

Consultation Strategy Update

September 2020

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with energy.**



Report for

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Doc Ref. 41310-WOOD-XX-XX-RP-J-0001_S3_2

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Document revisions

No.	Details	Date
AA	For Issue	07/07/20
B	Updated following Local Authority comments	14/09/20



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1. Introduction

1.1 Purpose of this Consultation Strategy Update

- 1.1.1 MVV Environment Ltd (the Developer) intends to submit an application for a Development Consent Order (DCO) for the construction and operation of an energy from waste facility – known as ‘the Medworth Energy from Waste (EfW) combined heat and power (CHP) Facility’ (hereafter referred to as the ‘Project’). The Project also includes associated development such as a steam pipeline connection to local industries, access improvements and a grid connection. The application would be for a Development Consent Order (DCO) under Section 37 of the Planning Act 2008 (PA 2008).
- 1.1.2 In December 2019, the Developer presented their strategy for pre-application consultation; feedback was received from all four host authorities¹. Details of the comments received and the Developers response are set out in **Appendix A**. The feedback received has been taken into account in developing this Consultation Strategy Update.
- 1.1.3 In accordance with that strategy, a non-statutory consultation was undertaken on the emerging proposals between 16th March and 4th May 2020; this would have included the holding of seven public exhibitions in March and April 2020. However, due to the Covid-19 pandemic and the associated social restrictions, these public exhibitions were postponed. The Developer is therefore proposing to undertake an additional non-statutory consultation on its proposals prior to its statutory consultation.
- 1.1.4 The purpose of this Consultation Strategy Update is to inform the approach to the additional non-statutory consultation and ensure that:
- a) Host authorities are made aware of the Developers proposals for pre-application consultation;
 - b) Host authorities are consulted on the proposals for the additional non-statutory consultation and are given opportunities and the appropriate time to influence them;
 - c) The consultation is comprehensive whilst also being transparent and accessible; and
 - d) All responses received are analysed and considered in the development of the DCO application for the Project.
- 1.1.5 Details of the comments received from the local authorities on the Consultation Strategy Update and the Developers response are set out in **Appendix D**.
- 1.1.6 Following the additional non-statutory consultation and the consideration of feedback received, the Developer will prepare a Statement of Community Consultation (SoCC) setting out how it proposes to carry out the statutory

¹ As defined under s42(1)(b) of the Planning Act 2008



consultation. As required by the PA 2008, the Developer will consult on the SoCC with all host authorities.

1.1.7

Outside of the non-statutory and statutory consultations, there is an ongoing programme of pre-application engagement with local communities and stakeholders that provides a forum for briefing on, and discussion about, the Project. This programme of ongoing engagement is not detailed in this document.

1.2 Structure of this Consultation Strategy Update

1.2.1

The Consultation Strategy Update is structured as follows:

- Section 2: Describes the background to the Project and the aim and approach to the additional non-statutory consultation and its position within the broader context of pre-application consultation.
- Section 3: Describes the key drivers, aims and objectives which underpin the need to undertake pre-application consultation as part of the development of the proposals for the Project.
- Section 4: Identifies the consultation process and content.
- Section 5: Sets out when, where and who will be consulted.
- Section 6: Sets out the methods of consultation that will be used.
- Section 7: Sets out the consultation recording and reporting process.



2. The Project and the approach to consultation

2.1 The Project

- 2.1.1 The Developer intends to make an application to the Secretary of State for a DCO for the Medworth EfW CHP Facility on the industrial estate, Algores Way, Wisbech, Cambridgeshire. The proposed development is a Nationally Significant Infrastructure Project (NSIP) under Part 3 Section 15 of the PA 2008 due to the fact that it will be a generating station located in England and will have a generating capacity of over 50 MW. It, therefore, requires an application to be submitted to the Secretary of State for Business, Energy and Industrial Strategy for a DCO.
- 2.1.2 The proposed development will recover useful energy in the form of electricity and steam from over half a million tonnes of non-recyclable (residual) municipal and commercial and industrial waste each year. Generating over 50 megawatts (MW), the electricity will be exported to the grid. The facility will also have the capability to export steam and electricity to users on the surrounding industrial estate.
- 2.1.3 The proposals include connections to supply steam and electricity on a private wire basis, following the disused railway line adjacent to the western boundary of the EfW CHP Facility site. The proposals will also include a grid connection, access improvements, a temporary construction compound, and a substation. The elements of the proposal, the area it covers, and associated consultation zones will be refined as part of the connection route selection process and further to ongoing engagement and assessment work.

2.2 The aim of the consultation process

- 2.2.1 The overarching aim of pre-application consultation is to ensure that the local community and all those with an interest in the Project are notified, consulted and given an opportunity to influence the proposals. Accordingly, this means that:
- The effects and benefits of the Project will be explained to allow all parties to understand what is being proposed and to be able to comment further on the proposals throughout the preparation of delivering an application for submission.
 - Members of the public living in the vicinity of the site will be consulted in good time during the evolution of the Project, helping them to understand what they can influence, enabling them to comment on its development, potential mitigation and enhancement measures.
 - All stakeholders, from those with statutory interests through to businesses, local communities, individual residents, affected landowners, as well as those who work or transit through the local area, will have access to accurate and



high-quality information on the Project which is accessible to stakeholders with varying levels of knowledge.

2.3 The approach to consultation

- 2.3.1 The Developer's published Consultation Strategy (December 2019) set out a two stage pre-application consultation process for the Project. Due to the Covid-19 pandemic and the associated social restrictions, the public exhibitions that were proposed as part of the non-statutory consultation were postponed. The Developer is therefore proposing to undertake an additional non-statutory consultation on its proposals prior to its statutory consultation.
- 2.3.2 The Developer recognises that it may be appropriate to undertake targeted consultation or additional consultation prior to submission of the DCO application, depending on how the proposals evolve as a result of consultation feedback, design development or environmental assessment work. In considering the need for targeted or additional consultation, the Developer will be guided by the degree of change, the effect on the local community and the level of public interest.
- 2.3.3 It is expected that consultations on the Project will attract a high level of public interest and participation. Some members of the public, groups and elected representatives already have some knowledge of the background to the principle of the Project and an established interest whilst others will not have the same background knowledge.
- 2.3.4 The approach to consultation is guided by the requirements of the PA 2008 and DCLG Guidance.
- 2.3.5 Pre-application consultation is a key requirement of the PA 2008 process. It is crucial in raising awareness and understanding about the Project and in helping develop a two-way dialogue with local communities and stakeholders to understand the issues that are important to them. Importantly, it can inform how proposals develop and potential effects of the development can be mitigated before submitting an application to the Planning Inspectorate for examination.
- 2.3.6 Due to the anticipated level of interest in the Project across a wide geographical area, a range of communication, engagement and consultation approaches will be required. These methods will ensure:
- The consultation is inclusive and provides opportunities for people to get involved and influence the development of the Project;
 - The consultation approach and methods are appropriate to the different stakeholders affected; and
 - Harder to reach groups are identified, and appropriate methods of communication are implemented to enable their involvement, including any need for translated materials on request.



