

Pre –application community consultation strategy for proposed Brig y Cwm Energy from Waste facility

Introduction

Purpose

This report has been compiled to detail the activities Covanta Energy UK has undertaken between January 2009 and March 2010 in communicating and consulting with the communities in the vicinity of its proposed Energy from Waste (EfW) facility in Merthyr Tydfil County Borough.

The report also outlines the community consultation activities Covanta proposes to undertake from now (April 2010) until it submits its planning application for Brig y Cwm EfW to the Infrastructure Planning Commission (IPC) during late summer / early autumn 2010.

Background

Covanta is developing plans for its proposed Brig y Cwm EfW facility on the outskirts of Merthyr Tydfil. The facility will be on land adjacent to the Cwmbargoed rail head and largely within the Ffos y Fran Land Reclamation Scheme.

The facility will be capable of generating 67MW of energy by processing up to 750,000 tonnes annually of residual waste, ie. that waste left for disposal after recycling and composting. The waste will be a combination of municipal waste and commercial and industrial waste and will contribute significantly to diversion of waste from landfill within Wales.

Approximately 75% of the waste will arrive at the facility by rail in sealed containers. The remaining 25% will arrive by road coming from the host local authority area and its immediate neighbouring authority areas.

While the site is located wholly within the borough of Merthyr Tydfil it also lies near to the boundary with the authority of Caerphilly. In fact, the nearest residential area to the proposed site is within the Caerphilly borough. In undertaking and planning all consultation activity therefore, Covanta has engaged with relevant communities in both local authority areas on an equal basis.

Details of the Brig y Cwm proposal were first made public in January 2009 when the company formally announced its plans.

As the facility will generate more than 50MW of electricity, the application – known as a development consent order (DCO) - will be submitted to the IPC for determination. The

IPC is an independent public body set up to examine and determine applications for nationally significant infrastructure projects. In making its decision, the IPC will have regard to Welsh Assembly Government policies.

Covanta is committed to best practice in public consultation and engagement throughout the planning process. 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.

Consultation undertaken to date

Since announcing its proposal, Covanta has engaged in an inclusive programme of consultation activity in neighbouring communities and with relevant local stakeholders. This section explains the methods of consultation activity undertaken to date and audiences engaged.

To plan and execute all consultation activity, Covanta employed the services of Warwick Emanuel Public Relations Ltd (WEPR), which is based in Cardiff and operates extensively in south Wales. WEPR helped develop a clear and coordinated approach to consultation and information management and have been the first point of contact for media enquiries and public enquiries regarding the project.

Database

Prior to the announcement of the proposed facility, a database of relevant local stakeholders was compiled who it was deemed would have a strategic interest in the project. They included:

- All elected Merthyr Tydfil and Caerphilly County Borough councillors
- Relevant Assembly Members and Members of Parliament
- Chief executives of all local authorities in Wales
- Heads of waste management at all south / mid and west Wales local authorities
- Leader of North Wales Waste Consortium
- Members of Prosiect Gwyrdd

Since moving into the land use planning stage of the project, the database has been updated using local knowledge, desk research, media coverage and direct contact. It has also been informed by the requirements of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 which list all prescribed consultees for the purposes of the DCO application.

The database will continue to be updated as the project progresses, in particular taking account of feedback from the pre-application community consultation.

Announcement of proposal

Plans for the project were made public via a media announcement which was widely covered in the local and Wales national media. Print and broadcast media was secured in both English and Welsh.

To tie in with the media launch, personally addressed letters were issued to the identified local stakeholders informing them of the plans.

The media release and letters contained information on the project, Covanta Energy, the EfW process and the company's commitment to consult fully on the plans.

The media release, and accompanying artist's impression of the facility, was issued to the following media:

- South Wales Echo
- Merthyr Express
- Rhymney Valley Express
- Western Mail
- BBC Wales (TV and radio both in English and Welsh)
- ITV Wales

Local community

A letter from Covanta was also hand delivered to all properties in Fochriw - the community lying nearest to the proposed site. The letter contained information on the proposal and detailed Covanta's commitment to establish a Community Liaison Panel.

Dedicated points of contact

Covanta set up a dedicated project e-mail address and contact telephone number for interested parties to contact should they have questions about the proposal or wish to be kept informed about developments.

Enquiries through the medium of Welsh are also welcomed through these channels.

All calls / e-mails received are managed by WEPR who record the details of each enquiry received.

Website

A dedicated Brig y Cwm project web page was set up on the Covanta website - <http://www.covantaenergy.co.uk/site/wales/>

The web page includes the latest information on the project and provides a detailed overview of the CLP including its purpose, how it was formed and the names / contact

details of its members. The approved notes of each CLP meeting – including handouts of any presentations given – also appear.

Information Days

Within three months of announcing its outline plan for the Brig y Cwm facility, Covanta held a round of information days to introduce the company and the concept of energy from waste to the local communities.

The information days provided local people with the opportunity for face-to-face dialogue with members of the project team who were on hand to discuss the project and to answer questions raised.

