

6. Pre Submission Consultation

6.1 Introduction

- 6.1.1 Thames Water has undertaken extensive consultation prior to the submission of this planning application. A Statement of Community Involvement (SCI) accompanies the planning application (Planning Application Folder - Tab 4), setting out the planning policy context for community involvement and explaining how Thames Water has consulted key stakeholders and the wider community on the preparation of the proposed development.
- 6.1.2 The SCI sets out the details of the engagement that Thames Water has undertaken at each stage of the pre-application process, by reference to the stage of the project and by reference to the individual stakeholders.
- 6.1.3 The SCI also explains how Thames Water intends to engage with stakeholders and the wider community throughout the determination of this planning application and the construction of the Upgrade.
- 6.1.4 This Chapter provides a summary description of the consultation Thames Water has undertaken as it has prepared and refined its proposed Deephams Sewage Works Upgrade. It also summarises the consultation activities which have taken place at each point within the pre-submission consultation process and the feedback received. Full details of the consultation are provided in the SCI.
- 6.1.5 This Chapter covers the following matters:
- Pre-phase 1 consultation
 - Phase 1 consultation
 - Pre-phase 2 consultation
 - Phase 2 consultation
 - Post phase 2 consultation (pre-submission)
 - Summary of engagement by stakeholder

6.2 Pre-phase 1 consultation

Consultation Strategy and Statement of Community Consultation

- 6.2.1 In 2011 Thames Water prepared a Consultation Strategy and associated Statement of Community Consultation (SOCC) to meet the requirements of the Planning Act 2008, as at that time, the project might potentially require determination as a Nationally Significant Infrastructure Project (NSIP) under that Act.
- 6.2.2 However, following the phase 1 consultation it was confirmed that the Upgrade was to be provided at the existing Deephams Sewage Works. It was therefore confirmed that the project was not an NSIP (as it did not fall within the definitions of an NSIP in the Planning Act 2008) and instead a planning application was to be submitted to be determined under the Town and Country Planning Act. However, the processes put in place at that stage for consulting on the proposed development have largely been retained and followed through the pre-application process.

6.2.3 The SOCC set out how Thames Water planned to carry out consultation on the proposed development, both pre and post submission of the planning application to the Local Planning Authority (LPA). It identified the stakeholders Thames Water sought to engage with, the locations where consultation events would take place and the consultation materials that would be used to inform the process.

6.2.4 Consultation on the SOCC with LBE, and the local authorities bordering it, took place between November 2011 and February 2012. LBE was the only local authority to provide comments relating to the SOCC, which suggested a number of stakeholders who should be included in the list of stakeholders identified by the SOCC.

Stakeholder Identification

6.2.5 Thames Water identified a list of key stakeholders (both statutory consultees and other groups expected to have an interest in the project). Statutory consultees were identified from the list in Schedule 1 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 and other interested groups were identified from Thames Water's contact database.

Stakeholder Meetings, Forums and Workshops

6.2.6 Initial meetings were held with stakeholders in the spring of 2011 to provide an introduction to the project and gain their views on the key issues they would wish to see addressed. Key issues raised related to the planning consent route for the project (whether it would be an NSIP), the short-listed sites and whether the March 2017 consent date could be met and the consequences of not meeting it.

6.2.7 These meetings also indicated support for a Stakeholder Forum, the purpose of which would be to enable all the key stakeholders to gain an update on the project at the same time and also to allow stakeholders to hear each others views in order to help build a consensus on the way forward for the project and the key issues for it to address.

