



MILLBROOK POWER
PROJECT

Millbrook,
Bedfordshire

S47 CONSULTATION PLAN

September 2014

www.millbrookpower.co.uk

MILLBROOK POWER PROJECT

S47 LOCAL COMMUNITY CONSULTATION PLAN,

INTRODUCTION

Millbrook Power Limited (“MPL”) proposes to develop a gas-fired power generation plant and connections to the electricity and gas networks on land located in Rookery South Pit, near the villages of Stewartby, Lidlington, Millbrook and Marston Mortaine in Bedfordshire.

The proposed power generation plant would have a rated electrical output of up to 299 MW of electricity. Using the latest and most efficient power generating technology, it will burn natural gas to generate electricity that is delivered into the National Grid. Due to its size, the Millbrook Power project would be a Nationally Significant Infrastructure Project and as such it would require a Development Consent Order (DCO).

STATUTORY REQUIREMENTS

The community consultation described is carried out under section 47 of the Planning Act 2008; the Act sets out requirements for formal pre-application consultation for those applications that are considered by the Planning Inspectorate on behalf of the relevant Secretary of State.

Section 47(1) of the Planning Act 2008 states that the applicant must prepare a statement setting out how it proposes to consult those people, who are living in the vicinity of all or part of the land to which the proposed application relates, about the proposed application.

Furthermore, MPL is required to consult Central Bedfordshire Council (CBC) and Bedford Borough Council (BBC) on its proposed Statement of Community Consultation (“SoCC”). Once MPL has finalised its SoCC, it is required to make the same available to the public in a way that is reasonably convenient and must also publish a notice in the local press as to where and when the SoCC can be inspected. This plan sets out how Millbrook Power Limited intends to meet these s47 consultation requirements. This plan is not itself required pursuant to the Planning Act 2008.

1.0 PURPOSE

- a. This document explains how MPL intends to consult people living and working in the vicinity of the proposed up to 299 MW gas-fired power station, its integral gas and electrical connections and other related infrastructure (the “Project”) on land located in and adjacent to Rookery South Pit. The land is situated in the Marston Vale between Milton Keynes and Bedford, approximately 3 km north of Ampthill, a local market town, and 7 km south west of Bedford in Central Bedfordshire and Bedford Borough.

- b. The Project's infrastructure that is integral to the power generation plant includes a new purpose built access road, a gas pipeline connection and a new electrical connection that will facilitate the export of power to the National Grid for distribution to homes and businesses.
- c. MPL has been established by Watt Power Limited to develop the Project at Rookery South Pit. Watt Power is seeking to develop flexible gas fired power generation assets at three further sites in the UK to support the UK Government's drive towards a low carbon economy: one at Eye Airfield in Suffolk, one near Aberdare in south Wales and the third near Felindre, also in south Wales.
- d. Stag Energy provides the resources to MPL through a management services agreement with Watt Power. Stag Energy was founded in 2002 and the company draws on a depth of experience with a team that has created and delivered over 10,000 MW of power generation and related infrastructure projects across the globe, of which, 2,500 MW has been delivered in the UK.
- e. The details of the consultation methodology set out in this document aim to explain how MPL will satisfy the community consultation requirements for an application for a DCO under the Planning Act 2008 which, if granted, would enable the Project to be constructed and operated. MPL intends to submit an application for a DCO which will be examined by the Planning Inspectorate on behalf of the Secretary of State for Energy & Climate Change (SoS). It should be noted that the application will be accompanied by an Environmental Statement as the development is considered to be an Environmental Impact Assessment (EIA) Development. A Preliminary Environmental Information Report (PEIR) will be produced which will describe the preliminary assessment as to the likely significant environmental effects of the proposed Power Generation Plant and its associated infrastructure. The PEIR is expected to be published and made available for public scrutiny and consultation in the autumn of this year.

- f. As part of the DCO application, MPL is required to produce a Consultation Report explaining how the three strands of consultation required under the Planning Act 2008 (s42¹, s47 and s48²) have been complied with. MPL intends that its Consultation Report will include an explanation of how the relevant local authorities were consulted about the content of the SoCC and what the local authorities' comments were. The Consultation Report will demonstrate that the local authorities were given sufficient time to provide comments, explain how MPL had regard to those comments and provide evidence that the SoCC was made available and notified in the correct manner.

