AUGEAN SOUTH LTD ENRMF

APPENDIX CRE

Consultation draft of SoCC, responses received and copy of amended section of SoCC following Covid 19 restrictions being implemented.

PINS project reference: WS010005

PINS document reference: 4.2.5



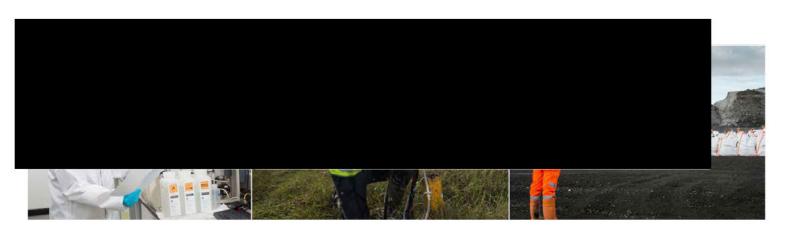


DRAFT STATEMENT OF COMMUNITY CONSULTATION

FOR THE PROPOSED DEVELOPMENT CONSENT ORDER
APPLICATION FOR THE ALTERATION AND
CONSTRUCTION OF HAZARDOUS WASTE AND LOW
LEVEL RADIOACTIVE WASTE FACILITIES AT THE EAST
NORTHANTS RESOURCE MANAGEMENT FACILITY,
STAMFORD ROAD, NORTHAMPTONSHIRE

PINS project reference: WS010005

September 2020





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1. Introduction

This Statement of Community Consultation ("SoCC") explains proposals by Augean South Ltd ("Augean") for public consultation regarding an application for a Development Consent Order ("DCO") for an extension in the area and life of the East Northants Resource Management Facility (ENRMF) including an extension to the west of the existing landfill site and increasing the throughput of the waste treatment facility ("Proposed Development") at the East Northants Resource Management Facility, Stamford Road, Kings Cliffe. PE8 6XX ("Site").

The Proposed Development is classified as a Nationally Significant Infrastructure Project under the Planning Act 2008 (as amended) which may only be authorised by a DCO made by the Secretary of State.

The application for a DCO will be accompanied by an Environmental Impact Assessment which will be reported in an Environmental Statement.

This SoCC has been prepared in accordance with Section 47 of the Planning Act 2008 (as amended) which requires applicants to prepare a statement explaining the scope and methods of consultation that will be used to consult with the local community about the proposed development and explaining how the community can engage with the development consent process.

The consultation will provide an important opportunity for the local community to engage and help inform the Proposed Development before the application is submitted. Responses to the consultation will be taken into account before finalising the proposals and submitting an application for a DCO to the Secretary of State.

Augean hopes to submit the application for examination in Spring 2021.

2. Augean

Augean is a leader in the specialist waste management sector. The company delivers a broad range of services across many key areas for the sustainable management of waste. The company specialises in the management of the UK's more difficult to manage wastes including hazardous waste and low level radioactive waste. The company applies the waste hierarchy to enable recycling, recovery and reuse wherever possible for these more challenging waste types. Where waste must be disposed of Augean treats the waste where practicable to reduce the polluting potential before landfill disposal.

3. The East Northants Resource Management Facility

The existing ENRMF site comprises an active hazardous waste and low level radioactive waste (LLW) landfill site together with a waste treatment and recovery facility. The landfill is operated progressively; accordingly there are parts of the site operating, awaiting operations and completed and under restoration. A gas management and surface water management compound including a flare stack are located in the north western corner of the current site. Site infrastructure including the site access, waste reception facilities, car parking areas, site offices, welfare facilities, storage areas, laboratories and wheel and vehicle body washing facilities are in place at the site. The new area that will be included in the site which is the subject of the Proposed Development is immediately west of the existing site and is currently predominantly agricultural land.

4. The proposals

The main elements of the Proposed Development are summarised below:

- The construction of new landfill void for the disposal of the same range of hazardous wastes and Low Level Radioactive waste (LLW) with a capacity of greater than 100,000 tonnes per annum (tpa) supported by the existing site infrastructure. The new landfill area will comprise a number of operational phases.
- The continuation of filling of the existing ENRMF landfill with hazardous waste and LLW the subject of the current Development Consent Order and the creation of new void at the existing site in order to tie the restoration profile in to the extension area.
- The winning and working of minerals in order to create the landfill void including the
 use of extracted materials on site and the exportation of clay and overburden for use
 in engineering, restoration and general fill at other sites.
- The stockpiling of clay, overburden and soils for use in the construction of the engineered containment system at the site and restoration of the site.
- The direct input of waste into the landfill will continue at a rate of up to 150,000tpa
- An increase to the waste throughput of the waste treatment facility to 250,000tpa which comprises an increase of 50,000tpa compared with the rate consented in the 2018 DCO amendment
- A combined waste importation rate limit to the waste treatment facility and landfill of 300,000tpa which is an increase of 50,000tpa compared with the currently consented total input rate.
- The LLW which is and will continue to be disposed of at the site will be limited to that which has a level of radioactivity of up to 200Bq/g.
- The waste which is and will continue to be disposed of at the ENRMF will be limited to that which has a level of radioactivity of up to 200 Bq/g.
- The diversion of services that cross the western extension to alternative routes within the application area.
- The operational hours of the site will not change from those already permitted.
- Restoration to generally domed restoration landforms in the extension area and amendment to the approved restoration profile of the existing ENRMF site to create a coherent restored landform over the whole application site.
- Restoration of the site to nature conservation interest using the soils available at the site as well as suitable imported materials.
- Completion of the landfilling and restoration operations by December 2046. This is a
 provisional completion date that will be updated as part of the ongoing detailed design
 works and confirmed in the DCO application.
- The site will be subject to a ten year aftercare and maintenance period following the completion of restoration.

