

A630 Deephams Sewage Works Upgrade

Consultation Strategy

Public consultation version

**Deephams
Sewage Works Upgrade**
Creating a cleaner, healthier River Lee



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1 INTRODUCTION

- 1.1.1 We are proposing a major upgrade to our Deephams Sewage Works in north-east London to significantly improve the treated wastewater that flows into the Salmon's Brook, a tributary to the River Lee. No decisions have been made on how we plan to carry out this upgrade. You will have the opportunity to influence our proposals through the consultations we carry out.
- 1.1.2 This Consultation Strategy has been prepared to set out our approach and indicative timetable for consulting all those with an interest in the proposed Deephams Sewage Works upgrade. This includes the local community, key stakeholders and statutory consultees. Our Consultation Strategy is separate from the formal Statement of Community Consultation (SOCC) which has been prepared in accordance with the requirements of the Planning Act 2008 regarding Nationally Significant Infrastructure Projects (NSIPs). This Consultation Strategy also covers the SOCC for completeness, but nothing in this strategy is intended to restrict or limit the implementation of the SOCC.

1.2 The proposed upgrade

- 1.2.1 The Environment Agency has set us a new quality standard for the treated wastewater that flows into the Salmon's Brook, which means that we need develop an improved sewage treatment process for the Deephams Sewage Works. As well as treating sewage to a higher standard, the proposed upgrade will be designed to allow the sewage works to cope with the additional sewage produced by a future increase in the number of local homes and businesses in the area already served by the works. The upgrade will also improve treatment facilities that are becoming old and worn out and will be designed to take account of climate change, so that it can cope with the effects of the heavier winter rainfall and warmer summer temperatures that are forecast in the future.
- 1.2.2 We have considered a number of options to achieve these objectives, including improving or replacing the main parts of the sewage treatment process on the existing Deephams Sewage Works site or rebuilding them on a new site elsewhere. We have carefully assessed 22 potential sites within an area approximately 3km from the existing sewage works, as well as assessing a number of possible different treatment technology options and the timescales for building the upgrade.
- 1.2.3 The proposed upgrade will improve the quality of the water in the Salmon's Brook and a number of watercourses downstream of the works, including the Pymmes Brook, Lee Navigation and River Lee. River Lee and will benefit the plants and wildlife that live in these watercourses. The Environment Agency has estimated that the new water quality standard for treated wastewater will improve approximately 26km of river, including 13km of reaches of the River Lee and Lee Navigation. This will improve the health of the rivers and will enhance their amenity, biodiversity and fisheries value.
- 1.2.4 However, more improvements to river water quality are still needed because there are other sources of pollution in the River Lee catchment. These include storm overflows from the foul sewers and wastewater from properties whose drains have been wrongly connected to the surface water drains rather than to the foul sewers. We are working with the Environment Agency and local authorities on these issues as well, by implementing an ongoing programme of measures within the Lower Lee catchment to further improve river water quality.
- 1.2.5 Upgrading the sewage treatment process will also significantly reduce the levels of odour released from the Deephams Sewage Works. The proposed upgrade is likely to require major construction works, and depending on the site and treatment technologies eventually selected, it is likely to take up to seven years to build.
- 1.2.6 We will hold a first phase of public consultation from July to October 2012 on our preferred site and the range of treatment technologies we are considering, as well as

our outline proposals for construction works on the preferred site and the other shortlisted (but not preferred) sites. There will be a second phase of consultation on more detailed proposals for the upgrade on the preferred site in 2013 (see Section 3). Following these two phases of public consultation, we plan to submit an application for permission to build the upgrade in 2014 and, if successful, we plan to start the main construction work in 2015.

1.3 The story so far

1.3.1 To date, we have:

- Consulted with stakeholders and the relevant local authorities on this Consultation Strategy and the Statement of Community Consultation (SOCC).
- Engaged with stakeholders and the relevant local authorities on our Assessment Methodology to identify potential sites for the upgraded works (including development on the existing Deephams Sewage Works site).
- Engaged with stakeholders and the relevant local authorities on other key issues, such as the range of potential treatment technologies for the upgraded works, construction timescales and our plans to reduce odour produced by the sewage works.
- Set up a Stakeholder Forum and Stakeholder Working Groups, attended by the relevant local authorities, Greater London Authority, Lee Valley Regional Park Authority, the North London Strategic Alliance and other key stakeholder, regulatory and environmental groups.

1.3.2 We intend to carry out two phases of pre-application consultation on the proposed upgrade. These are further described in the sections below.

1.3.3 Phase 1 of our pre-application consultation on the upgrade will take place in summer 2012. During this phase, we propose to consult on the need for the proposed upgrade, the sites where we could potentially build the upgraded works and the range of potential sewage treatment options we are considering for the upgrade. We will identify a preferred site as well as the other sites considered and our reasons. We will also seek views on information relating to the planning, environment, community, engineering and land issues we have considered during our assessment work and on how we propose to build the upgrade on the preferred site, as well as the shortlisted (but not preferred) sites. We will review the comments and other representations received during the Phase 1 consultation, as well as any new environmental and technical information that becomes available, and revise our plans to take account of this feedback, where we can. We will publish a consultation feedback report after the Phase 1 consultation.