- g. The Consultation Report will also explain what activities were undertaken to enable consultation with the local community, how those consulted responded and how MPL had regard to representations received in the development of the Project and the DCO application, prior to its submission to the SoS.

- h. This document does not set out how MPL intends to undertake the other strands of statutory consultation required by Sections 42 and 48 of the Planning Act 2008.

2.0 THE PROPOSED SITE

- a. The site for the proposed Power Generation Plant (which comprises part of the Project) is located on land located within Rookery South Pit, a former clay pit and designated as Rookery Clay Pits County Wildlife Site (CWS). The site is adjacent to the proposed Covanta Energy from Waste project, which has been consented but has not yet been constructed.

- a. The site is located mostly within the local authority administrative area of Central Bedfordshire Council and in part within the administrative area of Bedford Borough Council. The proposed routes of the electrical and gas connections would be located in farmland to the south and/or east of Rookery South Pit within Central

¹ Section 42 of the Planning Act 2008 requires consultation with certain local authorities, listed statutory consultees and those with an interest in the land on which the proposed Project will be built and operated or who may be particularly affected by it

² Section 48 sets out publicity requirements on a national basis

Bedfordshire, whilst part of the proposed access route, subject to consultation, environmental and technical studies, resides within the administrative area of Bedford Borough Council.

3.0 THE PROJECT

The Project would comprise:

- A new Power Generation Plant in the form of a Simple Cycle Gas Turbine (SCGT) gas fired peaking power generating station fuelled by natural gas and with a rated electrical output of between 50 and 299 Megawatts (MW) comprising:
 - The Generating Equipment including the Gas Turbine Generators and balance of plant, which are located within the Generating Equipment Site;
 - A new purpose built Access Road from Green Lane to the Generating Equipment Site; and
 - During construction a temporary construction compound (the Laydown Area).
- A new Gas Connection to bring natural gas to the Generating Equipment from the National Transmission System (NTS) which is located within the Gas Connection Opportunity Area; and
- A new Electrical Connection to export power from the Generating Equipment to the National Grid Electricity Transmission System (NETS) for distribution to homes and businesses which is located within the Electrical Connection Opportunity Area.

The Generating Equipment, Access Road and Laydown Area are together known as the Power Generation Plant, and are located within the Power Generation Plant Site.

The Power Generation Plant, Gas Connection, and Electrical Connection, are all integral to the generation of electricity and together are referred to as the 'Project'. The

land upon which the Project would be developed, or which would be required in order to facilitate the development of the Project, is referred to as the 'Project Site'.

