

**NuGen's Development Consent Order Consultation for the Moorside Power Station Project
Response from Cumbria County Council to NuGen Stage 2 consultation - 14th May to 30th July 2016**

1. Introduction

- 1.1 Cumbria County Council (the Council) recognises the considerable economic benefits that can be realised for the local economy through NuGen's proposed investment in a new nuclear power station at Moorside and is supportive in principle.
- 1.2 However, this investment must be accompanied by appropriate parallel investment in infrastructure and community facilities in order to mitigate the negative impacts of the development and to deliver a positive lasting legacy for the local economy and our communities in Cumbria, as host for this major and challenging development.
- 1.3 The area is proud to host this critical piece of national energy infrastructure and to be at the forefront of nuclear technology in the UK, but expects to realise clear advantages from doing so. Whilst the NuGen Development Consent Order (DCO) application will be determined by the Planning Inspectorate given the national significance of the proposal, a critical part of the process is the adequacy of engagement with local authorities and stakeholders and demonstration of appropriate mitigation to address the local impacts arising from the development.
- 1.4 The Council, working with the Local Enterprise Partnership (LEP) and Copeland Borough Council has prepared a joint legacy strategy entitled 'Nationally Significant Infrastructure Investment, Maximising Project Legacy for Cumbria' (March 2016). This document has been used to inform our response and has previously been supplied to NuGen. It sets out some key outcomes the Council expects NuGen to deliver through its development of the Moorside project.
- 1.5 Whilst there is broad support for the over-arching objectives proposed by NuGen, the Council has significant concerns that will need to be adequately addressed in order for it to be able to support the proposed development at DCO Examination. Whilst the *process* of consultation might be appropriate, there are major concerns about the *substance*, evidence and level of detail provided. The Council has concerns that it, the public and other consultees, have not had a genuinely informed opportunity to comment on and help shape key aspects of the proposals prior to the submission of the DCO. As such, NuGen should undertake a further consultation exercise so that the following concerns can be adequately addressed:
- **The proposals currently focus on the minimum infrastructure** that NuGen believes necessary for nuclear new build. Given that the evidence on workforce and freight movements is still emerging, this leaves insufficient flexibility in NuGen's plans, increases risk to deliverability and does not provide a sufficient enhancement of infrastructure as a lasting legacy. The absence of detail is such that the Council has a significant concern about the credibility of the transport strategy proposed.
 - There are statements of intent to deliver legacy benefits; however there are **no specific legacy proposals** for how NuGen will mitigate the impact of the development or how legacy will be delivered. It is essential that this detail is provided, and that the Council and other stakeholders have the opportunity to comment on it in advance of the DCO application being submitted.
 - **The absence of adequately informed modelling to justify the highways proposals;** meaning that it is not possible to assess the highway infrastructure or confirm that the

proposals will adequately address the significant highway impacts. It is essential that NuGen identifies and agrees with the Council the scope of highway improvements based on evidence comprising detailed trip characteristics and traffic modelling.

- The **Sellafield Off-Site Emergency Plan** needs an assessment of potential infrastructure improvements necessary to enable the effective implementation of a range of emergency scenarios. Any proposed infrastructure improvements associated with the emergency plan should be the subject of formal consultation.
- The **Health Impact Assessment (HIA)** will not be completed until December 2016, leaving no time for consultation with the community on proposed mitigation measures and uncertainty on how they will be delivered. Health related effects of major power station development, and nuclear in particular, are well established as a key issue for local communities and it is difficult to see how the absence of engagement on this assessment either shows proper regard for public concerns or fulfils required consultation process.
- NuGen's desire to achieve a self-imposed challenging delivery timetable should not lead to compromises in the **effectiveness of consultation**, nor must it reduce the opportunity to identify adequate impact mitigation and secure appropriate legacy for Cumbria.