3. The need for pre-application consultation

- 3.1.1 Under the PA 2008, pre-application consultation is a statutory requirement. Non-statutory consultation, whilst not a legal requirement, provides an opportunity for the Developer to engage with stakeholders at the earliest possible stage of the development; the Developer considers this to be invaluable.
- 3.1.2 Before accepting a DCO application for examination, the Planning Inspectorate will need to be satisfied that the Developer has carried out pre-application consultation and publicity in accordance with the requirements of the PA 2008. Evidence of this will be presented in the Consultation Report that will be submitted with the application for development consent.
- 3.1.3 As part of the process for accepting the application, the Planning Inspectorate will invite responses from each of the host authorities consulted and must have regard to any representations received regarding the adequacy of the pre-application consultation. If the Planning Inspectorate considers that the consultation has been inadequate, they can decide not to accept the application for examination.

3.2 DCLG guidance

- 3.2.1 Guidance on the pre-application process² is provided by DCLG, the latest version of which was published in March 2015. As explained above, the Developer is obliged to have regard to this Guidance in completing the pre-application consultation on the Project and this Guidance has informed the approach to consultation.
- 3.2.2 The most directly relevant advice in the Guidance is summarised below:
- Consultation (and publicity) is a key requirement of the PA 2008 process and is crucial to the effectiveness of the PA 2008 regime. If conducted effectively consultation and publicity leads to better applications.
 - Consultation should be based on accurate information that gives consultees a clear view of what is proposed, including any options. It should also be shared at an early enough stage so that a proposal can be influenced, and it should be engaging and accessible in style, encouraging consultees to react and offer their views.
 - Consultation should be appropriate to the scale and nature of the project in question and where any potential impacts may be experienced. Consultation should be thorough, effective and proportionate. However, larger more complex applications are likely to need to go beyond the statutory minimum timescales laid down in the PA 2008 to ensure enough time for consultees to understand project proposals and formulate responses.
 - Applicants must set out clearly what is being consulted on. They must be careful to make it clear what is settled and why, and what can be influenced. Applicants could prepare a short document specifically for local communities

² DCLG 'Planning Act 2008: Guidance on the pre-application process' (March 2015).



summarising the project proposals and outlining the matters on which the view of the local community is sought.

- To manage the tension between consulting early and having project proposals that are firm enough to enable consultees to comment, applicants are encouraged to consider an iterative, phased approach to consultation consisting of two (or more) stages.
- Where a phased consultation is proposed, applicants might wish to consider undertaking non-statutory early consultation at a stage where options are still being considered. This will be helpful in informing proposals and assisting the applicant in establishing a preferred option on which to undertake statutory consultation. Applicants may also find it advisable to carry out consultation with affected landowners in the final stage of consultation once project proposals have been developed in enough detail to allow the identification of all affected land interests
- Where the project proposals change to such a degree that what is being taken forward is fundamentally different to what was consulted on, applicants should undertake further re-consultation on the new proposals

3.3 Best practice consultation principles

3.3.1 The Developer recognises the importance of adhering to the best practice consultation principles set out in guidance produced by local authorities who are affected by, or have an interest in, the Project. For example, in line with Cambridgeshire County Council's Statement of Community Involvement (2019), the Developer will undertake consultation which includes:

- Well publicised, manned public exhibitions which are advertised in a local newspaper in advance. These will be held in local venues and include material written in 'plain English';
- Opportunities for the community to provide feedback; and
- Leaflets, posters and media coverage in the local area.

3.3.2 In line with Fenland District Council's Consultation Strategy (2017-2020), the Developer will strive to ensure its own approach to consultation will be:

- As required;
- Able to enable informed opinion;
- Well-planned and timely;
- Inclusive; and
- Well managed and undertaken using appropriate methods.

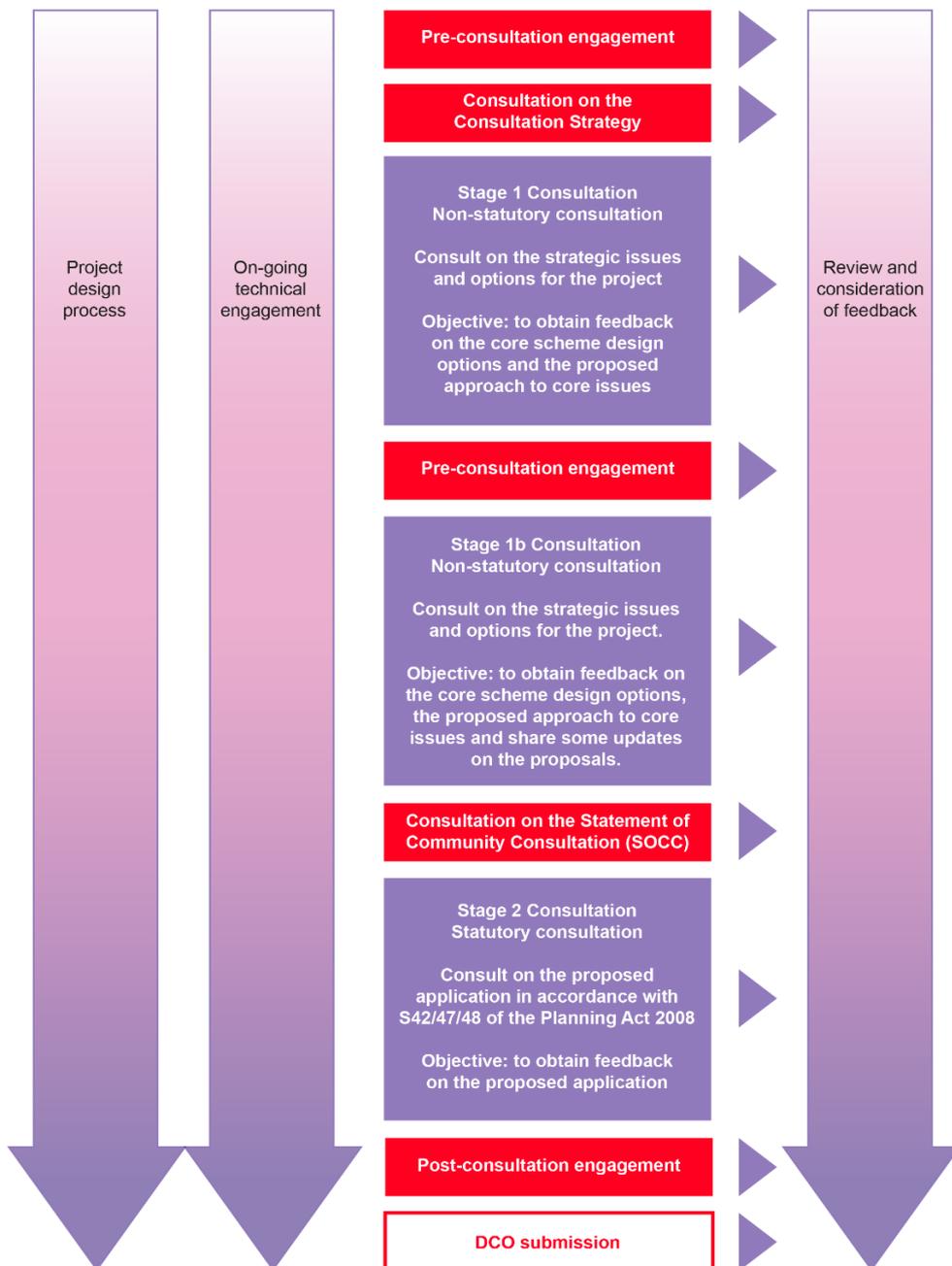


4. The consultation process

4.1.1 The Developer proposes to undertake a three-stage pre-application consultation process (see Fig 4.1):

- Stage 1 – non-statutory consultation;
- Stage 1b – additional non-statutory consultation; and
- Stage 2 – statutory consultation in accordance with the requirements of the PA 2008.

