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1.0 Introduction

1.1 The purpose of this document

1.1.1 This Stakeholder and Community Consultation Strategy has been produced in relation to SSE's proposal to develop and operate a new gas-fired power station and its associated infrastructure (called Seabank 3) on a site at Severnside (near Bristol) close to the existing Seabank Power Station (Seabank 1 & 2).

1.1.2 We are engaging in pre-application consultation ahead of submitting a Development Consent Order (DCO) application to the National Infrastructure Directorate of the Planning Inspectorate, which we anticipate will be in early 2014.

1.1.3 This Stakeholder and Community Consultation Strategy sets out our approach to, and timetable for, consulting (both informally and formally) all those with a potential interest in Seabank 3.

1.1.4 In accordance with Section 47(6) of the Planning Act 2008 (as amended) we have also prepared a formal Statement of Community Consultation (SoCC). This Strategy and the SoCC will also be made publically available via the project's website ([www.sse.com/seabank3](http://www.sse.com/seabank3)) and also at inspection locations (Council offices, local libraries) in the vicinity of the site.

1.1.5 It is recognised that consultations on similar developments have taken place in the recent past. To avoid potential confusion, it is emphasised here that our proposals are not linked to Scottish Power's proposed Avon Power Station that was consulted on in summer 2011.

1.2 The proposed power station (Seabank 3)

1.2.1 The power station that we are proposing to build will be very similar in form to the existing Seabank Power Station (Seabank 1 & 2). The new power station will consist of two main gas turbines, and associated steam turbine(s), with a combined potential output of up to 1,400 megawatts (MW) of electricity. Further details (including a project description) will be available on [www.sse.com/seabank3](http://www.sse.com/seabank3).
1.2.2 The site for Seabank 3 is ideally located and although it has the potential of being able to operate independently of Seabank 1 & 2, it can still realise the opportunity of making use of sharing services such as access roads, gas supply and grid connection.

1.2.3 As indicated in Figure 1, there may be additional land areas that are required to be included within the application site boundary to make the electrical connection to the Seabank substation or to bring a water supply pipeline for cooling. There are several options at this stage for what the development application will consist of. This Strategy sets out how consultation will help us to finalise our proposals before submitting a development application (see 2.2 – The Application Process).

1.2.4 In line with Government guidance, we will design the power station to be “Carbon Capture Ready (CCR)”. This means that we will need to demonstrate that it would be technically feasible to provide for Carbon Capture and Storage (CCS) facilities within our site at a later date, if and when required by the Government.
1.3 Who is SSE

1.3.1 SSE (formerly Scottish and Southern Energy) is one of the UK’s leading energy companies and the largest non-nuclear electricity generator, operating a diverse generation portfolio across the UK and Ireland.

1.3.2 The current power station at Seabank is operated by Seabank Power Ltd (SPL) of which SSE is a 50% stakeholder.

1.3.3 Details of assets operated by SSE can be found at www.sse.com
2.0 Our approach to consultation

2.1 Introduction

2.1.1 SSE recognises that pre-application consultation is a key requirement for applications for Development Consent Orders (DCO) for major infrastructure projects. Effective pre-application consultation will lead to applications that are better developed and better understood by the public, and in which the important issues have been articulated and considered as far as possible in advance of submission of the application.

2.1.2 We believe the early involvement of local communities, local authorities and other statutory consultees at this stage can bring about significant benefits for all parties, as set out in recent Government guidance\(^1\) which is repeated below:

- it allows members of the public to influence the way projects are developed and how they are integrated into the community, by providing feedback on potential options, providing them with an opportunity to shape the way in which their community develops;
- it helps local people understand better what a particular project means for them, so that concerns resulting from misunderstandings are resolved early;
- it allows an applicant to obtain important information about the economic, social and environmental impacts of a scheme from consultees, thus helping applicants to identify as early as possible those project options which are unsuitable and not worth developing further;
- it enables potential mitigating measures to be considered and, in some cases, built into the project before an application is submitted;
- it may identify ways in which the project could, without significant costs to promoters, support wider strategic or local objectives.

2.1.3 Our approach to consultation will be discussed with relevant local authorities and will take into account the characteristics of the site, the surrounding communities and the environment. A flexible approach to consultation will be important so that issues identified throughout the process can be taken into account and any necessary changes can be made prior to the application being finalised.