4.0 CONSULTATION BACKGROUND

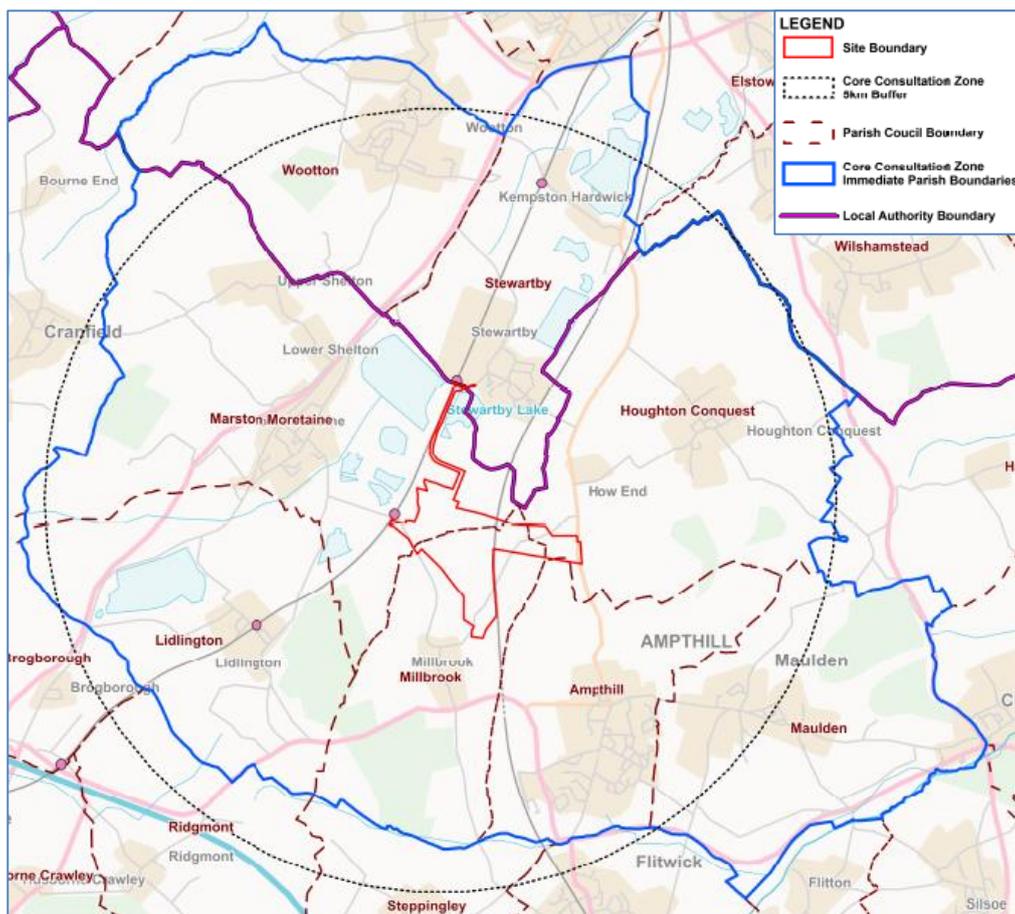
- a. MPL is committed to open and responsive consultation with local communities and interested parties. The programme recommended within this document sets out a framework for a formal and inclusive consultation process.
- b. The draft SoCC appended to this document is designed to meet the legal requirements set out in section 47 of the Planning Act 2008 and follows a range of advice and guidance set out by the Planning Inspectorate and the Department for Communities & Local Government. The consultation process is designed to enable informed, detailed and two-way communication. Through this process, relevant matters identified during consultation will be taken into account during the development of the proposal and before submission of the application for a DCO.
- c. Since May 2014, MPL has proactively communicated its intentions with elected representatives and directly within the local community, in order to introduce and discuss aspects of the Project. These non-statutory information activities and other forthcoming initiatives will also be captured in the Consultation Report. On the 5th, 6th and 7th of June a series of non-statutory public exhibitions were held in the villages of Lidlington, Marston Moretaine and Stewartby. The choice of location for these and future events was decided upon after initial consultation with members of CBC and BBC.

