

Pre-Application Consultation Strategy

Proposed Resource Recovery Facility at Rookery South Pit, nr Stewartby

1. Introduction

1.1 Purpose

- 1.1.1 This report explains the pre-application consultation strategy that Covanta Rookery South Limited (Covanta) has followed since November 2008 until December 2009 for its proposals for a Resource Recovery Facility at Rookery South Pit, nr Stewartby, Bedfordshire. The report also sets out a suggested consultation strategy for the period from now (December 2009) until Covanta's application is submitted to the Infrastructure Planning Commission (IPC). This is anticipated to be March 2010, subject to the outcomes of the consultation process.
- 1.1.2 Covanta believes that its approach fulfils the requirements of best practice in consultation and as such it will satisfy the new IPC requirements. The proposed development site is partly within the Central Bedfordshire authority area and - in respect of a small area of land - within Bedford Borough. Covanta is seeking the agreement of both Central Bedfordshire Council and Bedford Borough Council to this consultation approach prior to publicising consultation proposals by publishing the Statement of Community Consultation (SOCC) in a local newspaper (The Bedford Times & Citizen).
- 1.1.3 Covanta is keen to receive the views of the Councils so that it may publish its SOCC as soon as possible. Should the Councils wish to comment upon the proposed SOCC, they should reply to the letter that accompanies this report **within** 28 days of the date of receipt of the letter, which has been sent by recorded delivery. Should the Councils find it difficult to respond within this time, an extension may be possible and an early enquiry regarding this is requested. Any representations about the proposed SOCC should be made in writing, indicating who is making the representation and giving a correspondence address to which correspondence may be sent. Covanta will then consider the Councils' responses to the SOCC before it is published.

1.2 Background

- 1.2.1 This report has been prepared as a basis for discussing and agreeing a pre-application consultation strategy to explain Covanta's proposals to develop a Resource Recovery Facility at Rookery South Pit, near Stewartby (the "Project"). The main components of the Project are an Energy from Waste Facility (EfW) and a post-treatment Materials Recovery Facility (MRF). It accompanies a draft Statement of Community Consultation (SOCC) in respect of which Covanta is formally consulting Bedford Borough Council and Central Bedfordshire Council [*please see Appendix 1*].
- 1.2.2 The EfW Facility would process residual municipal and commercial/industrial waste (nominally 585,000 tonnes per annum) primarily from the Bedfordshire and Luton sub-region. The MRF would recover residues from the EfW process to capture metals for recycling and bottom ash for use in construction as a secondary aggregate.

- 1.2.3 As the proposed EfW Facility would generate more than 50MWe of electricity, an application is being made for a development consent order ("DCO") to the IPC. The IPC is an independent public body set up with the dedicated task of examining and determining applications for nationally significant infrastructure projects (NSIPs).
- 1.2.4 It had originally been the intention of Covanta to submit its proposals to the Secretary of State for Energy and Climate Change under the terms of the Section 36 of the Electricity Act 1989. To inform environmental scoping Covanta produced an earlier communications strategy outlining its proposed approach to consultation and its part in the application process. As such, Covanta has already undertaken extensive engagement, including discussions with statutory consultees (since Spring 2009) public exhibitions (in July and August 2009) and profile raising (eg leaflet drops) in relation to explaining the nature of the Project.
- 1.2.5 A draft of that communications strategy was produced for discussion with Central Bedfordshire and Bedford Borough Councils [*please see Appendix 2*]. It is referred to in this paper as the "Section 36 environmental scoping consultation" and reflects Council cited examples of good practice.
- 1.2.6 Covanta wishes to reiterate its commitment to public consultation in respect of its plans and proposes to undertake further and additional consultation as outlined below, prior to its proposed application to the IPC. This document explains how Covanta has already consulted, how it proposes to consult and the philosophy behind that consultation. Although the SOCC relates to consultation with the community at large in the future, this takes place in the context of the extensive and earlier consultation and the two should be understood together.

1.3 Best Practice

- 1.3.1 The principles that have and will continue to guide Covanta's pre-application consultation strategy are based on best practice as set out in a number of documents including:
- (a) the pre-application consultation requirements under the new IPC regime, in particular the document *Planning Act: Guidance on pre-application consultation*, published by the Department of Communities and Local Government in September 2009. The preceding "Consultation on the Pre-Application Consultation and Application Procedures for Nationally Significant Infrastructure Projects" published by the Department of Communities and Local Government in March 2009 also guided Covanta's consultation approach;
 - (b) the Department for Communities and Local Government guidance document, "Community Involvement in Planning: the Government Objectives";
 - (c) planning guidance for example "PPS1: Delivering Sustainable Development" and "Planning for Sustainable Waste Management: Companion Guide to Planning Policy Statement 10"; and

- (d) helpful and relevant advice from both Central Bedfordshire and Bedford Borough Councils.

