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| Title | Response to NuGen Request for Scoping Opinion – EIA Scoping Report |
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The Council acknowledge the receipt of from the Planning Inspectorate having regard to the Scoping Request by NuGen relating to the Moorside Environmental Impact Assessment.

The Council has commissioned ARUP to provide a technical appraisal of issues which are covered by the EIA Scoping Report. A report is attached as Appendix 1 to this response. The Council would ask that this report is considered as the substantive basis for response to this consultation.

It is recognised that this consultation precedes more detailed evolution of the Moorside project. Whilst it is accepted that a range of principles about the construction of reactors on the main site can be accepted, it is clear that there is considerable additional detail around the project which will need to be specified in anticipation of the submission of an application for a Development Consent Order.

A separate document provides for the Council's comments in respect of the consultation by NuGen on a Stage 1 Strategic Issues Consultation. It is requested that this document – attached as Appendix 2 is read in conjunction with the specific EIA Scoping Submission provided by ARUP. This wider commentary elaborates on the Council's position in respect of the issues which are not covered in either Stage 1 or EIA Scoping processes as a result of omission or as a result of the detail of the project not as yet being sufficiently formed. For the most part it is acknowledged that any concerns or inadequacies identified are a consequence of the absence of detail in parts of the Moorside project

Whilst this consultation over Scoping early in the formulation of the project is welcomed, particularly based on an assumption that this enables the consultation to realistically inform the detailed design and form of the development and the approach to Environmental Assessment – it is clear that the nature of the wider project as currently presented is based on a considerable number of assumptions many of which are not currently evidenced.

It is accepted that the process of designing the project is inevitably iterative. It is considered however that the Council must highlight those areas where appraisal and understanding of the impact of the on the residential and business communities in Copeland, is currently constrained as a consequence of the limited information available. This particularly relates to understanding of the requirements for a construction workforce, the manner in which that workforce will be established and the consequences for accommodation, transportation and skills development strategies. It is considered that there are inherent weaknesses in submissions within the EIA Scoping Report around the topics of Socio-economic and Transport related impacts

It is accepted that this information will evolve as the project as a whole develops. The Council has confidence in the technical information which has emerged to date and a consequent expectation that as detail of the project is presented it will be provided in a competent and comprehensive manner. It should be noted however that the timetable established by NuGen for the submission of the DCO is incredibly challenging given this position. The ability to understand and respond appropriately to this evolving position must represent a risk in the projects progression and particularly the ability of the Council to be assured that the interests of the community which it represents can be adequately appraised and reported.

It will be noted that the Council has endeavoured to ensure that analysis of the Scoping Report is structure in a manner which highlights three categories of response:

- Area of consideration is adequately presented in consultation documentation and requires not further appraisal. (Subject to review as proposals evolve).
- Area of consideration is inadequately presented and requires further and/or amended appraisal.
- Proposals are insufficiently formed to enable informed response by the Council.

It is anticipated that the position of the Council in regard to the issue of a Scoping Opinion is consequently clear.

Appendix 1 – Scoping response on NuGen Moorside EIA Scoping Report - ARUP

Appendix 2 Copeland Borough Council Draft Response to NuGen Stage 1 Consultation