Figure 4.1 – pre-application consultation process





- 4.1.2 Stage 1 took place between 16th March and 4th May 2020 and was a non-statutory consultation.
- 4.1.3 As outlined in Section 2, the Developer is proposing to undertake an additional non-statutory consultation (the Stage 1b consultation) on its emerging proposals. This consultation will provide a further opportunity for stakeholders and local communities to share their views on the strategic issues and options for the Project and attend consultation exhibitions. The consultation will also include some updates on the proposals resulting from consultation feedback at Stage 1 and the further development and refinement of the proposals. This includes the refinement of the options for the electricity connection to the grid.
- 4.1.4 Stage 2 will be a statutory consultation carried out in line with the legal requirements of the PA 2008. Further detail on these principles and the approach to the Stage 2 consultation will be included in the SoCC.



5. When, where and who will be consulted

5.1 When will the consultation take place

- 5.1.1 In planning the timing of the consultation, the Developer will carefully consider government advice and guidelines in relation to Covid-19 and social distancing. The Developer will also be mindful of other external consultations taking place in order to manage any issues of consultation fatigue.
- 5.1.2 It is anticipated that the Stage 1b consultation will be held in Autumn 2020 for a period of six weeks.
- 5.1.3 The approach to and duration of, the Stage 2 consultation will be determined as part of the consultation on the SoCC with host authorities.

5.2 Where will the consultation take place

- 5.2.1 The zones described below and illustrated at **Appendix B** comprise the proposed Consultation Zone for the Stage 1b consultation and are the same as those used for Stage 1. This is to ensure that all stakeholders originally consulted are made aware of the additional non-statutory consultation and updates to the Project and have an opportunity to provide feedback. For the Stage 2 consultation, the size of the Consultation Zone will be reviewed and may change as more information becomes available on the potential effects of the Project.

Zone A

- 5.2.2 Zone A includes the community within a two-kilometre radius of the main site boundary, plus the full extent of residential areas in Wisbech and Elm. The coverage of Zone A is represented by the purple line in Appendix B.

Zone B

- 5.2.3 Zone B represents a five-kilometre radius of the main site boundary. It also includes a two-kilometre buffer around the potential grid connection options that were identified at Stage 1. The extent of Zone B is represented by the pink line in Appendix B. This approach has been taken from good practice applied in consultations for other similar proposals.

5.3 Who will be consulted

- 5.3.1 Although a non-statutory consultation, in accordance with the PA 2008 and best practice guidelines the consultation activity will be focussed on the following groups:



Prescribed consultees

- 5.3.2 Prescribed consultees under Section 42(1)(a) (often referred to as statutory consultees) are defined in Schedule 1 to the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended).

Local authorities

- 5.3.3 Under Section 43 of the PA 2008 applicants are required to consult with the local authorities in which the Project falls and those authorities that share a boundary with the host authorities.

- 5.3.4 Host and adjoining authorities cover:

- Cambridgeshire County Council (host);
- Fenland District Council (host);
- Norfolk County Council (host);
- Borough Council of Kings Lynn and West Norfolk (host);
- East Cambridgeshire District Council;
- Huntingdonshire District Council;
- South Holland District Council;
- Breckland Council;
- North Norfolk District Council;
- West Suffolk Council;
- Peterborough City Council;
- The Broads Authority;
- Bedford Borough Council;
- Central Bedfordshire Council;
- Lincolnshire County Council;
- Northamptonshire County Council;
- Essex County Council;
- Hertfordshire County Council; and
- Suffolk County Council.

Persons with an interest in the land (PILs)

- 5.3.5 This is a broad category as detailed by Section 44 of the PA 2008 and includes:
- Any owner, lessee, tenant or occupier of the land;
 - Anyone who is interested in the land;



- Anyone who has the power to sell and convey or release the land (e.g. a mortgage); and
- Anyone who might be entitled to make a relevant claim under section 10 of the Compulsory Purchase Act 1965, Part 1 of the Land Compensation Act 1973 or Section 152(3) of the PA 2008.

5.3.6 As the proposals are still evolving at the time of the Stage 1b consultation, specific consultation with PILs will not take place. Prior to the Stage 2 consultation diligent enquiries will be made into this broad category to ensure that all those with an interest in the land or who would or might be entitled to make a relevant claim are identified and consulted at Stage 2.

Local communities

5.3.7 Section 47 of the PA 2008 imposes a specific requirement on applicants to consult people living in the vicinity of the land to which the proposed application relates. We have defined local community consultees as:

- Individuals, owners/occupiers, businesses and groups based or living in the vicinity of the Project;
- Individuals who are users of the area or visitors to it (e.g. workers);
- Voluntary organisations (including residents' associations);
- Faith communities;
- Traveller communities;
- Schools and colleges in the vicinity; and
- Local hospitals, care homes and private healthcare organisations in the vicinity.

Wider stakeholders

5.3.8 In addition to those consultees prescribed under sections 42, 44 and 47 of the PA 2008 we have identified a number of individuals and organisations with which we will voluntarily consult. These include:

- Bodies and individuals who are not defined as prescribed consultees in Schedule 1 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended). This includes local bodies and technical consultees such as local Wildlife Trusts, the National Trust and the Royal Society for the Protection of Birds (RSPB);
- Additional local authorities that are not included under Section 43 e.g. those that express an interest in the Project; and
- County and Ward Councillors and MPs in relevant areas.

5.3.9 A list of the wider stakeholders proposed to be consulted will be continually reviewed in light of discussions with the local authorities and consultation feedback to ensure that anyone who requests to be included as a consultee has the same opportunity to provide feedback as those prescribed under the relevant legislation.



6. Approach to consultation

- 6.1.1 This section sets out the channels of communication and types of information which will be adopted to engage consultees throughout the Stage 1b consultation.
- 6.1.2 In accordance with the relevant statutory provisions and guidance, the SoCC will set out the communications programme for the Stage 2 consultation.