5. The Planning Process

The Proposed Development is classified as a Nationally Significant Infrastructure Project (NSIP) under the Planning Act 2008 (as amended) and consent must be granted by the Secretary of State in the form of a development consent order ("DCO"). Augean must submit a DCO application to the Planning Inspectorate (PINS), an impartial public body whose role is to consider all important and relevant matters and whether consent should be granted for major infrastructure projects like the Proposed Development.

PINS will first decide, on behalf of the Secretary of State, whether to accept the application. If accepted, PINS will appoint an independent examiner or panel of examiners (referred to as the Examining Authority) who carry out a six month examination with hearings and consider any representations made by interested parties, any supporting evidence submitted and the answers given to the questions from the Examining Authority. Following the examination, the Examining Authority will make a recommendation to the Secretary of State who will then decide whether or not a DCO should be made. The Secretary of State's decision must be made in accordance with government policy including where in force any relevant National Policy Statement (NPS). For the Proposed Development the relevant NPS is the NPS for Hazardous Waste 2013. This can be viewed at:

www.gov.uk/government/publications/hazardous-waste-national-policy-statement

The NPS provides a framework for decision making on DCO applications for the construction or alteration of new hazardous waste infrastructure in England and how projects should be assessed.

Further information regarding the DCO application process are set out in the diagram below or can be found on the National Infrastructure Planning website at:

https://infrastructure.planninginspectorate.gov.uk/application-process/the-process/

or by telephone on 0303 444 5000

Preapplication Augean will consult local communities as outlined in this SoCC on the proposals. The responses
received during the consultation will help to finalise the details of the DCO application that is submitted
to PINS

Acceptance

 After Augean has submitted the DCO application, PINS has 28 days to decide whether it meets the standards required to proceed to examination, this includes determining whether the consultation has been adequate.

Preexamination After the application has been accepted stakeholders and consultees can register their interest with PINS to become Interested Parties. Doing this will ensure you will be kept informed of progress and opprtunities to put forward your case at examination.

Examination

•Interested Parties can send their comments in writing to PINS and ask to speak at any public hearing that may be held. The Examining Authority has 6 months to carry out the Examination

Docision

- •The Examining Authority will make a recommendation to the Secretary of State within three months of the examination closing.
- •The Secretary of State then has a further three months to issue a decision on the proposals.

Post -

•There is the opportunity for legal challenge.

6. Environmental Impact Assessments

The Proposed Development is classified as 'EIA development' for the purpose of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ('EIA Regulations 2017'). Augean is therefore required to undertake an Environmental Impact Assessment (EIA) of the proposal. As part of the pre-application consultation Augean will publish a Preliminary Environmental Information Report (PEIR) which will explain the potentially significant impacts and benefits of the Proposed Development and will be seeking views on this information from the local community in addition to its consultation with the prescribed statutory consultees. The PEIR will present the preliminary environmental information collected to date and an initial assessment of the likely significant environmental effects of the Proposed Development. Augean will submit an Environmental Statement (ES) with the DCO application which will report on the likely significant environmental effects of the proposals identified in the EIA, the appropriate mitigation measures to be put in place where necessary and any residual effects.

7. Consultation objectives

In accordance with its normal practice, Augean is committed to consultation with the local community in respect of any new development at its sites. The company collates and reviews all responses which further inform and shape its applications. When making an application for a DCO, the applicant has a statutory duty to consult on the proposals and must follow a specific process. The results of the consultation are collated into a Consultation Report and submitted to PINS as part of the application. The principal objectives of the consultation process are to:

- Raise awareness of the Proposed Development and provide the local community and other stakeholders with the opportunity to understand, comment on and influence the proposals.
- Provide clear and concise technical and non-technical information on the project.
- Provide clarity on what is and is not part of the Proposed Development, what is fixed and why and any proposals for mitigation.
- Provide a range of ways by which people can engage with consultation on the Proposed Development and provide comments and feedback.
- Ensure that comments and feedback are accurately captured and recorded.
- Ensure comments and feedback have been taken into account in finalising the proposals and the DCO application.
- Improve the DCO application to reflect local feedback, concerns and issues.
- Continue the existing dialogue with the local community through the submission and examination phase of the consenting process.

8. What we will consult about

Augean will provide information on the Proposed Development including preliminary information on environmental impacts and proposed mitigation measures based on the findings of the environmental impact assessments carried out by that time in a published Preliminary Environmental Information Report (PEIR). Augean will welcome and consider feedback on all aspects of the Proposed Development.

Augean has been operating at ENRMF for 16 years and has well established means of ongoing communication and consultation with the community local to the site through the site Liaison Group, the Register of Stakeholders, circulation of periodic newsletters and annual open days. The company also has an open door policy which is promoted at every opportunity. The company values the relationships that have been built with the local community and sees consultation and public engagement as a constant process. Not only will Augean consult with the local community before the statutory period commences but it will continue to communicate thereafter.

Augean intends for the consultation to be transparent, inclusive and accessible to those most likely to be affected by the Proposed Development. Throughout the pre-application consultation period there will be opportunities for discussion and comment on the proposals. Comments can be made throughout the consultation process, to Augean by email, via the company website or by letter in order to provide the maximum opportunity for feedback on the proposals.