2. Covanta's approach to consultation

2.1 Introduction

- 2.1.1 Covanta is committed to best practice in public consultation and engagement throughout the planning process irrespective of the route for determination. Covanta recognises the benefits that can be brought to local communities, local authorities, key stakeholders and developers through front loaded, inclusive pre-application consultation and communication.

2.2 Guiding principles and consultation to date

- 2.2.1 The engagement process addresses the following principles:

Using participative methods and making participation and involvement as easy and inclusive as possible;

Covanta has worked to ensure that the consultation undertaken and proposed is inclusive of all members of the community. At the Project's inception in November 2008, a wide database of stakeholders was developed pertinent to all those with an interest in the Rookery South site (see section 3.3). This list is continually updated and is sensitive to the likely impact of the Project.

In November 2008, consultees were informed of the proposals by letter and in the press and asked how they would like to be consulted. Since then, a Community Liaison Panel ("CLP") of volunteers from the environmental scoping public consultation exercise has been set up to provide ongoing liaison and a dedicated forum to work through the issues (see section 5.0).

Applying the decision principle - making sure that the exercise will inform and influence decisions to be made

This should operate such that;

- (a) the consultation is designed to inform the decision to be made;
- (b) Covanta takes great care to ensure that consultation materials are intuitive, clear and provide enough information to enable consultees to understand the Project and to provide meaningful input; and
- (c) it is clear to consultees that their responses to the consultation will be taken into account.

Clear feedback should be given to consultees on how their views were taken into account;

For example, all consultees who complete a feedback form or leave comments with details of their address are sent a letter detailing how their

views have been taken into account. At each CLP meeting feedback on issues raised at the previous meeting and resulting actions is also provided.

Front loading consultation is necessary - i.e. engaging with the local community before the application for a DCO is submitted to the IPC;

- 2.2.2 The upfront provision of information regarding the proposals, timescale of the proposed application for the DCO and the scope for involvement, is a key driver for the consultation. To date, all key stakeholders have been provided with a copy of the S36 environmental scoping report and have been encouraged to respond with their opinions as part of the Section 36 environmental scoping consultation exercise in 2009.

Considering the most appropriate and productive methods of consultation;

Care is taken to prepare consultation strategies that are as inclusive as possible but also carefully define the scope for public involvement in order to avoid misleading participants; and

Initial consultation is undertaken with technical statutory consultees to determine technical parameters. This process was explained to the public in the S36 environmental scoping exhibitions and further input where possible has been sought from the public, focusing primarily on issues with considerable local impact including design and landscape, traffic and access. In due course, as part of the additional pre-application consultation, a wider list of technical consultees will be consulted before submission of the application to the IPC.

The CLP has also been set up to provide a dedicated forum providing ongoing consultation on issues with local impact.

Regarding consultation as a meaningful process rather than a tick-box exercise;

Procedures have been established by Covanta from the outset to ensure two-way communication and a regular, open exchange of information and views on the proposals. Throughout the S36 environmental scoping consultation process Covanta has remained open to suggestions as to how best to communicate and listen to opinions and has refined its strategy accordingly.

3. Consultation undertaken to date

3.1 Introduction

- 3.1.1 Covanta has already instigated a 12 month programme of stakeholder consultation that evolved during the S36 environmental scoping stage. This section explains the consultation approach undertaken to date. This approach will be continued until the application is submitted to the IPC.

3.2 Communications and Public Relations

- 3.2.1 To establish a clear, coordinated approach to information management and consultation, Covanta initiated internal monthly communications meetings. Covanta appointed its public relations advisors Quantum PR as the first point of contact for local media relations and public enquiries regarding the Project.

3.3 Database

- 3.3.1 A stakeholder database was compiled of all local representatives (including MEPs, MPs, regional bodies, statutory consultees, local councillors, parish councils and local community representatives) and other interested parties identified by type of organisation, geographical proximity or interest group.
- 3.3.2 This database is continually updated by local knowledge, desk research, media coverage and direct contact initiated by external interests as the Project progresses.