1.3.4 Phase 2 of our pre-application public consultation will depend on the outcome of Phase 1. We anticipate that it will take place in 2013. We propose to consult further on the detail of the upgrade for which we propose to seek planning consent. We will consult on: the preferred site and construction programme; our draft proposals for avoiding or mitigating any negative environmental and community effects and providing environmental enhancement where practicable and at a reasonable cost to our customers; and our proposals for how the site will look after construction has finished. We will again review the comments and other representations received, as well as any new environmental and technical information that becomes available, and revise our plans to take account of this feedback, where we can. We will also publish a consultation feedback report after the Phase 2 consultation.

1.3.5 We may also carry out further, targeted consultation after these two phases of formal consultation, if required.

1.3.6 This Consultation Strategy is concerned with all consultation and engagement activities that relate to the preparation and submission of any application for permission to build the upgrade and post-submission activity. We will review this

Consultation Strategy from time to time in the light of any further guidance, changes to Government policy, development of the design for the upgrade, any development proposed by others in the area and the findings from the Phase 1 and Phase 2 consultation processes.

1.4 Route to planning consent

- 1.4.1 The Planning Act 2008 provides a new process for applying for planning approval (development consent) for Nationally Significant Infrastructure Projects (NSIPs). The Act requires that an application for a Development Consent Order for an NSIP is submitted to the Planning Inspectorate. The Planning Inspectorate would arrange an examination into the Development Consent Order application and will make a recommendation to the relevant Secretary of State who would make the decision. The Localism Act abolished the Infrastructure Planning Commission (IPC) in April 2012 and replaced it with the National Infrastructure Directorate within the Planning Inspectorate. However, the IPC Development Consent Order application process remains largely the same with the Planning Inspectorate.
- 1.4.2 If the proposed upgrade is an NSIP under the Planning Act 2008, the application for a Development Consent Order would be submitted to the Planning Inspectorate who would make a recommendation following a public examination to the Secretary of State who would make the decision. Among the matters to be considered by the Planning Inspectorate in examining a Development Consent Order application is whether pre-application consultation has been sufficient in accordance with the requirements of the Act.
- 1.4.3 Due to the size of the population served by Deephams Sewage Works being greater than 500,000 and the possibility that the works would need to be relocated to a different site in order to carry out the proposed upgrade, the project is identified in the Government's National Policy Statement for Waste Water, adopted in March 2012, as a potential "Nationally Significant Infrastructure Project" (NSIP).
- 1.4.4 One of the options being considered is to carry out alterations to the existing Deephams Sewage Works to upgrade the works to meet the new discharge consent. In this case, these alterations would be carried out on land within the existing Deephams Sewage Works site and the works would operate continuously throughout the upgrade. These works would therefore be unlikely to meet the criteria for an NSIP in the Planning Act 2008, since they would not involve the construction of a new sewage treatment works and the increase in the overall capacity of the works (by a population equivalent of approximately 64,000 people) would fall below the required threshold of 500,000 people. In this case an application under the Town and Country Planning Act for planning permission would be made to the London Borough of Enfield.
- 1.4.5 In either case, our consultation process will comply with the pre-planning application requirements of the local planning authorities relevant to the sites considered within the Assessment Methodology.
- 1.4.6 Section 42 of the Planning Act 2008 sets out which stakeholders the applicant must consult in relation to NSIPs and this includes: the local authority affected by the development; adjoining local authorities; the Greater London Authority; anyone with an interest in the land i.e. landowners/lessees/tenants/occupiers and specified statutory consultees such as the Environment Agency (see list in Appendix 1).
- 1.4.7 Section 47 of the Planning Act 2008 sets out the duty to consult the local community. Before the applicant consults people "living in the vicinity" (Section 47,(1)) of the land, they must prepare a statement setting out how they propose to consult on the application i.e. a Statement of Community Consultation (SOCC), and publish it.



2 AIMS AND APPROACH

2.1 Introduction

- 2.1.1 This section sets out our approach and how we will undertake consultation in order to make sure anyone interested in the upgrade has an opportunity to be involved.

2.2 Aims

- 2.2.1 The overriding aim of our pre-application consultation is to ensure that both community and technical consultees have a chance to be informed and to influence the proposals for the Deephams Sewage Works Upgrade. This means that:
- The local and strategic impacts and benefits of the upgrade relating to river water quality and sewage treatment capacity will be explained.
 - Members of the public in the vicinity of the development site/s, should be consulted in good time during the evolution of the upgrade, enabling them to have a meaningful say and to influence its design and development.
 - All parties, ranging from statutory interests through to local business, local communities, seldom heard or harder to reach groups and individual residents, should have good access to accurate and high-quality information on the upgrade, communicated at all stages of the planning process and beyond.

