasibility Study concluded	May – Aug 2013				
Stage 12	Transmission Entry Connection (TEC) application	May 2013				
Stage 13	Project Site definition	May – Aug 2013				
Stage 14	Power Generation Technology Options	May 2013				
Stage 15	Power Generation Plant Stacks	May 2013				
Stage 16	Non statutory consultation with local community/Scoping Briefing to MSDC/SCC/Environment Agency (EA)/Natural England (NE)/ English Heritage (EH) Non-statutory consultation on draft SoCC	May – Septemb er 2013				
Stage 17	EIA Scoping Report submitted	May 2013				

Stage	Description	Period				
Stage 18	EIA Scoping Opinion issued	June 2013				
Phase 3 SoCC Statutory Consultation and Non-Statutory Consultation leading into Statutory Consultation						
Stage 19	Statutory consultation on the Statement of Community Consultation (SoCC)	July 2013				
Stage 20	Project Design Development	Sept-Oct 2013				
Stage 21	Statement of Community Consultation Published	Sept 2013				
Stage 22	Statutory publicity	Sept - Oct 2013				
Stage 23	Revised Regulation 6 notification and Regulation 9 request	Sept 2013 – Jan 2014				
Stage 24	Commencement of statutory s47/42 consultation	Oct 2013				
Stage 25	Statutory Consultation concludes	Nov 2013				
Stage 26	National Grid Electricity Transmission issue Transmission Entry Connection (TEC) offer	Nov 2013				
Phase 4 Detailed Assessment & Consultation Review						
Stage 27	Review of statutory consultation responses	Nov – Dec 2013				
Stage 28	Identification of substation access and substation location	Nov/Dec 2013 – Jan 2014				
Phase 5 Statutory s42 Consultation and Non-statutory Consultation						
Stage 29	Targeted s42 consultation for affected landowners following slight amendment to project red line boundary	Jan 2014				
Stage 30	Non-statutory local community and stakeholder notification regarding access arrangements and sub-station location	Jan 2014				
Stage 31	Review of consultation responses	March 2014				
Stage 32	DCO Application preparation	March 2014				

2.1.5 The following section explains how PPL consulted during the pre application phase of the Project.

3 Consultation Activities and Feedback

3.1 Previous Consultation

- 3.1.1 During the preparation of the Mid Suffolk District Council Core Strategy (adopted 2008) consultation was undertaken by MSDC on the 'Preferred Options' (21st May 2nd July 2007) and the 'Submission Document' (October 2007 November 2007). In 2011, MSDC undertook a focussed review of the Core Strategy to encompass evidence and issues that had arisen in preceding years. Subsequently, Core Strategy Policy CS11 was replaced by Policy FC3, which allocates the former Eye Airfield as a priority site for the expansion and intensification of employment uses.
- 3.1.2 MSDC also consulted on the 'Eye Airfield Development Framework' (EADF). The EADF has no planning status but at the Environment Policy Panel in February 2013 elected members unanimously supported the EADF as a basis for the future development of the former Eye Airfield. On 18th November 2013, a Position Statement, which supplements the EADF, was adopted as non-standard Planning Guidance. The EADF was informed by various stages of consultation with local businesses, landowners, stakeholders and residents and anticipates energy related development at the former airfield.
- 3.1.3 In recent years, statutory and non-statutory consultees, including council members and the local community, have also been consulted on other development plan initiatives, as well as two wind turbine projects, both of which are now operational.

3.2 Non Statutory Consultation & EIA Scoping

- 3.2.1 PPL decided to consult at an early stage of the Project's development, several months in advance of the commencement of the statutory consultation phase. Local exhibitions were held in May 2013, attended by approximately 150 people. Press coverage at the time reflected feedback received by PPL. Reporting covered concerns about visual impacts, observations about energy policy, the future development of the former Eye Airfield and raised questions about the level and extent of potential local benefits.
- 3.2.2 PPL's decision to engage early was subsequently validated. Specific concerns, including those expressed about the potential need for new overhead lines and pylons, ultimately influenced PPL's decision to adopt an underground cable option. During this period, PPL was also asked to consider other design considerations in respect of stack heights, which PPL subsequently took into account as it developed the Project. Feedback also revealed a strong preference for the realisation of local benefits, primarily socio-economic in nature. These ideas would eventually be developed into a coherent suite of measures and commitments made in the Application.
- 3.2.3 During this period, PPL also identified key technical consultees with an interest in the Project, and through a process known as EIA 'scoping', was able to agree its primary methodological approaches to environmental assessment

with the SoS. Environmental survey and assessment work was subsequently undertaken during 2013 and early 2014.

Local Community

- In May 2013, PPL undertook non-statutory consultation regarding the current proposals with key stakeholders (Stage 16, Table 2.1) and the local community (Stage 16, Table 2.1). Non-statutory consultation was also undertaken with SCC, MSDC and the Planning Inspectorate on the Statement of Community Consultation (SoCC) (Stage 16, Table 2.1).
- 3.2.5 At the commencement of non-statutory consultation, several options were under consideration, including:
 - Three potential generating technologies: Combine Cycle Gas Turbine (CCGT), Simple Cycle Gas Turbines (SCGT), and Reciprocating Gas Engines (RGE).
 - Stack heights between 30m and 90m in height.
 - Four possible gas connections points to connect into the National Transmission System (NTS) infrastructure. Five possible gas route corridor options which were considered suitable to connect into the four points.
 - Electrical Connection Opportunity Area identified. Options for the Electrical Connection within this Opportunity Area comprised a new 400 kV electricity export cable, either in the form of an underground cable or overhead line.
- 3.2.6 At this stage, the viability of Combined Heat and Power (CHP) options was also being considered.
- 3.2.7 To ensure the local community had ample opportunity to comment on the Project during its development, non-statutory consultation was regarded by PPL as having the same significance as statutory consultation within the overall pre-application consultation process.
- 3.2.8 The local community was consulted initially at a two day exhibition at Eye Community Centre in May 2013 (Stage 16, Table 2.1), in order to raise awareness and invite comments on the overall Project. The exhibitions were advertised by letters to local community representatives; adverts in the Diss Express, Bury Free Press, Eastern Daily Press and East Anglian Daily Times newspapers; posters in the local area; press releases in local and national media; and radio and local television coverage. PPL also maintained a Project website with news and consultation materials.
- 3.2.9 At the exhibition, brochures were provided and information boards outlining details of the Project, the developers (PPL), the need for the development, the planning and consultation process, and the indicative programme of activities and key milestones. A total of 137 people attended the exhibition, of which 73% returned a feedback form. The responses provided by the local

community were categorised into a number of themes, as shown in Figure 3.1 below:

