

Hinkley Point C Proposed Changes to 'Preferred Proposals': Consultation Strategy and Revised Statement of Community Consultation

Background

NNB Generation Company Limited whose registered office is at 40 Grosvenor Place, London SW1 7EN (referred to in this document as 'EDF Energy') carried out Stage 2 consultation on its 'Preferred Proposals' for Hinkley Point C between 9 July 2010 and 4 October 2010.

Our proposals have evolved further following feedback received from the Stage 2 consultation and because more information has become available as we have developed our proposals. In light of this we have concluded that some material changes¹ will need to be made to our proposals.

Before submitting our application for a development consent order (DCO) to the Infrastructure Planning Commission (IPC), we therefore intend to publicise and consult on these changes. This consultation will be conducted in accordance with an updated Statement of Community Consultation (SoCC) published on 15 February 2011.

The SoCC sets out how EDF Energy is proposing to consult with the local community as required under section 47(1) of the Planning Act 2008. Further consultation with statutory consultees will be undertaken in parallel under section 42 of the Act.

Full details of the Hinkley Point C pre-application consultation strategy and programme undertaken by EDF Energy at Stages 1 and 2 of our consultation is published on the project website.² This further stage of limited consultation extends and builds on the programme already undertaken.

¹ In general, 'material changes' are changes that EDF Energy considers it appropriate to consult on and include any changes that could result in new or substantially different impacts on people living in the vicinity of any of our proposed development sites.

² See www.edfenergyconsultation.info, "Hinkley Point C: Stage 2 Consultation Strategy and Revised Statement of Community Consultation", June 2010

Consultation Guidance

There is no specific guidance from the IPC about changes to projects following consultation, although guidance has been issued on the level of detail that should be consulted upon.³

EDF Energy's approach to consultation on material changes made after and as a result of Stage 2 is therefore based on paragraph 78 of "Planning Act 2008: Guidance on Pre-Application Consultation", published by Communities and Local Government (CLG), which states:

"It may be necessary from time to time for a promoter to proceed with project options significantly different from those consulted on (for example because new information arises which renders all previous options unworkable or invalid for some reason). Where a proposed application changes to such a degree that the legitimacy of the consultation may be in question, promoters should consult the community again on the new options. In such circumstances promoters should supply consultees with sufficient information to enable them to fully understand the nature of the change (but not necessarily the full suite of consultation documents), and allow at least 28 days for consultees to respond."

Many of our proposals remain unaltered and the extent of the proposed changes is limited. However, we consider that material changes and new information do justify further consultation.

Statement of Community Consultation (SoCC)

Further public consultation beyond Stage 2 was not envisaged when EDF Energy's revised SoCC was published in June 2010.

We have therefore published an updated SoCC, following consultation with the Somerset local authorities⁴. This updated SoCC explains how EDF Energy proposes to undertake this further public consultation and helps to publicise the process.

Scope of the Consultation

EDF Energy will seek the views of landowners, stakeholders⁵, the local community and the general public on the material changes we have made to our 'Preferred Proposals' since the close of the Stage 2

³ See IPC Guidance Note 1 on Pre-Application Stages, published in revised form in March 2010

⁴ i.e. Somerset County Council, West Somerset Council and Sedgemoor District Council

⁵ Stakeholders include local community groups, their representatives and relevant statutory consultees

consultation. The consultation will cover the relevant parties specified in sections 42-48 of the Planning Act 2008.

We do not believe that it is either necessary or appropriate to re-consult on the project as a whole. EDF Energy is proposing to change only certain elements of the proposals presented at Stage 2 and we have already received views on the 'Preferred Proposals'.

We will therefore seek views primarily on the material changes proposed to be made to our 'Preferred Proposals' since the Stage 2 consultation. However, EDF Energy will give consultees an opportunity to provide feedback on other matters in order to ensure that the consultation exercise as a whole is thorough and effective.

We will publish additional information in relation to our strategies for accommodation, freight and transportation to support these changes and the overall proposals for Hinkley Point C.

Our consultation documentation will communicate the overall context in which material changes are proposed to the proposals for the development of Hinkley Point C, including implications for our accommodation, freight and transportation strategies. It will also describe where impacts will be materially different and the suggested mitigation.