2.3 Approach

- 2.3.1 Our approach to consultation is informed by our experience of previous public and stakeholder engagement programmes for major infrastructure upgrades, our knowledge of the various north London and adjoining local authorities likely to be affected by the development of the proposed upgrade and by best practice. It has also been informed by discussions with relevant stakeholders.
- 2.3.2 We recognise that to achieve effective consultation, we will need to take into account the characteristics of specific sites and communities and the stage the upgrade has reached. Although we provide information here on the broad range of consultation techniques we intend to use (see sections 5 and 6), the strategy is designed to allow some flexibility of approaches, taking into account local needs and changing requirements as the consultation process progresses.
- 2.3.3 We will employ a range of communication, engagement and consultation approaches, as set out in Sections 5 and 6 of this strategy.
- 2.3.4 In parallel with the proposed public consultation activities, we are also committed to ongoing consultation and engagement with statutory and other stakeholders on technical issues relating to the planning, environmental, engineering, and community aspects of the upgrade. This includes working closely with local authorities and other statutory parties to ensure:
- Our consultation methods are appropriate to the community concerned
 - We identify seldom heard or harder to reach groups and use appropriate methods to communicate with such groups, including any need for translated material.
- 2.3.5 In developing this strategy, we have taken into account the requirements of Chapter 2 of Part 5 of the Planning Act 2008 and relevant subordinate legislation. We have also taken account of relevant local and national Government policy and guidance for stakeholder and community consultation, in relation to the development of major infrastructure projects, to ensure that our approach is in line with legislation, policy requirements and recognised best practice, including:
- Relevant local authorities' Statements of Community Involvement
 - The Enfield Compact
 - *Consultation Institute/RTPI Consultation Charter (2009)*

- *Code of practice on the dissemination of information* (1999)
- DCLG - *The Planning Act 2008, Guidance on pre-application consultation* (2009)
- Planning Inspectorate National Infrastructure Advice note fourteen: Compiling the consultation report
- Planning Inspectorate National Infrastructure Advice note sixteen: The developer's pre-application consultation, publicity and notification duties
- HM Government *Code of Practice on Consultation* (2008)

3 WHAT WE WILL CONSULT ON

3.1 Introduction

3.1.1 This section covers what we will be consulting on in each of the two phases of public consultation on the upgrade.

3.2 Phase 1 consultation

3.2.1 As part of the Phase 1 consultation, we will set out the background to the upgrade as a whole and propose to provide the following information:

- Details on the way in which we have identified a preferred site and a range of potential treatment technologies
- Information on the timetable and process for securing permissions to build the upgrade
- The timescale for the proposed upgrade works
- Information relating to the planning, environment, community impact, engineering, funding and land issues that were identified and considered during our site selection work
- Outline proposals of what development options might look like on the preferred site and the shortlisted sites, if they were to become preferred.

During Phase 1, we propose to consult on:

- The need for the proposed upgrade
- The findings of our work so far in considering potential sites and treatment technologies
- The preferred site and the reasons for this selection, as well as the reasons why sites not preferred have been rejected
- How we propose to build the upgrade on the preferred site and the other shortlisted sites, if they were to become preferred.
- The statutory and other consents each option is likely to require
- The way we have carried out the consultation (eg the information provided, exhibitions, website, feedback form, etc)

3.2.2 The Phase 1 public consultation will take place in accordance with our Statement of Community Consultation (SOCC).

3.2.3 After the Phase 1 consultation we will review the comments and other representations received, as well as any new environmental and technical information that becomes available as the project progresses, and revise our plans to take account of this feedback, where we can.

3.2.4 We will issue a report on the Phase 1 consultation and how we have taken feedback into account, prior to the Phase 2 consultation.



3.3 Phase 2 consultation

- 3.3.1 In Phase 2, we will consult on the proposed detail of our application for permission to build the upgrade.
- 3.3.2 We propose to provide the following information:
- Feedback received during Phase 1 and how this has been taken into account
 - Detailed development proposals for the upgrade, including the construction programme
 - Information relating to the planning, environment, community impact, engineering, funding and land issues associated with the preferred option for the upgrade
 - Information on the potential environmental impacts of the upgrade and our draft proposals for mitigating them
 - Our proposals for how the site will look during and after construction of the upgrade
 - Information on when an application for permission to build the upgrade is intended to be submitted
- 3.3.3 **During Phase 2**, we propose to consult on:
- Further details of our development proposals for the preferred site, including the construction programme, taking into account consultation responses and further design development
 - Our draft proposals for avoiding or mitigating any potential environmental impacts of the upgrade
 - Our draft proposals for avoiding or mitigating any potential negative community effects of the upgrade
 - Proposals for how the preferred site will look during and after construction work has finished
- 3.3.4 We intend that any application for permission to build the upgrade will be accompanied by an Environmental Statement, having completed an Environmental Impact Assessment (EIA) of our development proposals. The EIA will investigate the positive and negative environmental effects of the proposed upgrade. The EIA will also help us ensure that the upgrade is as sustainable as practically possible, at a reasonable cost to our customers, and will help us to assess and mitigate any adverse effects on the environment as far as is practical.
- 3.3.5 If the upgrade is an NSIP, our Phase 2 consultation will also address the requirements of the Planning Act 2008 concerning pre application consultation.
- 3.3.6 Our Phase 2 consultation will also, where possible, be consistent with the requirements of the relevant planning authorities concerning the publication of planning applications for consultation prior to these being formally submitted.
- 3.3.7 After the Phase 2 consultation we will again review the comments and other representations received, as well as any new environmental and technical information that becomes available as the project progresses, and revise our plans to take account of this feedback, where we can, prior to submitting an application for permission to build the upgrade.
- 3.3.8 We will issue a report on the Phase 2 consultation and how we have taken feedback into account in advance of submitting any application for permission to build the upgrade.