6.2 Channels of communication

- 6.2.1 To ensure the consultation is inclusive and open to all, a number of communications channels will be utilised to allow consultees to access project information and members of the team. These comprise:

Website

- 6.2.2 A dedicated website (<https://www.mvv-medworthchp.co.uk/>) was launched in December 2019 and will run for the duration of the Project. All consultation documentation and details of event locations, timings and document inspection locations will be available on a dedicated consultation section of this website. The website meets all standards in terms of accessibility and usability and will enable people to submit their comments online via a feedback form.
- 6.2.3 Following the close of the Stage 1b consultation the website will continue to provide a library of documents that were available during consultation but will clearly indicate that the consultation has closed. The website will be updated for subsequent stages of consultation.

Community contact point

- 6.2.4 A project contact point (local rate telephone number) has been set up for questions relating to the Project. Consultees are able to call this contact point to discuss the Project, leave a message or request hard copies of project documents. Consultees can also request a telephone appointment to discuss the Project.
- 6.2.5 All reasonable queries related to the consultation and the Project received will be responded to within 10 working days. There is also a dedicated email address, which is monitored by the Developer and from which all reasonable queries relating to the consultation and the Project will receive a response.

Exhibitions

- 6.2.6 Subject to limitations on public gatherings or social distancing imposed as a result of the Covid-19 pandemic, public exhibitions will be held throughout the Consultation Zone in Disability Discrimination Act 1995 (DDA) compliant and accessible venues which are known to the local community. Members of the Project team will be available to answer questions about the Project, assist with the interpretation of materials and provide guidance on the completion of feedback forms. If government advice and/or local circumstances change and it is necessary



to adjust the approach to public exhibitions the Developer will engage with the host authorities to agree suitable alternative arrangements; these may include alternative public exhibition venues or digital consultation events/activities. If these activities are required, access will also be provided via telephone.

6.2.7 The exhibition venues proposed for the Stage 1b consultation are those booked at Stage 1; these are detailed in Table 6.1 below and illustrated at **Appendix C**. The Developer will liaise with each venue and, should they become unavailable due to the Covid-19 pandemic, a suitable alternative will be secured; as a last resort, that public exhibition would be cancelled.

6.2.8 The public exhibitions will be promoted through project materials sent directly to stakeholders, the Project website, locally displayed posters, local press and local leafleting.

Table 6.1 – Stage 1b Consultation Exhibitions

Exhibition Venue	Address
Rosmini Centre	69a Queens Road, Wisbech PE13 2PH
Queen Mary Centre	Queens Road, Wisbech, PE13 2PE
Oasis Community Centre	St Michael's Ave, Wisbech PE13 3NR
Tower Hall	Maltmas Drove, Friday Bridge, Wisbech, PE14 0HW
Marshland Hall	Marshland Hall, 156 – 158 Smeeth Rd, Wisbech PE14 8JB
Walton Highway Village Club	Lynn Road, Walton Highway, Wisbech PE14 7DF
Wisbech St Mary Sports & Community Centre	Beechings Close, Wisbech St Mary, Wisbech, PE13 4SS

Document inspection locations

6.2.9 Subject to access limitations or social distancing imposed as a result of the Covid-19 pandemic, full sets of the consultation documents will be made available for inspection at the locations detailed in Table 6.2 throughout the consultation period. If local circumstances change and it is necessary to adjust the approach to document inspection locations, the Developer will engage with the host authorities to agree suitable alternative arrangements.



- 6.2.10 Awdry House was originally identified as a document inspection location, however Cambridgeshire County Council have confirmed that this venue is no longer open to the public due to Covid-19 restrictions and therefore this has been removed from the strategy.

Table 6.2 – Stage 1b Document Inspection Locations

Document Inspection Location	Address
Wisbech Library	Ely Place, Wisbech, PE13 1EU
Oasis Community Centre	St Michael's Ave, Wisbech, PE13 3NR
Wisbech St Mary Sports and Community Centre	Beechings Close, Wisbech St Mary, Wisbech, PE13 4SS
Marshland Hall	Marshland Hall, 156 – 158 Smeeth Rd, Wisbech PE14 8JB
Rosmini Centre	69a Queens Rd, Wisbech, PE13 2PH
Wisbech Customer Services Centre	Harbour Square, Boathouse Business Centre, Wisbech, PE13 3BH
Walton Highway Village Club	Lynn Road, Walton, Highway, Wisbech, PE14 7DE

6.3 Types of information

- 6.3.1 Written information on the Project and details of the consultation will be provided to inform consultees about the proposals and will be made available on the website, at public exhibitions and at document inspection locations (unless stated otherwise). These include:

Consultation invitation flyer

- 6.3.2 An invitation flyer notifying consultees about the consultation will be issued to everyone in the Zone A Consultation area, prescribed consultees and wider stakeholders prior to, or at the launch of, the consultation. This will provide a summary of information about the Project, detail on the consultation, including how to get involved and where more information can be found.



Consultation booklet

- 6.3.3 A non-technical document summarising the background to the Developer and the Project as well as information on the approach to managing any impacts of the proposals.

Information paper

- 6.3.4 A non-technical document setting out updates to the Project as a result of consultation feedback at Stage 1 and the further development and refinement of the proposals.

Consultation Feedback Report

- 6.3.5 A non-technical document detailing the approach to consultation at the Stage 1 non-statutory consultation and summarising the feedback received together with the Developer's current response.

Technical information

- 6.3.6 More detailed technical information on the main aspects of the proposals.

Feedback form

- 6.3.7 A feedback form will be provided for anyone wishing to respond. The feedback form will be capable of being completed by hand (and will be returnable using a 'Freepost' address) or online via the Project website.

6.4 Notification of Consultees

- 6.4.1 A number of methods will be used prior to and during the consultation to ensure that all consultees are given the opportunity to find out more and take part. These include:
- **Flyer** - As set out above, a consultation invitation flyer will be issued to residents and businesses within the Zone A Consultation area prior to, or at the launch of, consultation inviting them to get involved.
 - **Press notices and advertising** - Adverts detailing event locations and timings will be placed in appropriate publications e.g. local newspapers and posters across Zone A and B consultation areas.
 - **Stakeholders, groups and organisations** - A range of stakeholders, bodies and organisations will be engaged to make them aware of the consultation and, where appropriate, provide details of how their membership can get involved.

6.5 Hard to reach groups

- 6.5.1 The Developer recognises that some consultees will not be able to participate in the consultation without assistance and will ensure that all groups and members of



the community have the opportunity to participate and are not disadvantaged in the consultation process. As a result, the Developer will:

- Ensure all exhibition venues are DDA compliant;
- Utilise project staff with relevant language skills or provide translation services where appropriate / on request; and
- Publish the consultation booklet in large copy print, audio or Braille on request.



7. Recording and reporting

7.1 Recording feedback

7.1.1 In accordance with Section 49 of the PA 2008, the Developer is committed to recording, analysing and demonstrating how it has had regard to comments received during the pre-application consultation. The preferred method of collecting comments is through the dedicated project website as it is the most efficient way of securely collecting information. However, consultation feedback can also be given through:

- Feedback forms submitted at exhibitions and via the Project Freepost address, and
- Feedback received via the Project email address or other forms of correspondence received via the Project Freepost address

7.1.2 Verbal feedback will not be accepted via the community contact point or at exhibitions except where necessary to recognise an individual's particular exceptional circumstances which would otherwise stop their view from being taken into account. Assistance with completing feedback forms will be provided at exhibitions for those who request it.