6.2.8 The Stakeholder Forum was set up in July 2011, inviting statutory consultees and other stakeholders expected to have an interest, along with any other organisations who expressed an interest in attending, and went on to meet prior to the phase 1 consultation as follows:

- Meeting 1: 15 July 2011, Penridge Suite, New Southgate, Enfield
- Meeting 2: 7 October 2011, Penridge Suite, New Southgate, Enfield
- Meeting 3: 12 January 2012, Penridge Suite, New Southgate, Enfield
- Meeting 4: 27 April 2012, Penridge Suite, New Southgate, Enfield

6.2.9 The full list of Forum members is set out in Appendix 2 of the SCI. Regular Forum attendees up to phase 1 consultation were:

- London Borough of Enfield
- London Borough of Waltham Forest
- London Borough of Haringey
- Environment Agency
- Defra

- Thames 21
- Lee Valley Regional Park Authority
- Canal and River Trust
- Greater London Authority
- Transport for London
- Natural England
- North London Waste Authority

6.2.10 The Stakeholder Forums identified an interest in further specialist Stakeholder Workshops that were held from time to time as required. The aim of the workshops was to bring specific groups together to discuss particular topics of interest in a level of detail that was not appropriate for the wider ranging forum meetings, such as on site selection or odour.

6.2.11 On 19 August 2011 a day of workshops covering consultation, methodology/site selection, odour strategy and transport strategy was held where stakeholders could attend as many or as few of the workshops as they were interested in. Several stakeholders attended the full day. In November 2011 there was a further set of workshops covering site selection, options for renewable energy, and odour modelling.

6.2.12 Details of the individual engagement with each stakeholder prior to the phase 1 consultation, and throughout the pre-application process, can be found in the SCI.

Site Visits

6.2.13 A series of site visits to Deephams Sewage Works have been held in order to allow stakeholders to better understand the project by viewing the existing Deephams Sewage Works and learning about the treatment processes, the issues which the site is facing and why an upgrade is needed.

6.2.14 Site visits were held in June 2011 and during the workshop sessions in August 2011, as well as additional site visits that were run for Enfield Councillors in October 2011.

Briefings for Groups including Local Councillors

6.2.15 Briefings were provided for stakeholder groups who requested them. Briefings were given to LBE Councillors on 5 September 2011. Briefings and updates were also given to the North London Strategic Alliance Place Shaping Board meetings.

6.3 Phase 1 consultation

Purpose

6.3.1 The phase 1 consultation process represented the first round of formal public consultation on the preparation of the Deephams Sewage Works Upgrade development proposals. Open to all, Thames Water consulted on the need for the proposed Upgrade, the sites that had been considered for the location of the upgrade, the technologies that could be used to deliver the Upgrade, and the emerging proposals for the development.

- 6.3.2 In addition, Thames Water also presented details on the property, legal, planning, environmental and engineering issues that had been identified and were considered to play a key role in defining the development proposals. Information was also presented on the proposed timetable and process of securing the consents necessary to deliver the upgrade.
- 6.3.3 Details of the consultations completed prior to the phase 1 consultation process were made available for review, and literature was provided to enable interested parties to respond to Thames Water with their view on the proposed development and the process that had been followed and was intended to be followed.

Process

- 6.3.4 The phase 1 consultation process was launched at a stakeholder event on 3rd July 2012 for both Stakeholder Forum members and other stakeholders. The briefing covered the need for the upgrade, site selection, potential treatment technologies, plans to reduce odour, details of public exhibitions and how to take part in the consultation. The phase 1 consultation ran until 24th October 2012.
- 6.3.5 At the start of the phase 1 consultation over 18,000 letters, leaflets and postcards were delivered to properties located within 250 metres of the boundary of all of the shortlisted sites and within 1km of the boundary of the preferred site (Deephams Sewage Works).
- 6.3.6 A dedicated website was set up on which all of the consultation materials were made available, along with an electronic feedback form. Advertisements were placed in local newspapers and posters displayed in public buildings such as libraries and council offices listing the planned consultation exhibitions.
- 6.3.7 An initial round of public exhibitions was held in libraries and community centres around the local area in the week of 16th – 20th July 2012. These exhibitions consisted of boards of information on all the main topics being consulted on, and copies of all of the consultation documents were available at each event. Members from each of the planning, engineering/design, environment and communications teams within the upgrade project team were on hand to explain the proposals and answer questions.
- 6.3.8 A second round of consultation events were held in late September and early October 2012 at train stations, supermarkets and shopping centres in the area surrounding Deephams Sewage Works. Full details on the phase 1 consultation process are provided in the Phase 1 Consultation Feedback Report.
- 6.3.9 A separate consultation event was held for the residents of Picketts Lock Lane, which borders the Deephams Sewage Works site to the north. A total of 60 letters were sent out to the residents promoting this event and seven residents attended.