4.1 CONSULTATION AREAS

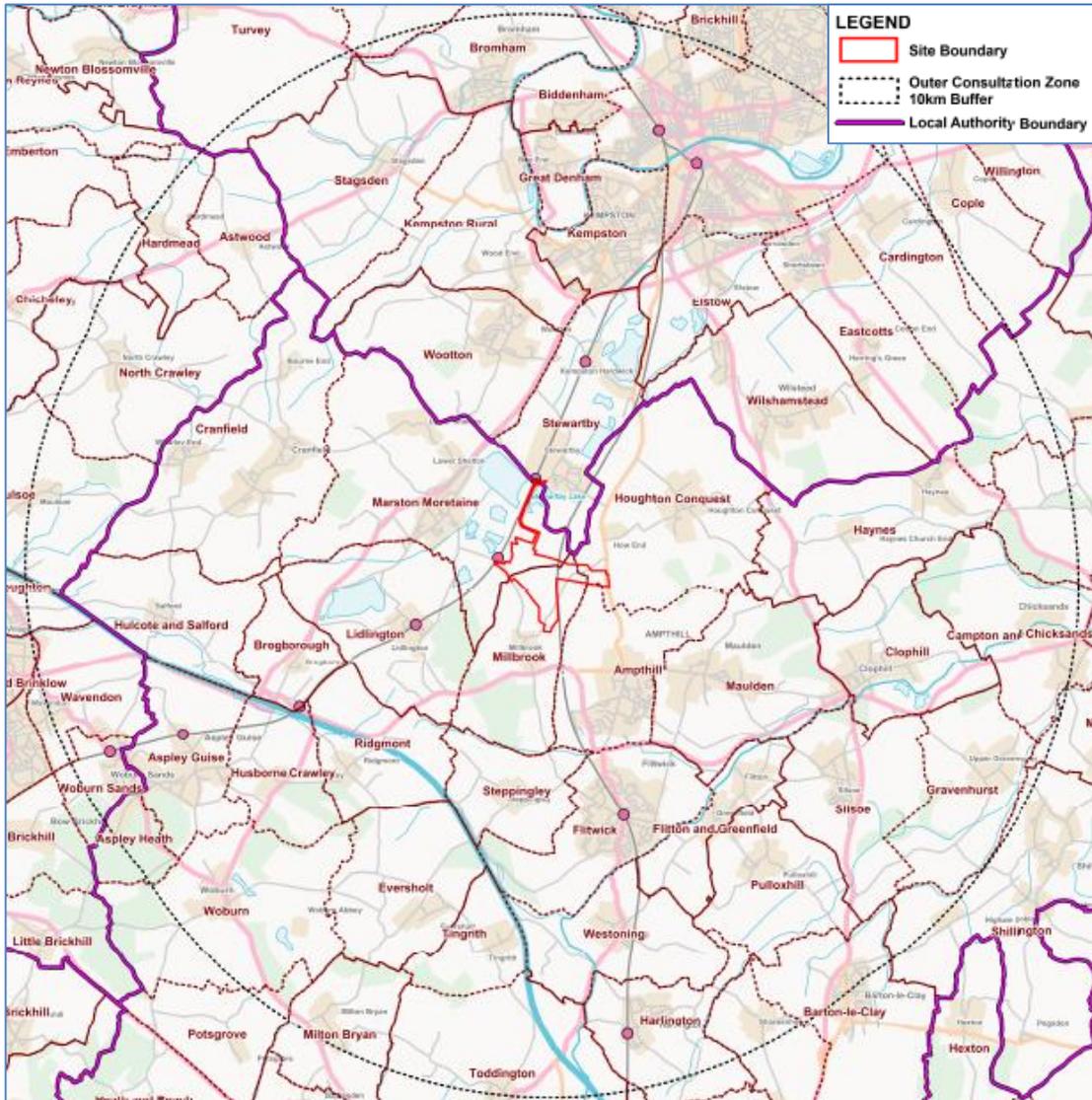
- a. MPL proposes to carry out its consultation in two areas: a core consultation zone (CCZ) that equates to an approximate 5 km radius from the site of the Power Generation Plant (see map overleaf), and an outer consultation zone (OCZ) that equates to a radius of 10 km. The CCZ is defined by parish council boundaries closest to the 5 km radius. These consultation zones were chosen following

feedback from various elected representatives with whom MPL has been liaising and would be in accordance with those used by Covanta for the Rookery South Energy from Waste Generating Station, even though the impact of the Project is expected to be considerably less than that of the Covanta scheme.

- b. The CCZ has been designed to include the main population areas in the vicinity of the Power Generation Plant Site that have the potential to be impacted by the Project's construction and operation and expected to have the greatest interest in the Project. These include the villages of Stewartby, Marston Moretaine, Ampthill and Millbrook, as well as other settlements within the CCZ. Whilst a 5 km buffer has been used as a guide, where settlements fall only partially within this area discretion has been exercised.



Proposed CCZ – approx. 5 km radius from the Power Generation Plant Site



Proposed OCZ – 10 km radius from the Power Generation Plant Site

c. Whilst the site is located directly within the CBC ward of Cranfield and Marston Moretaine the following neighbouring wards also fall within the proposed CCZ:

- Houghton Conquest and Haynes
- Ampthill

d) The proposed CCZ also includes wards within the neighbouring local authority - BBC. The following BBC wards fall within the CCZ:

- Elstow and Stewartby
- Wootton

e) The CCZ would include all or parts of the following parish council areas:

- Marston Moreteyne (CBC)
- Houghton Conquest (CBC)
- Millbrook (CBC)
- Ampthill (CBC)
- Maulden (CBC)
- Lidlington (CBC)
- Stewartby (BBC)
- Wootton (BBC)

The CCZ will be MPL's primary focus of activity when consulting about its plans.

- f) Communities in the OCZ will be informed about the Project (via newspaper advertisements, posters, media coverage and contact with parish councils and other relevant local organisations in the OCZ) and will have the opportunity to comment on the plans. The OCZ includes the main population area of Bedford. MPL does not anticipate that the communities and businesses that lie within the OCZ will be significantly impacted by the Project's construction and operation although MPL recognises that they may be interested in it.
- g) Communities outside the OCZ will be informed about the Project as the circulation areas and reach of the media (TV, radio, printed media) that will be used to communicate details of the Project and the consultation activities are far greater than the boundaries of the OCZ.