7.1.3 All responses received will be analysed and considered in the development of the DCO application for the Project.

7.1.4 Any personal data received as part of the consultation or as part of the consultation process will be stored and protected as per relevant data protection requirements as set out in the General Data Protection Regulation (GDPR). No personal details will be used or published in any materials produced in support of the Project.

7.2 Reporting

7.2.1 A Consultation Feedback Report (CFR) will be produced which summarises all feedback received at the Stage 1 non-statutory consultation. This Report will be made publicly available at the Stage 1b consultation. Following the Stage 1b consultation, a CFR will be produced which summarises the feedback received and this will be made publicly available as part of the Stage 2 consultation.

In accordance with Section 37(3)(c) of the PA 2008, a Consultation Report will be submitted with the application for development consent. This will report on both the non-statutory and statutory pre-application consultations to demonstrate how all statutory requirements relating to consultation and publicity including compliance with the PA 2008 have been met, how DCLG Guidance has been taken in to account and how the feedback received has influenced the application.



Appendix A Local Authority Comments on Consultation Strategy

BOROUGH COUNCIL OF KING'S LYNN AND WEST NORFOLK	
Authority Comment	MVV response
MVV clearly reference the relevant guidance and legislation.	No response required
The Stages are clearly set out, and the focus on the earliest identification of issues is welcomed.	No response required
It is helpful that there is a review point for the extent of the Zones following the Stage 1 non-statutory consultation.	No response required
Zone B seems appropriate at this stage, pending further detail about the transmission lines and grid connection.	No response required
In earlier discussions it was noted that Medworth may concentrate on only one of the routes, rather than the two shown on the Zones map. Has this decision been made, or will two routes be shown? It clearly has an impact on the degree of interaction that might be necessary with local communities.	<p>Two grid connection routes are currently under investigation along corridors to the north and east of Wisbech and both will be shown as part of this non-statutory consultation.</p> <p>These options will be refined as part of the connection route selection process and further to ongoing engagement and assessment work.</p> <p>Once a final decision on the grid connection route option is taken, the extent of the red line boundary and consequently the associated consultation zones will be further refined.</p>
Schedule 1 to the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) is clearly the starting point. The prescribed consultees includes the Parish / Town Councils, and section 47 covers 'local communities' beyond that. This is all appropriate.	No response required
The specific mention of Ward Councillors is welcomed.	No response required
The channels identified are appropriate.	No response required
Bearing in mind the relative population size involved and the distances around the zones the proposed venues seem appropriately distributed to reach local people.	No response required
All of these (4 in total) are in Wisbech. Can you confirm that all the same documents will be available online? Assuming that they	All documents provided at document inspection locations will also appear online. MVV's dedicated website (www.mvv-medworthchp.co.uk) was



BOROUGH COUNCIL OF KING'S LYNN AND WEST NORFOLK	
Authority Comment	MVV response
are online, which would be helpful, are there other particular reasons for not having a rural location available also?	<p>launched in December 2019 and will run for the duration of the Project. All consultation documentation and details of event locations, timings and document inspection locations will be available on a dedicated consultation section of this website.</p> <p>In order to give consultees in rural locations to the north of the site ample opportunity to attend events, engage with the proposals and have their say, MVV propose a consultation event in Walton Highway Village Club.</p>
In preliminary discussions MVV mentioned a specific briefing could be arranged for West Norfolk Borough Councillors. This would be welcomed at an early stage before the non-statutory consultations begin.	Meeting was arranged and took place at 2pm to 4pm on 11 th March 2020 Town Hall, King's Lynn. The meeting was attended by Members and Officer's from Borough Council of King's Lynn and West Norfolk.

FENLAND DISTRICT COUNCIL	
Authority Comment	MVV response
<p>In the Town Centre, we consider that there should be a 'pop up' venue provided in the Market Place Whilst Elm, Marshland and Walton Highway areas are identified together with Wisbech Town there is a lack of venue to the west of Wisbech and we consider the Wisbech St Mary Community centre should be included.</p> <p>Given the large concentration of Eastern Europeans and travellers in the town, the Rosmini Centre is a popular hub that these groups use and therefore I think the Rosmini Centre should also be included.</p>	<p>In order to engage communities visiting and living within the centre of Wisbech, MVV is proposing a number of consultation events within close proximity of Market Place, including Queen Mary Centre, which is adjacent to a large car park in central Wisbech.</p> <p>MVV is proposing an event at Wisbech St Mary Sports and Community Centre to ensure that consultation events are easily accessible to communities located to the west of the site.</p> <p>In order to ensure that that all groups and members of the community have the opportunity to participate and are not disadvantaged in the consultation process, MVV is proposing to host a document inspection location at the Rosmini Centre, Wisbech. Additionally, MVV staff who speak Romanian, Polish and German can be made available for the public exhibitions.</p>
We would suggest that The Boathouse, Rosmini Centre, Wisbech Information Centre and FDC's Fenland Hall March be added to the list.	Within the list of document inspection locations, MVV proposes to include The Boathouse (Wisbech Customer Services Centre) and the Rosmini Centre.



FENLAND DISTRICT COUNCIL	
Authority Comment	MVV response
	MVV's proposals for document inspection locations do not include March Hall, as this sits outside of the consultation zone, or Wisbech Information Centre as MVV is instead proposing Wisbech Library document inspection location which is within very close proximity of this venue.
<p>We would welcome the inclusion of the following: Parish / Town Councils, Wisbech Society, Getting it Sorted Group, Cambridgeshire friends of the earth, Chamber of commerce, National Trust, Rail Future and the Bramley Line (www.brmaleyle.org.uk, and the Rosmini Centre. There are a number of traveller families living the the [sic] area close to the proposed development site and so we are trying to establish if there is a community representative that we can put you in touch with. Alternatively we will be able to identify the location of the pitches so that they can be included in any mail shots.</p>	<p>Concerning community groups identified by the authority, to ensure all members of the community have the opportunity to participate and are not disadvantaged in the consultation process, MVV will send the consultation information leaflet directly to the following groups</p> <p>Parish Town Councils</p> <ul style="list-style-type: none"> • Elm Parish Council • Emneth Parish Council • Gorfield Parish Council • Leverington Parish Council • Newton-In-The-Isle Parish Council • Outwell Parish Council • Parsons Drove Parish Council • Sutton Bridge Parish Council • Tydd St. Giles Parish Council • Walpole Parish Council • Walsoken Parish Council • West Walton Parish Council • Wisbech St Mary Parish Council • Wisbech Town Council <p>Additional Interested Parties suggested by Fenland District Council</p> <ul style="list-style-type: none"> • Cambridge Friends of the Earth • Cambridgeshire Chamber of commerce • Getting it Sorted Group • National Trust • Rail Future • The Bramley Line • Wisbech Society <p>MVV are liaising with Fenland District Council to contact traveller families.</p>

NORFOLK COUNTY COUNCIL	
Authority Comment	MVV response
As per 2.3.6 we would underline the need to identify and consult the harder to reach groups (including gypsy and traveller groups within the	MVV are liaising with Fenland District Council to contact traveller groups.