Augean hopes to be able to consult with the local community by arranging for them attend a series of face to face events. However, due to the Covid19 pandemic and the need to take account of present restrictions and uncertainties regarding what public health advice might be applicable during the consultation period, and how that might affect public events, some alternative arrangements to consult with the local community are also proposed in case they become necessary to provide appropriate opportunities for consultation for a wide range of individuals. For example, Augean recognises that many people may need to continue to shield and/or socially distance themselves from public events so alternative methods of engagement are designed to run in parallel with/potentially replace the conventional methods of consultation, which will be adapted and managed as necessary based on Government guidance in place at the relevant time. Care will be taken that consultation events will meet any Government recommended safety criteria that exists to protect the safety of the local community in a reasonable way.

The statutory consultation will take place between [dates to be confirmed].

Based on the level and nature of interest shown during and before the statutory consultation Augean will continue to engage with interested parties throughout the DCO determination process and beyond. The means of engagement will be determined from responses received but will include continued commitment to the Community Liaison Group, periodic newsletters and annual open days.

Information

Augean will provide information about the Proposed Development and the details of the dates and consultation events through a range of methods:

Public Information Leaflet

Augean will deliver a public information leaflet which will explain the Proposed Development to all homes and businesses within the consultation area. The leaflet will be further distributed to other key stakeholders including the Liaison Group members, elected representatives at all levels as well as special interest groups, local community groups and organisations such as schools, faith groups and local health and welfare facilities. The leaflet will detail sources of further information and an invitation to attend the consultation events or participate in alternative means of consultation as may be required due to Covid 19.

Posters

Posters advertising the public exhibitions, open day and workshops or alternative means of consultation as may be required due to Covid 19 will be displayed in local venues and locations within the consultation area.

Newspaper advertisements

Augean will publish statutory notices in the Stamford Mercury which is circulated as a hard copy paper and is published electronically giving details about the consultation events or alternative means of consultation as may be required due to Covid 19.

Community publications.

Wherever possible Augean will request that details of the proposed consultation and any specific consultation events are published in local community and parish magazines.

News media

Augean will issue news releases about the proposed consultation and any specific consultation events to local print and broadcast news media to further raise awareness of the Proposed Development in the local community.

Social media

Augean will use its social media platforms to further advertise the proposed consultation and any specific consultation events and availability of consultation documentation.

Newsletters

Augean regularly publishes a community newsletter that is widely distributed to the local community and made available on the Augean website. Advance notice of the Proposed Development and opportunities to engage in the proposed consultation or any specific consultation events will be promoted through this publication.

Electronic newsletters

These are primarily distributed to those on the Register of Stakeholders; a database of subscribers who wish to be kept updated about Augean and any opportunities to engage with the company, and will be used to promote any specific consultation events or other opportunities to engage with the company as well as signposting the availability of

consultation documentation or explaining more complex aspects of the Proposed Development in detailed topic sheets.

The range of methods employed to circulate information to consultees will ensure anyone isolating or shielding due to Covid-19 will be able to access the consultation information. If anyone is unable to access the information for any reason, Augean will work directly with that person to find a solution and provide access to the consultation information.

Engagement

The range of direct engagement opportunities are proposed to facilitate dialogue for those who wish to understand more about the Proposed Development. The proposed means of direct engagement are as follows:

Public exhibitions

In order to facilitate a two way flow of information and comment on the applications and to record and take account of the issues raised the preferred method of Augean is to hold public exhibitions in the vicinity of the Proposed Development. These will be subject to the practical ability to hold safe events based on Government Covid 19 guidance applicable at the relevant time.

The aim is to provide a forum for explanation and discussion about the Proposed Development with the project team. The public exhibitions therefore will be attended by representatives from the Augean professional team who will be available to answer questions on the Proposed Development and the consultation. Augean would like the views, opinions and comments of the local community to influence aspects of the project that are still to be determined and are not fixed by technical necessity, legislation or national or local policy. Augean will use the responses received to help consider any changes that should be made to the Proposed Development before finalising the application.

It is proposed that the exhibitions will be held in the following locations:

Kings Cliffe Memorial Hall [November 2020 date to be confirmed]

Duddington Village Hall or Easton on the Hill Village Hall [November 2020 date to be confirmed]

Collyweston Village Hall [November 2020 date to be confirmed]

Open Day

In addition, subject to being able to do so based on Government advice, a site Open Day will be held at ENRMF during November 2020 for any members of the public wishing to discuss the proposals and view the site. This will be further promoted by the circulation of a flyer and advertisements in the local news media.

Open Door site visits

Augean already operates an open door policy at ENRMF. Anyone wishing to visit the site to see how a modern, highly engineered landfill facility and treatment facilities operate can telephone or email to arrange a convenient date and time subject to being able to do so based on Government advice. Contact details can be found at the end of this document.

Website

The website www.augeanplc.com/enrmf-planning/ will be used as an accessible method for engaging with the consultation for people who may have difficulty attending any of the events in person, as well as being a resource for all the documentation for the Proposed Development. The website will contain all the materials presented at other consultation opportunities and an online feedback form.

Additional opportunities

Augean may hold additional events if considered beneficial in order to enable the local community to gain a greater understanding of the Proposed Development and to help them respond to the consultation effectively. If Augean decides to do this notice of any additional events will be given as soon as possible and with adequate time before the date of the event.

Adaptation due to Covid 19

Augean recognises that Government advice at the time may restrict the ability to hold public events and, even where the events are able to take place, some members of the community may not wish to attend consultation activities in person due to the risks to them resulting from the Covid 19 pandemic. To take account of this, the exhibition boards and other consultation materials and documentation will be uploaded onto the Augean website with opportunities to leave comments via an online feedback form. There will be opportunities for the local community to pose questions and receive detailed answers about the proposals. If the direct consultation events as envisaged cannot take place at all due to restrictions that may be in place at that time, Augean will undertake to provide further interactive online opportunities like presentations or webinars. If individuals are unable to access the consultation online, the project telephone helpline can be contacted to request hard copies of the information which is being presented as part of the overall consultation.