4 WHO WE WILL CONSULT

4.1 Introduction

4.1.1 Many individuals and organisations will have an interest in the upgrade. While consulting the public generally, we also recognise the need to target specific stakeholders. We will aim our consultation activity at three broad groups:

- Community consultees, including the general public, local property owners/occupiers, local businesses, community representatives and groups, including hard-to-reach or seldom heard groups.
- Technical consultees, including local and regional authorities, other statutory consultees, utilities and pan-north London and pan-London strategic stakeholders. A list is provided in Annex 1.
- If the Deephams Sewage Works Upgrade becomes a Nationally Significant Infrastructure Project (see section 1.4), we will consult landowners including property owners and lessees of the shortlisted sites and those within the 'consultation zone' around the preferred site and shortlisted sites. This 'consultation zone' will be defined as within 250m from the boundary of each shortlisted site and within 1km from the boundary of the preferred site (see section 7).

4.1.2 The fact that we will consult with specified groups or individuals does not prevent others from commenting or making representations on the upgrade and we will also take these comments and representations into account.

4.2 Community consultees

4.2.1 Community consultees includes the general public within the consultation zone (see section 7), as well as the ward councillors, the local MPs and MEPs, community representatives, individuals or organisations and local business representatives that formally or informally represent local interests. This includes, but is not limited to:

- Individuals, owners/occupiers, land owners, local businesses and groups based or living in the area
- Individuals, owners/occupiers, land owners, businesses and groups who live or work further away, but have, or represent, an interest in the proposed site or sites
- Area forums, partnerships, civic forums and community groups
- Business forums
- Local environmental groups
- Voluntary organisations (including residents' associations and black, asian, and minority ethnic support groups)
- Faith communities
- Schools and colleges
- Local hospitals, care homes and private healthcare organisations
- Disability networks

4.2.2 We will ask the relevant local authorities for their help to identify all those groups noted above with a potential interest in a site and we will continue to seek their views on the best ways to engage particular groups.

4.3 Technical consultees

4.3.1 In addition to the community, we are consulting the relevant technical consultees. These are defined in the Planning Act 2008 as the affected local authorities, adjoining local authorities, the Greater London Authority and other statutory consultees as listed in Annex 1.

- 4.3.2 Engagement meetings have been held with key stakeholders. These indicated support for consultation with key technical stakeholders through a Stakeholder Forum.
- 4.3.3 A Deephams Sewage Works Upgrade Stakeholder Forum has been set up and meets quarterly. The Forum discusses the planning and delivery of the proposed upgrade and strategic issues arising from it, initiating various working groups where needed. The working groups take forward specific matters relating to working methods and practices and feed back to the Forum. Working groups have covered: The Assessment Methodology; consultation strategy; site selection; treatment technologies; transport; odour; and renewable energy. Invitees of the forum include the following:
- Representatives from the local authorities likely to be affected by the proposed Deephams Sewage Works Upgrade
 - Representatives from consent granting bodies and other pan-north London statutory stakeholders
 - Representatives from environmental bodies

4.4 Landowners, property owners and lessees

- 4.4.1 If the Deephams Sewage Works Upgrade becomes a Nationally Significant Infrastructure Project (see section 1.4), we will also consult landowners including property owners, lessees, tenants and those with a property interest in the land subject to our proposals. We will carry out the required applicable statutory consultation and notification procedures. The consultation will take place with owners and occupiers of properties in the 'consultation zone' around the preferred site and shortlisted sites (see Section 7).

5 HOW WE WILL CONSULT COMMUNITY CONSULTEES

5.1 Introduction

- 5.1.1 This section describes our wider communications programme throughout the upgrade and provides more detail on how we will consult and engage with the public in Phases 1 and 2 and after our application for permission to build the upgrade has been submitted.