3.4 Consultation launch

- 3.4.1 Plans for the Project were made public via a letter to all key stakeholders, followed by a press release to local media, in November 2008. The letters and press release gave information on the nature of the Project and requested nominations for the proposed CLP as well as asking for recommendations on future communications channels.
- 3.4.2 Following a series of informal scoping meetings with technical statutory consultees (*see Appendix 3*) in Spring 2009, the formal S36 environmental scoping consultation for the Project was launched through a number of mechanisms in June 2009:
- (a) Press releases; (*see appendix 4*)
 - (b) Advertisements; (*see appendix 4*)
 - (c) Direct mail to almost 15,000 addresses within 5km of the proposals; (*see appendix 4*)
 - (d) Individual letters (~220) to all councillors in Central Bedfordshire, Bedford Borough and Luton, parish councillors, local community representatives, landowners and developers and all others who had expressed an interest since the announcement of the project; (*see appendix 4*)
 - (e) Copies (~90) of the draft Environmental Scoping Report were also issued to all local representatives including MEPs, MPs, councillors, Town/Parish Councillors, near neighbours, wildlife groups, Environment Agency, English Heritage, Natural England and other statutory consultees and opinions invited;
 - (f) Leaflets made available in key public venues e.g. town/village halls, churches, post offices, newsagents etc; (*see appendix 4*)
 - (g) Posters throughout the area; (*see appendix 4*) and

- (h) Dedicated Rookery South RRF web page:
<http://www.covantaenergy.co.uk/site/rookerysouth/> (see appendix 4).

3.5 Public relations

- 3.5.1 Covanta established a dedicated Project email address to allow interested parties to register their comments during the consultation period. Quantum Public Relations logged the enquiries, which were as follows:
- (a) 2 business/contractors showing an interest in work for Covanta;
 - (b) 4 Community Liaison Panel nominations;
 - (c) 1 complaint about wrongly addressed post;
 - (d) 1 request for a hard copy of the Environmental Scoping report;
 - (e) 1 invitation to meet a local Parish Council to discuss the proposals in more detail;
 - (f) 1 query re: access routes for construction and on-going phases of development; and
 - (g) 1 query re: commercial waste disposal.

3.6 Website

- 3.6.1 All communications materials included the Rookery South Resource Recovery Facility Project website: <http://www.covantaenergy.co.uk/site/rookerysouth/>. The Project web page includes the consultation programme, dates, venues, a copy of the consultation flyer, a flyer on how to join the CLP, downloadable copies of the consultation exhibition, downloadable summary leaflet, downloadable information on the application process; downloadable pdf of the draft Environmental Scoping report and links for further information and contacts.

3.7 Leaflet

- 3.7.1 The consultation was publicised by a leaflet and a letter of invitation listing the forthcoming consultation events, outlining the main elements of the Project and key issues for consultation. This was delivered by Royal Mail Walksort during the week commencing 22nd June 2009, to the following areas:
- (a) MK43 0: 4644 homes; 212 businesses in Lidlinton, Marston Moretaine, Cranfield and Lower Shelton;
 - (b) MK43 9: 2487 homes; 64 businesses in Keeley Green; Upper Shelton; Wootton and Stewartby;
 - (c) MK45 2: 4288 homes; 260 businesses in Millbrook, Amptill and Maulden; and
 - (d) MK45 3: 2539 homes; 110 businesses in Kempston Hardwick; Houghton Conquest; Wilhamstead; Haynes Church End and Haynes.

3.8 Public exhibition

3.8.1 Covanta provided a number of opportunities for face-to-face dialogue, questions and discussion through a series of public exhibitions. Copies of the exhibition boards are provided in *Appendix 4*.

3.8.2 A preview exhibition was offered to all local MEPs, MPs, councillors of the relevant local authorities, local representatives, parish councillors, landowners and developers in the area. This enabled Covanta staff and the wider Project team to answer any questions these key stakeholders had and to provide one-to-one briefings, where appropriate, to address issues and to provide a conduit for a flow of information to the local community/ interests they represented.

3.8.3 Those who were unable to attend were invited to come to any of the six other public exhibitions at their convenience. These were held throughout the Marston Vale on:

Friday 10 July 2009	Preview, Stewartby Village Hall	12 - 2pm
Friday 10 July 2009	Stewartby Village Hall	2 – 8pm
Saturday 11 July 2009	Parkside Hall, Ampthill	10 – 6pm
Sunday 12 July 2009	Houghton Conquest Village Hall	10 – 6pm
Friday 14 August 2009	Millbrook Village Hall	10 – 8pm
Saturday 15 August 2009	Marston Vale Forest Centre	10 – 6pm
Sunday 16 August 2009	Wootton Memorial Hall	10 – 6pm

3.8.4 The preview and exhibitions were manned by a variety of senior Covanta staff, engineers and planners working on the Project, as well as a wider Project team of external consultants on noise, traffic, landscape and design, ecology, and air quality impacts. Following requests from the July 2009 exhibition, in August, an Environment Agency representative was also available for questioning on the Environment Agency literature concerning Energy from Waste.