Cancellation

In the event that any of the consultation activities have to be cancelled or rescheduled due to circumstances such as changes in Government advice, Augean will seek to alert the local community at the earliest opportunity by informing the Liaison Group, Parish Councils and elected representatives, Register of Stakeholders and venues where the exhibitions were planned to be held. Augean will also update the company website and use news and social media to notify the community about the change. Notice of any alternative arrangements will be given as soon as possible.

The consultation process has been designed to engage with those local communities who may be affected by the Proposed Development within the proposed consultation area, shown at Appendix 1. This is the same area that was previously identified for the consultation regarding the existing DCO.

We have refined the consultation area into Zone A and Zone B.

Zone A includes the villages nearest to the Proposed Development whose representatives participate in the Kings Cliffe Liaison Group and whose residents and businesses have taken an interest in previous planning applications at the ENRMF. Augean will publicise the consultation events by distributing the public information leaflet to all households and businesses within Zone A as well as to special interest groups, faith groups, schools, health and welfare providers. The events will be further publicised through electronic newsletters, posters, community publications, local newspaper advertisements, news media, social media and the company website.

Zone B includes outlying villages whose residents and businesses have taken an interest in previous planning applications at the ENRMF. Augean will publicise the consultation events by distributing multiple copies of the public information leaflets to the Town Councils, Parish Councils or Parish Meetings as well as sending electronic copies of the leaflet to the clerks. The events will be further publicised through electronic newsletters, posters, community publications, local newspaper advertisements, news media, social media and the company website.

These zones can be reviewed on request if communities feel a strong interest.

Augean will inform communities beyond Zone B about the Proposed Development and consultation through local newspaper advertisements, news media, social media and the company website.

Augean will provide information about the Proposed Development and consultation events to all elected representatives (Parish, District and County Councillors and Members of Parliament).

Augean welcomes the participation of those who live or work in or visit the consultation area and will take account of their views.

We [have engaged] with the relevant local authorities, Northamptonshire County Council and East Northants District Council about the make-up of their communities, including whether people in the area might have particular needs or requirements, whether the authority has identified any groups that it knows to be 'seldom heard' and [we have discussed and agreed with them the] techniques that might be appropriate to overcome barriers to communication and participation in consultation.

Recognising that some people may find it difficult to access the information including people who may need to isolate, socially distance or shield themselves due to Covid 19 requests for materials to be made available in formats appropriate to the needs of those people or those with disabilities or in other languages will be considered on request by contacting Augean by telephone or email.

11. Consultation documentation

Consultation documents will be available for inspection at the public exhibitions, in the document inspection locations detailed at the end of this document and on the Augean website at https://www.augeanplc.com/enrmf-planning/ during the statutory consultation period. The consultation documents will include:

- PEIR: containing an overview of the nature and scale of the Proposed Development and an initial assessment of the likely significant environmental effects and proposed mitigation.
- PEIR NTS: a non-technical summary of the information in the PEIR
- Project leaflet: a non-technical summary of the Proposed Development
- The SoCC
- Section 48 notice: a copy of the notice published in local and national newspapers advertising Augean's intention to submit a DCO application for the Proposed Development as required by Section 48 of the 2008 Planning Act (as amended).

12. Consultation responses

There will be a six- week opportunity to respond to the consultation which may be extended to take account of any Covid 19 restrictions that might be in place. Consultation responses should be submitted to Augean by 5.00 pm [on ?? 2020 date to be confirmed]. Augean will consider consultation responses received after this date wherever possible. There will be further opportunities to provide comments on the application once it has been submitted to the Planning Inspectorate.

Augean will consider all consultation responses received when finalising the details of the Proposed Development.

There will be a number of ways in which the local community can respond to the consultation:

- Hard copy feedback form which will be available at all consultation events, on request or to download from the website.
- Online feedback form which will be available on the website.
- By email or letter.
- Oral feedback in person or by telephone where necessary if other methods of communication are not available and circumstances would prevent a response.
- Responses via social media will not be accepted.

Following the consultation period, as part of the DCO application a Consultation Report will be prepared and submitted to PINS which will set out the consultation opportunities which have been provided, list the issues raised during the consultation and explain Augean's response to them. The responses received or extracts from them may be published with personal details redacted.

Website

The Augean website: https://www.augeanplc.com/enrmf-planning/ will be regularly updated with the latest news about the Proposed Development and will provide free of charge access to all consultation documents including the PEIR which can be downloaded. As further project documentation becomes available, we will ensure that it is made accessible. Additionally, the documents will be available via the PINS project page:

https://infrastructure.planninginspectorate.gov.uk/projects/east-midlands/east-northants-resource-management-facility-western-extension/

Email

Augean has a project email <a href="mailto:com/com/englished-length:com/com/englished-length:com/com/englished-length:com/com/englished-length:com/com/englished-length:com/com/englished-length:com/e

Telephone Helpline

Augean has a Telephone Helpline: 01904 654989 for the Proposed Development. Members of the public are invited to use it if they have any queries on the DCO application or associated events.

Kings Cliffe Local Liaison Group

Augean is an active participant in the Kings Cliffe Local Liaison Group, a committee run by Northamptonshire County Council and whose members are drawn from local parish councils and East Northants District Council as well as the Environment Agency. Its purpose is to act as a link between the company and local communities to discuss operational matters as well as issues arising from planning/DCO applications. The group meets periodically and minutes of the meetings can be read on the company website.