5.2 Communications programme

- 5.2.1 Our communications programme will aim to explain the need and rationale for the proposed development and to support the consultation process. At each consultation phase a range of short documents will be prepared specifically for local communities, summarising the proposals and outlining the matters on which the view of the local community is sought. They will also describe the need for the upgrade, key aims and objectives of our proposals and explain what the potential impacts might be. These documents will also state where and when public exhibitions and any other events will be taking place, where full sets of the consultation documents may be viewed locally and the date by which responses to the consultation must be submitted. These documents will be made available online, at any exhibitions or other events held by us and on request.
- 5.2.2 Activities will include:
- Attendance at open events and in response to requests for presentations to interested groups
 - Media relations work – coverage of the upgrade by local media will be sought
 - The provision of information via our Deephams Sewage Works Upgrade consultation website, including, for example, a calendar of engagement activities and latest news articles that will be regularly updated

- A rolling programme of ongoing talks and briefings for a wide range of stakeholder and community groups
- The running of a regular Stakeholder Forum
- The dissemination of leaflets and posters about the project and consultation at public buildings such as libraries, council offices, transport hubs, shopping areas and generally in the local area

5.3 Phase 1 public consultation on the upgrade

- 5.3.1 Our Phase 1 consultation will last for 12 weeks. The aim of this phase is to make sure people have a chance to be informed and to influence the proposals for the Deephams Sewage Works Upgrade and comment on the conclusions of the work we have undertaken to date. This includes members of the public who may be directly affected by the use of any of the shortlisted sites or the preferred site, or by the upgrade as a whole.
- 5.3.2 Views expressed during this first phase will help inform our choice of preferred site and treatment technology and influence how we propose to build the upgrade.

5.4 Activities

- 5.4.1 We will use a range of approaches designed to meet the requirements of the audiences we need to engage. We will base our approach on the following main elements:
- The Deephams Sewage Works Upgrade consultation website
 - The use of posters and dissemination of leaflets at public buildings such as libraries, council offices, transport hubs and generally in the local area to promote consultation events and give information on the proposed upgrade
 - Briefings with local community representatives and community groups
 - Provision of written information in local libraries, town halls or other public places
 - A programme of public exhibitions where people will have the opportunity to meet staff from the upgrade project team, ask questions and receive help with completing paper feedback forms

5.5 Website

- 5.5.1 We will launch our Deephams Sewage Works Upgrade consultation website approximately two weeks before the start of our Phase 1 consultation. This will provide initial information on the proposed upgrade, give the opportunity to sign up for updates and advertise the dates of the consultation period and public exhibitions. The website will present information on the need for the upgrade, the preferred site, the other sites we have considered and the reasons why these sites are not preferred. It will also include information on initial planning and construction timelines, latest news articles, frequently asked questions and a document library containing all the relevant documents relating to the upgrade.
- 5.5.2 The Deephams upgrade consultation website will meet good practice standards in terms of accessibility and usability and we will make available online all of the information available at the public exhibitions.
- 5.5.3 The website will provide a 'feedback form' section where there will be an opportunity to fill in an online feedback form.

5.6 Phase 1 Community briefings

- 5.6.1 During Phase 1, we will offer community representatives and other stakeholders (as defined in paragraph 4.2.1) a face-to-face briefing at the start of consultation activities with the local communities likely to be affected. These briefings will include sessions

both during the day and in the evening to allow as many community representatives to attend as possible.

- 5.6.2 The aim of these briefings is to ensure that community representatives, both formal and informal, understand our proposals and have a suitable level of information on the upgrade. This is to enable them to pass on factual information to interested members of the local community and help to ensure they are accurately informed. The briefings are also aimed at explaining the upgrade to community representatives at an early stage, in recognition that they may receive a number of enquiries about the upgrade from local residents.
- 5.6.3 We will also discuss with these community representatives our proposals for consulting the communities in the area surrounding a specific site, or groups of sites.
- 5.6.4 We will ask the relevant local authority officers and Stakeholder Forum members for help and advice on identifying the individuals who should be invited to the briefing sessions.
- 5.6.5 The initial briefings will cover a range of topics, including: explanation of the upgrade as a whole and the need for the proposed upgrade; the Assessment Methodology; the process of identifying our preferred site and range of treatment options; our development proposals on our preferred site and shortlisted sites, if they were to become preferred; our assessment of the current social and community use of the site; and the communications and information programme which will take place with local communities.

5.7 Feedback forms

- 5.7.1 While the Deephams upgrade consultation website will enable the public to give their comments, we will also make paper feedback forms available to all those visiting our public exhibitions and on request via our Customer Centre. We will also make forms available at local libraries and town halls and ensure that the feedback forms are available to community representatives at the briefings.

5.8 Information on the upgrade

- 5.8.1 We will promote the exhibitions directly via letters and leaflets delivered to those within the 'consultation zone' around the preferred site (see Section 7 for details). We will also display posters locally and advertise the venues, dates and times of the exhibitions in the local press and public buildings in the local area.
- 5.8.2 In addition to the above, we will also issue information to the local press and other media. We will work with communications personnel at the relevant local authorities and strategic north London stakeholders to ensure information on the consultation passes via relevant publications and websites to the individuals likely to be interested in the upgrade. We will also, where appropriate, make information on the consultation and feedback methods available in libraries, town halls and community facilities local to the proposed worksite(s).
- 5.8.3 All key upgrade documents, including summary leaflets, more detailed technical documents, the Statement of Community Consultation and this Consultation Strategy, will be available to view at the public exhibitions and on the website.
- 5.8.4 We will aim to answer all written questions raised during the consultation period, whether they are received by email, letter or on a feedback form, to enable people to better engage with the consultation.