2. Moorside Power Station Site

- 2.1 The Council has fundamental concerns over the size of the power station structure and its proximity and impact upon the communities of Beckermet, Braystones and Calder Bridge. The proximity of the power station to the existing residents gives rise to potential for considerable construction related disturbance, including noise, light pollution and air quality. NuGen needs to be very clear why the power station is proposed so close to Beckermet and demonstrate conclusively that it could not be located further to the south to lessen the impact on local residents.
- 2.2 The Council has similar concerns over the large landscaped mounds which impact upon the landscape and the amenity of local residents as well as views from the Lake District National Park. Together with the **landscape impacts**, there is the negative impact on the setting of the historical old Church of St Bridget. Furthermore, with haul roads proposed at a high level on top of the mounds, adjacent to Beckermet, there is potential for significant environmental and health impacts particularly given the length of the construction period. NuGen must demonstrate what alternatives have been considered and why this outcome is preferred. In particular, the Council would expect NuGen to explain whether the excavated material could be disposed of elsewhere within the site boundary (eg. within the flood plain), whether the outcome is driven by an artificially constrained site boundary and whether options for other uses of the material have been considered (eg. for MOLF construction or beneficial uses off-site).
- 2.3 The visual impact of the power station and the associated landscaping mounds is potentially further compounded by the pylons from the National Grid project. The impact of the vertical structures alongside the Moorside project requires further assessment including the potential for mitigation of the cumulative impact by undergrounding the cables.
- 2.4 The construction activity has major implications for **site access** and highways. The new Moorside and Sellafield site access arrangements and A595 realignment between Blackbeck Roundabout and Calder Bridge urgently requires further design and modelling work in conjunction with Highways England and the Council to determine the most appropriate solution. Given that appropriate highway access will be required before construction commences and in order to maintain access to the Sellafield site throughout, the Council

believes a planning application needs to be submitted in advance of the DCO and the access completed in advance of site works commencing. The options identified do not deal with the pinch point at Calder Bridge, which constrains movements to the south, that could be critical to effective evacuation plans.

3. Transport and Connectivity

3.1 The multi-modal approach to the transport strategy for Moorside is supported in principle, but given the inadequacy of existing infrastructure, there is a need for substantial investment in essential rail, port and highway infrastructure in order to construct and operate the new nuclear power facility.

3.2 The rail-led strategy is welcomed, but the proposals are not sufficient to ensure that the **Cumbrian Coastal Railway** can support the development, particularly in the context of the other major developments also planned in West Cumbria. To ensure that Moorside can be constructed at the same time as other key developments without risk of interruption, it will be essential to improve the railway in a single, early planned intervention, to provide the overall capacity required. NuGen will need to make a commitment and substantial contribution towards the costs of delivering these additional improvements. Without this commitment it is the Council's position that the overall transport strategy is not yet credible in the context of other known major development that will be delivered during the construction phase of Moorside.

3.3 Even with a rail-based strategy there will inevitably be significant impact on an already constrained local and strategic **highway network**. It has been agreed that the Strategic Transport Model held by Cumbria County Council will be used by the Council to model the highway demand scenarios agreed with NuGen's Consultants. The output will then be used by NuGen, the County Council and their Consultants to further inform highway improvements required. The Council is not able to assess the adequacy of the highway proposals based on the level of information provided. At present NuGen's proposals are focused on a small number of junction improvements which are not evidenced by reliable modelling. The Council has serious reservations about NuGen's approach, which were set out in its letter of 26th May 2016. As such, NuGen should note the following points in relation to highway matters:

- It is highly likely that further modelling of traffic impacts (using a range of scenarios, including emergency situations) will identify the need for other improvements as well as refinement of those junction improvements that NuGen has identified. This has implications for land required (i.e. identified within the DCO red line boundary) and land acquisition, which are highly likely to require formal consultation beyond this current stage.
- There is insufficient information currently on the delivery mechanisms for the highway improvements that will be needed. At present NuGen appears to suggest that all that will be required will be a S106 contribution to the works required, with the implication that the County Council will then deliver the works. The Council's normal position, particularly for works of the overall scale that will be needed is that the developer both funds and delivers highway improvements. It is essential that proposals for delivery are made clear and agreed with the Council prior to DCO submission. This will require further consultation.
- Whitehaven Eastern Relief Road is an important highway scheme for the Council that is identified as a medium/long term priority in the Cumbria Infrastructure Plan and its future delivery must not be jeopardised by NuGen's proposals. The location of highway improvements and new access roads in the Mirehouse vicinity must have regard to the future delivery of this project and should be designed accordingly. The Eastern Relief

Road will provide significant relief to the A595 and as a result the Council will seek a contribution from NuGen for the scheme (subject to the results of ongoing modelling of highway impacts).