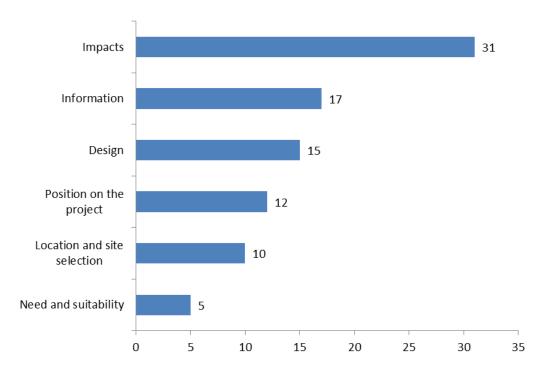


Figure 3.1 – Local Community Non-Statutory Consultation – Master Themes of Respondent Comments

3.2.10 A summary of local community comments and PPL's response is set out below:

Impacts – Comments were made on the impacts of the proposal in respect of landscape and visual, traffic and access, environmental, construction, future development at Eye, community benefits, availability of gas, employment, and safety. PPL stated that the assessment of environmental impacts at the time was ongoing; however, the EIA Scoping Report was available on the Project website and set out the approach to assessing environmental impacts. PPL would also take into account these comments on impacts as it carried out its EIA, the preliminary results of which would be published in a Preliminary Environmental Impact Report (which ultimately formed part of PPL's statutory consultation).

Information – Some respondents said that more information was needed on the Project. PPL explained that the exhibitions were intended to introduce and enable discussions of aspects of the Project with the local community and that they were held at an early stage in the design development process when a number of options were still under consideration, therefore further design and environmental assessment work was to be completed. PPL sought to balance the availability of information and a desire to raise awareness and knowledge and gain local feedback on the proposals. As PPL developed its consultation plan for statutory consultation, PPL took into account comments on the information that people wanted to know about in future consultation.

Design – Comments were made by respondents on the underground versus overhead lines, the scale of development and the stack height. PPL stated that as the exhibition was held early in the design process, further design work was still to be completed. These comments would go on to influence PPL's decision on key aspects of the Project prior to statutory consultation.

Position on the Project – PPL introduced and discussed the Project with the local community as part of the proactive approach to consultation. Best available information was provided to allow informed decisions to be made. A number of respondents were opposed to local development in general and two were opposed to the Project itself. Other respondents were open to/supportive of the Project.

Location and site selection – Five comments were made opposing the location and siting of the Project, referring to the locality of Eye, the rural location, and one to their house. Two comments were also received in support of the location and siting and another respondent commented on the unattractive appearance of the former Eye Airfield at present. PPL explained why it considered the location suitable, highlighting the locational advantages of the site and MSDC's support for energy-related use on part of the former Eye Airfield.

Need and suitability – Comments were made both opposing and supporting the suitability of gas as an energy source, as well as on the value of renewable energy sources and the need for the development. PPL highlighted the growing acknowledgement within Government policy and industry that established renewable technologies alone cannot provide the security of support that consumers require.

Key Stakeholders

3.2.11 PPL consulted local community representations and stakeholders about the Project at a number of meetings (Stage 16, Table 2.1). Consultees included MSDC and SCC officers and councillors, the EA, English Heritage, Eye Town Council. PPL also met with the Planning Inspectorate during this period to keep them updated on the Project's progress and timeline. The responses of key stakeholders were categorised into a number of themes, as shown in Figure 3.2 below:

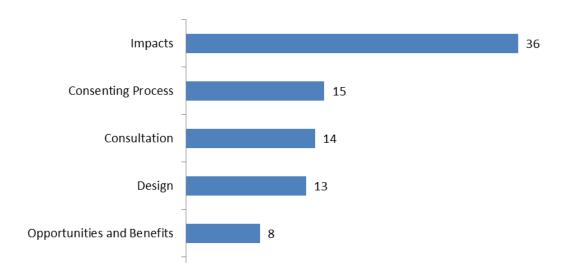


Figure 3.2 - Key Stakeholders Non-Statutory Consultation - Master Themes of Respondent Comments

3.2.12 A summary of Key Stakeholder comments and PPL's responses are set out below:

Developer and Delivery

Impacts – Advice and information was provided by MSDC, SCC, the EA, Eye Town Council and Suffolk Association of Local Council's regarding environmental and cumulative impacts. PPL subsequently considered these comments within the EIA and in the preparation of the Preliminary Environmental Information Report (PEIR), used for statutory consultation purposes, as well as the ES (Document References 6.1 and 6.2).

Consenting Process – the Planning Inspectorate provided advice (which was made publically available) regarding the DCO process, SCC queried what other permits would be required and Dr Dan Poulter MP queried the likely timescales for DCO development. PPL followed the advice received from consultees in the preparation of the DCO and responded to queries by explaining the DCO process, timescales and process of engagement.