NORFOLK COUNTY COUNCIL	
Authority Comment	MVV response
consultation area) – it would be useful to have further information on this as and when these groups are identified;	
In terms of 3.3 we would emphasize that there are ample weekend and evening events are held to allow interested parties sufficient opportunity to visit the exhibitions;	In order to engage consultees and provide them with ample opportunity to learn about the consultation and have their say, consultation events will be spread throughout the consultation period and take place on both weekends and weekdays. MVV proposes that weekday events will run from 2pm – 8pm and weekend events will run from 10am – 5pm.
At 5.3.6, for the avoidance of doubt this should include County Councillors (the Norfolk Electoral Divisions and Members can be provided) as well as Ward Councillors;	County councillors are now included in section 'wider stakeholders'.
In 6.5, we consider the Zone B consultation area to be reasonable but please could it be clarified what additional engagement residents/business in Zone B can actually expect compared to the wider population such as through the measures identified (press notices and adverts)?	<p>In order to raise awareness about the consultation, MVV proposes a number of approaches to publicity to help engage consultees within zone B including; 7 consultation events held at accessible times throughout the local area, 8 document inspection locations including copies of all consultation documentation, a press release, posters in local venues and adverts in the Fenland Citizen newspaper and the Wisbech Standard newspaper.</p> <p>The consultation website will encourage and enable anyone to participate in the consultation – including those who are situated within and beyond zone B.</p> <p>MVV will continue to review the consultation zones as part of the connection route selection process, further to ongoing engagement and assessment work and following the non-statutory consultation.</p>
We would emphasize that one of the key points in the Reporting (7.2) is to state in detail how the consultation exercise has informed and influenced the proposals, and outline where amendments have been made to the scheme.	<p>Following the Stage 1 non-statutory consultation, MVV will take all consultation responses into account and demonstrate at the Stage 2 statutory consultation how the proposals have developed as a result of feedback.</p> <p>MVV will summarise all responses to the Stage 1 and Stage 2 consultations in a Consultation Report which will be submitted with the application. The Consultation Report</p>



NORFOLK COUNTY COUNCIL	
Authority Comment	MVV response
	will explain how MVV has had regard to consultation responses.

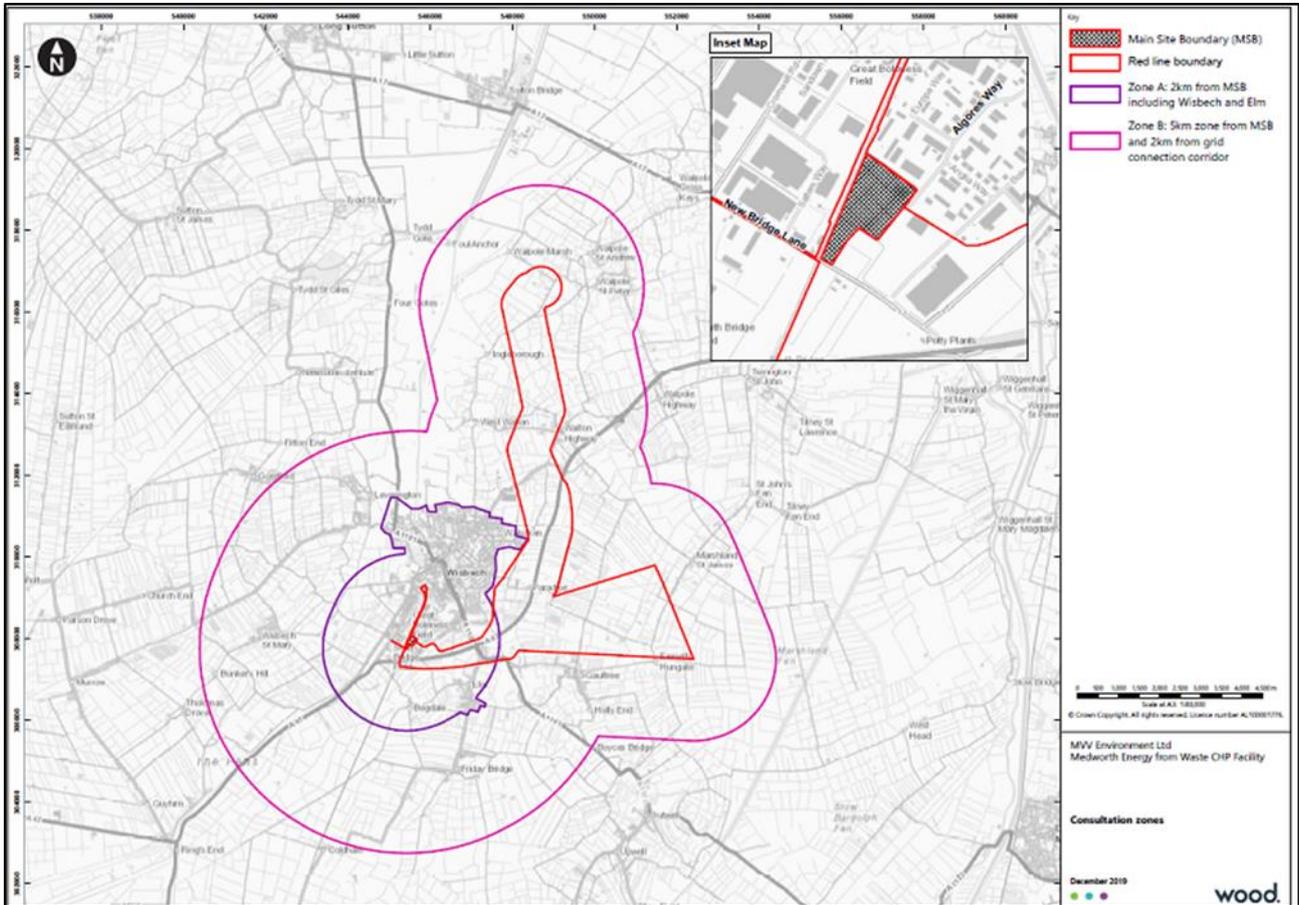
CAMBRIDGESHIRE COUNTY COUNCIL	
Authority Comment	MVV response
<p>A number of public exhibitions are proposed, and these will be well publicised, including in a local newspapers. If not proposed already the use of Town and Parish newsletters to publicise the events should also be considered.</p>	<p>In order to raise awareness about the consultation, MVV proposes a number of approaches to publicity including; 7 consultation events held at accessible times throughout the local area, 8 document inspection locations including copies of all consultation documentation, a press release, posters in local venues and adverts in the Fenland Citizen newspaper and the Wisbech Standard newspaper.</p> <p>MVV will notify local town and parish councils of the consultation, ahead of it taking place, to inform them of the proposals and allow them to share the information with local communities via their own engagement platforms.</p> <p>MVV will continuously review its approach to advertising and publicity to ensure it encourages participation in the consultation process.</p>
<p>The intent to hold local community events at local venues is welcomed, all such events should be 'open' in the afternoon and the evening to enable full attendance. The County Council's SCI requires the opportunity to allow feedback to be made in oral, written or electronic form; and it is noted in this context that assistance will be provided for those who do not wish to reply in a written or electronic form. This is welcomed.</p>	<p>In order to capture consultees and provide them with sufficient opportunity to learn about the consultation and have their say, MVV will ensure that consultation events are spread throughout the consultation period and take place on both weekends and weekdays. MVV is proposing that weekday events will run from 2pm – 8pm and weekend events will run from 10am – 5pm.</p> <p>The consultation will provide a feedback form for anyone wishing to respond. The feedback form will be capable of being completed by hand (and will be returnable using a 'Freepost' address) or online via the Project website.</p> <p>Verbal feedback will not be accepted via the Project helpline or at exhibitions except where necessary to recognise an individual's particular exceptional circumstances which would otherwise stop their view from being taken into account. Assistance with completing</p>