3.8.5 The exhibitions were not simply static displays but a mix of exhibition boards and more interactive elements, including bottom ash samples, tutorials on how the proposed technology would work, a map to identify traffic routes and a DVD with chapters on Covanta's worldwide experience, the waste hierarchy, EfW and Health, EfW and the Environment and why failing to change the way we manage waste is not an option.

3.8.6 Over the six consultation days held throughout July and August 2009 nearly 500 people attended the public exhibitions, including representatives from:

Alameda Middle School;

Ampthill Town Council;

Ampthill Park House;

BEaR project;
Bedford Borough Council;
Broadmead Lower School;
Buckinghamshire County Council;
Central Bedfordshire Council;
Cranfield Parish Council;
Cranfield University;
CPRE Bedfordshire;
Environment Agency;
Forest of Marston Vale Trust;
Gallaghers;
Haynes Parish Council;
Houghton Conquest Parish Council;
House of Commons (Nadine Dorries, MP);
Lidlington Parish Council;
Marston Moreteyne Parish Council;
Maulden Parish Council;
Millbrook Golf Club;
Millbrook Parish Meeting;
MMAG;
O&H Properties;
Ridgmont Parish Council;
RevAmp;
Sir Malcolm Stewart Homes;
Stewartby Parish Council; and
Wootton Parish Council.

3.8.7 In total, 99 people completed and returned a feedback form and over 40 volunteered to be part of the proposed CLP. Part of the function of the CLP is to voice opinions and public conceptions of the Project, seek explanations and

provide input and guidance for future decisions. Discussions at CLP meetings go into great detail across a wide variety of subjects from design through to transport and employment. All questions and responses are noted to show where consideration and changes following CLP opinion have been made. (See appendix 5). These responses will be further evidenced in the ongoing consultation process.

3.9 Communications materials

3.9.1 A selection of bespoke handouts and summary leaflets were produced including:

- (a) a handout explaining the S36 application process;
- (b) a summary leaflet on Covanta's proposals and where to find more information;
- (c) a flyer giving details of further exhibition dates and how to join the CLP;
- (d) independently produced Environment Agency information on: energy from waste facilities; EfW and health; Questions and Answers including licensing and monitoring procedures; and FAQ's on air quality, health and environment impacts etc
- (e) those who attended were also requested to fill out a feedback form on the information, including what further information they would like to receive.

3.9.2 Stakeholders were also directed to an online communications resource and dedicated web page containing information on the project and pdfs of the exhibition boards and communications materials. A dedicated email address and freepost address was also set up so that further information could be sought.

4. Design and Consultation

4.1 Introduction

4.1.1 This section of the report sets out the iterative approach undertaken to date in developing the design of the project. The approach to design is a product in part of the responses to consultation that Covanta receives. Accordingly, it is important to understand how the two fit together.

4.2 Design approach

4.2.1 Covanta takes an iterative approach to design informed by the operational requirements of the specific plant, site context, the characteristics of the site and the outcomes of consultation. Initial design concepts were developed following discussions with the project team, engineers, planners and landscape and building architects. These were worked up in consultation with the local authority landscape and heritage officers, other relevant officers and statutory consultees in Spring 2009.

- 4.2.2 This process set the wider parameters for the formal S36 environmental scoping consultation and included meetings with relevant Central Bedfordshire and Bedford Borough planning, highways and cultural heritage officers, the Bedford Primary Care Trust (including the Health Protection Agency), the Environment Agency, Highways Agency, Natural England and English Heritage among others.
- 4.2.3 Outline technical analysis was also undertaken on issues such as site drainage, access/transportation and planning, as well as air quality monitoring, and an outline appraisal of environmental, cultural heritage and visual impacts.

4.3 Building Code

- 4.3.1 Initial design concepts were then progressed to develop a Building Code that was discussed and presented to the relevant authorities, technical advisors and statutory consultees and agreed as a sound basis for developing the building design. Meetings were held with:

English Heritage, 15th May 2009 – meeting to discuss emerging scheme design, heritage features of interest to English Heritage and appropriate design/mitigation responses;

The Canvas Vision, 5th June 2009 – master planning session to explore the story underpinning, and context for, the whole project, the site and the building including Covanta Energy as a neighbour/patronage;

Design Workshop, 12th June 2009 – design team meeting with engineers, architects and planners to understand the operational requirements, environmental considerations including sustainability requirements and aspirations and context studies to inform the design; and

English Heritage and Central Bedfordshire, 16th June 2009 – review of emerging site layout and building design, discussion of influences on building form and finish and review of Cultural Heritage Impact Assessment (CHIA) scope and methodology.