- 3.4 The Council has concerns about the deliverability of the necessary improvements for road and rail in line with NuGen's current programme. Rail improvements are fundamental to the transport strategy and if these are not in place in time, there could be a significant adverse impact on the road network. Road improvements may also need to start before any Final Investment Decision is made by NuGen in order to meet the proposed Moorside project construction programme. The construction programme and infrastructure provided should be clearly defined in the DCO to ensure that the necessary improvements are in place before construction commences.
- 3.5 Within the overall Moorside transport strategy there is limited detail provided on **travel planning**. The travel behaviour of the Moorside construction workforce will be fundamental in successful delivery of the wider transport strategy. Key issues will include:
- mechanisms to ensure workers use the transport modes proposed, to control parking arrangements and which respond to shift patterns. There is a great deal of detail needed, to ensure that there can be proper controls through DCO Requirement or Obligation.
 - the provision of details for travel planning together with necessary commitments for the associated costs of implementation and monitoring. This detail will be required in advance of DCO submission and the Council considers that this central plank of the transport strategy requires further formal consultation.
 - adequate proposals for car parking and a strategy to manage off-site parking. Public car parking should be provided at Corkickle and be the subject of further detailed discussion for its potential use at Mirehouse during construction and provision at a public rail station at Mirehouse. Proposals for physical car parking facilities, and the mechanisms needed to control and implement those need to be captured within the Travel Plan noted above.
 - improvements to stations along the coastal railway line to encourage greater passenger use of the railway as an alternative to the car. The LEP is already investing in Workington and Maryport train stations.
 - new and improved pedestrian and cycle routes will be an integral part of the travel plan with green infrastructure, particularly along the corridor between Moorside and Whitehaven town centre, requiring investment.
 - bus services will be an integral part of any travel plan and ensuring regular and reliable service delivery.
- 3.6 There is a lack of commitment by NuGen for use of the **Port of Workington (PoW)** and associated delivery of a legacy benefit, which is a major concern to the Council. The Council would expect to see use of the port starting in 2019 at the same time as the MOLF; not several years later. Without the use of the port for consolidation and sequencing of deliveries (from all modes), it is unclear how NuGen intends to effect its rail-led strategy and avoid direct deliveries to site by road. Use of the port and associated improvements to its infrastructure would provide greater flexibility for NuGen and reduce risks to deliverability. Such improvements would be strongly favoured by the Council and would make a lasting and beneficial contribution to local infrastructure. It should be noted that PoW is identified in the Cumbria Strategic Economic Plan as a key location with potential for economic growth.
- 3.7 The size and layout of the proposed **Marine Off-Loading Facility (MOLF)**, being larger than anticipated based on other new nuclear projects, suggests that it is NuGen's intention to focus all port operations here rather than PoW. This would have a significant adverse impact on the

PoW and wider Cumbrian maritime and industrial economy both during the construction period and beyond, and would represent a major lost opportunity to invest in the existing port facility and associated rail freight links in particular.

4. Resilience

- 4.1 Proximity to the high risk Sellafield site, means resilience and **emergency planning** must be critical to the DCO. The Council is currently not satisfied with the approach to emergency planning and NuGen's proposals for emergency preparedness are currently inadequate and the emergency response strategy is not robust. NuGen has not provided an assessment of infrastructure requirements in order to respond to an emergency. The proposed rail based evacuation has not been evidenced to show how it could work and there is no explanation of how an evacuation to the south could be facilitated.
- 4.2 Sellafield Off-site Emergency Plan must be developed in conjunction with the County Council and the Council has responsibility for recommending the plan to the Office for Nuclear Regulation (ONR) for approval. NuGen's full co-operation is required by ONR in relation to the Sellafield Off-site Emergency Plan. It is now critical that NuGen engages proactively in a multi-agency approach to emergency planning. A multi-agency emergency scenario planning workshop is required for September 2016. This will include consideration of the infrastructure requirements associated with ensuring the effective implementation of the emergency plan scenarios. The infrastructure requirements arising from this exercise should be the subject of further formal consultation. Without a credible strategy for dealing with the Sellafield Off-site Emergency Plan in the DCO application, the Council as the responsible emergency planning authority will not be able to support your proposals, potentially risking the future deliverability of the project.
- 4.3 Aligned to the emergency plan, there are a number of pinch points in the local transport network (e.g. Calder Bridge), where NuGen as part of its approach to emergency preparedness, needs to demonstrate the most vulnerable parts of the transport network have been addressed in order to mitigate the risk of cumulative emergency incidents occurring at any one time. NuGen therefore needs to identify vulnerabilities in the transport network that may be required to support evacuation and undertakes to carry out infrastructure improvements to address those weaknesses and to ensure the effectiveness of evacuation in the context of cumulative impacts.
- 4.4 The recent flood events and the after-effects of Storm Desmond on infrastructure demonstrate the need for **severe weather resilience** in the infrastructure for business continuity purposes. The fell roads are regularly closed in the winter months as a result of severe weather and this need to be taken into account in the transport modelling work.
- 4.5 There are limited proposals for resilience measures in the event of a flood and the County Council as Emergency Planning Authority expects to see investment being provided to deliver flood defences. The approach to flood defence planning and delivery will need to be developed in dialogue and agreement with the EA and with Cumbria County Council as Lead Local Flood Authority. Significant further detail is needed in this regard prior to DCO submission and the Council considers that proposals are likely to require a further formal stage of consultation.
- 4.6 Resilient communication infrastructure has been identified as critical to supporting the response to an emergency event. NuGen should therefore be supporting the development of higher speed **broadband and mobile phone coverage** to ensure it can operate in an