Register of Stakeholders

To improve and speed up the dissemination of information and to advise on further events and activities, which may be of interest to people, Augean has established a Register of Stakeholders, which has been developed from existing contacts with whom we have already corresponded by email. This will enable the company to contact those on the Register by email at short notice. Those attending the consultation events and those who contact us via the website or by post will be invited to join the Register. At all stages it will be possible to unsubscribe from this method of contact if people no longer wish to receive emails. Careful notice will be taken of stakeholders who cannot be contacted by email and information will be provided by post if preferred. Augean is compliant with current Data Protection regulations.

Document inspection locations

The consultation documents will be available at the following normally publicly accessible locations if the facilities are open and able to receive visitors:

Northamptonshire County Council

One Angel Square Angel Street Northampton NN1 1ED

East Northamptonshire District Council

East Northamptonshire House, Cedar Drive, Thrapston. NN14 4LZ

Oundle Public Library

Glapthorne Road Oundle PE8 4JA

Stamford Public Library

High Street Stamford Lincolnshire PE9 2BB

• [Location in Kings Cliffe if possible – to be confirmed]

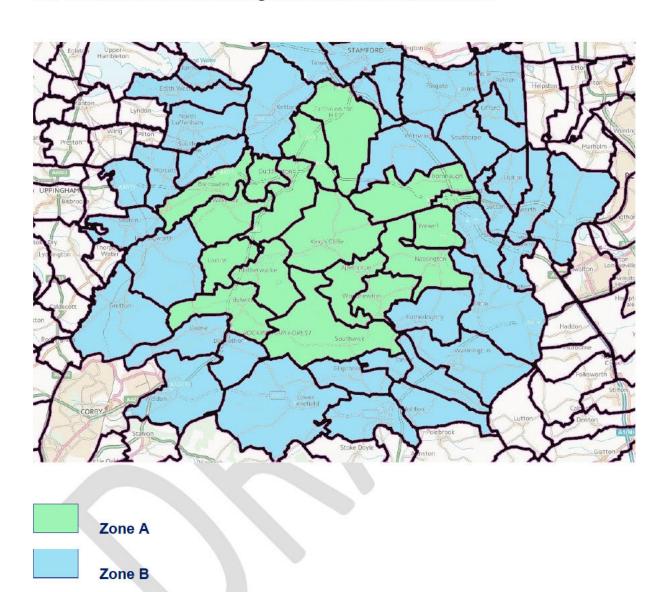
If the above locations are not open to the public due to Covid 19 restrictions, the consultation documents can be made available to view by appointment at the Site:

East Northants Resource Management Facility
 Stamford Road
 Kings Cliffe
 PE8 6XX

Please telephone the helpline 01904 654989 or email: consultation@augeanplc.com for assistance

Appendix 1

The Consultation area illustrating consultation Zone A and Zone B



From: Eleanor Nicholson

Sent: 08 September 2020 10:20

To: Gavin Sylvester <u>@east-northamptonshire.gov.uk</u>>

-northamptonshire.gov.uk

Subject: Augean - ENRMF Western Extension DCO -draft Statement of Community Consultation

Mr G Sylvester
East Northants District Council
Cedar Drive
Thrapston
Northamptonshire
NN14 4LZ

8 September 2020

Dear Gavin,

Proposed Western Extension, East Northants Resource Management Facility, Stamford Road, Northamptonshire.

Consultation Draft of the Pre-application Statement of Community Consultation

I am writing to you regarding the proposed Development Consent Order application for the alteration and construction of hazardous waste and low level radioactive waste facilities at the East Northants Resource Management Facility (ENRMF).

In accordance with S47 of the Planning Act 2008 (the 2008 Act), Augean has a duty to consult with the local community about the proposed development prior to submitting the Development Consent Order (DCO) application.

With reference to S47(1) of the 2008 Act, the proposed methodology for consulting the local community is set out in the Statement of Community Consultation (SoCC).

S47(2) of the 2008 Act identifies that consultation on the SoCC shall take place with the local authority. Although Northamptonshire County Council are the local authority for the proposed development at present, we are aware of the forthcoming change to create the unitary authority of North Northamptonshire and therefore feel that it is both important and prudent to seek advice from East Northants District Council as well.

Please find attached the draft SoCC. We should be grateful if you would review the proposals in the draft and let us have your views on whether the proposals should be changed, and if so how, or whether you consider that the proposals are appropriate. Your comments, however major or minor are welcomed and valued.

S47(3) of the 2008 Act requires the draft SoCC is consulted for 28 days. We would be grateful if you would provide your comments to us by 6 October 2020 at the latest.

Should you have any questions please do not hesitate to contact me.

Kind regards

Eleanor

Eleanor Nicholson Managing Partner Jennings Nicholson Associates 52 The Tannery Lawrence Street YORK YO10 3WH 01904 629210



From: Eleanor Nicholson

Sent: 08 September 2020 10:20

@northamptonshire.gov.uk

Subject: Augean - ENRMF Western Extension DCO -draft Statement of Community Consultation

Mr P Watson Northamptonshire County Council One Angel Square Angel Street Northampton NN1 1ED

BY EMAIL ONLY to

8 September 2020

Dear Phil,

Proposed Western Extension, East Northants Resource Management Facility, Stamford Road, Northamptonshire.

Consultation Draft of the Pre-application Statement of Community Consultation

I am writing to you regarding the proposed Development Consent Order application for the alteration and construction of hazardous waste and low level radioactive waste facilities at the East Northants Resource Management Facility (ENRMF).