English Heritage and Central Bedfordshire, 22 April 2009 - introductory meeting to the explain the proposal and scope key areas of potential impact and initial ideas for design response and exploration

- 4.3.2 Although technical input from statutory bodies forms one part of the consultation that Covanta has undertaken, it is just as important to consult the public in relation to these matters. The S36 environmental scoping exhibitions in July and August 2009 provided information on the emerging design and context including the local setting and measures to reduce impacts and enable the building to be well integrated with the landscape.
- 4.3.3 Having established and tested the parameters and basic concepts that drive the design through the public exhibition, Covanta then worked with key stakeholders and near neighbours overlooking the site and the CLP to test those concepts and explore through discussion and presentation how the design was to develop.
- 4.3.4 A further series of design meetings was held including:

English Heritage and Central Bedfordshire, 13th August 2009 – building design update and presentation of architectural study, update of CHIA and discussion of viewpoint/photomontage locations;

Amphill Park House residents, 4th September 2009 – scale of the proposals and visual impacts from Amphill Park House and Amphill Park;

Forest of Marston Vale, 15th September 2009 – introduction to EfW project, neighbour and long term relations, design response and links to wider initiatives;

Community Liaison Panel, 22nd September 2009 – building design consultation;

Forest of Marston Vale, 9th October 2009 – Millennium Country Park synergies - ecology; biodiversity; interpretation; design development and environmental contribution to the Forest of Marston Vale;

Bedford Borough, 19th October 2009 - Project overview and debate on Cultural Heritage Impact Assessment and Landscape and Visual Impact assessment; heritage assets and conservation sensitivities relating to the brickworks and company village; and

Community Liaison Panel, 20th October 2009 – design and landscape update: visual and noise impacts; plans to preserve the natural environment and enhance green spaces.

- 4.3.5 It was critical that the basis for the design concept was understood by the CLP and other consultees and that whilst the built form of the Project would not be designed by committee, it should be developed having consideration for the views of all consultees.

5. Community Liaison Panel

5.1 Introduction

- 5.1.1 The CLP for the Rookery South Project was proposed as a forum of 12-15 representatives that would be drawn from local residents/businesses, community groups, local organisations and council representatives to find out more about the Project's progress.
- 5.1.2 Covanta acknowledges that not all neighbourhoods want or welcome a CLP. However, from its experience, the formation of a CLP provides local communities with a forum for discussing issues affecting them in relation to the proposed developments and provides a conduit for the flow of information between Covanta and local people. In order to maintain the independence of the Panel, this aspect of the consultation has been, and continues to be, undertaken by an independent facilitator.

5.2 Recruitment

- 5.2.1 The CLP was initially advertised at the announcement of the Project in November 2008 when two expressions of interest were received. It was further promoted in advertisements and throughout the public consultation in July and

August 2009 when nominations could be made by email, post or through return of the consultation feedback form before the publicised closing date of Friday 28th August 2009.

- 5.2.2 Of the 40 nominations received, 15 members were selected by the independent facilitator to reflect the local community most directly affected by the Project, and ensure that there was representation from the different neighbourhoods around the site.

5.3 Membership

- 5.3.1 The members of the CLP were approached to give priority to community groups representing residents, local organisations and businesses, environmental groups, and then to residents who were geographically closest to the project.

- 5.3.2 By using this approach the following members were identified representing each of the seven local villages who had expressed an interest, the CPRE, one local school, two local businesses and three private individuals, namely:

- (a) A Stewartby Parish Council Councillor;
- (b) The Chairman of Houghton Conquest Parish Council;
- (c) The Clerk of Millbrook Parish Meeting;
- (d) A Wootton Parish Councillor;
- (e) A local Stewartby resident and business owner;
- (f) The Chairman of “RevAmp”, Ampthill;
- (g) A Maulden Parish Council Councillor;
- (h) A local resident and Head Teacher at Broadmead Lower School;
- (i) A local resident and volunteer with CPRE;
- (j) A local resident and Director of the Waste and Society Programme at Cranfield University;
- (k) The Chairman of Marston Moretaine Action Group;
- (l) A resident of the property nearest the proposal;
- (m) A resident of Ampthill House which overlooks the proposed development (who later withdrew); and
- (n) The Chief Executive of the Forest of the Marston Vale.

- 5.3.3 Although not prescriptive, this representation was based on the independent facilitator’s experience that any CLP has a natural maximum size of about 14 members - any more than this and individuals would find it difficult to get their voice heard and tend to leave. All others who had applied were therefore given

details of their nearest representative on the panel and how to find out more information.

- 5.3.4 Following a request by a local Bedford Borough Councillor and a local Ampthill Town Councillor (also representing Central Bedfordshire Council) to attend the meetings, this was put to the CLP members to decide at the first meeting held on 22nd September 2009. Upon confirmation that this was acceptable, the councillors were invited to participate in all future meetings. Membership has also grown again by request and CLP agreement to accommodate the late application of Marston Moreteyne Parish Council in October 2009.