5.9 Access for all

- 5.9.1 We will ensure that responding to our consultations is equally possible for everyone and will offer a range of solutions for people requiring additional assistance. For example consultation information will be available in large print, Braille, or in an audio format upon request. Our Customer Centre will also offer a telephone service translating consultation materials to different languages on request. At the

consultation events and public exhibitions we will provide staff to assist people filling in the feedback form, where this is helpful.

5.10 Communication with elected representatives

- 5.10.1 Local councillors, Assembly Members, MPs and MEPs as elected representatives are an important channel for passing on information to the public and encouraging them to give us their comments.
- 5.10.2 Precisely how we communicate with elected representatives will depend on the protocols in place for each of the relevant local authorities, and the expectations of MPs and MEPs. We are keen to progress opportunities for all elected representatives to get involved and to keep abreast of developments, as follows:
- Through Councillor briefings at local authorities
 - Through local authority officer briefings throughout the upgrade
 - Through attendance at regular liaison meetings with the local authority (where this is local authority policy)
 - Through attendance at the pre-planned senior officer workshops (where this is local authority policy)
 - Through initial briefings of stakeholder representatives
 - Through ensuring they receive copies of relevant letters and leaflets. These materials can be sent directly to their town hall mailbox as well as by email, where this is appropriate
 - Through invitation of elected representatives to the relevant public exhibitions and community briefings.

5.11 Programme of Phase 1 public exhibitions

- 5.11.1 We propose to stage public exhibitions in the locality of the preferred site and the shortlisted sites. These will be held in accessible venues that are well known to the local community.
- 5.11.2 We will promote the exhibitions directly via letters and leaflets delivered to properties in the 'consultation zone' around the preferred site and shortlisted sites. We will also display posters locally and advertise the venue, date and time of exhibitions in the local press.
- 5.11.3 Members of the upgrade team will be available to answer questions, assist with interpreting materials or completing feedback forms and to encourage people to give their views.
- 5.11.4 We will display information at each exhibition to inform visitors about the upgrade and the construction process and we will make available at the exhibitions all of the information available on the website.
- 5.11.5 We will encourage members of the public to use our Deephams Sewage Works Upgrade consultation website to register their comments. Paper feedback forms will also be available at the exhibitions, community briefings, libraries, town halls and on request. In addition and where requested, respondents will be given help to fill in the feedback form.

5.12 Phase 2 public consultation on the upgrade

- 5.12.1 Phase 2 consultation will take place before we submit our application for permission to build the upgrade.
- 5.12.2 The aim of this second phase of public consultation is to ensure all members of the public, including those who have an interest in, or may be directly affected by, our activities at the preferred site have the opportunity to review and comment on:

- The proposals for which we intend to seek permission to build, after taking into account the feedback from our Phase 1 consultation and further, more detailed, technical work.
- Draft proposals for avoiding and mitigating any potential negative environmental impacts and community effects of the upgrade.

5.13 Detailed activities

- 5.13.1 During the Phase 2 public consultation, we plan to undertake the activities described in sections 5.14 to 5.16.

5.14 Information giving

- 5.14.1 We will put information on the proposed upgrade on the Deephams upgrade consultation website. We will also write to all properties within the 'consultation zone' around the preferred site to notify them of where the consultation materials are available. Paper copies of the consultation materials will be available to view at public buildings in the locality of the preferred site and at public exhibitions. Our aim is to make sure all consultees have an opportunity to raise any questions or comments.

5.15 Phase 2 community briefings

- 5.15.1 Similar to the Phase 1 consultation, we will offer community representatives (as defined in paragraph 4.2.2) briefings at the start of consultation activities with the local communities likely to be affected. These briefings will include sessions both during the day and in the evening to allow as many community representatives to attend as possible.
- 5.15.2 The aim of these briefings is again to ensure that community representatives, both formal and informal, understand the proposals and have a suitable level of information on the upgrade. This is to enable them to pass on factual information to interested members of the local community and help to ensure they are accurately informed. The briefings are also aimed at explaining the upgrade to community representatives at an early stage, in recognition that they may receive a number of enquiries about the upgrade from local residents.
- 5.15.3 We will send invitations to all those who attended briefings during Phase 1, or their successors where personnel changes have occurred. We will also invite other community representatives who have become known to us during the Phase 1 consultation.
- 5.15.4 At these Phase 2 briefings, we will provide feedback on how we amended our plans in the light of the Phase 1 consultation responses and provide details of how the preferred site would be developed to meet the upgrade requirements.