In accordance with S47 of the Planning Act 2008 (the 2008 Act), Augean has a duty to consult with the local community about the proposed development prior to submitting the Development Consent Order (DCO) application.

With reference to S47(1) of the 2008 Act, the proposed methodology for consulting the local community is set out in the Statement of Community Consultation (SoCC). S47(2) of the 2008 Act identifies that consultation should take place on the SoCC with the local authority.

With reference to S43(1) of the 2008 Act, Northamptonshire County Council are the local authority for the proposed development.

Please find attached the draft SoCC. We should be grateful if you would review the proposals in the draft and let us have your views on whether the proposals should be changed, and if so how, or whether you consider that the proposals are appropriate. Your comments, however major or minor are welcomed and valued.

Due to the forthcoming change to create the unitary authority of North Northamptonshire we also have requested comments on the draft SoCC from East Northants District Council. We also have requested the views of the members of the Kings Cliffe Liaison Group as discussed at the recent

meeting. When we have received all the comments we shall revise and finalise the SoCC for publication and circulation.

S47(3) of the 2008 Act requires the draft SoCC is consulted on for 28 days. We would be grateful if you would provide your comments to us by 6 October 2020 at the latest.

Should you have any questions please do not hesitate to contact me

With kind regards

Eleanor

Eleanor Nicholson Managing Partner Jennings Nicholson Associates 52 The Tannery Lawrence Street YORK YO10 3WH 01904 629210



EXAMPLE

From: Eleanor Nicholson Sent: 08 September 2020

To:

Subject: Augean - ENRMF Western Extension DCO -draft Statement of Community Consultation

Dear

Proposed Western Extension, East Northants Resource Management Facility, Stamford Road, Northamptonshire.

Consultation Draft of the Pre-application Statement of Community Consultation

As discussed during the Liaison Group meeting, the planning process for a Development Consent Order to extend the ENRMF to the west has been started.

As explained as part of the planning process, Augean has a statutory obligation to consult with the local community and as part of that process we are required to set out clearly in a Statement of Community Consultation (SoCC) how, when, where and with whom we will consult and how the local community can participate.

The purpose of this letter is to seek your views on the draft proposals for consultation. We would be grateful if you would review the proposals for consultation in the attached draft SoCC and let us have your views on whether the proposals should be changed, and if so how, or whether you consider that the proposals are appropriate. Your comments, however major or minor are welcomed and valued.

The draft SoCC is informed by the experience gained from the extensive and on-going consultation associated with the ENRMF. It follows guidance set out by Government, National Infrastructure Planning and the District and County Council's Statements of Community Involvement, and other government agency guidance, as well as the Augean Corporate Social Responsibility Policy.

At present there is the added complexity of taking account of Covid 19 but if possible we would prefer to give the local community the opportunity to come and find out more about the proposals and discuss them with us in person in a safe way.

Matters that we would be grateful for your consideration and views include:

- Are the sources of information and methods of consultation satisfactory? Do you have any further suggestions to add?
- Will the public exhibition venues meet the accessibility needs of the local community? Are
 there any other suggestions that may need consideration? The text has been altered to
 include the idea of an exhibition at Easton on the Hill instead of at Duddington which may be
 too small to allow for social distancing. All venues will have to be subject to risk assessments
 that take account of necessary measures in place because of Covid 19
- Do the suggested document inspection locations meet the accessibility needs of the local community? Might it be better to just make the documents accessible at ENDC rather than at NCC? Do you have any suggestions for a suitable location in Kings Cliffe?
- Are the suggestions for arrangements taking account of Covid 19 satisfactory? What about the proposed alternative arrangements if public exhibitions are not possible?

I would be grateful for any comments as soon as possible but certainly before 6 October 2020.

We are undertaking a formal consultation with Northamptonshire County Council and East Northants District Council about the SoCC. Once we have collated all the comments we will circulate and publish the finalised SoCC and will send you a copy.

Should you have any questions please do not hesitate to contact me

With kind regards

Eleanor

Eleanor Nicholson Managing Partner Jennings Nicholson Associates 52 The Tannery Lawrence Street YORK YO10 3WH 01904 629210



From: Fiona Cowan

Sent: 21 September 2020 10:32

To: Eleanor Nicholson
Cc: Collyweston Parish Council

Subject: Re: Augean - ENRMF Western Extension DCO -draft Statement of Community Consultation

Importance: High

Dear Eleanor,

Thank you for sending me the draft SCC.

Clearly, several dates in the document remain 'to be confirmed' because nobody can be 100% sure what Covid-19 restrictions will be in place in the future. However, the public exhibitions - one of them in Collyweston village hall - and an Open Day at the Kings Cliffe site are planned for 'November 2020'.

Given the copy deadlines for *Collyweston News*, delivered free to every household in Collyweston, please note that any event in November will need to be as confirmed as it can be before mid-October in order to reach all Collyweston residents. I appreciate that the company's newsletter is also *delivered* to every household, but realistically it will not read as keenly as the more general community magazine.

The map that clarifies the 2 consultation Zones, A and B, doesn't have any parish/village named on it, nor is the site itself marked. I am left to assume that Collyweston is in Zone A!

Kind regards,

Fiona Cowan

From: Jo Williams <

Sent: 22 September 2020 16:31

To: Eleanor Nicholson >

Cc: Peter Kerruish ; Anne Chamberlain

Subject: Feedback from Apethorpe Village on Augean Community Engagement Plan.