5.0 INTRODUCTORY INFORMATION PERIOD/NON-STATUTORY CONSULTATION

As an introduction to the Project, MPL undertook an introductory information programme and non-statutory consultation exercise in May/June 2014. This included:

- a. Discussions with officers and councillors at CBC and BBC about our plans and proposed non-statutory consultation plans, including exhibition venues and organisations that should be invited.

- b. As every home and business in the CCZ is represented by both a CBC councillor or a BBC councillor, and a Parish councillor, MPL communicated its plans (and information regarding the public exhibitions that were held between June 5th – 7th 2014) to the CBC and BBC, as well as the local MP Nadine Dorries, and Richard Fuller MP (whose constituency partially falls within the CCZ). MPL met Nadine Dorries MP on June 25th to discuss the Project and answer her questions.
- c. As part of the non-statutory consultation, a Project website was launched to coincide with the Project being introduced to the local community. The website (www.millbrookpower.co.uk) provides information on the Project and enables people to ask questions and provide feedback to MPL about the Project.
- d. As part of the non-statutory consultation, a letter of introduction about the Project was sent to approximately 10,000 households and businesses within a 5 km radius of the site (i.e an area very closely aligned with the CCZ). The letter contained details about the Project and an invitation to attend information exhibitions near the Project site. The letter was sent and distributed by Royal Mail a week prior to the first exhibition date.
- e. As part of the non-statutory consultation, exhibitions were held at the following locations to give local people the maximum opportunity to attend:
 - Thursday, June 5th - Lidlington Village Hall (4.00pm till 7.30pm)
 - Friday, June 6th - Stewartby Village Hall (3.00pm till 7.00pm)
 - Saturday, June 7th - Marston Moreteyne Village Hall (10.00am till 1.00pm)
- f. Exhibition locations were chosen because they were considered convenient to those communities within the CCZ that surrounds the proposed Power Generation Plant Site. These events featured relevant information that was known at the time in a variety of formats (display panels, maps, plans, leaflet etc) about the proposal. Members of the MPL project team were available to discuss the proposal, answer questions and to receive feedback from members of the public. Feedback as to

whether MPL should do anything differently during the statutory consultation process was sought during the informal information period/non-statutory consultation about the Project.

- g. MPL used venues that met Disability Discrimination Act 1995 requirements and upon a reasonable and timely request had provisions in place for those with special requirements who were unable to attend or access a consultation event (for example, private transport to the exhibition event).
- h. More than 250 people attended the exhibitions, including local councillors. The local media (print, TV, radio and social media) published news reports about the exhibitions in advance of them being held as well as afterwards.
- i. MPL issued press releases before and after the exhibitions were held, and these were posted on the MPL website. The press releases were issued to the local media including parish council newsletters, and news reports were published in the media as a result of receiving them from MPL.
- j. MPL advertised the informal information/non-statutory consultation exhibitions via a display advertisement in the Bedfordshire on Sunday newspaper, published on June 1st2014.
- k. A leaflet about the Project was produced for people who attended the exhibition, and additional copies were provided to local councilors and others for wider dissemination. The leaflet contained details of the Project, the consultation process, an indicative timeframe for the Project's development and the Millbrook Power website address and contact details. In addition, a Feedback form was available for people to fill in on the day or to return via Freepost to MPL.
- l. Posters advertising the non-statutory consultation events were displayed on parish noticeboards and other community venues within the CCZ, for example local libraries, local shops and post offices and doctors' surgeries.

- m. The MPL website carries the latest information about the project (technical, environmental and communications), contact details and a mechanism to enable people to ask questions and provide feedback. The website address was provided to CBC, BBC and parish councils for inclusion on parish websites, newsletters and other local information material.
- n. MPL will consider the provision, upon request, of written materials about the Project in different formats (for example, large print or braille).
- o. Comments and queries via telephone (as well as via post, email or fax) were accepted following the launch of the non-statutory period of consultation.
- p. In summary, the Project has been introduced to the local community which is now broadly aware of the Project. The proposed statutory consultation process detailed in section 6.0 will therefore build upon this awareness with a view to gaining formal feedback from local people and interested stakeholders before the application for the DCO is submitted in 2015.