Consultation – The Planning Inspectorate advised on best practice for the consultation process and advised PPL to share draft documents with the local authorities. Dr Dan Poulter MP and Eye Town Council queried local consultation responses, and David Ruffley MP for Bury St Edmunds was suggested as an additional consultee. SCC and the EA enquired about what level of detail would be provided in the PEIR and how it would respond to the Scoping Report given the timescales proposed (this timescale is a statutory timescale, in which the SoS asks certain stakeholders for their views on what an ES should contain. See further below). PPL sought to outline the consultation approach, make consultation material accessible, and followed relevant legislation and guidance in the carrying out of both statutory and non-statutory consultation. In respect of the Scoping Report, PPL would maintain

dialogue with the key stakeholders so that the Scoping Report and the PEIR would be informed by their comments before publication. PPL highlighted that through engagement with key stakeholders, PPL sought to ensure that any Project issues or local information was known prior to the receipt of the Scoping Report and PEIR. The PEIR included PPL responses to comments received via the Scoping Opinion.

Design – Comments were made in respect of the electrical connection, emission stacks, landscaping, layout and form, movement, water resources, safety and gas storage. PPL responded to queries on the height of the stacks. In response to comments made regarding the layout and form of the Project, PPL stated that the Project is aligned with the priorities of MSDC's EADF. PPL also advised that the EIA would include an assessment of the traffic and access impacts arising from the Project. In response to queries raised by SCC and the EA regarding water resources, PPL advised that it would take account of scarcity in its Water Quality and Resources Assessment. It was noted by PPL that gas would not be stored on the Project Site.

Opportunities and Benefits – Queries were raised by multiple consultees about how community benefits could be realised and the impact that employment opportunities of the Project would have on accommodation and transport. PPL advised that the Project would provide job opportunities for skilled and semi-skilled workers at the construction phase. During operation, a number of full time positions would be created with others supported in the local community in facility management and other lines of work.

Developer and Delivery – Consultees sought clarification on site selection process, the life of the plant and its decommissioning, and who would be responsible for the connection between the Project and existing infrastructure. PPL stated that an extensive site selection process had preceded the identification of the former Eye Airfield, over several years. PPL also highlighted the advantages of the site and MSDC's support for energy-related use on part of the former Eye Airfield. PPL confirmed that NGC would own and operate any substation/SEC elements of the Project, PPL would retain control of the Cable and the Pipeline.

- 3.2.13 This first stage of non-statutory consultation influenced the Project in three important respects.
 - It enabled PPL to identify and understand the key interests of the local community and local stakeholders. This would subsequently inform the development of the SoCC and the related statutory consultation activities.
 - It served to encourage PPL to subsequently disregard overhead line electrical connection options, based upon consistent and vocal local opposition. Concerns were primarily founded on anticipated visual and landscape impacts.
 - Consultation revealed a strong preference for the realisation of 'local' benefits, primarily socio-economic in nature. These ideas would eventually be developed further into coherent measures capable of being delivered, and forming part of the Application and a suite of proposed heads of terms for a Section 106 legal Agreement.

3.3 EIA Scoping

- 3.3.1 In accordance with EIA Regulations, an EIA Scoping Report was submitted on 7th May 2013 to the Planning Inspectorate, who acts on behalf of the SoS (Stage 17, Table 2.1). The purpose of the submission was to request a view on the scope and content of the EIA via a 'Scoping Opinion' and confirm an EIA was to be undertaken as part of the Application.
- 3.3.2 The EIA Scoping Report provided an introduction to the Project, including its need and benefits, the developer, the consenting regime, and the intended scope and structure of the ES (which presents the findings of the EIA). The Report detailed the options under consideration at the time, which included: potential generating technologies, stack heights, consideration of Combined Heat and Power (CHP), gas connection routes and points, and potential electrical connection routes.
- 3.3.3 The EIA Scoping consultation was undertaken with statutory consultees in parallel to the non-statutory consultation, summarised above. A Scoping Opinion was received from the Planning Inspectorate on 26th June 2013.
- 3.3.4 Under Regulation 6 of the EIA Regulations, on 10th September 2013, PPL confirmed to the SoS that the Application would include the Power Generation Plant, Gas Connection, Cable and the Electrical Connection Compound (sealing end compound (SEC) and a substation).

- 3.3.5 The EIA Scoping phase informed the development of the Project in the following ways:
 - PPL was able to identify key technical consultees with a potential interest in the Project.
 - PPL was able to establish its primary methodological approaches to environmental assessment.
 - PPL was able to confirm that transboundary effects were unlikely.

3.4 Statement of Community Consultation (SoCC)

- 3.4.1 S47 of the Act requires applicants to consult with the local community and outline the consultation strategy in a SoCC.
- 3.4.2 PPL's early non statutory engagement informed the development of the Project's SoCC. The draft SoCC and related Consultation Plan, set out how PPL would consult with the local community under s37 of the Act. The documents included key aspects of the approach, including: early proactive consultation, the definition of consultation areas, exhibitions at convenient times and locations, reaching out to 'hard to reach' groups, and publicity of the Project and exhibitions. The draft documents were issued to the Planning Inspectorate, MSDC and SCC in July 2013 for informal feedback, before PPL issued the SoCC to MSDC formally under s47 of the Act.
- 3.4.3 Informed by both non statutory and statutory consultation, PPL was able to agree the content and objectives of the SoCC with both MSDC and SCC. As the relevant local authorities, MSDC and SCC's knowledge and contribution was invaluable: It enabled PPL to develop a proportionate and targeted approach to consultation, informed by detailed local knowledge.
- 3.4.4 The SoCC Notice was published in local newspapers from Thursday 12th September 2013. It advised the public of PPL's planned statutory consultation activities. The SoCC development process enabled PPL to:
 - Agree a proportionate and appropriate approach to consultation with the relevant local authorities, MSDC and SCC, informed by a non statutory, then statutory consultation on the SoCC.
 - Identify a variety of measures to facilitate engagement with the local community, including hard to reach groups.