Dear Eleanor,

I have circulated your information brochure to Apethorpe residents and have requested feedback on Aegean's proposed community engagement plan. On behalf of the village, I can make the following observations:

- 1) As COVID has not abated many of our parishioners would not want to turn out to view the proposed plans in any public environment, i.e. village halls etc. Therefore, in current conditions 'normal' routes of engagement are not considered to be an effective method of obtaining public interaction or views.
- 2) We suggest that you utilise digital media and engagement tactics. We think that your website is currently a bit of a missed opportunity. It provides a formal, fixed state, top-level, one-way information flow. We recommend the addition of interactive pages with a community focus where people can interact with you and ask questions. We suggest that the modeling (and presentations) which you are proposing to use in the village hall scenarios are digitalised and displayed online. We believe that this would enable Augean to communicate with the local community in both the short and longer term. It would be especially helpful if you could enable interactive Q&As.
- 3) We also suggest that you host a number of zoom 'conferences'. You could give out various dates and the parishes could inform their residents when these are available. You could then use your digital displays to engage, inform and receive feedback.

Hope this is helpful.

Best Regards,

Jo Williams, Clerk to Apethorpe Village Meeting.

From: Sent: 02 October 2020 13:29

To: Eleanor Nicholson

Subject: Re: Augean - ENRMF Western Extension DCO -draft Statement of Community Consultation

Afternoon Eleanor,

Just to let you know Yarwell Village Hall is available if of any use to you to exhibit to the people in our area. The contact details are Catherine Voyle, Chairperson of the Village Hall, email:catherine.voyle@yarwellparishcouncil.org.uk

Thanks

Sue Henson

From: Gavin Sylvester

Sent: 05 October 2020 12:24

To: Eleanor Nicholson

Cc: Paul Bland

Subject: RE: Augean - ENRMF Western Extension DCO -draft Statement of Community Consultation

Dear Eleanor,

Both myself and a colleague in the community team have read through the draft SCC and we have no comments to make on its contents.

Regards

Gavin Sylvester Principal Development Management Officer Planning Services East Northamptonshire Council 01832 742082

East Northamptonshire Council takes the protection of your personal data seriously. Please read our <u>Planning Services Privacy Notice</u> for information on how we treat your personal data.

From:	

Subject: Re: Augean - ENRMF Western Extension DCO

Dear Eleanor

The content of the document is fine and very comprehensive.

Here in Easton on the Hill we have various methods of communication.

We have a monthly Whats on the Hill email circulated by

The bi monthly parish magazine News and Views is currently not being produced because the local editors have resigned due to work commitments.

There are several noticeboards - Village Hall, board opposite War Memorial, Village Shop window, crossroads of High Street and West Street.

The trustees of our Village Hall are currently considering mothballing it for a period of time.

The village primary school in New Road closed a few years ago and the buildings are currently used occasionally for meetings. It has several entrance/exit doors so is suitable for use under the current Cover 19 restrictions. It is run by the Garford

Trust and Steve Forster is the contact |

I feel exhibitions further away would not be visited by local residents particularly those people who don't have their own transport.

Easton on the Hill has a Facebook page.

The Help on the Hill system consists of about 50 volunteers who can probably deliver leaflets if necessary.

The Parish Council clerk Jenny Rice can give you contact

details.

Hope this helps.

Daphne Sharpe

9. How we will consult

Augean has been operating at ENRMF for 16 years and has well established means of ongoing communication and consultation with the community local to the site through the site Liaison Group, the Register of Stakeholders, circulation of periodic newsletters and annual open days. The company also has an open door policy which is promoted at every opportunity. The company values the relationships that have been built with the local community and sees consultation and public engagement as a constant process. Not only will Augean consult with the local community before the statutory period commences but it will continue to communicate thereafter.

Augean intends for the consultation to be transparent, inclusive and accessible to those most likely to be affected by the Proposed Development. Throughout the pre-application consultation period there will be opportunities for discussion and comment on the proposals. Comments can be made throughout the consultation process, to Augean by email, via the company website or by letter in order to provide the maximum opportunity for feedback on the proposals.

Augean had hoped to be able to consult with the local community by arranging for them attend a series of face to face events. However, due to the Covid -19 pandemic and the need to take account of present restrictions and future uncertainties regarding what further public health advice might be applicable during the consultation period, and how that might affect public events it is no longer possible to be confident that we can hold suitably safe physical public exhibitions or an open day at present. The planned consultation arrangements will provide equivalent opportunities to conventional methods of consultation and will enable the local community to access information about the Proposed Development, to ask questions and receive answers from the Augean professional team and to be able to comment on the application. Although many of these opportunities are based on digital technology every effort will be made to ensure that those without access to digital methods of engagement are given other alternative options to access, question and respond to information.

The range of methods will ensure that the local community will be able to access the consultation information. If anyone is unable to access the information for any reason, Augean will work directly with that person to find a solution and provide access to the information.

Augean will seek to identify future opportunities for face to face events once Covid19 restrictions are relaxed. All such events will be widely publicised to the local community when available.

The statutory consultation will take place [dates to be confirmed].

Based on the level and nature of interest shown during and before the statutory consultation Augean will continue to engage with interested parties throughout the DCO determination process and beyond. The means of engagement will be determined from responses received but will include continued commitment to the Community Liaison Group, periodic newsletters and annual open days.

Information

Augean will provide information about the Proposed Development and the details of the dates and how to access the consultation through a range of methods:

Public Information Leaflet

Augean will deliver a public information leaflet which will explain the Proposed Development to all homes and businesses within the consultation area. The leaflet will be further distributed to other key stakeholders including the Liaison Group members, elected representatives at all levels as well as special interest groups, local community groups and organisations such as schools, faith groups and local health and welfare facilities. The leaflet will detail sources of further information and an invitation to participate in the consultation with details of how to access information, ask questions and make responses.