5.4 Purpose

- 5.4.1 The prime purpose of the Panel is to facilitate communication and the flow of information between Covanta and the local community in the following areas:

- (a) to identify and respond to issues of local concern;
- (b) to better understand local concerns;
- (c) to provide a channel so those issues can be articulated;
- (d) to help inform and educate local opinion formers;
- (e) to provide a structured arena for constructive debate;
- (f) to hear how best to communicate with the local community;
- (g) to update the local community on the progress of the project; and
- (h) to resolve any questions that may result from the construction and operation of the Project.

- 5.4.2 It is hoped that the formation of the CLP will also help to build up trust between the local community and Covanta via the independent facilitator. However membership of the Panel does not imply either support for or objection to the Project.

- 5.4.3 Where relevant, it is expected that the CLP members will report back as appropriate to the people or groups that they represent. Covanta makes information about the project available in an electronic format to assist with this.

- 5.4.4 The facilitator fulfils the role of Chairperson and nominees may themselves appoint a substitute to attend any particular meeting in his or her place.

- 5.4.5 Covanta provides presenters and specialist technical input approved by the panel as requested.

5.5 Consultation via CLP

- 5.5.1 In order to distil the issues most pertinent to the CLP and enable the provision of the appropriate level of technical detail and further information requested,

the independent facilitator contacted each of the community representatives following the July and August 2009 exhibitions and asked them what role they would like the CLP to play in ongoing consultation and for their initial top priorities.

5.5.2 Following this, a first meeting date, time, location and agenda was determined to accommodate members. Covanta undertook to provide the CLP with a modest budget to enable it to hire meeting rooms and pay for basic refreshments, provide members with meeting papers and hire expert speakers to address them on topics such as health, waste minimisation, transport, and access etc – any topic it chooses providing it is pertinent to local concerns regarding the Project.

5.5.3 The CLP has met on five occasions and will continue to be supported by Covanta throughout the IPC application process and beyond. The expectation is that the Panel will remain involved throughout the construction phase and migrate into a panel for the operational phase as well.

6. Proposed Future Consultation

6.1 Introduction

6.1.1 The intention of the S36 environmental scoping consultation was to ensure that, as far as is reasonable, local people were aware of Covanta's evolving proposals and had a good opportunity to express their views at an early but still meaningful stage. In order to ensure that Covanta can continue to clarify matters, allay concerns and incorporate suggestions and respond to issues through the final detail of its evolving scheme, the views/agreement of Central Bedfordshire and Bedford Borough Councils are sought on Covanta's proposed consultation strategy moving forward. This is a requirement of statute and the reasons behind this are set out below.

6.2 Infrastructure Planning Commission

6.2.1 In the proposed communications strategy submitted to the Councils in June 2009, Covanta stated that an application would be made to the Secretary of State for Energy and Climate Change under Section 36 of the Electricity Act. Covanta has now determined that it will pursue an application for a DCO via the IPC. After March 2010 the IPC replaces the Secretary of State as the applicable determining body for development proposals generating more than 50MWe of electricity. The IPC process requires high quality pre-application consultation prior to the proposed submission of an application to the IPC for a DCO. Covanta believes that its best practice approach to date already accords in large part with the consultation requirements of a DCO application, subject to complying with certain specific requirements imposed under the Planning Act 2008 that were absent under previous regimes.

6.2.2 The IPC process also reiterates the leading role that a local authority should play in guiding consultation over plans for development in its area. Covanta wishes to engage once more with both Central Bedfordshire Council and Bedford Borough Council as communities in each authority would be affected by the proposals. The proposed development site is partly within the Central Bedfordshire authority area and - in respect of a small area of land - within Bedford Borough.

6.3 Local Authority Consultation

- 6.3.1 In order to meet and exceed the strict consultation requirements necessary before an application can be made to the IPC and to satisfy local authority requirements, Covanta proposes to build upon existing consultation to date and to undertake further consultation.
- 6.3.2 Covanta believes that the 12 months of consultation undertaken to date means the local community and key stakeholders are very familiar with the company's aspirations. Indeed many consultees have influenced the proposed design and operation of the Project. Given this history, Covanta is of the opinion that many consultees already have a high degree of understanding and knowledge of the Project.
- 6.3.3 Building on the extensive consultation that has taken place to date, Covanta met with officers of Central Bedfordshire and Bedford Borough Councils on 17 November and 1 December respectively to discuss the terms of a draft SOCC and then move forward under the IPC process. It is proposed to continue such liaison with council communications, planning and other officers to seek to agree the draft SOCC that this document accompanies. This consultation strategy has played a significant role in informing the draft SOCC. It is therefore important that any proposed variation to the approach set out in this pre application consultation strategy is raised by the Councils at an early stage.