Outcome

- 6.3.10 A total of 36 consultation responses were received from 34 different respondents. There was clear support amongst the technical and statutory consultees for upgrading on the existing Deephams site, and the majority of community respondents were also in favour of the emerging proposals.

6.3.11 Some concerns were expressed about the potential impacts of the Upgrade on the local environment and local residents, particularly about odour and other potential impacts, such as noise and traffic, during the construction and operation of the upgrade. The need to deliver a significant reduction in odour emissions from the site, compared to existing levels, was the most often stated issue to be addressed. Full details of the consultation responses are summarised in section 6 of the Statement of Community Involvement and set out in detail the Phase 1 Consultation Feedback Report (appended to the SCI on CD).

6.4 Pre-phase 2 consultation

Stakeholder Engagement

6.4.1 Following the phase 1 consultation engagement with stakeholders continued through the Stakeholder Forum, individual stakeholder meetings as necessary and through workshops. Stakeholder Forums were held on 29 November 2012 and 20 May 2013, with email updates sent out in March and September 2013 and further Forum meetings taking place on 27 November 2013 and 6 February 2014.

6.4.2 Forum Workshops on odour strategy were held on 30th May and 21st June 2013 with the LBE and their consultants, AMEC. Briefings were provided for the LBE Councillors on 11 February 2013. Further details on each of these activities are contained within the LBE consultation summary in the SCI submitted with this planning application.

Public Consultation

6.4.3 The public were kept informed through the publication of the Phase 1 Consultation Feedback Report on the project website in December 2012, and through the summary leaflet that was distributed to residents. This provided Thames Water's response to the issues raised during the consultation and confirmed that the development would proceed on the existing Deephams site, which was the preferred site at the phase 1 consultation.

6.4.4 Between the phase 1 and phase 2 consultations, a number of meetings were held with stakeholders, including

- Lee Valley Regional Park Authority
- London Waste
- North London Waste Authority
- Transport for London
- LBE
- Canals and River Trust

6.4.5 There was also email correspondence with a number of stakeholders including the Environment Agency and the GLA. Details of these are set out in the SCI.

6.4.6 There were a series of meetings, workshops and discussions about the extent of the planned odour mitigation during the period between the phase 1 and phase 2 consultations, building on earlier discussions that had taken place. Thames Water prepared and submitted technical reports and assessments to LBE and LB Waltham Forest Officers and engaged in a series of meetings and workshops to discuss the

findings with Officers and with LBE's consultants Amec. The outcomes were also presented to the Stakeholder Forum.

6.4.7 Thames Water attended a LBE Overview & Scrutiny Committee meeting in October 2013, to discuss its latest proposals for the Upgrade, including measures to reduce and mitigate odour emissions. A petition signed by approximately 2,500 people was presented to that Committee by local residents seeking significant odour reductions as part of the Upgrade. The petition was subsequently considered by a meeting of the Full Council in November 2013, which resolved "*to share residents concern about the issue and instruct officers to continue to work with Thames Water, Ofwat and London Borough of Waltham Forest to ensure that as far as practicable all odour is contained within the site as soon as possible*".

6.4.8 Briefings were held for LBE Members on 10th February 2014 and for LVRPA Planning Committee Members on 13th February 2014. These provided the latest information on the project proposals prior to the launch of the phase 2 consultation, and an opportunity to ask Thames Water questions.

6.5 Phase 2 consultation

Purpose

6.5.1 The phase 2 consultation process represented the second round of formal public consultation on the development proposals. It provided the opportunity for the public to have a say on the more detailed proposals. Issues being consulted on included plans for building the upgrade, for significantly reducing odour from the sewage works and for reducing noise and dust during construction and managing construction traffic. The consultation also sought feedback on the benefits of the project for the local community.