We will respond to detailed comments on all stages of our consultation in a Final Consultation Report to be submitted with our DCO application. In respect of the proposed material changes to the 'Preferred Proposals', we will explain in general terms during this consultation how these changes relate to comments made in response to our Stage 2 consultation.

Following the close of this consultation, we will consider the further consultation responses before adjusting and finalising our application for a DCO to be submitted to the IPC. The Final Consultation Report will explain how responses at all stages of the consultation have influenced the final proposals.

Consultation Programme

In designing the programme for this consultation, we have been guided by paragraphs 13 and 14 of the CLG Guidance (see above), which states the Government's views that:

"We also recognise that, whilst consultation should be thorough and effective, there will be a variety of possible approaches to discharging the requirements [of the framework set out in the Planning Act 2008], and that consultation will need to be proportionate. We understand that promoters will have their own approaches to consultation, and already have a wealth of good practice on which to draw.

This guidance therefore outlines what the Government's expectations are, and suggests a range of approaches as a 'toolkit' for promoters to use

where relevant and helpful, but does not specify a particular approach to pre-application consultation.”

EDF Energy proposes to carry out this consultation from 25 February until 28 March 2011. This period is slightly longer than the minimum 28-day period required but shorter than the time allowed during Stages 1 and 2 of our pre-application consultation. The shorter timescale reflects the fact that this consultation will be focused on material changes to our ‘Preferred Proposals’ and is not designed to repeat the extensive Stage 1 and Stage 2 consultations, which were concerned with the project as a whole, many aspects of which remain unchanged.

While consultation documentation and events will be specifically targeted at relevant stakeholders and local residents directly affected by the proposed changes, anyone can comment on EDF Energy’s revised proposals.

In terms of specific consultation events and information, we will:

- Publish a succinct document to:
 - Explain why this consultation is being undertaken
 - Outline the proposed changes to the Hinkley Point C ‘Preferred Proposals’
 - Explain the context in which these proposed changes are being made
 - Highlight and summarise any new information being published to support these changes, including further technical information that may be of interest to some stakeholders
 - Identify key consultation questions where EDF Energy is seeking views
 - Set out the timing of the consultation, key consultation events and how people can respond.A summary of the proposed changes will be included in this document.
- Distribute this document to:
 - All members of the local community and the general public who have responded to either the Stage 1 or Stage 2 consultations, including representatives of ‘hard to hear’ groups
 - Other landowners and statutory consultees who may be affected by the proposed changes
 - All elected members of the three Somerset local authorities
 - All Parish/Town Councils within the ‘Inner, Middle and Outer consultation zones’⁶
 - People attending the consultation events
 - Visitors to the EDF Energy Bridgwater officeThe document will also be published on the project website, www.edfenergyconsultation.info

⁶ Defined as: ‘Inner Zone’ covering communities within an approximate 5 mile radius of the Hinkley Point site and in the vicinity of all proposed associated development sites; ‘Middle Zone’ bordered by Burnham-on-Sea to the north, the M5 to the east (but including Puriton), south of Bridgwater and along the Quantock Hills as far as Williton and Watchet; and ‘Outer Zone’ stretching around Taunton to the south, Minehead to the west, Weston-super-Mare to the north and to the west of the M5

- A summary of the document will be translated into key minority languages used in the Bridgwater area and made available on the project website, www.edfenergyconsultation.info. Copies of this summary will also be available, on request, in large print format and we will offer a translation and interpretation service if required. This service will be advertised in our newsletters and on the project website.
- Publish for comment on our website, www.edfenergyconsultation.info additional supporting material including new information about our accommodation, freight and transportation strategies.
- Meet and brief members of the three Somerset local authorities.
- Hold a meeting of the EDF Energy Hinkley Point C Community Forum to discuss the proposed changes.
- Hold public exhibitions staffed by members of the EDF Energy project team in the following places:
 - Near the main site (i.e. in Stogursey Parish);
 - Cannington;
 - Otterhampton;
 - Williton;
 - Bridgwater Central;
 - Bridgwater North; and
 - Bridgwater South (i.e. Stockmoor/North Petherton).
- Invite Parish/Town Councils for the locations above to attend previews of our public exhibitions and meet as required.
- Provide a display of the proposed changes and supporting information at the EDF Energy office at 14 King Square, Bridgwater, TA6 3DG during normal office hours.