6.4 Wider Stakeholder Consultation

- 6.4.1 Covanta has developed a detailed stakeholder database identifying all groups and individuals who have/may express an interest in the Project and all those who have attended exhibitions, meetings or provided feedback to date. This includes local residents, community groups and representatives, landowners, developers, politicians (from European to parish level), industry leaders, businesses and key individuals from within the statutory consultee requirements and all additional statutory consultees to be consulted under the new IPC regime.
- 6.4.2 The database will be used to contact stakeholders directly, updating them on how we have used feedback received to date, our intention to submit to the IPC for determination and to give them timely information about how they can get involved and have their say during the consultation process and following an application to the IPC for a DCO.

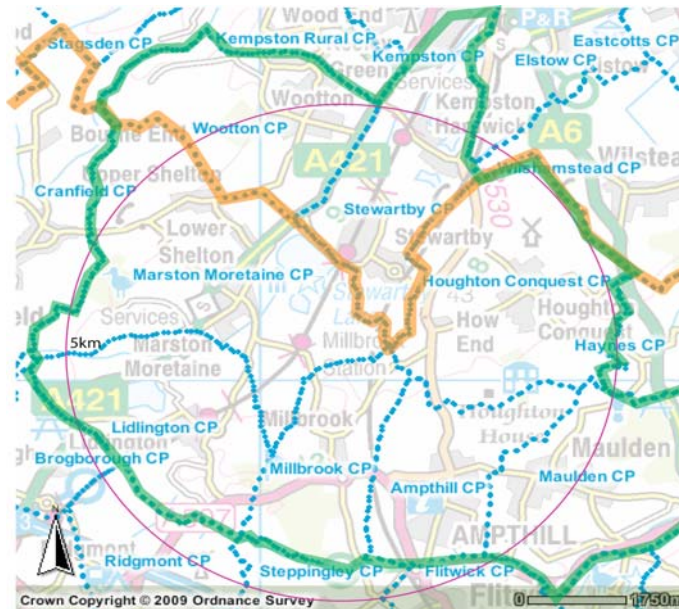
6.5 IPC Environmental Scoping Consultation

- 6.5.1 Under the terms of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 the Project is required to be accompanied by an Environmental Statement (ES) that will assess the significant environmental impacts arising from the proposed development.
- 6.5.2 In general terms the nature of an ES required by the IPC is much the same as an ES required under S36 of The Electricity Act 1989. In June 2009 Covanta sought a Scoping Opinion from the Department of Energy and Climate Change (DECC) to guide its preparation of the ES that would accompany its S36 application. DECC provided such a Scoping Opinion on 4 September 2009 having then consulted with the appropriate consultees.

6.5.3 Whilst Covanta already has a Scoping Opinion for its Project under the S36 determination route, and scoping is not mandatory under the new IPC Environmental Impact Assessment Regulations, Covanta is committed to following best practice and has undertaken to seek a Scoping Opinion from the IPC. This process will in itself facilitate further wide consultation with a large group of technical prescribed consultees on the Project as it has evolved some 3 – 4 months on from when the S36 environmental scoping consultation was carried out in July and August 2009.

6.6 Consultation footprint

6.6.1 As evidenced by work to date, Covanta believes that those within close proximity to its projects should be encouraged to engage with its development proposals. Replicating the consultation footprint adopted during the environmental scoping consultation, Covanta proposes a direct mail consultation footprint of 5km radius of the site adjusted to reflect parish council boundaries (please see outline map below).



Orange line = Central Bedfordshire and Bedford Borough boundary
Green Line = Consultation area along parish council boundaries

6.6.2 It is proposed that a distribution company or Royal Mail will be engaged to deliver leaflets and updated information on the Project and the further proposed exhibition dates to all households/businesses within the agreed area (approx. 15,000). This information will be supplemented by posters and flyers advertising the consultation process at key public venues throughout the area; an official public notice and publicity in local press; newsletters; and a dedicated letter of invitation to all local area representatives, interest groups and voluntary and community groups to engage hard to reach groups.