Process

6.5.2 The phase 2 consultation ran for 7 weeks from 18 February to 8 April 2014. It sought to gain views on the proposed layout for the upgraded sewage works, on the proposals to significantly reduce odour produced by the works, and to reduce noise and dust during construction. Feedback was also sought on proposals for managing traffic while the upgrade is built and on the benefits the upgrade will provide for the local community. Information was also presented on the proposed timetable and process for securing planning permission to build the upgrade.

6.5.3 At the start of the phase 2 consultation over 18,000 letters, leaflets and postcards were delivered to properties located within 1km from the boundary of Deephams Sewage Works. The leaflet explained the need for the upgrade, how long it will take, how it will be built, plans to significantly reduce odour, how to find out more at local drop-in sessions and how to take part in the consultation.

6.5.4 A dedicated website was set up on which all of the consultation materials were made available, along with an electronic feedback form. Leaflets were displayed and made available at public buildings such as libraries and council offices in the local area to promote the consultation events and give information on the proposed upgrade.

- 6.5.5 A total of 11 drop-in sessions were held at local venues, such as shopping centres, train stations and community centres. In addition Thames Water attended eight community meetings, details of these are contained in the Phase 2 Consultation Feedback Report. On 17 May 2014 an open day was held at Deephams Sewage Works which enabled those with an interest to take a tour of the site and to understand the upgrade proposals in more detail.
- 6.5.6 Details of all the events held can be found in the Statement of Community Involvement and a detailed explanation of the phase 2 consultation process and responses received is contained in the Phase 2 Consultation Feedback Report, submitted as part of this planning application.

Outcomes

- 6.5.7 A total of 57 consultation responses were received, including responses from LBE and North London Waste Plan authority. Comments were completed online, through comment cards and feedback forms, by letter and email, and by telephone and in person. The overwhelming majority of the responses supported the Upgrade proposals. Although many support the proposed significant reduction in odour emissions that was set out in the phase 2 consultation material, both the LBE and a number of local residents sought a further reduction in odour emissions from the site.
- 6.5.8 Details of the consultation feedback, together with Thames Water's response to the issues raised, is included within the Phase 2 Consultation Feedback Report, submitted as an Appendix to the SCI on CD (Planning Application Folder - Tab 4).

6.6 Post phase 2 consultation (pre submission)

- 6.6.1 In response to the feedback from the phase 2 consultation, the petition submitted to the LBE, and meetings of LBE's Overview & Scrutiny Committee, Thames Water committed to implementing additional odour mitigation measures to further reduce odour emissions, a significant change from the position on which the phase 2 consultation was based.
- 6.6.2 The odour mitigation proposals submitted as part of this planning application include measures to cover and odour control the four smelliest parts of the sewage works. Thames Water will also implement robust odour management procedures defined within an Odour Management Plan for the site. This will significantly reduce the odour emissions from the Site meaning that there will be a 99% reduction in the number of residential and commercial properties within the areas most and moderately affected by odour.
- 6.6.3 During the period after the phase 2 consultation, Thames Water confirmed its final odour mitigation proposals with the LBE. It also engaged in meetings and discussions with the LBE, GLA, the EA and other stakeholders as part of finalising the planning application documentation. The final application proposals, including the proposed odour mitigation measures, were presented to the Stakeholder Forum on 26 June 2014.

6.7 Consultation summaries by stakeholder

- 6.7.1 Section 12 of the Statement of Community involvement provides a summary of the engagement held with each of the main stakeholders from commencement of the Upgrade project until submission of the planning application, identifying any key issues which were raised and how Thames Water has considered these in finalising the details of the proposed development.

6.8 Summary and Conclusions

- 6.8.1 Thames Water has extensively engaged with stakeholder organisations and the local community during the pre-application period. This has included two phases of formal consultation, together with other meetings, briefings and discussions throughout the process.
- 6.8.2 Thames Water has received positive feedback from LBE and other stakeholders on the quality of the engagement and consultation that has been undertaken, and the degree to which Thames Water has actively sought to engage with the local community on the Upgrade proposals.
- 6.8.3 Thames Water has sought to respond to the issues raised in the consultation, including but not limited to concerns relating to odour. It considers that the Upgrade proposals submitted in this planning application have positively responded to the issues that have been raised.