3.5 Sections 42, 47 and 48 Statutory Consultation and Publicity

- 3.5.1 For clarity and to avoid confusion, PPL took the approach of conducting a single phase of statutory consultation under s42, s47 and s48. Published in September 2013, the SoCC notice confirmed where and when the SoCC could be inspected by members of the public. Letters were sent to s42 consultees directly. Consultation notices were published in national and local newspapers under s48 of the PA 2008.
- PPL's statutory phase of consultation commenced on 3rd October 2013 and ended on the 7th November 2013, a period of 35 days. PPL sought to provide sufficient clarity to enable consultees to develop an informed view of the Project. In order to do so, PPL introduced the key elements of the Project, supported by significant quantities of information including a preliminary environmental information report (PEIR), and non-technical summary (PEIR NTS). PPL facilitated a range of activities, briefings and events widely publicised in accordance with the SoCC. PPL explained what decisions had been made to date, and sought feedback on specific Electrical Connection and Gas Connection and Power Generation Plant options, whilst inviting feedback on the PEIR.
 - 3.5.3 The Project had developed during the period following non-statutory consultation and several key decisions had been made at the commencement of statutory consultation. These were confirmed in the consultation material and included:
 - Power Generation Plant operating as a flexible plant, rather than base load;
 - Selection of Simple Cycle Gas Turbine (SCGT), operating as a 'peaking plant' (maximum 1500 hours per year);
 - Stack height to be between 20-30m;
 - CHP provision not viable, therefore not part of the scheme; and
 - Two preferred gas connection route corridors options to connect into the National Transmission System (NTS) infrastructure.
 - 3.5.4 In order to avoid unwanted visual impacts, and to respond directly to representations made during the non statutory consultation phase, PPL decided to assess potential Electrical Connection Compound sites within a revised 'opportunity area' (comprising a smaller area of land than an earlier version of the Opportunity Area presented within the Scoping Report) based on the development of an underground cable, rather than an overhead line solution.
 - 3.5.5 PPL subsequently identified two potential locations where the Electrical Connection Compound could be sited. The PEIR confirmed that in respect of Electrical Connection options, the suitability of sites within the opportunity area was considered in light of potential impacts on noise, landscape and visual

- impact, ecology, water and flood risk, geology and agriculture, and impacts on cultural heritage assets and archaeology.
- 3.5.6 Secondly, based on the conditional offer from NGET for a connection to the NETS, PPL confirmed that the Electrical Connection Compound needed to be sited adjacent to the NETS.
- 3.5.7 In view of the above, PPL presented the following Electrical Connection options for statutory consultation purposes in the PEIR:
 - Electrical Connection Option 1: Comprising the Electrical Connection Compound located on agricultural land to the north of The Leys, off Leys Lane between The Leys and Goswold Hall, together with a buried underground electrical Cable to the Power Generation Plant; and
 - Electrical Connection Option 2: Comprising the Electrical Connection Compound located on agricultural land to the south of 'The Leys', north of Mellis Road, together with an buried underground electrical Cable to the Power Generation Plant.
- 3.5.8 In accordance with s48 of the Act, notices providing details of the statutory consultation events were placed in print media during September 2013. In accordance with Regulation 11 of the EIA Regulations, a copy of the s48 notice was issued to the consultation bodies and to those persons notified to PPL in accordance with Regulation 9 of the EIA Regulations as at September 2013. PPL did not receive any consultation responses that identified themselves as responding to the s48 publicity approach.
- 3.5.9 Exhibitions were held at six venues across seven dates (a two-day exhibition was held at Eye). The PEIR NTS (which set out the preliminary findings of the EIA at the time), was made available at the same locations as the SoCC, as well as the main PEIR. The Project and exhibitions were publicised via a number of different methods including leaflet distribution, local newspaper adverts, posters and media coverage.
- 3.5.10 PPL received requests from parish councillors and the local community during the first two exhibitions at Hoxne and Mellis to hold an additional exhibition in Yaxley. The SoCC acknowledged the potential need for additional consultation activities, and thus PPL agreed to hold an additional event at Yaxley Village Hall on Monday 21st October 2013. The additional exhibition was advertised via hand delivered letters, a press release, and a news bulletin on the PPL website. It was extremely well attended.
- 3.5.11 PPL contacted a range of local stakeholders, including elected representatives, local community, business and special interest groups inviting them to express their views on the Project. In all, 332 people attended the exhibitions the majority of which attended the Yaxley and Mellis events. Feedback forms were provided, with questions seeking feedback regarding the overall Project, the PEIR and the exhibition.

- 3.5.12 PPL received a number of reports that some people did not receive leaflets containing information about the Project and consultation process. PPL received independent confirmation that 17,000 leaflets were delivered, at a 'penetration rate' of 81%. For a variety of reasons, the SoCC did not guarantee that everyone would receive, or indeed read the leaflet. Nevertheless, PPL's other complementary activities ensured that there were high levels of participation in the process, evidenced by the significant number of responses and high levels of attendance at the exhibitions. SCC agreed that PPL had undertaken its leafleting distribution activities in accordance with the SoCC.
- 3.5.13 In response to the questions posed, a number of key themes were raised, as shown in Figure 3.3 below.