2.2 The application process

2.2.1 Onshore electricity generating stations (in England and Wales) with a capacity of more than 50MW are classified as Nationally Significant Infrastructure Projects (NSIP) under Section 15(2) of the Planning Act 2008 and therefore require a Development Consent Order.\(^1\) Department for Communities and Local Government, “Planning Act 2008: Guidance on the pre-application process”, (January 2013): p5
Order (DCO) before they can be built. The proposed Seabank 3 Power Station is proposed to be up to 1,400MW and therefore falls within this definition.

2.2.2 The Planning Inspectorate is the Government Agency responsible for examining applications for DCOs which authorise NSIPs. Therefore SSE will submit an application for a DCO to the Planning Inspectorate for examination.

2.2.3 For each application, the Planning Inspectorate will firstly decide whether or not the application should be accepted. If accepted, it will proceed to examine the application, and following the completion of the examination process will then recommend to the Secretary of State for Energy and Climate Change (SoS) whether or not the application should be approved. Appendix 1 illustrates the six steps of application process for DCOs.

2.2.4 In deciding whether or not to approve the application, the SoS must have regard to the relevant National Policy Statements (NPSs), which set out the need for new energy infrastructure and the issues to be considered in determining an application. For this project, the relevant NPSs include:

- EN1 – Overarching Energy
- EN2 – Fossil Fuel Electricity Generating Infrastructure
- EN4 – Gas Supply Infrastructure & Gas and Oil Pipelines
- EN5 – Electricity Networks

2.2.5 For more information about the National Infrastructure Directorate of the Planning Inspectorate, please refer to: http://infrastructure.planningportal.gov.uk

2.3 Our consultation strategy and objectives

2.3.1 We aim to be clear, open and honest in our engagement and consultation with stakeholders and the community.

2.3.2 We have taken account of relevant local and national policy and guidance including:


In addition to above published guidance, our approach to consultation on this project has been guided by discussion with the relevant local authorities and by a review of best practice on recent applications of a similar nature and scale.

Our overall consultation objectives are to:

- Raise awareness of what is proposed and to give local people, relevant local authorities and other statutory consultees an opportunity to comment and potentially influence the proposals;
- Provide clear and concise information to all sections of the local community;
- Provide a range of different opportunities for members of the local community, relevant local authorities and other statutory consultees to engage with the project and comment on the proposals;
- Invite feedback and ensure that SSE understands the views of consultees so that they can be considered during the development process; and
- Show how consultation has influenced the proposal.
2.3.5 To deliver these objectives we will be undertaking a two stage consultation process consisting of:

**Stage One consultation:** Formal consultation with the local community\(^6\) and informal consultation with relevant technical bodies (e.g. Natural England and the Environment Agency) and relevant local authorities.

**Stage Two consultation:** Formal consultation with the local community, and relevant prescribed statutory consultees including technical and regulatory organisations, relevant statutory undertakers, relevant local authorities, and those persons with an interest in the land required for the proposed development\(^7\).

2.4 **When we will consult**

2.4.1 In advance of our Stage One consultation, we will undertake a programme of targeted communication to raise awareness of the proposed development and forthcoming consultation, and consult on our SoCC.

2.4.2 Our Stage One consultation is scheduled to commence in June/July 2013 and last for a period of at least four weeks.

2.4.3 Our Stage Two consultation is scheduled to take place in late 2013/early 2014 and last for at least four weeks.

2.4.4 We will try to avoid holding our public consultation events at the same time as similar scale proposals in the local area.

2.5 **What we will consult on**

2.5.1 The aim of our pre-application consultation on the project is to ensure that the local community, relevant local authorities and other relevant statutory consultees have a chance to understand and influence our proposals.

2.5.2 There are some aspects of our proposals that are fixed (such as our proposed generation capacity, point of grid connection and gas connection). There is however the opportunity to influence the following aspects, subject to technical feasibility, economic considerations, operational requirements, proposals for the development of land in the surrounding area, health and safety considerations and the views of specialist organisations:

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\(^6\) In accordance with section 47 of the Planning Act 2008 (as amended)

\(^7\) In accordance with sections 47 and 42 of the Planning Act 2008 (as amended)
• Appearance of structures (we are suggesting a visual similarity with the existing Seabank 1 and 2 power station);
• Orientation of buildings;
• Connection to the electricity substation via overhead or underground routes;
• Construction methods and working hours;
• Environmental mitigation measures, such as landscaping and ecology; and
• Access arrangements.