emergency event as well as deliver a wider benefit of a modern high-performance business environment. The effectiveness of this technology would complement NuGen's transport strategy, by enabling home and remote working during the operational stage and minimising the need to travel.

- 4.7 Mobile phone coverage, and indeed the current emergency services communication system Airwave, is poor in West Cumbria. Due to potential additional pressures on Cumbria Fire and Rescue Service (CFRS) from the Moorside development, the Council is keen to explore collaborative opportunities for enhancement of the Emergency Services Network (ESN) in and around the Moorside development.
- 4.8 Cumbria **Fire and Rescue** Service has identified a range of impacts resulting from the Moorside project that will increase its workload, areas of responsibility and service delivery. These have capacity and funding implications that will need to be mitigated by NuGen. They include an increase in community safety duties, issues relating to incoming workers, increased On Call attendance, an increase in response times due to traffic, increased road traffic collisions, potential calls to the Moorside site, potential maritime incident and local liaison work.

5. Skills and Supply Chain

- 5.1 The delivery of this large and complex development will require access to suppliers and a workforce with the right skills. NuGen has assumed that, at peak construction, 1,000 workers will be recruited from the existing local population to work on the project. However, the latest ONS projections suggest that Cumbria would lose 20,000 working age people by 2026 if recent demographic trends continue (7,000 of them from Allerdale & Copeland). Against this background, NuGen must try to ensure that people currently not in work will have the skills to access the opportunities (i.e. apprenticeships and support for the under-employed and unemployed). This will be a significant challenge and could result in higher levels of transient / migrant workers than currently anticipated, which could have a substantial impact on local infrastructure.
- 5.2 In addition, to the 1,000 workers proposed to come from the existing population, it is anticipated by NuGen that 1,500 additional workers will chose to relocate to Cumbria in order to access the employment opportunities. There will therefore be a need to have appropriate training facilities not only to support the existing population but also to help attract new workers and their families to come and work in Cumbria.
- 5.3 It is in the interests of NuGen and the local economy for the skills to be locally available and for the businesses to be equipped to become part of the supply chain. This will require collaborative investment in local skills development and supply chain capability development, but will in turn provide for a longer-term uplift in economic performance. NuGen's commitment to provide legacy benefit relating to skills and supply chain is welcome. However, it is disappointing that the content of the consultation proposals on how this will be done is wholly inadequate. There is no detail provided in the documentation that provides any confidence that socio-economic impacts will be mitigated. In order to address this, NuGen will need to work with the Cumbria LEP and local partners to develop an employment and skills strategy and a supply chain strategy.
- 5.4 In order to address the impacts of the Moorside development, but also to deliver meaningful benefit for the local economy and local people, it is important that NuGen:

- makes clear and early commitments to providing funding to support the development of local business capability and capacity, working with the LEP and other nuclear-related partners, through the development and implementation of a supply chain strategy.
- progresses the development of a detailed skills action plan with the LEP to ensure that there is investment in skills development in advance of construction in order to facilitate employment and training of local people.
- makes early commitments to capital investment in training facilities.
- provides a clear procurement strategy and to develop specific interventions with measurable targets that capture the local benefit for Cumbrian businesses.
- demonstrates support for growing the research and development base to create further opportunities for innovation and business diversification, including the establishment of a nuclear operations facility.
- works with its supply chain businesses to maximise opportunities for private sector investment including opportunities for new modular construction facilities and logistics consolidation.