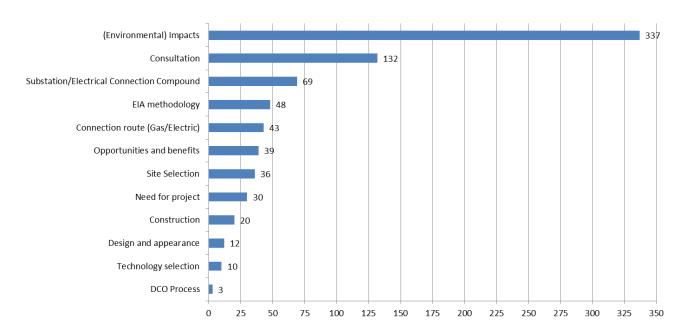


Figure 3.3 – Local Community Statutory Consultation – Master Themes of Respondent Comments

Section 47 Consultee Feedback

3.5.14 A summary of local community comments and PPL's response is set out below:

Environmental Impacts – Concerns were raised regarding the impact of the development of various aspects, including traffic, transport and access, landscape and visual, noise and vibration, air quality, cultural heritage and archaeology, ecology, landscaping and screening. PPL took these comments into account, which informed the final assessments in the ES (Document number 6.1) as well as refinements in the Project (such as the access arrangements to the Electrical Connection Compound).

Consultation Process – Several respondents expressed concern over the consultation process and felt it to be inadequate in the information and publicity of the consultation provided. However, PPL responded by highlighting that they were committed to undertaking and delivering

consultation with the local community as set out in the SoCC. The approach to consultation, including publicity, was agreed with MSDC and SCC and the number of attendees at the events as well as the responses received demonstrated that PPL's publicity methods had penetrated the local community.

Electrical Connection Compound – PPL stated that the selection of the location for the Electrical Connection Compound was an iterative process informed by consultation, commercial, environmental and technical considerations. An Electrical Connection Siting Report detailing the process has been prepared and accompanies the Application (Document Reference 10.3).

EIA methodology – In response to queries on the EIA methodology, PPL clarified that during the statutory s47 consultation process the preliminary findings of the EIA were presented in the PEIR and PEIR NTS, as such these were not the final results of the EIA. The final EIA findings are presented in the ES that accompanies the Application (Document References 6.1 and 6.2). PPL also stated that the scope of the EIA had been agreed with statutory consultees via the EIA Scoping process.

Connection route (Gas/Electric) – PPL responded to queries and concerns on the connection routes by highlighting that a number of connection options had been considered. The comments received, alongside s42 responses, environmental and technical studies, informed the selection of the final design within the Application. An Electrical Connection Siting Report accompanies the Application which sets out the process that led to the identification of the technology and location and the decision to underground the Cable (Document Reference 10.3).

Opportunities and benefits – In response to queries on opportunities and benefits the Project would provide, PPL highlighted that an EIA has been undertaken which includes a socio-economic assessment, the findings of which are presented in the ES. PPL also reiterated the number of jobs the Project would provide. PPL stated that it would continue to consult with MSDC and SCC on ways to bring wider social and environmental benefits to the surrounding area.

Site Selection – PPL emphasised the extensive site selection process it had gone through, investigating around 600 sites in total over the past three years, and reiterated the advantages of the Project Site. PPL also highlight MSDC's position with regard to future development of the former Eye Airfield and the potential for an Energy Park. PPL also sought to ensure that the site layout and positioning of the infrastructure removes or minimises any potential impacts, and the ES presents the findings of the EIA which assesses the likely significant environmental impacts of the Project.

Need for project – Comments were received questioning the need for a gas power station as opposed to renewable energy sources, and also the national need for a gas fired power stations. PPL highlighted the growing

acknowledgment within Government Policy and industry that established renewable technologies cannot provide the security of supply that consumers require. PPL also highlighted that gas is the most appropriate energy source due to delays to nuclear and the closure of coal fired plant.

Construction – The EIA considers construction, operational and decommissioning phase effects and during the statutory s47 consultation process the preliminary findings of the EIA were presented in the PEIR and PEIR NTS. The PEIR and PEIR NTS also described the further studies and assessments to be undertaken in support of the EIA. The final EIA findings are presented in the ES that accompanies the Application, including an assessment of traffic and access impacts arising from the Project.

Design and appearance – Comments were received raising concern about the potential visual impact of the Project. The Design and Access Statement (DAS) (Document Reference 10.2) sets out the rationale and final design of the Project. PPL also highlighted that it had sought feedback from MSDC and SCC officers throughout the Project evolution to ensure that the final scheme is sensitive to the site and surrounds. In response to comments, PPL has also prepared an outline Landscape Strategy, which is part of the Application.

Technology selection – In response to comments on technology, PPL emphasised the growing acknowledgement within Government Policy and industry that established renewable technologies cannot provide the security of supply that consumers require. PPL also clarified that the plant would operate as a 'peaking plant' operating for a maximum of 1500 hours per year. The Project would obtain gas from the National Transmission System, which may be derived from a variety of sources. PPL also emphasised the evolution of the Project in respect of stack heights. PPL clarified that during the non-statutory phase the viability of CHP had not been established, but by the statutory stage it had been established that CHP was not viable for the Project. A report outlining the viability of CHP has been prepared and accompanies the Application (Document 6.2 Appendix 5.A).

DCO Process – PPL clarified that throughout the consultation process PPL has explained how consultees can engage in the DCO process. In addition, PPL facilitated the organisation of a PINS Outreach event, held on 22nd January 2014. During this event, the Planning Inspectorate gave a presentation to representatives of parish councils, MSDC officers and an SCC councillor, providing an overview of the DCO process and explaining how parties can engage with the process.

S42 Consultee Feedback

3.5.15 Respondent's comments to s42 statutory consultation were focused on a number of key themes, as shown in Figure 3.4 below.

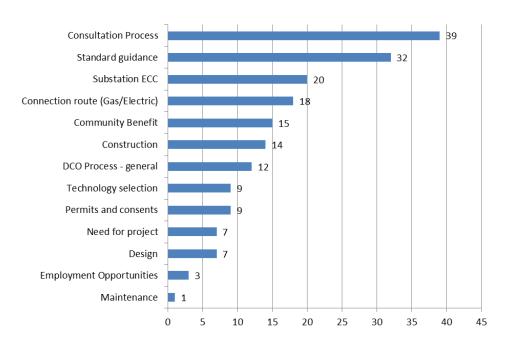


Figure 3.4 – Prescribed Consultees Statutory Consultation – Master Themes of Respondent Comments

3.5.16 A summary of prescribed consultee comments and PPL's response is set out below:

Consultation Process – In response to requests for more information on the proposals and further engagement going forward, PPL held a Project update session with the SCC, MSDC and the parish councils in early 2014. PPL also highlighted that it is committed to continued engagement with the local community and key stakeholders following submission of the Application, as well as throughout the construction, operational and decommissioning phases should a DCO be granted. PPL also emphasised that the number of exhibitions and locations were agreed in the SoCC with MSDC and SCC.