2.5.3 **Stage One** will set out the background to the proposed power station, detailing why it is needed, and how it fits in with current energy policy. We will consult on the following:

- Our proposals for the site, including how the power station will look and operate; and
- The environmental assessment work carried out to date for the proposed development

2.5.4 **Stage Two** will involve consultation on the detail of our proposed DCO application including:

- Details of our revised proposals including how the final site will look and operate;
- The Preliminary Environmental Information we have compiled (which will be available via our project website); and
- Our proposals for avoiding, minimising and/or mitigating any adverse environmental or community effects likely to arise in connection with the project.

2.5.4 During Stage Two, we will also publicise our application in accordance with section 48 of the Planning Act 2008 and this is discussed further in section 2.8 of this document.

2.6 **Who we will consult**

2.6.1 We will consult with the following audience groups in accordance with the requirements of section 47 and section 42 of the Planning Act 2008 (as amended):

- **(Section 47) Community consultees:** This includes the general public living within a Consultation Area in the vicinity of the site, community representatives and local community groups. The proposed “Consultation Area” is discussed below.

- **(Section 42) Prescribed statutory consultees:** This includes relevant technical and regulatory organisations (e.g Environment Agency, Natural England), relevant statutory undertakers (e.g Wessex Water), relevant local authorities and those persons with an interest in the land required for the proposed development (e.g landowners and lessees) prescribed by legislation.
2.6.2 Figure 2 illustrates the Consultation Area we have defined for consulting the local community. This has been defined based on initially identifying a minimum 2 mile zone of consultation (approximately 3.2km) from the centre of the site. This approach has been used by other projects in the area of a similar scale, following consultation with the local authority on the scope of consultation. The zone of consultation includes the settlements of Almondsbury, Avonmouth, Easter Compton, Hallen, Pilning and Severn Beach and the Severnside and Avonmouth employment areas that are in the vicinity of the site.

2.6.3 The zone of consultation was then amended in line with identified political boundaries within the zone, so as to not cut across identified community boundaries, and also taking into account major physical features, such as the local motorway network. The wards comprising the defined Consultation Area are:

- Pilning and Severn Beach
- Almondsbury
- Avonmouth

2.6.4 In defining the Consultation Area we have also sought the professional opinions of the specialist consultants undertaking the various Environmental Impact Assessment technical studies, to ensure the Area captures those local communities potentially affected by environmental impacts of the proposed development.

2.6.5 The prescribed statutory consultees (section 42 consultees) have been identified by considering the relevance of the list of prescribed consultees set out in Schedule 1 to the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended); guidance produced by the Planning Inspectorate\(^8\); and the location of the proposed development site.

\(^8\) The Planning Inspectorate Advice Note Three: EIA consultation and notification (Republished April May 2012, version 4); and The Planning Inspectorate Advice Note Eleven: Working with public bodies in the infrastructure planning process (Republished April 2012, version 3);
2.7 How we will consult

Pre-Stage One communication

2.7.1 Prior to the start of the Stage One consultation, we will undertake a programme of targeted communication with key stakeholders.

2.7.2 We will meet with South Gloucestershire Council and Bristol City Council to introduce the scope of our proposals and to discuss an appropriate approach to consultation.

2.7.3 Community information leaflets introducing SSE and the project, will be sent, together with a briefing note providing an overview of the proposed development, to the following people:

- Immediate neighbours of the proposed Site;
- Councillors representing the wards within the defined consultation area (i.e. Pilning and Severn Beach ward (South Gloucestershire), Almondsbury ward (South Gloucestershire) and Avonmouth ward (Bristol City Council));
- Clerks to the Parish Councils that are located within the wards identified above; and
- The local MP.

2.7.4 We will also informally consult key section 42 statutory bodies such as Natural England, the Environment Agency and English Heritage during this time to gather early feedback on our proposals and to help scope and agree the assessments we need to undertake to assess the environmental impacts of the proposed development.

Statement of Community Consultation (SoCC)

2.7.5 Prior to the start of the Stage One consultation, we will prepare a SoCC and formally consult with South Gloucestershire Council and Bristol City Council on the content of our draft SoCC in accordance with Section.47 of the Planning Act 2008 (as amended). The Councils will be given 28 days starting from the day after they receive the SoCC to provide comments. We will then have regard to these comments in finalising the SoCC for publication.

2.7.6 Given the proximity of the proposed development site to a number of local authority boundaries, we will also provide final copies of the SoCC to Newport City Council and Monmouthshire County Council.

2.7.7 Each of the above authorities will be contacted by phone to identify the most suitable contact for the SoCC document.
Community consultation (Section 47)

2.7.8 The following actions will be undertaken to publicise the proposal, the two stages of consultation, and provide the local community the opportunity to comment.