The wider community will also be notified about this consultation and encouraged to participate by:

- Advertising the consultation and events in the local media through the publication of the updated SoCC.
- Seeking editorial coverage in the local media.
- Advertising the consultation in a national newspaper and the London Gazette in line with the provisions of section 48 of the Planning Act 2008.
- Distributing a special edition of the Hinkley Point C newsletter to over 35,000 households, including by post to those living near proposed development sites.
- Providing full information on the consultation on the project website, www.edfenergyconsultation.info
- Providing information on the consultation at the EDF Energy Bridgwater office and in Council offices and public libraries.

EDF Energy will respond to specific requests for additional meetings or consultation events where these are appropriate and necessary. At this stage in the consultation process, we do not intend to hold further stakeholder workshops and focus groups.

We undertook consultation with 'hard to hear' groups during our Stage 2 consultation. Those who attended the focus groups and other events for 'hard to hear' groups in Stage 2 will receive notification of this consultation. We do not, therefore, consider it necessary or proportionate to hold further consultation events for 'hard to hear' groups.

Related Consultations

Part of EDF Energy's consultation strategy is to make sure that people are aware of related consultations and events taking place at a similar time to this consultation in order to reduce the risk of confusion. We will therefore use our project website, www.edfenergyconsultation.info, and our public exhibitions to publicise related consultations and events that we are aware of, whether these are organised by EDF Energy or others.

West Somerset and Sedgemoor District Councils will be consulting on a draft Hinkley Point Nuclear Supplementary Planning Document from 24 February 2011 for 42 days and we will refer to this consultation as described above.

National Grid has also been undertaking consultation on proposals for new transmission lines in parts of Somerset, including areas in the vicinity of the Hinkley Point C site and in the Bridgwater area. It is likely that there will be further consultation undertaken by National Grid on this issue during 2011 and, in the event that National Grid's consultation takes place at a similar time to our own, we will endeavour to co-ordinate our consultation events with theirs.

EDF Energy has already submitted applications for consent for preliminary works, which are subject to consultation by the relevant authorities. West Somerset Council may undertake further consultation on our application for site preparation works (which forms part of the package of proposed preliminary works) during the period of this consultation.

Our consultation on material changes to the Stage 2 'Preferred Proposals' will therefore explain the relationship between our existing applications and the proposed DCO application.

Follow Up Stakeholder and Community Engagement

During the period after our consultation, and prior to submission of the DCO application, we will continue to engage with key stakeholders and the local community using the EDF Energy Hinkley Point C newsletter, Community Forum and project website.

We will also consider:

- Update briefings with members and senior officers of the three Somerset local authorities.
- 'Drop in' sessions and targeted mailings as required.

This approach is consistent with paragraph 85 of CLG's Guidance (see above), which states that:

“Formal pre-application consultation is unlikely to be either the beginning or the end of the process of engaging consultees. Promoters are encouraged to engage iteratively with communities, local authorities and technical consultees before they undertake formal consultation, and continue to consult with them bilaterally throughout the application and examination process and beyond.”

Submission of DCO Application

EDF Energy will undertake a public information exercise immediately following submission of the DCO application to the IPC where we will provide/undertake:

- A 'DCO Application Summary Document' and a 'Consultation Report Summary' (summarising the Final Consultation Report submitted to the IPC) to be sent to all key stakeholders and those who responded to the consultation process.
- A series of public exhibitions in the main locations affected by the development incorporating exhibition boards and full DCO documentation.
- A further issue of EDF Energy Hinkley Point News summarising the DCO application and providing IPC contact details.
- All DCO application material to be provided on the project website, www.edfenergyconsultation.info
- All exhibition material and DCO application documentation to be available on an ongoing basis at the EDF Energy Bridgwater office during normal office hours.

We will publicise this information exercise and the availability of final documentation through the local and regional media.

This material will help to facilitate examination of our DCO application when statutory consultees, the local community and the general public (if registered with the IPC as interested parties) will have a further opportunity to comment directly to the IPC on the final proposals for Hinkley Point C.

We will seek to co-ordinate this public information exercise with any outreach events that the IPC may hold in relation to the Hinkley Point C project and ensure that the role of the IPC is clearly explained.