Standard Guidance – A number of consultees highlighted the availability of standard guidance on a number of matters. PPL noted the standing advice provided and has given it due regard where appropriate in formulating the Project for the Application.

Electrical Connection Compound – In response to a request for more information regarding the chosen location of the substation element of the Electrical Connection Compound, PPL provided an information update to the local community and other consultees in February 2014 about the Electrical Connection Compound and Access Road. It provided information about the selected location and the decision making process behind its selection.

Connection Route (Gas/Electric) – SCC required more information regarding the Electrical Connection and Gas Connection Route Corridor and other route options. PPL responded by providing an information update to SCC, MSDC, the local community and other consultees in February 2014 about the Electrical Connection Compound and Access Road. PPL has also

met with MSDC and SCC officers to explain the decisions around the Electrical Connection and Gas Connection. PPL also clarified the selection process behind the Electrical Connection. PPL will continue to communicate and engage with stakeholders as the Project progresses to ensure that working practices and operational requirements are considered at an appropriate time in the process. In response to comments about the effect the Project would have on the landscape, PPL stated that an outline Landscape Strategy has been prepared in response to consultation comments and would be submitted with the Application.

Community Benefit – PPL highlighted that an EIA has been undertaken which includes a socio-economic assessment, the findings of which are presented in the ES. PPL also clarified that it will continue to consult MSDC and SCC on ways to bring wider social and environmental benefits to Eye and the surrounding area. In this respect, PPL has held discussions with MSDC and SCC over a potential Section 106 legal agreement (Document 10.4).

Construction – In response to comments from National Grid that construction works should not compromise tower foundations or their assets, PPL will continue to communicate with stakeholders as the Project progresses to ensure that working practices and operational requirements are considered at the appropriate time in the process. PPL is working to agree a Statement of Common Ground with National Grid, which will result in Protective Provisions being attached to the DCO.

DCO Process – PPL confirmed that a Construction Environmental Management Plan (CEMP) has been prepared taking into account consultation comments to manage the effects during construction and an outline CEMP will accompany the Application (the intent being that the DCO will secure the production of a full CEMP based o the outline CEMP). PPL also confirmed to consultees that the EIA considers construction, operational and decommissioning phase effects (the latter is similar to construction in most instances).

Technology selection – comments were made on the stack and overhead lines, water use and gas turbines. During the development of the Project, a number of connection options have been considered and that the selection of the electrical connection for the Project has been an iterative process informed by technical considerations as well as consultation responses. Consultation has informed the selection of the technology for the Project as Simple Cycle Gas Turbine (SCGT), operating as a 'peaking plant' (maximum 1500 hours per year).

Permits and consents – Energy Power Resource Limited, the EA, the Health and Safety Executive, the Forestry Commission and SCC commented on the requirement of a number of permits and consents. PPL noted the requirements and has given it due regard where it applies at this stage of the process.

Need for project – Comments related to the need for a secure, affordable and diverse energy supply to meet the nation's energy demand. Comments were made by SCC and MSDC. PPL noted these comments and highlighted the growing acknowledgment within Government policy and industry that established renewable technologies cannot provide the security of supply that consumers require. They also highlight that delays in nuclear development and coal fired power station closures mean that gas is the most appropriate energy source.

Design – The EA commented on the Best Available Technology to be used. SCC and MSDC commented on the need for good design to be applied to all elements of the Project. In response to these comments, the ES explores the Best Available Technology requirements and emissions standards of the Project and the suitability for a future Environmental Permit.

Employment Opportunities – The Project would bring a range of benefits to the area during both the construction and operational phases, including employment opportunities which have been assessed in the socioeconomic assessment of the EIA, which is presented in the ES (Document Reference 6.1). PPL will continue to consult MSDC and SCC on ways to bring wider social and environmental benefits to the surrounding area.

3.5.17 The statutory phase of consultation exercise enabled PPL to:

- Seek the views of the community, prescribed persons, local authorities and persons with land interests;
- Seek feedback on its commitment to underground the Electrical Connection;
- Seek feedback on the specific proposals for the Gas Connection and Electrical Connection and Power Generation Plant options;
- Invite comments on the findings of the preliminary environmental studies.

3.6 Targeted S42 Consultation & Information Update

In response to feedback from the local community during the statutory consultation, and in order to reduce potential disturbance to Yaxley and Mellis, PPL confirmed its intention to develop a new access to the A140. This resulted in a minor modification of the redline boundary. Consequently, between the 6th February and 6th March 2014 PPL undertook a targeted 28 day period of statutory consultation of those s42 consultees with land interests affected by the boundary change.

