



MILLBROOK POWER
PROJECT

Millbrook,
Bedfordshire

S47 CONSULTATION PLAN

May 2017

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 Moretaine in Bedfordshire (the "Project").

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 would burn natural gas to generate electricity that is delivered into the National Grid. Due to its size, the gas-fired power generation plant 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 Nationally Significant Infrastructure Projects before they are submitted to the relevant Secretary of State for examination and determination.

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 MPL intends to meet these s47 consultation requirements. This plan is not itself required pursuant to the Planning Act 2008.

2014 CONSULTATION

MPL first announced its proposals for its power generation project in May 2014 and conducted its consultation activities in two phases: an initial phase of consultation between May and September 2014 that included mailing of an introductory leaflet to c10,500 homes and businesses in the area surrounding the site, public exhibitions at three locations in the vicinity of the site (Lidlington, Stewartby and Marston Moretaine), meetings with CBC and BBC councillors as well as meetings with those parish councils that were within the project's Core Consultation Zone ("CCZ"). MPL also shared its plans to the wider community via Parish Councils further afield, the two local constituency MPs, via social media and the internet, newspaper advertising and articles/broadcast reports, and via organisations that were a conduit to "hard to reach

groups” in the area. Among the highlights of its work, MPL representatives addressed sixth form students at the Kimberley STEM College.

Having agreed its Consultation Plan and Statement of Community Consultation with CBC and BBC, MPL conducted a period of statutory consultation between 13th October and 16th November 2014. An information leaflet was distributed to homes and businesses in the CCZ, four public exhibitions were held at Stewartby, Lidlington, Marston Moretaine and Ampthill and there was once again local advertising and a series of media reports (print, TV, radio and social media).

The choice of location for the exhibitions (in both phases of consultation) was decided upon following discussions with members of CBC and BBC.

In addition, local councillors from CBC, BBC and eight parish councils attended an “outreach meeting” with the Planning Inspectorate which was organised and attended by MPL.

The various consultation activities during 2014 helped inform the Project’s development and led to MPL’s decision to underground the electrical connection rather than connect the power generation plant to the National Grid via overhead lines and additional transmission towers.

In March 2015, the Project was put on hold due to market and political uncertainty and both CBC and BBC were informed as were the parish councils and other interested parties in the area. However, MPL has recently re-started its work to secure development consent for the Project and as such has decided to conduct another phase of statutory consultation.

1.0 PURPOSE

- a. This document explains how MPL once more intends to consult people living and working in the vicinity of the proposed up to 299 MW gas-fired power generation station, its associated gas and electrical connections and other related infrastructure 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 includes a new purpose built access road, an underground gas pipeline connection and a new electrical connection (including underground cables) that would facilitate the export of power to the National Grid for distribution to homes and businesses.

- c. Since December 2016, MPL, the development company for the Project at Rookery South Pit, has been a subsidiary company of Drax Group plc. Drax Group 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 Drax Group. 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 one or more inspectors (known as an Examining Authority) who will be appointed by the Secretary of State for Business, Energy & Industrial Strategy (SoS) through the Planning Inspectorate. 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"), reviewed and updated from 2014, will be produced and will describe, at a preliminary level, the likely significant environmental effects of the Project. The PEIR will be published and made available for public scrutiny and consultation in May 2017.
- 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 (in 2014, 2015 and in 2017) 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 Generating Equipment (which comprises part of the Project including the gas turbine generator) 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 CBC and in part within the administrative area of BBC. The proposed routes of the electrical and gas connections would be located in farmland to the south of Rookery South Pit within Central Bedfordshire, whilst part of the proposed access route, subject to

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

consultation, environmental and technical studies, resides within the administrative area of BBC.

3.0 THE PROJECT

The Project would comprise:

- A new Power Generation Plant in the form of a Open Cycle Gas Turbine (SCGT) gas fired peaking power generating station fueled 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 to the Generating Equipment Site; and
 - During construction, a temporary construction compound (the Laydown 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
- A new underground Gas pipeline Connection to bring natural gas to the Generating Equipment from the National Transmission System (NTS) which is located to the South of Rookery South Pit. The Gas Connection includes an underground pipeline of length approximately 1.8 km.; and
- A new Electrical Connection (including underground cables) to export power from the Generating Equipment to the National Grid Electricity Transmission System (NETS) for distribution to homes and businesses and which is also located to the South of Rookery South Pit.