5.16 Phase 2 exhibitions on preferred site and proposed development

- 5.16.1 Following a similar format to the Phase 1 consultation, we will hold a second round of public exhibitions in the locality of the preferred site and proposed development, prior to submission of any application for permission to build the upgrade.
- 5.16.2 We will use any feedback provided during the Phase 1 consultation to make improvements to the exhibitions, selection of venues and consultation materials.
- 5.16.3 These exhibitions will again be held in accessible venues that are known to the local community and as close as reasonably possible to the preferred site. We will also use venues in places where people already go for other reasons. Where possible and feasible, we will make use of venues used for the Phase 1 consultation.
- 5.16.4 We will promote the exhibitions directly via letters and leaflets delivered to those within the 'consultation zone' around the preferred site (see Section 7). We will also display posters locally and advertise the venue, date and time of the exhibitions in the local press and in public buildings in the local area.

- 5.16.5 The exhibitions will show the upgrade as a whole and include information on the proposed development. These exhibitions will provide the local community and stakeholders with a summary of the proposed upgrade, supporting studies and a summary of the comments received during the Phase 1 consultation and how they have influenced the final application for permission to build the upgrade. The exhibitions will also provide details on our draft proposals for avoiding and mitigating any potential environmental impacts of the proposed upgrade.
- 5.16.6 Paper feedback forms will again be available at the exhibitions and on request.. However, we will encourage members of the public to use our Deephams Sewage Works Upgrade consultation website to provide comments on our preferred site and the proposed development.

6 HOW WE WILL CONSULT TECHNICAL CONSULTEES

6.1 Introduction

- 6.1.1 This section describes specific consultation activities for the local authorities potentially directly affected by the upgrade and neighbouring local authorities where appropriate. These technical briefings will be in addition to any involvement local authorities will have in the public consultation, described in Section 5.
- 6.1.2 In addition to the above, we will be holding regular meetings with the Greater London Authority, other London and adjoining local authorities as required by the Planning Act 2008, and pan-London and north London strategic stakeholders with an interest in the upgrade (see list in Annex 1). We will directly contact property owners, lessees, tenants and those with a legal interest in the land subject to our application for permission to build the upgrade, as described in paragraph 4.4.1.

6.2 Ongoing dialogue

- 6.2.1 Throughout the site selection period and beyond, we will ensure an ongoing and constructive dialogue between our upgrade project team members and the relevant local authorities. This has already begun and will continue throughout the upgrade's development and after we submit our application for permission to build the upgrade. These discussions will cover, among other things:
- General updates on progress, including the upgrade programme and the consultation approach on specific sites and areas
 - Emerging planning and design matters
 - Conforming with planning policy
 - Code of Construction Practice
 - Scoping procedures relating to the Environmental Impact Assessment
 - Environmental information arising from the assessment work
 - Proposed mitigation measures
 - Transportation and highway matters
 - Property and works protection
 - The timetable, progress and matters relating to consultation as they may affect a particular local authority
- 6.2.2 We envisage that these discussions will take various forms depending upon the issues to be discussed, including:
- Workshops and meetings within individual relevant local authorities (cross departmental)

- Working groups to which other stakeholders will be invited, such as the Environment Agency, Natural England and English Heritage, depending on the issues to be discussed
- Formal and informal meetings with individuals from potentially directly affected local authorities

In addition to the above, the relevant local authorities will be specifically invited to all public consultation events in Phases 1 and 2 (see Section 5).

- 6.2.3 We have established a quarterly forum with key stakeholders involving the potentially directly affected and adjoining local authorities, together with strategic pan-north London stakeholders with an interest in the upgrade. Invitations to the Stakeholder Forum were sent to senior decision makers from these stakeholder organisations with the potential for additions to the membership of the Forum at any relevant point. Representatives from nearly all the organisations invited have attended at least one Forum.

7 HOW WE WILL CONSULT THOSE WITHIN THE 'CONSULTATION ZONE'

- 7.1 Those within the 'consultation zone' around the preferred site will be consulted through the sending of leaflets and letters to properties within this zone. The leaflets will provide information on the upgrade and on local exhibition dates and how to respond to the consultation.
- 7.2 This 'consultation zone' will be defined as within 250m from the boundary of each the shortlisted sites and within 1km from the boundary of the preferred site. We will apply this consultation zone flexibly, extending the area to include whole roads to make sure neighbouring properties receive the leaflets and letters. We will also extend the zone further to meet obvious breaks and boundaries within the geography of the area, such as A-roads and train lines.

8 RESPONDENTS' COMMENTS: CAPTURE, RECORDING AND FEEDBACK

8.1 Introduction

- 8.1.1 We are committed to recording and providing feedback on the comments received during our two pre-application consultation phases. Feedback forms can be completed online through our dedicated Deephams Sewage Works Upgrade consultation website. However, for those who prefer, there will also be a number of other channels, for example:
- We will provide paper feedback forms in order to capture the comments received. These will be available with the upgrade project documents in local libraries and town halls, as well as at the public exhibitions, at any community briefings held in relation to the upgrade and on request via our Customer Centre.
 - Outside of exhibitions, staff at our Customer Service call centre will be available to answer general questions about the upgrade.
 - We will also capture feedback received via letters and emails sent to our contact details provided.
 - We will summarise all comments received, and our responses to them, in the Report on Community Consultation to be submitted with the application for permission to build the upgrade (see Section 8.2). A consultation report will be produced after the Phase 1 and Phase 2 consultations showing how feedback has been taken into account in the development of the next stage of the consultation process.
 - We will endeavour to answer any questions raised during the consultations as we go along, to help people respond to the consultation.