- At the same time, PPL produced and distributed an Information Update. The purpose of the update was to share details with the local community about the proposed Access Road, the A140 Junction and location arrangements for the Electricity Connection Compound. The Information Update was produced as a consequence of PPL's review of responses received during the Project's period of statutory consultation, and continued technical and environmental studies. PPL's decision to progress the southern Electrical Connection Compound (Option 2) was not a change in the Project. However, given the levels of interest expressed during the statutory consultation phase, it was considered courteous to issue confirmation of PPL's decision to the community, with reasons why it had selected its preferred option.
 - 3.6.3 The Information Update took the form of a published document detailing the rationale behind the proposed A140 Access and the selection of the Electrical Connection Compound location. A letter was posted to Lord Framlingham (a life peer in the House of Lords, formerly an MP for Central Suffolk and North Ipswich), Dan Poulter MP, David Ruffley MP and Richard Bacon MP. Email notifications were also provided to all Parish Councils within the CCZ, as well as local awareness group Common Concern and the Suffolk Preservation Society. MSDC Officers and SCC Councillors also received the email notification. Letters were also sent to all s42a and s42b consultees for information.
 - 3.6.4 Letters were hand delivered to households in Mellis, Yaxley, Thrandeston and parts of Eye, and posters were displayed, notifying residents of the Information Update. Information was made available to view in five local libraries. During the Information Update period, PPL hosted 'MP style' drop-in sessions in Mellis, Yaxley and Eye on 25th February 2014, which were attended by over 70 people.
 - 3.6.5 A summary of local community comments and PPL's response is set out below:

Community Benefit – A number of comments were made querying the benefit or compensation that the community would receive from the Project. Specific comments were made suggesting a historic building fund or environmental fund be set up. PPL advised that it is currently in discussions with MSDC and SCC over a Section 106 Agreement, which would include measures for socio-economic and educational improvements, enhancing connectivity between the proposed development and Eye, and improving landscape and visual amenity.

Connection Route – Some respondents from the local community suggested overhead electrical lines and some suggested underground cables. One respondent queried which connection corridor had been selected. PPL stated that that it has considered a number of connection options, and determined that the proposed Electrical Connection would be via an underground cable from the Power Generation Plant to an Electrical Connection Compound adjacent to the existing NETS 400 kV overhead lines to the west of the A140. Gas Route Corridor Option 2 has been selected as Option 1 is technically

unachievable because of its close proximity to the National Grid Gas Compression System.

Construction – Comments were made in respect of the impact of construction on safety and emergencies, and the impact of traffic, dirt and noise. PPL noted that it has had regard to these comments when developing a draft CEMP (Document 6.2 Appendix 4.A) and Construction Traffic Management Plan (Document 6.2 Appendix 12.D). These documents ensure that construction activities are undertaken in accordance with good practice and safety guidelines.

Consultation Process – The majority of comments made related to consultation materials and that PPL has failed to disclose sufficient detail of the Project to enable consultees to reach an informed decision about important elements of the Project. PPL advised of the stages of the consultation process undertaken and the materials published, which have included leaflets to advertise the consultation and consultation events where people could review exhibition boards and hard copies of the PEIR and PEIR NTS. Some comments stated that the consultation process has been inadequate and of poor quality. PPL stated that it has undertaken a wide range of activities to carry out both statutory and non-statutory consultation in the local community. Consultation has also been carried out in accordance with PPL's SoCC, which was agreed with MSDC and SCC.

DCO Process – Some comments opposed the Project and its location, whilst some stated that the proposed substation and new Access Road would encourage further development in this area. PPL advised that, under the EIA Regulations, an applicant has to outline the main alternatives studied, and where an application involves compulsory purchase, the application needs to show that there are no reasonable alternatives to the scheme being put forward.

Design - A number of comments objected to the removal of access to the fishing pond and allotments at the end of Old Norwich Road. Respondents suggested that a barrier on the Access Road set back from the A140 would be a preferred option. PPL stated that the restriction of Old Norwich Road would be a temporary measure that would be required during the construction period only, and following construction, access via Old Norwich Road would be restored. Some comments also stated that the three way junction with ghost island is unsafe and would create an accident black spot - PPL advised that the Transport Assessment found that the Project would have no significant impact on the A140. 5 comments were made on the inadequacy of landscaping and screening. PPL responded that a draft Landscape Mitigation Strategy (Document 10.6) and Outline Landscaping Plans (Document 2.9) have been prepared as a result of consultation and would be submitted with the Application and a requirement of the DCO would require PPL to agree a landscaping plan with the local authority prior to construction. Some gueries were raised regarding the minimum achievable stack heights. PPL responded that a minimum stack height of 25m is required for the Power Generation Plant in order to achieve adequate dispersion rates of pollutants and meet UK air quality objectives.

EIA Methodology – A number of comments were made relating to the methodology used within the landscape and visual chapter of the EIA. PPL stated that a total of 26 viewpoints have been agreed in consultation with SCC, and the potential impacts on Conservation Areas have been assessed within the ES (Document Number 6.1).

Employment Opportunities – The majority of comments made stated that employment would not come from the local area as highly skilled individuals are required during construction and operation so no local benefit will be seen. As a result of consultation responses, PPL is in discussions with MSDC and SCC over a Section 106 Agreement to include proposals for socio-economic and educational improvements, such as delivering a local service provider engagement scheme to MSDC to ensure that opportunities for local organisations to bid for contracts are advertised locally.

Environmental Impacts – Comments were made in respect of the following sub-themes: air quality; cultural, heritage and archaeology; cumulative impacts; ecology; residential amenity; health; landscape and visual; landscape and screening; lighting; noise and vibration; property prices; public rights of way; safety and emergencies; socio-economics; traffic, transport and access; and water resources.