5.5 While the focus on skills and supply chain relates to socio economic effects, there is also a need for an evidenced and credible approach in order to support the assumptions made in the transport strategy for the trip origins and travel behaviours of the construction workforce. At present all these matters are presented as separate siloed items with no real attempt to pull them together to demonstrate a coherent and credible overall approach.

5.6 The detailed workforce requirements data which underpins the assumptions being made has not been shared with Cumbria County Council despite regular requests. It is therefore impossible to evaluate the assumptions behind the geographical sourcing of employment which will lead to different levels of impact on the local labour market and also on the worker accommodation strategy, transport strategy and other aspects.

6. Environment and Sustainability

6.1 Cumbria's environment is one of its best assets. The Council will therefore be seeking to ensure that there is no detrimental impact on the area's environmental quality.

6.2 There is limited information at present on **waste**. While there are broad statements made about waste management for the construction and operation phases of the Moorside project, there is no detail or substantiation of assumptions. The Council acknowledges that detailed quantities will need to be identified as the construction phase planning and design is refined, but it remains the case that there is no attempt currently to show what waste management routes will be used and what the likely destinations are for waste taken off site. The working assumption is that the majority of the waste will be retained and recycled on site. Information needs to be provided on the types, volume, timing, storage, treatment, transportation and disposal of waste in order to understand the impacts.

6.3 In relation to **minerals**, there is no information at present on the sourcing of construction aggregates for the Moorside project. As a result no comments can be made on the merits of the transport strategy in this regard or in respect of the environmental, economic or health impacts that mining and transporting of aggregates might have, particularly if any are to be sourced in Cumbria. This needs to be considered as part of a coherent approach to the way the project is proposed to be delivered, and assessed, which is identified above as lacking. NuGen should consider the synergies between inert waste arising and aggregates required for other major projects in West Cumbria to minimise the need for transport or disposal of waste and to maximise the beneficial use of materials.

6.4 The current proposals are heavily reliant on Environment Agency Flood Zone data and as such only provide an indicative assessment of **flood risk**. The absence of flood modelling data to prepare a Flood Risk Assessment of the Moorside site is disappointing and therefore it is not possible to comment on the current proposals. It is recommended that further formal consultation will be required following completion of the Flood Risk Assessment. This will need to take account of all forms of flood risk, including surface water and flooding from ordinary watercourses. Any Flood Risk Assessment should take account of the County Council's Flood Risk Management Strategy (dated April 2015) and NuGen should comply with best practice in relation to sustainable drainage.

7. Vibrant Communities

7.1 Given that Cumbria will be hosting a nationally significant infrastructure project with significant adverse impacts on local communities, our priority is to secure a sustainable legacy. Whilst there is a commitment made to providing a legacy, the Council has a fundamental concern over how this will be delivered due to the absence of any community legacy proposals in any of the consultation documentation. This must be addressed with the provision of evidenced proposals for legacy outcomes.

7.2 As noted earlier, absence of the **health** impact assessment (HIA) during this final programmed formal consultation stage is a major concern to the Council. It is expected there will be significant negative impacts on local communities and there are no proposals contained within the consultation material to advise how NuGen intends to mitigate those impacts, due in part to the absence of a HIA. Effective consultation on the HIA would inform part of a mitigation strategy that includes an open dialogue on potential health effects and would reduce the risk of anxiety related effects arising. Therefore the Council seeks a formal stage of consultation that allows inclusion of the HIA. Thereafter the Council expects NuGen to give an undertaking to address concerns and implement any recommendations that emerge from the HIA. As such there is an expectation that NuGen will need to invest in a range of health services to mitigate the negative impacts on existing communities and also to service the additional workforce.

7.3 There needs to be consideration given to the potential impact the NuGen development will have on access to both primary and secondary care services. In relation to secondary care, there are currently no facilities for emergency surgery at West Cumbria. Overall health services in North and West Cumbria are undergoing significant changes as a result of the plans being put in place by the Success Regime. The changing shape of services needs to be a consideration for the NuGen development and there needs to be full consultation with both the Success Regime and the North Cumbria University Hospitals Trust in relation to the proposed development.