Publication of the Statement of Community Consultation (SoCC)

2.7.9 A notice will be published (in accordance with Section 47(6) of the Planning Act 2008 (as amended)) in relevant local newspapers prior to the start of the Stage One consultation advertising where the local community can inspect the SoCC. We have identified the Gloucestershire Gazette Series, Bristol Post, and Bristol Observer as being most appropriate.

2.7.10 The published version of the SoCC will be made available at various Public Inspection Locations (to be identified with South Gloucestershire and Bristol City Councils but expected to be Council offices and local libraries) that are accessible to those living within the vicinity of the site as well as being available on our project website before the first day of the Stage One consultation.

Press statement

2.7.11 A press statement setting out the key elements of the proposal and the dates and times of the public consultation events will be sent to the local newspapers (as identified above) in advance of the public information events.

Community information leaflets

2.7.12 Community information leaflets will be used to provide the local community with details of the proposed development and the consultation process. These will be posted to all properties in the defined “Consultation Area” as shown on Figure 2.

2.7.13 The leaflets will clearly advertise the forthcoming consultation periods, highlight the public information events and provide details of the project helpline and website which will be set up to enable people to contact the project team.

Elected member briefings

2.7.14 It is generally recognised, including by the Planning Advisory Service, that pre-application discussions for major proposals benefit both councillors, applicants and residents.

2.7.15 We will aim to inform relevant elected members about our project and will ensure that this is carried out in accordance with the Councillors’ Code of Conduct.

2.7.16 We will ensure that any proactive contact with elected members is preceded by discussion with officers at the relevant Local Planning Authorities.
Public information events

2.7.17 A series of public information events will be held in the main communities in the vicinity of the site during the two consultation stages.

2.7.18 By taking public information events to each of the main communities we aim to ensure they are accessible for as many people as reasonably possible. The timing of the events will be varied and run into the evenings on a number of occasions, and will include one weekend day.

2.7.19 The public information events will be attended by members of the project team to answer questions on the proposal, assist with interpreting the project information available at the events and to encourage people to give their views.

2.7.20 A series of information boards will be displayed at each public information event to set out details of the proposed development along with a “Frequently Asked Question” (FAQ) document. Supporting technical information (such as the Scoping Report for the Environmental Impact Assessment) will be made available at the public information events. These will also be made available on the project website: www.sse.com/seabank3.

2.7.21 Some initial proposals of how the power station could look will also be available to be viewed at each of the public information events. Feedback forms will be developed and made available at each event and visitors will be encouraged to use these to provide feedback and comment on the proposal.

Community Liaison Group (CLG)

2.7.22 If there is sufficient interest, we will set up a Community Liaison Group to provide an ongoing link to the local community and a means via which local concerns can be presented directly to the project team.

2.7.23 We will use Stage One of consultation to identify people potentially interested in joining a CLG and then look to set this group up prior to the start of Stage Two consultation.

2.7.24 Subject to there being sufficient interest from each group, the CLG will be made up of a mix of local residents, local councillors and representatives from local community groups and associations (including local schools where interest is shown).

Project website, email address and telephone helpline

2.7.25 A project website will be set up to provide background information on the proposed development, the dates, times and locations of the public information events. Downloadable versions of project documents including the briefing note, community information leaflets, information boards used at the public information events and feedback form will also be made available on the website.
2.7.26 A project email address and telephone helpline will also be set up prior to the first phase of consultation to provide additional ways in which people can contact the project team and access information on the proposal.

Responding to information requests

2.7.27 We will aim to provide a detailed response in a timely manner to all questions or requests for further information received via the project website, email address, helpline or written correspondence.

2.7.28 We will also aim to respond to any verbal requests (particularly at the public information events), but will generally ask for comments to be made in writing (through any method identified above). Unless we are able to explicitly confirm (in writing) that we are able to respond to a verbal request, we would ask that respondents contact us via the project website, email address, helpline or written correspondence.

Consultation with relevant prescribed statutory consultees (section 42)

2.7.29 Informal consultation with relevant prescribed statutory consultees will take place in advance of Stage One consultation inviting them to access further information about the proposals by attending the public information events or viewing information on the project website, and commenting on the proposals. They will be contacted by letter via post, or email where a postal address is not known.

2.7.30 Before the start of the Stage Two consultation relevant prescribed statutory consultees will be consulted in accordance with section 42 of the Planning Act 2008 (as amended) and secondary legislation including The Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 (as amended) and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 (as amended).