	<p>feedback forms will be provided at exhibitions for those who request it.</p>
<p>The technical documents available e.g. the Preliminary Environmental Information Report, should include a non-technical summary which is also in 'plain English'</p>	<p>The Preliminary Environmental Information Report will not form part of the Stage 1 non-statutory consultation.</p> <p>As part of the Stage 2 statutory consultation, MVV will produce non-technical summaries of environmental information including the Preliminary Environmental Information Report.</p> <p>The EIA Scoping Report and Scoping Opinion will be available at Document Inspection Points and public exhibitions.</p>
<p>It is noted that information will be made available at a number of public information points – materials should be available in hard copy for people who wish to inspect it in this form (rather than via a computer). These information points should be spread across the proposal area, and as stated readily accessible to the community. It is noted that the majority of the proposed venues are libraries and public offices, regard will need to be had to their opening times to ensure that the public can also view materials in evenings and weekends if necessary.</p>	<p>A full set of the consultation documents will be made available, in hard copy, at each document inspection location throughout the consultation period. In choosing these document inspection locations, MVV has ensured that they are accessible to the community and their opening times collectively cover the morning, daytime and evening periods.</p>
<p>In terms of the Consultation Zones, it has been noted by the County Council in considering the Scoping Report for this proposal, that the impact of the proposed development e.g. in visual terms, may extend beyond 5 km. It is therefore suggested that some consideration should be given to including those communities which may be most affected by views of the facility from beyond the 5 km zone.</p>	<p>Based on best practice approaches used on similar projects and anticipated levels of visual effects, MVV considers that the 5km consultation zone (zone B) proposed for the non-statutory consultation is sufficient in engaging consultees who could be affected by the Project.</p> <p>The consultation website and advertising and publicity channels will encourage and enable anyone to participate in the consultation – including those who are situated beyond zone B.</p> <p>MVV will continue to review the consultation zones as part of the connection route selection process, further to ongoing engagement and assessment work and following the non-statutory consultation.</p>