7.4 Part of the Council's concerns on community legacy revolves around the potential for temporary development on the Associated Development sites rather than provision of **permanent development** and social infrastructure for local communities. It is considered that NuGen should commit to submitting planning applications for the worker sites that will deliver permanent development. Early planning applications (or applications twin-tracked with the DCO) will provide confidence that the ancillary development worker sites will be capable of long term use and demonstrate NuGen's commitment to the delivery of a planned after-use that is not possible through the DCO. Such planning applications need to be accompanied by design principles for the worker accommodation Associated Development sites such that the

ability to retain and re-use serviced sites and/or built form can be fully understood and confirmed.

- 7.5 The Council needs to see commitments being made to improving community facilities and infrastructure, including local schools, health centres, community development centres, etc. to address the unacceptable impacts on local residents.
- 7.6 There are already significant stresses on **schools** in the Whitehaven area due to capacity and quality issues. The Council wishes to work closely with NuGen to identify specific improvements to schools to develop new capacity, including temporary capacity, to manage any unexpected increases in pupil numbers during construction of Moorside.
- 7.7 Little information has been provided on the likely impact on school places in the area. NuGen assumes that there will be little impact. This is not accepted as there is nothing to suggest that those seeking housing outside of the worker accommodation sites won't bring families. If, for example, only 20% of the 1,500 workers that are proposed to seek accommodation locally bring families, and assuming average household size, the Council would be responsible for accommodating over 560 additional children in local schools and colleges. The Council does however, recognise the difficulty in making assumptions at this stage given the range of variables, but it is almost certain that there will be some level of impact on local schools and this must be acknowledged by NuGen and mitigation proposals made.
- 7.8 The Council is keen to work with both NuGen and local schools to ensure that any additional capacity required can be provided at the right time and in the right locations in order to ensure that neither schools, nor indigenous or workers' children are disadvantaged or disrupted. Whilst we acknowledge that there remains uncertainty over numbers and location, it seems reasonable to assume that families will largely live in the more urban areas within travelling distance of Moorside rather than the rural villages. It is these urban areas where additional pressure on education services are most likely to be felt, and the mitigation of negative impacts on the indigenous population will require advance intervention and prudent management. Commitment is needed from NuGen that increased education capacity will be needed, and that this must form part of the package of DCO obligations that NuGen is developing.
- 7.9 It is worth NuGen recognising the potential wider legacy benefits that could be realised through collaborative working with the Council and local schools to provide for new/improved, high-quality buildings that would undoubtedly enhance the quality of life and education provision in areas which suffer from high levels of deprivation. Where such improvements might be focused will require detailed discussion with local school representatives, but the Council believes that this approach could provide lasting and substantial benefits. An education investment plan would also need to make provision for:
- additional early years (pre-school) places,
 - access to the appropriate levels of teaching support for additional children accessing education in Cumbria during the construction phase
 - support for children with English as an Additional Language (EAL) and/or Special Educational Needs (SEN).
 - access to school transport given that the majority are unlikely to live within 2 miles (for children aged below 8) or 3 miles (children 8 and over) of their school.

8. Conclusion

- 8.1 In summary, the Council considers that there are many important outstanding issues still to be resolved. We expect NuGen to respond to these concerns and to engage effectively with the Council by providing the additional detail required, consulting appropriately and entering into constructive dialogue on legacy benefits with full recognition of Cumbria's role in hosting this nationally significant project. Due to the absence of detailed proposals, the Council believes that it is in NuGen's interests to formally consult on the following:
- Highway improvements, wider improvements to the Cumbrian Coastal Railway, use of Port of Workington and delivery of the transport strategy
 - Health Impact Assessment
 - Sellafield Off-site Emergency Plan infrastructure requirements
 - Legacy strategy
- 8.2 Overarching concerns about workforce assumptions are still not evidenced and this could potentially undermine many aspects of the proposals if there are changes to the figures proposed. These assumptions will affect a range of strategy proposals for the project and it is essential that they are firmed up, or some scenario ranges proposed in order that the wider proposals for effects and mitigation can be tested and shown to be credible. The Council does not accept that this is the case at present.
- 8.3 In addition, and appended, to this response from the County Council is a note compiled by Copeland and Allerdale Local Committees that incorporates feedback from the Council's Nuclear Issues Working Group (Appendix 1). The Council has also provided a detailed technical response which has been prepared on its behalf by consultants WSP. This covers matters where the County Council has the lead role. For matters where Copeland Borough Council is the lead body, consultants Arup have prepared a response and where relevant the Council will also rely on the Arup technical documents.