8.2 Consultation report

- 8.2.1 We will take all comments received into account and amend our plans where we can, while also considering the planning, land, environmental, engineering and technical requirements of the upgrade. We will produce a feedback report following analysis of the comments from the Phase 1 and Phase 2 consultations, stakeholder briefings, engagement with local authorities and other north London stakeholders, together with all other comments received from the public. These reports will explain how we have taken this feedback into account and how it has influenced our proposals for the upgrade. The reports will be available on our Deephams Sewage Works Upgrade consultation website and upon request. The reports will form the basis of our final Report on Community Consultation that will accompany our application for permission to build the upgrade and will be made available on our website, together with an accessible summary. Paper copies will be provided on request.
- 8.2.2 The formal consultation report submitted with our application for permission to build the upgrade will set out:
- A general description of the consultation process
 - What we have specifically done to comply with any relevant legislation, guidance or consultation best practice published
 - How we consulted and have taken account of consultation with local authorities on what should be in our Statement of Community Consultation
 - A summary of responses to the consultation
 - A description of how our application for permission to build the upgrade was influenced by the responses received
 - If appropriate, an explanation as to why we were unable to follow any significant relevant responses, including advice on impacts from statutory consultees
 - An explanation for any actions taken which have not followed the advice of the local authorities involved, or not complied with relevant guidance

8.3 Feedback outside of consultation phases

- 8.3.1 We will also record and respond to feedback received outside of the two phases of formal consultation and as part of our ongoing engagement with the local community, stakeholders, business and community representatives, local authorities and other individuals and organisations potentially affected by the upgrade.
- 8.3.2 We will use this feedback to improve our approach to consultation and engagement with these groups and amend this Consultation Strategy document as and when required.

9 POST-SUBMISSION AND APPROVAL

9.1 Introduction

- 9.1.1 This section of the strategy relates to our activities following formal submission of the application for permission to build the upgrade, which will complement the consultation carried out by the planning authority. We believe it will be important during this period to maintain communication and engagement with the stakeholders and communities with whom we developed relationships during the pre-application phase.
- 9.1.2 In addition to the required publication and notification of the application itself, the type of activities that we envisage undertaking include the following:
- Ongoing engagement with local planning officers and councillors and relevant pan-north London strategic stakeholders

- Ongoing engagement with community representatives
- Information bulletins (web and paper versions)

9.2 Ongoing technical and community engagement

- 9.2.1 In the months following the submission of the application for permission to build the upgrade, we envisage communication with local planning officers and councillors to answer questions in relation to the application, together with a level of ongoing information-giving with the communities around the preferred site.
- 9.2.2 The aim of this communication will be to respond to enquiries made by the community, continue discussions around potential mitigation and compensation measures and generally to keep the community up-to-date with the progress of the application for permission to build the upgrade. We are committed to ongoing communication with the communities likely to be affected by the proposed development.
- 9.2.3 We are aware that the need for consultation and communication does not end with the application process. We are committed to maintaining proactive and open communication throughout, and including the construction phase, so that communities are aware of the potential timing and nature of work that might take place, the measures being proposed to reduce disruption and details of where to go for further information. As part of that commitment likely specific activities will include:
- Fully publicising the timescales and timing for the upgrade
 - Circulating of information concerning the Code of Conduct for construction activities (details would be determined as part of the application process)
 - Ongoing face-to-face liaison with local community stakeholders (or liaison committee) to address areas of interest or concern and keep the local community up-to-date
 - Ongoing liaison with relevant local authority officers on progress



ANNEX 1: LIST OF CONSULTEES

Potentially affected local planning authority:

- Lee Valley Regional Park Authority
- London Borough of Enfield
- London Borough of Haringey
- London Borough of Waltham Forest

Neighbouring planning authorities:

- Broxbourne Borough Council
- Epping Forest District Council
- Essex County Council
- Hertfordshire County Council
- Hertsmere Borough Council
- London Borough of Barnet
- London Borough of Waltham Forest
- Welwyn Hatfield Borough Council

Other consultees include:

- British Waterways
- BT Group Plc
- Department for Transport
- English Heritage
- Environment Agency
- Equality and Human Rights Commission
- Greater London Authority
- Health and Safety Executive
- Health Protection Agency
- Homes and Communities Agency
- London Councils
- London Fire Brigade
- London Regional Resilience Forum
- Metropolitan and City of London Police
- National Grid
- Natural England
- Network Rail
- Office of the Gas and Electricity Markets
- Port of London Authority

- Sport England
- Sustainable Development Commission
- The Disabled Persons Transport Advisory Committee
- The Highways Agency
- The Historic Buildings and Monuments Commission for England
- Transco
- Transport for London
- UK Power Networks
- Water Services Regulation Authority (Ofwat)