2.7.31 These consultees will be contacted via post or email to be formally notified of the start of this stage of consultation; with details of where to find the preliminary environmental information; and how to comment on the proposals.

2.7.32 In addition, we plan to hold a series of ongoing pre-application consultation meetings with key consultees to ensure ongoing and constructive dialogue on the scope of the project and obtain feedback on the evolving proposal.

2.8 How we will publicise our final plans

2.8.1 In line with Section 48 of the Planning Act 2008 (as amended), we will publicise details of our final proposals in a national newspaper, the London Gazette, the local newspapers identified above before submitting our DCO application. This will be undertaken in conjunction with our Stage Two consultation.
2.8.2 In publicising our plans, we will include a four week deadline from the date the last notice was published for the receipt of comments. Any comments received before the deadline will be taken into account before we submit our DCO application.

2.8.3 In accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 we will also send a copy of the Section 48 notice to relevant section 42 prescribed statutory consultees.
3.0 Capture, analysis and reporting consultees’ comments

3.1 Introduction

3.1.1 We are committed to recording, analysing, properly considering and providing feedback on all the comments received during the two stages of pre-application consultation and following publicity. In line with section 37(3)(c) of the Planning Act 2008 (as amended) the results of this process will be made available in a Consultation Report which will be a public document accompanying our DCO application.

3.2 How feedback can be provided

3.2.1 All consultees will have the opportunity to respond to our proposals in a number of ways, specifically:

- Written representation either via letter or via the feedback forms available at the public information events;

- Emailing the project email address; and

- Leaving a message on the project telephone helpline.

3.3 How feedback will be acknowledged

3.3.1 We will aim to acknowledge and respond to all individual written responses (whether by email, online, letter or completed feedback form) within 10 working days, provided that a clear address to respond to is given.

3.3.2 Where possible, we will aim to provide a response to (non-rhetorical) questions raised and will keep respondents informed on the project proposals as they develop. We will state whether any questions require detailed input (and therefore more time to respond to).

3.3.3 Petitions and standardised letters will be acknowledged, recorded, and treated, as such. We will only be able to acknowledge individuals who have provided an identifiable address. As above, we will aim to provide a response to (non-rhetorical) questions raised and will keep respondents informed on the project proposals as they develop. We will state whether any questions require detailed input (and therefore more time to respond to).

3.4 Analysis

3.4.1 We will analyse all comments received and take them into account as we develop our proposals. We will identify common themes arising out of the feedback received based on common key words, phrases or topics. For responses received under Section 47 (community consultees), the objective will be to collate substantive points into a series of
common themes against which we can provide a response. For Section 42 responses (prescribed statutory consultees), we will be expected to provide a more detailed response to individual issues raised.

3.4.2 Petitions and standardised letters will be recorded, treated, and analysed as such.

3.4.3 Feedback analysis from the Stage One consultation will be summarised in an interim Stage One consultation report which will later become part of our final Consultation Report accompanying our DCO application. We will avoid publishing individual names and addresses of members of the public unless explicitly asked to do so by the individual/group concerned.

3.5 Reporting

3.5.1 All consultation responses will be made available for inspection by South Gloucestershire Council officers, Bristol City Council officers and the Planning Inspectorate (where requested).

3.5.2 We will produce a final Consultation Report following analysis and consideration of all the comments received from both stages of consultation and in response to the final stage of publicity for our final plans. The Consultation Report will accompany our DCO application and will be made available to the public via the project website.
Appendix 1: The DCO application process

The application process. The six steps

1. Pre-application
   - The Inspectorate, on behalf of the Secretary of State, has 28 days to decide whether the application meets the required standards to proceed to examination including whether the developer’s consultation has been adequate.

2. Acceptance
   - You can send in your comments in writing. You can request to speak at a public hearing. The Inspectorate has 6 months to carry out the examination.

3. Pre-examination
   - There is the opportunity for legal challenge.

4. Examination
   - Look out for information in local media and in public places near the location of the proposed project, such as your library. The developer will be developing their proposals and will consult widely.

5. Decision
   - You can now register as an interested party, you will be kept informed of progress and opportunities to put your case. Inspectors will hold a Preliminary Meeting and set the timetable for examination.

6. Post-decision
   - A recommendation to the relevant Secretary of State will be issued by the Inspectorate within 3 months. The Secretary of State then has a further 3 months to issue a decision on the proposal.

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