Appendix 1

Members Feedback

Title of Briefing: Copeland and Allerdale Local Committee and Nuclear Issues Working Group Feedback on NuGen development at Moorside Stage 2 Consultation
Date: 6th July 2016
Author: Gillian Elliott
Unit / Directorate: Environment & Regulatory Services / Environment and Community Services

1. Purpose of Briefing

1.1 To provide accurate feedback on the views of Copeland and Allerdale Local Committee and the Nuclear Issues Working Group on the NuGen Stage 2 Consultation with respect to emerging plans for the Moorside Power Station project.

2. Background

2.1 NuGen is developing its plans for a new 3.6GW nuclear power station at Moorside.

2.2 Cumbria County Council (the Council) and Copeland Borough Council (CBC) are working under a Planning Performance Agreement (PPA) with NuGen to resource their involvement in responding to and shaping the development of the Moorside project in the interests of the local community.

2.3 NuGen has held regular quarterly Members briefing sessions at similar timings to the Moorside Technical Group meetings to update on key workstreams.

2.4 Following earlier briefings on a variety of points associated with the NuGen development the DCO2 consultation was raised at Nuclear Issues Working Group on the 10th May 2016 with a pre-launch discussion followed, on the 27th May 2016, by a consultation presentation to Copeland and Allerdale Local Committees.

3. Nuclear Issues Working Group and Local Committee Member views

3.1 Questions were raised at both the Nuclear Issues Working Group on the 10th May and at a joint Copeland and Allerdale Local Committee briefing session held on the 27th May when CCC Officers went through the content of the Development Consent Order Stage 2 consultation documents with Members. Some of these are pertinent to the identified developments, some are around the realism of proposals by NuGen and some are around the anticipated legacy and opportunities for legacy from the development.

3.2 The Members all recognise the need for NuGen to develop an attractive Investment proposal in order to ensure the project can progress but there are concerns that NuGen are following the NSIP process in a manner more akin to 'tick box' than genuine consultation and that without substance, evidence and detail the current consultation will lead to negative responses and impact detrimentally on the proposal.

- 3.3 The Copeland Local Committee are proud to have hosted nationally significant Nuclear establishments over the past 60 years and are keen to ensure that a positive relationship continues with the Nuclear industry but raise legitimate questions over the timing for the provision of infrastructure required to enable the additional development. There appears to be reluctance by NuGen to provide any upfront investment to help unlock the major infrastructure upgrades and without this Members are again concerned that the attractiveness of the investment proposition will be severely reduced.
- 3.4 The doggedness of NuGen that rail travel is the only solution to all transport requirements continues to cause major frustration and concern with Members. Three initial concerns arise from this; one being a recognition that certain AD sites, eg Egremont, the possible home of 500 workers, are not on the rail network therefore coach transport is the replacement. That this would require the addition of coaches into the current highway network which have not currently been included in any highway modelling work. That when the rail network is out of action NuGen have indicated that coaches will be held on standby, to accommodate the workforce. This would rely on 80+ coaches with little or no acceptance of the usual peak transport on the network factored in to the transport impact assessment.
- 3.5 As with the previous sessions held with the Local Committee Members, they continue to raise concerns in relation to the following matters:
- Resilience and realism; with the lack of realism exhibited by NuGen around a number of elements of their proposals at the core. Major concerns were expressed over the transport of staff to and from the site especially with the continued insistence by NuGen that all staff will only be able to access the site by rail. With such a fragile coastal rail network local Members have clearly identified the issue of regular closures on the rail line through landslides and flooding.
 - As a consequence local Members are insistent that the County Council must reinforce the realistic expectations for infrastructure improvements in both rail and road without which there will be an impact on Emergency Plans for both NuGen and the Sellafield site. Although these have not been finalised with County Emergency Planning staff, nor with the ONR, there is a lack of realism as to how NuGen could evacuate 4,000-6,000 staff off site, the proposed mode of transport (80+ coaches would be required; where would these be held? What would the impact be on the highway network) and the issues this would then cause on the wider road network. Examples included when fell roads were closed, how will NuGen manage pinch points in the road network such as Gosforth to Calderbridge.
 - The local committee were adamant that NuGen need to understand the lack of credibility they carry when they continue to state staff will not use cars to access the site. Local Members are aware that the proposals are for each train to carry 800 people. The Members continue to seek assurance that the transport proposals will enable such measures as necessary to be built in to deal with all road network expectations including coaches, cars and be able to ensure the Emergency plans can be properly supported.
 - Members acknowledge that the Coastal railway is currently not fit for purpose to support the proposed movement of freight and the proposed bulk of the workforce to and from the construction site and would urge the same acknowledgement from NuGen.