The Power Generation Plant, Gas Connection and Electrical Connection are together 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

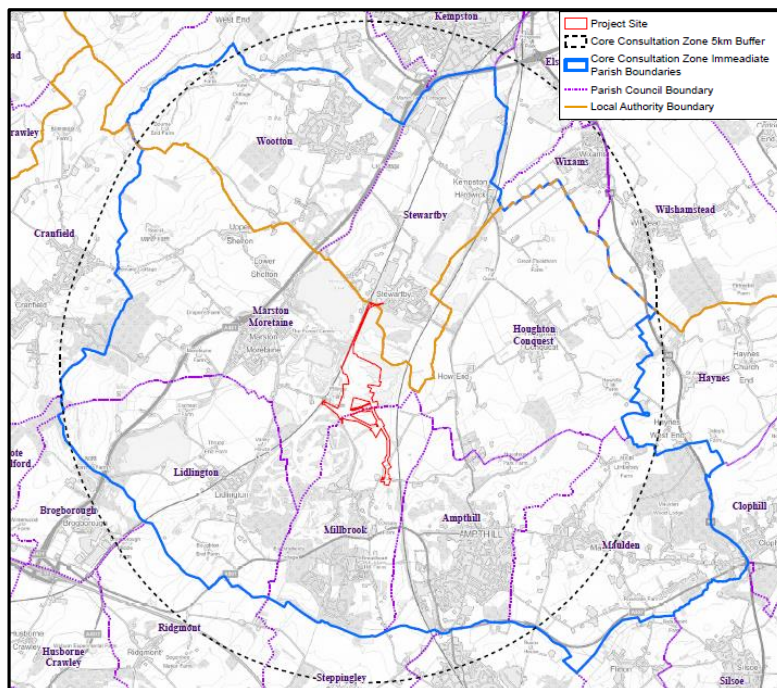
- a. MPL is committed to and has demonstrated an open and responsive consultation with local communities and interested parties. Taking note of the 2014 Consultation, the programme recommended within this document sets out a framework for a formal and inclusive consultation process.

- 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, as well as previous dialogue about public consultation with CBC and BBC (and feedback from local people) in 2014. 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.

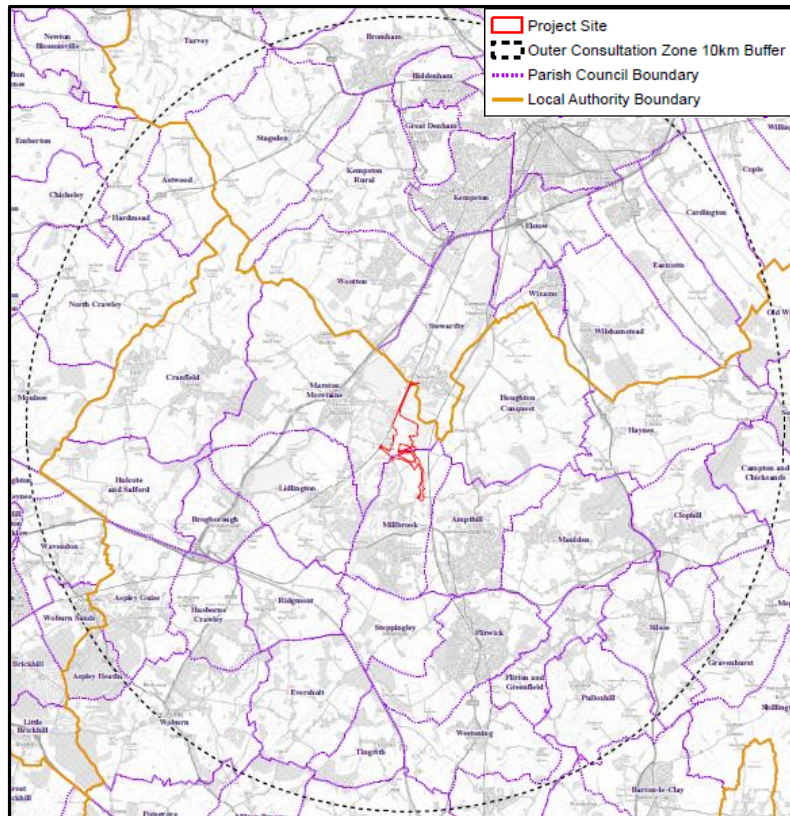
- c. Between May 2014 and March 2015, MPL has proactively communicated its intentions with elected representatives and directly within the local community, in order to introduce and discuss aspects of the Project. These non-statutory information activities, the 2014 period of statutory public consultation and forthcoming initiatives will be captured in the Consultation Report that will form part of the DCO application.