Posters

Posters advertising the consultation with details of how to participate will be displayed in available local venues and locations within the consultation area.

Newspaper advertisements

Augean will publish statutory notices in the Stamford Mercury giving details about how to access the consultation opportunities

• Community publications.

Wherever possible Augean will request that details of the consultation and any future specific events are published in local community and parish magazines.

News media

Augean will issue news releases about the consultation and any future specific events to local print and broadcast news media to further raise awareness of the Proposed Development in the local community.

Social media

Augean will use its social media platforms to further advertise the consultation and any future specific events and availability of consultation documentation.

Newsletters

Augean regularly publishes a community newsletter that is widely distributed to the local community and made available on the Augean website. Advance notice of the Proposed Development has been promoted through this publication and any opportunities to engage in future specific events will be promoted through this publication.

Electronic newsletters

These are primarily distributed to those on the Register of Stakeholders; a database of subscribers who wish to be kept updated about Augean and any opportunities to engage with the company, and will be used to promote any future specific events or other opportunities to engage with the company as well as signposting the availability of consultation documentation or explaining more complex aspects of the Proposed Development in detailed topic sheets.

Engagement

The engagement opportunities are proposed to facilitate dialogue for those who wish to understand more about the Proposed Development. The proposed means of engagement are as follows:

Exhibitions

The exhibition materials; exhibition boards, supporting documents; factsheets and comments sheets will be made available online via the company website wwwaugeanplc.com. A hard copy exhibition pack will be made available in response to requests by email, post or telephone for those unable to access online materials. The contact details to request a pack are available at the end of this document.

Opportunities for explanation and responses to questions about the Proposed Development from the project team will be made available. The online exhibition will incorporate a facility to ask questions and receive answers about the Proposed Development from the Augean professional team. For those unable to access digital technology there will be the opportunity to request a response to questions via telephone or post.

Members of the local community will be offered the opportunity to attend online topic specific presentations which will be organised subject to interest expressed.

Augean would like the views, opinions and comments of the local community to influence aspects of the project that are still to be determined and are not fixed by technical necessity, legislation or national or local policy. Comments can be submitted online, by email, or by post. Augean will use the responses received to help consider any changes that should be made to the Proposed Development before finalising the application

Open Day

Subject to being able to do so based on further Government advice, a site Open Day may be held at ENRMF during Spring 2021for any members of the public wishing to discuss the proposals and view the site. This will be promoted nearer the time by the circulation of a flyer and advertisements in the local news media. Consideration will be given providing an alternative opportunity if restrictions are still in place.

• Open Door site visits

Augean usually operates an open door policy at ENRMF to enable anyone wishing to visit the site to see how a modern, highly engineered landfill facility and treatment facilities operate. Due to current Covid19 restrictions this is not possible at the present time but subject to further Government advice it is hoped that this can be resumed. Augean will inform Parish Councils and those on the Register of Stakeholders or via the company newsletter when this opportunity is available once more.

Website

The website www.augeanplc.com/enrmf-planning/ will be used as an accessible method for engaging with the consultation as well as being a resource for all the documentation for the Proposed Development. The website will contain all the materials presented at other consultation opportunities and online feedback forms.

Additional opportunities

Augean may hold additional events if considered beneficial in order to enable the local community to gain a greater understanding of the Proposed Development and to help them respond to the consultation effectively. If Augean decides to do this notice of any additional events will be given as soon as possible and with adequate time before the date of the event.

From: Eleanor Nicholson Sent: 16 October 2020 13:06

To:

Subject: Augean - ENRMF Western Extension DCO -draft Statement of Community Consultation

Dear Phil

As further restrictions now have been put in place due to Covid 19 and there is some uncertainty as to whether more stringent measures may be necessary in the coming weeks, we have decided that it is not possible to conduct physical consultation events in a completely safe manner.

We now plan to make the exhibition available online with supporting interactive opportunities but are mindful that we need to take account of those unable to access digital technology.

As we have yet to finalise the SoCC we have amended Section 9 of the document which focusses on the detail of how we intend to consult with the local community.

I attach a copy of the revised section for you to review. If you have any further comments regarding the proposed changes, I would be grateful if you could provide them to me by 22 October 2020.

With regard to making documents – either hard or electronic - available at NCC, I assume that there is no present capability that would allow you to do so?

Kind regards

Eleanor

Eleanor Nicholson Managing Partner Jennings Nicholson Associates 52 The Tannery Lawrence Street YORK YO10 3WH 01904 629210



EXAMPLE

From: Eleanor Nicholson Sent: 16 October 2020 13:16

To: Fiona Cowan

Subject: RE: Augean - ENRMF Western Extension DCO -draft Statement of Community Consultation

Dear Fiona

Many thanks for your thoughtful comments which have been incorporated into the publication version which will be circulated at the end of October.

As further restrictions now have been put in place due to Covid 19 and there is some uncertainty as to whether more stringent measures may be necessary in the coming weeks, we have decided that it is not possible to conduct physical consultation events in a completely safe manner.

We now plan to make the exhibition available online with supporting interactive opportunities but are mindful that we need to take account of those unable to access digital technology.

As we have yet to finalise the SoCC we have amended Section 9 of the document which focusses on the detail of how we intend to consult with the local community.

I attach a copy of the revised section for you to review. If you have any further comments regarding the proposed changes, I would be grateful if you could provide them to me by 22 October 2020.

Kind regards

Eleanor

Eleanor Nicholson Managing Partner Jennings Nicholson Associates 52 The Tannery Lawrence Street YORK YO10 3WH 01904 629210