- Air Quality Some comments raised concerns regarding pollution levels. PPL has taken these comments into account and the ES has identified no significant operational impacts at the minimum stack height of 25m.
- Cultural, Heritage and Archaeology The majority of comments advised that there are a number of heritage assets within the consultation area which should not be degraded. PPL has taken these comments into account and the ES has determined that there would be slight to moderate / effects on the setting of Historic Assets within the Study Areas resulting from the construction or operation of the Project.
- Cumulative Impacts Some consultees commented that there would be a significant cumulative impacts as a result of the Project. PPL has taken these comments into account and the ES considers cumulative impacts of the Project, including the impact of the Eye Chicken Litter Plant, four wind turbines and existing 400 kV overhead lines west of the A140.
- Ecology Comments received related to the sighting of red kites and buzzards and the impacts on trees. PPL has taken these comments into account and the ES concludes that no significant effects on protected species or habitats are anticipated.
- Residential Amenity Two comments queried the impact of noise and light pollution on residential amenity. PPL has taken these comments into account and the ES concludes that no significant impacts are

- anticipated on any residential properties during construction or operational phases of the development.
- Health The majority of comments raised concerns regarding the proximity to electrical infrastructure. PPL has taken these comments into account and Appendix 15.A of the ES (Document Number 6.1) presents an Electro-Magnetic Field (EMF) study for the Project, which has been carried out to assess the potential impact of EMFs associated with the construction of the Project, specifically the Electrical Connection Compound and Cable. The impact assessment has found that the EMF field strength for the Project would be the same as that which is already present associated with the existing 400kV Norwich Main to Bramford overhead line.
- Landscape and Visual The majority of comments refer to the visual impact of both the Electrical Connection Compound site and the Power Generation Plant, in particular the stacks of the plant that are located on higher ground. PPL has taken these comments into account and the ES has determined that there would be slight to moderate effects on the setting of Historic Assets within the Study Areas resulting from the construction or operation of the Project. Further, in response to comments, PPL's proposed mitigation in the form of landscaping would reduce the significance of visual impacts over time.
- Landscape and screening Comments suggested that the time it takes for trees to grow has not been considered in the screening mitigation. In response to these comments, PPL has ensured that the draft Landscape Strategy considers landscape screening mitigation measures, and their effectiveness over time.
- Lighting Comments stated that there will be an impact from light pollution and that this should be mitigated. In response to these comments, PPL has ensured that the Outline Lighting Layout (Document 2.10) has been prepared in order to minimise the use of artificial lighting during constructing and operation.
- Noise and vibration Some respondents wanted to know the noise levels of the Power Generation Plant and Electrical Connection Compound. PPL has taken these comments into account and the ES (Document Number 6.1) sets out the predicted noise impacts of the Power Generation Plant and the Electrical Connection Compound. The ES concludes that there would be no significant noise output from the Electrical Connection Compound.
- Property prices Some comments refer to the potential impact of the Project on their properties price. PPL has taken these comments into account and the assessments carried out by PPL have included impacts on residential amenity.

- Public rights of way Two comments state that the ancient green lane is crossed by the proposals and would need to be diverted. PPL has taken these comments into account and the adoption of the southern Electrical Connection Compound avoids the need to adversely affect the green lane, access to it would be maintained during construction and a diversion would not be required.
- Socio-economics Numerous questions were raised in relation to the effects on business and tourism. PPL has taken these comments into account and the ES (Document Number 6.1) considers the socio-economic impacts of the Project, including the anticipated effects on business and tourism none of which are considered likely to be significantly adverse. The Project would create high quality, skilled jobs and represents a multi-million pound investment into the local area.
- Traffic, transport and access The majority of comments stated that the A140 access is unsuitable and that it would have an impact on local traffic. PPL has taken these comments into account and ES (Document Reference 6.1) has found that the Project will have no significant impact on the A140.
- 3.6.6 Substation ECC Respondents objected to the location of the Electrical Connection Compound on a greenfield site stating that the site is not suitable and impacts cannot be effectively mitigated. PPL has taken these comments into account and the Electrical Connection Siting Report demonstrates that the selection of the Electrical Connection Compound location has been carefully considered and informed by a range of factors, including consultation, environmental, technical and commercial factors (Document Reference 10.3).

3.6.7 This parallel s42 and Information Update phase:

- provided an opportunity for PPL to explain key design decisions to the local community, made following the statutory consultation;
- made information relating to the design and siting of the Electrical Connection Compound and the Access Road and A140 Junction available;
- gave consultees a further opportunity to present their comments to PPL;
- encouraged PPL to modify its design principles
- resulted in PPL committing to producing an Electricity Connection Siting Report, explaining its site selection and design rationale.
- Influenced PPL's decision to environmentally assess two substation technologies – an AIS technology variant and a GIS technology variant, although the former is considered acceptable.

4 Conclusions

4.1 Key Outcomes of Statutory Consultation

- 4.1.1 PPL delivered its consultation activities in accordance with its SoCC.
- 4.1.2 Non statutory and statutory phases of consultation informed several important aspects of the Project, resulting in significant design interventions and mitigation commitments including a new A140 Junction, the adoption of an underground Cable solution; measures designed to create local socio-economic benefits and a comprehensive landscaping strategy.
- 4.1.3 The outcomes enabled the Project to be refined prior to the submission of the Application.

4.2 Post-DCO Submission

- 4.2.1 Following submission of the Application, PPL are to issue a news bulletin to the local community confirming that the Application has been submitted to the Planning Inspectorate. The bulletin will confirm decisions made in relation to the Project through a review of consultation responses, and environmental and technical considerations, such as the selection of the Gas Connection Route Corridor Option 2, introduction of the A140 Junction, and Electrical Connection Compound site location. The bulletin will also note that, having regard to consultation responses and feedback in relation to the potential impact of the Electrical Connection Compound, PPL has ensured that there is room for two technology variants for the substation within the parameters of the Application both an air insulated substation and a gas insulated substation. The news bulletin will be disseminated within the local community in similar manner utilised to deliver the Information Update in February 2014.
- 4.2.2 PPL is committed to continued engagement with the local community and key stakeholders following submission of the Application, as well as throughout the construction, operational and decommissioning phases should a DCO be granted.
- 4.2.3 In the early stages of non-statutory consultation, PPL raised the possibility of a Community Liaison Group in which a number of respondents expressed an interest. Should a DCO be granted, PPL is committed to establishing this group to maintain a dialogue with the local community through the period of construction and potentially into operation.
- 4.2.4 PPL will maintain on-going engagement with key stakeholders and local authorities