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 in 2014 following feedback from various elected representatives with whom MPL had been liaising and was 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 and Millbrook and the town of Ampthill, 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 Project Site is located directly within the CBC ward of Cranfield and Marston Moreteyne 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) As in 2014, communities in the OCZ will be informed about the Project (via newspaper advertisements, posters, media coverage and direct 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. In 2014, there was little interest or comment about the Project from elected representatives or from the general public within the OCZ.
- 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 2014 NON-STATUTORY AND 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 MPL's 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 CBC and BBC, as well as the then MP Nadine Dorries for Mid-Bedfordshire, and Richard Fuller MP (whose constituency partially falls within the CCZ). MPL met Nadine Dorries MP on two occasions 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 an approximate 5 km radius of the Project 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 in 2014, 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 that followed in October/November 2014 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 1st 2014.
- 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. Since May 2014, the MPL website has carried 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 once again 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 during the periods of non-statutory and statutory consultation in 2014.

6.0 2014 STATUTORY CONSULTATION METHODOLOGY & ACCESSIBILITY

The period of statutory consultation was conducted between October 13th and 16th November 2014 (a 35 day period):

- a. MPL consulted officers at CBC and BBC on the content of the SoCC.
- b. MPL engaged with elected members of CBC, BBC, parish councils, the then local MP Nadine Dorries and Richard Fuller MP whose constituency lies within the CCZ.
- c. MPL used 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 were held at the following locations:
 - Marston Moretaine Village Hall, 31st October (1500 to 1900hrs)
 - Stewartby Village Hall, 1st November (0900 to 1300hrs)
 - Ampthill Masonic Centre, Ampthill, 3rd November (1600 to 2000hrs)
 - Lidlington Village Hall, 4th November (1100 to 1500hrs)

After consideration of the outcomes of the non-statutory consultation process these venues were considered the most convenient to those communities within the CCZ

that surround the proposed Power Generation Plant Site. These events featured relevant information in a variety of formats (display panels, plans, leaflet etc) about the proposal and copies of the Preliminary Environmental Information Report (PEIR) were made available. Members of the MPL project team were available to discuss the proposal, answer questions and to receive feedback from members of the public. About 175 people attended the public exhibitions.

- e. In order to ensure that people had the maximum opportunity to attend the exhibitions, MPL arranged for them to be held at the above convenient locations and at a variety of times. An event was held on a Saturday (at Stewartby) for those unable to visit during the working week.
- f. MPL used venues that met Disability Discrimination Act 1995 requirements and made provision for those with special requirements who were unable to attend or access a consultation event (for example, private transport to a consultation event).
- g. In consultation with CBC and BBC, MPL shared information about the Project with those “hard to reach groups” living and working within the CCZ. These groups were 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. Social media was used to reach the younger members of the community, whilst MPL gave one presentation to a local college about the Project. Local schools and colleges were notified of the consultation events.
- i. MPL advertised 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 announced via the issue of press releases to parish, local and regional news publications, the local radio and TV stations (and via online media) that the events were taking place. The newspaper

advertisements (and media coverage) reached the CCZ, the OCZ and further afield. The content gave information on MPL's proposals and details of the consultation events, including contact information.

- j. A leaflet about the Project and the consultation programme was 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 included details of the Project, the location and dates of the consultation events, the MPL website address, and a comments/questions card that could be returned Freepost.
- k. Posters advertising the consultation events were 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 informed those parish councils within the OCZ about the Project and the exhibition/consultation event via email.
- m. The MPL team proactively and reactively met 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. Comments and queries via telephone (as well as via post, email or fax) were considered and addressed where possible, as well as comments noted. The statutory consultation lasted for a period of 35 days. Relevant responses during the 2014 Statutory Consultation have been filed, had regard to and will be referred to in the Consultation Report that will accompany the DCO application.