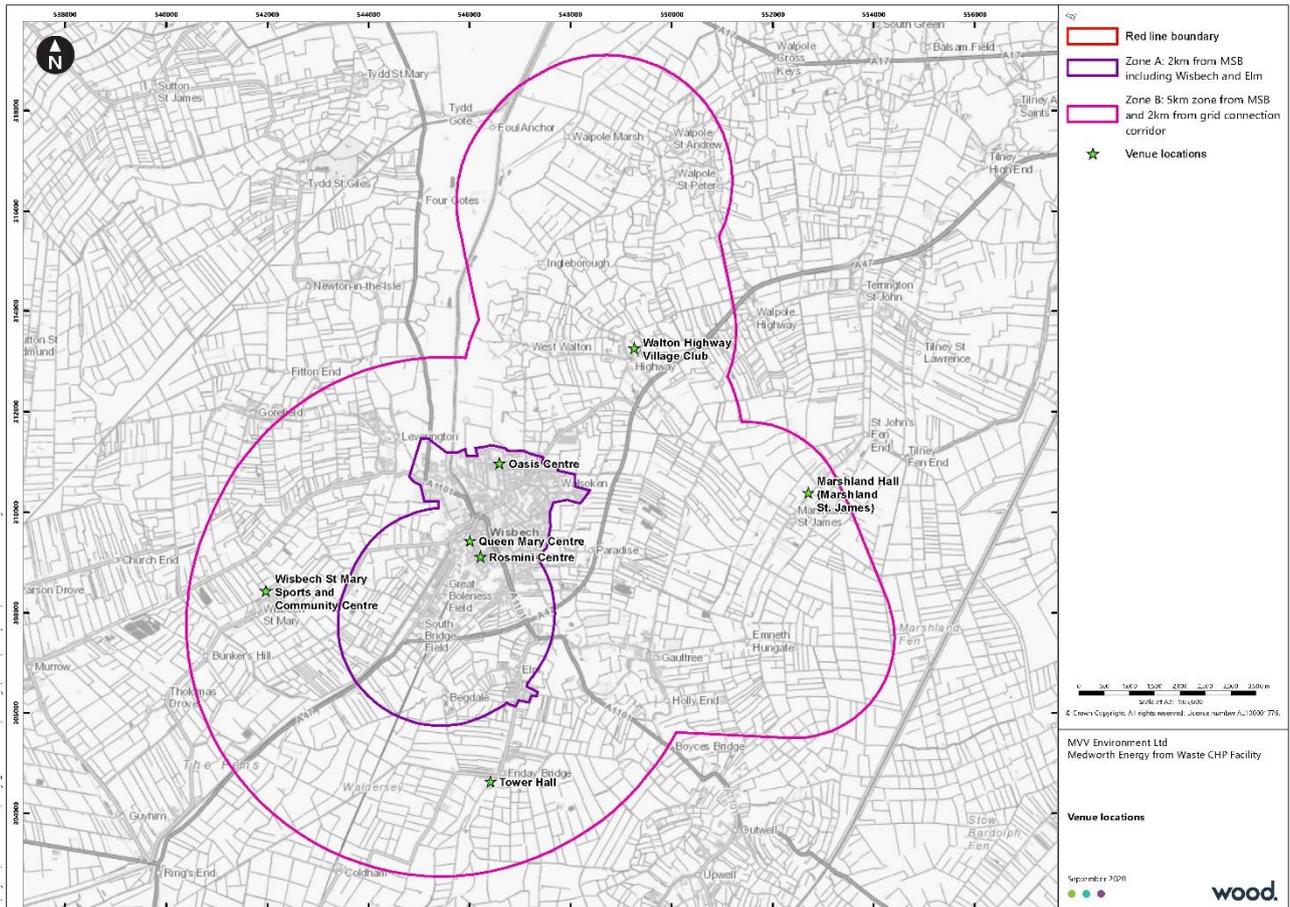


Appendix B Graphical representation of consultation zones





Appendix C Exhibition venues





Appendix D Local Authority Comments on the Consultation Strategy Update

FENLAND DISTRICT COUNCIL	
Authority Comment	MVV response
With regard to the timing and length of consultations, regard should be had to the dates of town and parish council meetings so as to ensure they have the ability to fully participate.	The non-statutory consultation stage 1b will take place over a 6 week period to ensure all stakeholders and consultees (including town and parish councils) have sufficient time to participate in the consultation. A range of opportunities, including public exhibitions, will be provided during this period for consultees to participate.
In 5.3, the 'relevant' councils to be consulted should be identified in the document.	The relevant councils are identified in paragraph 5.3.4 of the document.
Should face to face consultation events not be feasible due to covid restrictions, the alternatives should be discussed with and preferably agreed with the local authority.	MVV will liaise with Fenland District Council should the exhibition events be cancelled in light of Covid-19 government guidance. .
A consultation event should take place at the Rosmini Centre.	The Consultation Strategy has been updated to include an exhibition event at the Rosmini Centre.
In the event that the manned consultation events do not take place you should liaise with this council in order to discuss and agree suitable alternatives.	MVV will liaise with Fenland District Council should the exhibition events be cancelled in light of covid-19 government guidance.
At the consultation events people should be supported in submitting their written comments.	MVV will offer assistance to attendees at the exhibition events with completing written feedback forms.

CAMBRIDGESHIRE COUNTY COUNCIL	
Authority Comment	MVV response
I would like to start by highlighting our strong support for the inclusion of a 'phase 1b' to the non-statutory consultation in line with the details set out in Tables 6.1 and 6.2, and Figure 4.1 of the draft Consultation Strategy Update, that should allow well publicised and manned public exhibitions to still take place (once the Coronavirus guidance allows), rather than relying on online or virtual methods of consultation.	MVV welcomes the Council's support for holding a stage 1b consultation.
Furthermore, we welcome the fact that these manned public exhibitions will be advertised in advance of the events in the Fenland Citizen newspaper and the Wisbech Standard newspaper, in addition to being promoted	MVV acknowledges the Council's support for the methods proposed for advertising the non-statutory consultation.



<p>through the use of flyers issued to residents and businesses in Consultation Zone A shown in Appendix B, and through posters advertising the local events across Consultation Zones A and B.</p>	
<p>These proposals are all considered to be in line with this Council's adopted SCI.</p>	<p>MVV welcome the Council's confirmation that the Consultation Strategy Update accords with the adopted SCI.</p>
<p>In addition to the proposed manned public consultation events, we also welcome the fact that reference has been made to make contact with the town and parish councils, which should allow other avenues of engagement to be explored with local communities, such as placing information in the parish newsletters etc. to help promote the events moving forward. However, we would recommend that attention is paid to the deadlines for the parish council meetings as it is usual for these meetings to only take place monthly, so the timing of information will be key.</p>	<p>The non-statutory consultation stage 1b will take place over a 6 week period to ensure all stakeholders and consultees (including town and parish councils) have sufficient time to participate in the consultation. A range of opportunities, including public exhibitions, will be provided during this period for consultees to participate.</p>
<p>Section 5.3 'Who will be consulted' would benefit from showing a full list of the town and parish councils being consulted on the proposals. Whilst it is acknowledged that 'the relevant parish council' is one of the Prescribed Consultees listed in column 1 of Schedule 1 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended), and therefore captured by paragraph 5.3.2; nevertheless, it would be both courteous and beneficial to the reader to list them in the main body of the document, or make reference to them in paragraph 5.3.2 given they may well have closer interest in the proposal than many of the host and adjoining authorities listed at paragraph 5.3.4 of the strategy. However, in the event the list is considered too onerous for that part of the document itself, or considered to cause confusion over those that would be outside the definition of 'relevant' and have been added for request purposes only, then we would ask you to refer to the town and parish council's coming under that part of the legislation and signpost readers to an appendix, such as the list currently included in Appendix A B3, to address this point and make it user-friendly for all to see which town and parish councils are on the list for consultation purposes.</p>	<p>Details of the town and parish councils consulted during the Stage 1 non-statutory consultation are reported in the Consultation Feedback Report. These organisations will also be consulted as part of the Stage 1b consultation.</p>
<p>Emphasis has been placed on our support for public manned consultation events to ensure that members of the local community have an</p>	<p>MVV will liaise with Cambridgeshire County Council should the exhibition events be</p>



<p>opportunity to view the proposals and provide their feedback on the current scheme. However, in the event anything changes in this regard, it will be essential for any 'suitable alternative arrangements' or amendments to what is being proposed in the draft strategy to be put to the host authorities as soon as any changes are required for our approval, as referenced in paragraph 6.2.6 of the document.</p>	<p>cancelled in light of Covid-19 government guidance.</p>
<p>This Council places great importance on the need to fully engage with local communities, including with the hard to reach groups in the area. As such whilst we welcome reference to discussions already taking place with Fenland District Council colleagues to ensure you are taking appropriate guidance from them, we would recommend that early engagement is sought with the hard to reach groups, including the local traveller communities across both Cambridgeshire and Norfolk in line with the comments raised in Appendix A (B2 and B3) on specific requirements for their area. A public event at the Rosmini Centre in Wisbech is fully supported for this reason.</p>	<p>MVV contacted Fenland District Council and Cambridgeshire County Council to obtain details of officers who may be able to assist with contacting hard to reach groups.</p> <p>MVV have engaged with the officer contacts provided and are awaiting information on means of contacting hard to reach groups.</p>
<p>We wish to raise our concern with the word 'reasonable' in connection with consultation responses set out in paragraph 6.2.5 of the draft Consultation Strategy Update. Whilst we recognise this has probably been put in to safeguard against what you consider would be 'unreasonable' requests, we believe that all consultation responses should be considered and where they are unreasonable they are told why this is the case.</p>	<p>MVV will consider all consultation responses with the exception of those which are abusive or threatening.</p>
<p>In paragraph 7.1.2 of the draft Consultation Strategy Update, on the basis that you are not accepting 'verbal feedback', we would expect those staffing the exhibitions to proactively offer help completing forms to those who appear to need it, rather than waiting to be asked specifically for this facility.</p>	<p>MVV will offer assistance to attendees at the exhibition events with completing written feedback forms.</p>
<p>Whilst we acknowledge the strategy is focused on the non-statutory consultation phase at this stage, it would still be beneficial to highlight that the technical documents that will be available in later stages e.g. the Preliminary Environmental Information Report (PEIR), will include a non-technical summary which will also be in 'plain English' for the local residents to comment on.</p>	<p>A non-technical summary of the PEIR will be published as part of the Statutory Consultation. There is no requirement in the non-statutory consultation to explain what documents will be published in future rounds of consultation.</p>
<p>Finally, with regard to our previous comments in relation to the consultation zones, it has been noted that the non-statutory consultation events and the draft Consultation Strategy</p>	<p>MVV welcome the Council's agreement with the proposed consultation zones.</p>



<p>Update will all be based on the 5 km Zone B area shown in Appendix B. Nonetheless, we welcome reference to the fact that 'MVV will continue to review the consultation zones as part of the connection route selection process' on page 27 (B7), and that the 'consultation website and advertising and publicity channels will encourage and enable anyone to participate in the consultation – including those who are situated beyond Zone B'.</p>	
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