- Local Members are concerned that at the DCO2 stage there is still very little information on the proposed development including the procurement, skills and supply chain strategies. These strategies are fundamental to the delivery of the Moorside site and also to the ability of local communities to ensure a legacy for them is built into the opportunities emanating from this development. Concerns include the detrimental impact Moorside could have on local businesses who could lose skilled workforce to NuGen if the area does not start to skill up in sufficient time and also that if the strategies are not visible then both infrastructure and resource improvements will not be enabled soon enough to ensure the provision of access to supply chain sites, training facilities and accommodation sites. The Members expect that the supply chain strategy will identify local 'laydown' sites in the area and how NuGen will ensure some suppliers stay in the area post construction.
- There is a continued request that a clear training plan, in line with the proposed stages of development, with skills required at each stage, is shared with training providers to ensure local people have the opportunity to be trained at the right time to be available to support each stage of the development. There is a concern that if this is not done then local businesses could be detrimentally affected. Major concerns over the lack of stakeholder and community awareness that NuGen continue to exhibit. There are a number of concerns under this theme including:
 - No clarification or detail in the consultation document around the anticipated impact of incoming workforce on local communities and resources. This lack of detail is increasing concern within communities. This is around the proposed number of incoming workers and their families and how this will impact on local facilities such as shops, health service and education provision and furthermore the concern over whether the workforce will be enclaved or integrated.
 - NuGen are exhibiting a total lack of understanding with respect to the concerns raised by the Beckermets village over the disposal of spoil. The NuGen solution is to create high mounds around Beckermets village which is seen as totally unacceptable by the local community, but NuGen do not appear to have sought out any alternative solutions since the previous community consultation. This includes concern over the positioning of the mounds so close to the heritage site and national monument of St Bridget's Church.
- There continue to be concerns over associated development and accommodation sites which as well as having the potential to cause major community factions based on size, location and lack of access to sufficient amenities could have issues if NuGen identify these as local workers because of a 'weekday' post code. Members are keen that there is a clear methodology employed to identify the number of staff who are truly local employees.
- Members have concerns over whether this is actually a consultation where the views of Councils and the public can help to shape the proposal having been present when NuGen staff have said a number of decisions will not change during this consultation. NuGen do not appear to be listening to the concerns expressed locally at discussion events with various groups and Members have concerns over the lack of clear explanation and rationale

around some of the decisions for the exclusion or inclusion of particular AD sites.

- Final point is around infrastructure and the concern that NuGen is seeking minimal investment rather than the investment necessary to facilitate the development. This is evident in the identification in the DCO2 of only 9 road junctions contrary to highway modelling work where there are a significantly greater number of junctions impacted and this will no doubt increase as and when the use of coaches is factored into any modelling exercise. Local Members have also identified the need for a Whitehaven Relief Road, along with issues over road junctions to prevent 'rat runs' through villages where the A595 cannot accommodate the increased traffic. This is further impacted by issues with rail platforms not accommodating disabled passengers and bridges not accommodating the use of double rail lines.

4. Conclusion

- 4.1 The Nuclear Issues Working Group and the Copeland and Allerdale Local Committee Members have all expressed an enormous level of dissatisfaction at the approach being taken by NuGen to this Consultation and proposed infrastructure required to facilitate the development. They feel that as the Strategic Highways Authority, NuGen are not taking cognisance of the views of Cumbria County Council Members who want to support NuGen to ensure the delivery of what will be a fantastic project for the area. The proposed legacy benefits that Moorside can deliver in Cumbria are supported by both Local Committees but at the moment there are concerns over the level of detail in the DCO2 and the lack of communication currently observed by NuGen.