6.0 STATUTORY CONSULTATION METHODOLOGY & ACCESSIBILITY

Following the introductory information period/non-statutory consultation described in section 5.0, the statutory consultation programme will be conducted according to the following methodology:

- a. MPL will consult with officers at CBC and BBC on the content of the draft SoCC.
- b. MPL will begin engagement with elected members of CBC, BBC, parish councils, the local MP Nadine Dorries and Richard Fuller MP whose constituency lies within the CCZ, as it develops its plans.
- c. MPL will use elected members of CBC, BBC and parish councils as communication channels, via meetings and correspondence, to share information and seek community feedback during the period of statutory consultation.
- d. Exhibitions/consultation events will be held at the following locations:

- Lidlington Village Hall
- Stewartby Village Hall
- Marston Moretaine Village Hall
- Ampthill Masonic Centre, Ampthill

After consideration of the outcomes of the non-statutory consultation process these venues are considered the most convenient to those communities within the CCZ that surround the proposed Power Generation Plant Site. These events will feature relevant information in a variety of formats (display panels, plans, leaflet etc) about the proposal and copies of the Preliminary Environmental Information Report (PEIR) will be made available. Members of the MPL project team will be available to discuss the proposal, answer questions and to receive feedback from members of the public.

- e. In order to ensure that people have the maximum opportunity to attend the exhibitions, MPL will arrange for them to be held at the above convenient locations and at a variety of times. An event will be held on a Saturday for those unable to visit during the working week.
- f. MPL will use venues that meet Disability Discrimination Act 1995 requirements and upon a reasonable and timely request will make provision for those with special requirements who are unable to attend or access a consultation event (for example, private transport to a consultation event).
- g. In consultation with CBC and BBC, MPL will share information about the Project with those “hard to reach groups” living and working within the CCZ. These groups are likely to be accessed through informal and formal channels - via council services (for example, Central Bedfordshire Together, Bedford Borough Partnership, and others) and relevant specialist organisations (for example the Marston Moreteyne Action Group, local branches of the Women’s Institute, and local business representative groups such as the Bedfordshire Chamber of Commerce).

- h. Posters in colleges, schools, youth clubs and awareness through social media may be used to reach the younger members of the community, whilst consideration will be given to presentations at local schools and colleges about the Project. Local schools and colleges will be notified of the consultation events.
- i. MPL will advertise the consultation events via local and regional newspapers (Bedfordshire on Sunday, Bedford Borough Times & Citizen), for two weeks prior to the first event taking place. In addition MPL will announce via the issue of one or more press releases to parish, local and regional news publications, the local radio and TV stations (and via online media) that the events are taking place. The newspaper advertisements (and media coverage), will reach the CCZ, the OCZ and further afield. The content will give information on MPL's proposals and details of the consultation events, including contact information.
- j. A leaflet or letter about the Project and the consultation programme will be distributed to households, businesses and institutions in the CCZ some two weeks in advance of the first consultation event, informing them of the consultation events taking place. The leaflet will include details of the Project, the location and dates of the consultation events, the MPL website address, and a comments/questions card that can be returned Freepost.
- k. Posters advertising the consultation events will be displayed on parish noticeboards and other community venues within the CCZ and the OCZ, for example local libraries, local shops and post offices, local schools and colleges and doctors' surgeries.
- l. MPL will inform those parish councils within the OCZ about the Project and the exhibition/consultation event via email.
- m. The MPL team will proactively and reactively meet with individuals and interested groups in the local area as part of the formal consultation period to answer questions and provide updates about the Project.

- n. The MPL website will carry the latest information about the Project (technical, environmental and communications), contact details and a mechanism to enable people to ask questions and provide feedback. The website address has previously been provided to CBC, BBC and parish councils for inclusion on parish websites, newsletters and in other local information material.

- o. Comments and queries via telephone (as well as via post, email or fax) will be considered and addressed where possible, as well as comments noted. The statutory consultation will last for a period of 35 days . Relevant responses will be collated, had regard to and referred to in the Consultation Report that will accompany the DCO application.

- p. MPL may choose to undertake additional consultation and information activities. In addition, MPL will consider the provision, upon request, of written materials about the Project in different formats (for example, large print or braille).

- q. Statutory and non-statutory consultation activities and efforts will be detailed in the Consultation Report which will accompany the DCO application. This will detail the consultation activities, the feedback received and MPL's response to the issues that are raised during the process.