

**Draft Factual Check of the Statement of Community Consultation (SoCC) against Legislation and Guidance  
Draft SoCC Keuper Gas Storage Project (EN030002)**

Statement of Community Consultation			
Legislation/Guidance	Section	Requirement	PINS comment
PA 2008	s.47(2)	The applicant must consult each Local Authority (LA) defined in s.43(1) about what is to be in the SoCC.	PINS understands that the applicant is currently consulting with Cheshire West & Chester Council and Halton Borough Council and Cheshire East Council. The draft SoCC states that the SoCC has regard to their comments – the applicant should ensure that this is fully evidenced in any future consultation report submitted with the application.
PA 2008	s.47(3)	LA deadline for commenting on the draft SoCC (at least 28 days).	Not evidenced
PA 2008	s.47(5)	Developer must have regard to any response from a relevant LA.	Not evidenced. Page 2 states that the developer has had regards to the LAs comments.
PA 2008	s.47(za)	Make the statement available for inspection by the public in a way that is reasonably convenient for the public living in the vicinity of the land.	The SoCC does not yet include the location where the documents will be available for inspection (p.7-8, Access to consultation material)
PA 2008	s.47(6)(a)	Publish SoCC in a newspaper circulating in the vicinity of the land.	The SoCC will be published in the Northwich, Winsford & Middlewich Guardian, Runcorn & Widnes World and Runcorn & Widnes Weekly News.
PA 2008	s.47(6)(b)	Publish SoCC in such other manner as may be prescribed.	N/A
EIA Regulations 2009	Regulation 10(a)	The SoCC must state whether the development is EIA development.	The SoCC states on p.2 (Environmental Information) that the project is EIA development.
EIA Regulations 2009	Regulation 10(b)	The SoCC must state how the developer intends to publicise and consult on preliminary environmental information.	The SoCC states on p.2-3 (Environmental Information) and on p.7-8(Access to the Consultation Material) how the applicant intends to publicise and consult on the PIER.
DCLG Guidance on pre-application process 2013	Paragraph 25	Have the SoCC shown how it will capture not only the local impact of the project but also the wider impact of the project?	The SoCC describes how the developer has divided up its consultation zones into two categories depending how close they are to the main sites (Consultation Zones, p4-6). To ensure that people in zone become aware of the project the developer might consider leafleting people in

			Zone B rather than just consult through identified stakeholders. The keys on the maps could be clearer and should include the red line boundary in the key. The references to appendices in this section need renumbering as the plans and consultee lists are given the same numbers.
DCLG Guidance on pre-application process 2013	Paragraph 23 and 27	Does the SoCC show how the developer intends to engage with the various local communities including hard to reach communities?	The SoCC lists how it plans to engage with various consultees (Appendices 1 and 2, not provided) affected by the project and tabulates on p.4-5 how it intends to engage with hard to reach groups. The SoCC does not mention how it intends to engage with the transient population such as short term farm labourers. The SoCC does not mention translating documents into foreign languages. Despite the fact that DCLG guidance does not encourage this it might be worth considering if there are communities affected by the project who are non-native English speakers.
DCLG Guidance on pre-application process 2013	Paragraph 30	Has the applicant been unable to adhere to any of the advice given by the relevant Local Authorities?	No consultation responses from the LAs reproduced as currently being consulted
DCLG Guidance on pre-application process 2013	Paragraph 31	Does the SoCC allow for consultation with all who might have a legitimate interest or might be affected by the project?	Subject to the comment under DCLG guidance paragraph Yes. The developer will engage with stakeholders, statutory consultees, local residents and businesses, the general public and hard to reach groups using a variety of methods of engagement. (p.6-8 Consultation methods)
DCLG Guidance on pre-application process 2013	Paragraph 36	Does the SoCC capture the views of the people who live, work and socialise in the affected area?	The SoCC doesn't state how it intends to capture the views of people who socialise in the area but do not live there.
DCLG Guidance on pre-application process 2013	Paragraph 37 and 40	Does the SoCC show what techniques it intend to use to capture all local communities views on the project	P.6-8 (Consultation Methods) shows the techniques used to engage with the local communities.

DCLG Guidance on pre-application process 2013	Paragraph 38	Does the SoCC explain in plain English what the local communities are being consulted upon and is the SoCC accompanied by a non-technical summary	The SoCC in its current form is not accompanied by a non-technical summary as a stand-alone document. The Section called The Site and Proposed Development does describe the project in a non-technical manner.
DCLG Guidance on pre-application process 2013	Paragraph 38	Does the SoCC state how the applicant intends provide disabled people with project information in appropriate format?	Yes. See the page 5 (People with disabilities)
DCLG Guidance on pre-application process 2013	Paragraph 38	Does the SoCC state if any documents will be provided in Welsh?  NB. There is no longer any obligation to provide documents in non-native foreign languages	N/A
DCLG Guidance on pre-application process 2013	Paragraph 40	Will the SoCC been made available online, at any exhibitions/events, made available at deposit locations and sent to local community groups	The SoCC will be available at deposit locations (not specified yet) and online. However, there is no mentioning of the SoCC being made available at any events or sent to local community groups.
DCLG Guidance on pre-application process 2013	Paragraph 52-54	Has the developer used an iterative approach to consultation?	The applicant has undertaken non-statutory consultation in advance of statutory consultation and captured this in an interim consultation report.