7.0 2017 CONSULTATION

Taking note of the comments and feedback that were received about the Project during the 2014 consultations, MPL proposes a series of meetings with elected members of CBC and BBC, meetings with the parish councils that are located in the CCZ and the local MPs, followed by a single phase of public statutory consultation about the Project. This period of statutory consultation will follow similar lines to the consultation activities that were carried out in 2014 namely:

- a. MPL will use elected members of CBC, BBC and parish councils in the CCZ and OCZ as communication channels to share information and seek community feedback during the period of statutory consultation.
- b. Exhibitions/consultation events will be held between June 8th and June 13th at the following locations:

Friday 9 th June 1500 -1930	Marston Moretaine Village Hall, Bedford Road, Marston Moretaine, MK43 0LD
Saturday 10 th June 0900 - 1300	Stewartby Club, Stewartby Way, Stewartby, MK43 9NB
Monday 12 th June 1600 - 2000	Wingfield Club, 37 Church St, Ampthill, Bedford MK45 2PL
Tuesday 13 th June 1230 - 1530	Lidlington Village Hall, High Street, Lidlington, MK43 0RT

- c. These events will feature relevant information in a variety of formats (display panels, plans, photomontages etc.) about the Project 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,
- d. In order to ensure that people have the maximum opportunity to attend the exhibitions, MPL will once again 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.
- e. The venues meet Disability Discrimination Act 1995 requirements and MPL 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).

- f. MPL will again share information about the Project with those “hard to reach groups” living and working within the CCZ.
- g. Social media will again be used to reach the younger members of the community, whilst MPL will be willing to give presentations about the Project to local colleges and schools. Local schools and colleges will again be notified of the consultation events.
- h. 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 issue press releases to parish, local and regional news publications, the local radio and TV stations (and via online media) to give additional publicity to the events taking place. The newspaper advertisements (and media coverage) will reach the CCZ, the OCZ and further afield. The content will be key information on MPL’s proposals and details of the consultation events, including contact information.
- i. A leaflet about the Project and the consultation programme will be distributed to c13,000 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 could be returned Freepost.
- j. 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.
- k. MPL will inform those parish councils within the OCZ about the Project and the exhibition/consultation events via email.

- I. MPL will 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.
- m. Comments and queries via telephone (as well as via post or email) will be considered and addressed where possible, as well as comments noted. The 2017 period of statutory consultation will last for a period of 35 days, and the outcomes (along with the outcomes of the 2014 Statutory Consultation) will be referred to in the Consultation Report that will accompany the DCO application.
- n. Copies of the leaflet, the SoCC, a Consultation Document that will explain the Project as well as the proposed amendments to the Rookery South (Resource Recovery Facility) Order 2011, the Preliminary Environmental Information Report³ (PEIR) and the Non-Technical Summary as well as other information about the Project will be available (in addition to the main council offices of Central Bedfordshire Council and Bedford Borough Council’s Customer Service Centre) at Marston Vale Forest Centre, Marston Moretaine, MK43 0PR which is open seven days a week between 10.00am and 4.00pm, as well as the following libraries:

Bedford Library Harpur Street, Bedford, MK40 1PG	Mon/Tues/Wed/Fri 09.00 – 18.00 Thurs 09.00 – 13.00 Sat 09.00 – 17.00 Sun Closed
Amphill Library, 1 Dunstable Street, Amphill, Bedford, MK45 2NL	Mon/Wed/Fri 10.00 – 18.00 Tues Closed Thurs 14.00 – 18.00 Sat 10.00 – 13.00 Sun Closed
Wootton Library Lorraine Road, Wootton, MK43 9LH	Mon/Fri 14.00 – 18.00 Tues Closed

³ Note that the technical appendices to the PEIR will be provided electronically at the libraries, council offices and the Forest Centre. Printed copies will be available to view at the public exhibitions.

	Wed	10.00 – 1300 / 1400 -18.30
	Thurs	Closed
	Sat	10.00 – 13.00
	Sun	Closed

- o. MPL is aware of several housing developments at different stages of development within the CCZ. MPL will engage with developers and provide leaflets such that prospective home owners will be aware of the project.