6.7 Proposed Communication and Consultation Methods

6.7.1 Throughout the remaining pre-application process, Covanta continues to be open to suggestions on how best to communicate and listen to opinions whether

that is via the CLP or any other organisation. The principal measures that it intends to deploy are:

- (a) Covanta will deliver a leaflet explaining the proposed application to addresses in the parishes included within a 5km radius of the Project. This leaflet will provide details on how to respond to consultation about the Project, through the consultation process. It will be delivered to about 15,000 addresses;
- (b) Covanta will continue to hold meetings with the CLP during the consultation process and, afterwards, during the application for the DCO. Agendas from the CLP meetings will be made available by means of the Project website (see below); and
- (c) Local exhibitions and workshops will be held explaining the IPC application process. The exhibitions will provide opportunities for the public to provide feedback on the Project and to respond to the consultation. Exhibition attendees will also be encouraged to complete and submit a feedback form before the consultation closing date;
- (d) Details of the exhibitions are as follows:
- (e) Dates, locations and times will be published in the SOCC. It is proposed that the exhibition dates will include early Friday evenings, Saturday and Sunday on the weekend of January 29th, 30th and 31st at venues to be decided upon by the CLP for the Project;
- (f) The exhibitions will be staffed with professionals who are able to describe the Project and the application process. They will be able to note any comments and responses to the consultation. It will be possible to speak to the Project team on a one-to-one basis;
- (g) The exhibitions will be publicised via a press release to the local news media, including local radio and television and by placing a notice in the local newspaper, displaying posters and through door-to-door leaflets to be distributed throughout the locality;
- (h) Covanta will write directly to key stakeholders, such as local councillors, MPs and CLP members advising them of the exhibitions, other consultation proposals and the Project proposals;
- (i) Covanta's consultation process on this Project will provide feedback on people's views expressed so far and how they have been taken into account; and
- (j) Documents, plans and maps showing the nature and location of the proposed development will be available for inspection free of charge at the locations listed below. Hard copies will also be made available by request. Covanta may impose a reasonable copying charge for this service;

6.7.2 These approaches will take place in conjunction with the formal consultation requirements of the Infrastructure Planning Commission and will build upon consultation undertaken to date during the Environmental Scoping period. The

views of the CLP on future methods of consultation were requested and the feedback given included requests for:

- a permanent exhibition at the Forest Centre The incorporation within the exhibition of an architectural model of the facility in the context of the Vale, with detail of road, rail, towns and villages and other developments
- Wider use of photomontage views from villages and Ampthill
- The further use of feedback sheets for people to give views back to Covanta and promote the members of the CLP as an additional place to register feedback and ask questions for the CLP to bring to meetings

All suggestions were fully considered. Those that can be achieved are being considered; those that did not provide a practical solution were not progressed but this was explained.

7. Proposed media relations including Central Bedfordshire and Bedford Borough Councils

7.1 Introduction

7.1.1 Covanta prides itself in taking a pro-active, open and honest approach with the media – no matter how contentious or controversial the questioning might be. It alerted the local and regional media of its interest and hopes to the Project in November 2008 and maintains contact with journalists researching and writing on the topic. This includes electronic based media and the waste press.

7.1.2 As part of its media activities it is envisaged Covanta will:

- (a) produce a press pack detailing the key elements of the application – including artists' impressions, photo montages, plant and technology descriptions, waste arising, traffic routes and a plant schematic;
- (b) issue news releases concerning matters such as public exhibitions and public engagement;
- (c) arrange facility visits to existing operational EfW plants; and
- (d) provide a press enquiry service to answer any media questions about the proposal, the company and its worldwide activities.

7.1.3 The media programme – pro-active and reactive – will be conducted through our PR agency, Quantum PR, which is accountable to our Director of Planning (Rachel Ness), who will ensure the programme meets the planning requirements.

7.1.4 Press materials, media monitoring, media enquiries and strategic media advice will be sought from Quantum Public Relations. Managing Director Malcolm Chilton is most likely to act as the company's spokesperson (alternatives include Director of Planning Rachel Ness and Marketing Manager Dan

Carbery). However, it will be for Covanta to determine which person is the most appropriate voice on any given matter.

7.1.5 It is our intention to send media releases to the press offices of both Central Bedfordshire Council and Bedford Borough Council at the time of their release to the media. It will be a matter for those offices to determine any wider circulation within their respective Councils.

7.1.6 If - at any time - either Council press office wishes to obtain materials (words or images) they can use Quantum PR which will also assist them on matters of detail, accuracy or further information.

7.1.7 Covanta welcomes a climate in which it can share information concerning media activity with the two Councils in an open and non-confrontational manner in the interests of public understanding of the application. Our main PR contact for this is: Robin Treacher, Quantum PR, Tel: 01233 500200 or Email: robin@quantumpr.co.uk.

7.2 Media Experience

7.2.1 Covanta and its consultants Quantum PR have extensive experience of dealing with the media and its reaction and enquiries relating to this type of development. We are mindful of the impact this can have on a local authority and its elected Members.