Raising awareness of the information days

A number of measures were adopted to raise awareness of where and when the information days would take place. This included:

- Personally addressed letters sent to key local stakeholders advising them that the information days would be taking place and also personally inviting them to attend. This included letters to:
 - All elected Merthyr Tydfil and Caerphilly County Borough councillors
 - Relevant Assembly Members and Members of Parliament
 - Chief Executives of Merthyr Tydfil and Caerphilly County Borough Councils
 - Heads of waste management at all south / mid and west Wales local authorities
 - Members of Prosiect Gwyrdd

- Paid for advertisements in the relevant weekly and daily local newspapers, including:
 - Merthyr Express
 - Rhymney Valley Express
 - South Wales Echo

- News release to the above media to achieve editorial coverage, and to relevant broadcast media which included:
 - BBC Radio Wales
 - BBC Radio Cymru
 - ITV Wales
 - Red Dragon Radio
 - Real Radio

- Posters at focal points with the relevant local communities – which included libraries, community centre, local shops.
- Information on the project web page on the Covanta website

The Information Days

Four information days were held in total. These were:

27 th April 2009	Fochriw Community Centre	1pm – 7pm
28 th April 2009	Merthyr Tydfil Rugby Club	1pm – 7pm
29 th April 2009	Merthyr Tydfil Rugby Club	1pm – 7pm
30 th April 2009	Miller Argent Cwmbargoed Disposal Point	1pm – 7pm

The information days 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. A Freightliner representative was also present to discuss the transportation of waste by rail.

Information Available

An extensive suite of material (in both English and Welsh) was available at the information days. It included:

- Exhibition display boards which:
 - Provided specific information on the project
 - Introduced Covanta Energy, and
 - Explained the EfW process
- A range of printed information, including:
 - A project summary and details of where to find more information
 - Information on the Section 36 planning process
 - Covanta Energy's annual report
 - Latest edition of the Covanta quarterly newsletter

- A feedback form to gather responses on the quality of the exhibition and views on the proposal. It also asked people if they would be interested in becoming a member of the Community Liaison Panel.

Almost 210 people attended the information days.

Of the 51 people who completed feedback forms:

- 39 strongly agreed or agreed EfW is an effective method of waste disposal
- 36 stated they felt adequately informed about the Brig y Cwm proposal
- 45 strongly agreed or agreed that the Covanta team was helpful and able to answer questions, and
- 37 strongly agreed or agreed that the information at the information days was clear and concise

A letter providing an update on the information days along with a breakdown of the above finding was sent to the relevant local stakeholders. This included:

- All elected Merthyr Tydfil and Caerphilly County Borough councillors
- Relevant Assembly Members and Members of Parliament
- Chief Executives of all local authorities in Wales
- Heads of waste management at all south / mid and west Wales local authorities
- Leader of North Wales Waste Consortium
- Members of Prosiect Gwyrdd

Community Liaison Panel

The CLP for the Brig y Cwm project was proposed as a forum of up to 20 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.

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 channel 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.

Purpose

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:

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

It is intended that the CLP will also help to build up trust between the local community and Covanta via the independent facilitator. However, membership of the CLP does not imply either support for or objection to the project.

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 for ease of access.

The facilitator fulfils the role of Chairperson, meeting convenor and note taker.

Covanta provides presenters and specialist technical input approved by the Panel as requested.

Recruitment

Plans to set up a CLP were first made public in the letter issued to the community of Fochriw in January 2010. People who attended the information days were also asked to express their interest in joining via the feedback forms made available at the events.

Formal notification of the beginning of the application process was made in August 2009 through paid for advertisements in the local newspaper. This included:

- South Wales Echo
- Merthyr Express
- Rhymney Valley Express

A media release was also issued to the above newspapers detailing the start of the application process and encouraging those interested to apply for a place. This resulted in editorial coverage.

Posters were placed in community establishments within the relevant areas e.g. community centres, libraries, local convenience stores.

In addition, personally addressed letters were sent to those members of the public who attended the information days and had expressed an interest in joining.

In total, 15 applications were received by Opinion Research Services – the independent company employed to set up and chair the CLP – with each applicant being accepted onto the Panel. One member however has since withdrawn due to a conflict of interest with his involvement in Project Gwyrdd.

Meetings

The CLP met for the first time on 27 October 2009 and has met monthly since then. During the meetings, Covanta, at the request of the CLP, has arranged for speakers to deliver presentations on different aspects of the project. This has included presentations on the EfW process, management and monitoring of air quality, the design of the facility and the movement of waste by rail. Covanta has recently offered representatives of the CLP the opportunity to visit some of its operational facilities in the US and to meet with local regulators.

Environment Agency Wales also has an open invitation to attend the CLP meetings and has delivered two presentations including one on monitoring emissions.

All agreed meeting notes and summaries of the presentations given appear on the dedicated project web page of the Covanta website.

The CLP 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.

Proposed future consultation

In March 2010 the IPC replaced the Secretary of State for Energy and Climate Change as the applicable determining body for development proposals generating more than 50MWe of electricity. The new UK Government intends to abolish the IPC in due course, and the IPC or its successor (which is likely to be part of the Planning Inspectorate) will make a recommendation to the Secretary of State for Energy and Climate Change who will make the final decision on the application. In the meantime, applications that are already in the system will continue to be processed by the IPC.

The IPC process set up under the Planning Act 2008 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.

Local Authority Engagement

The IPC process emphasises the leading role local authorities must play in guiding consultation over plans for the development in its area. While the proposed development lies within the borough of Merthyr Tydfil, it is also in close proximity to the borough of Caerphilly. For this reason, Covanta is treating both local authorities on an equal level with regards to consulting on the proposed consultation programme.

Local authorities are recognised by the IPC as having expert knowledge of the local community. To ensure Covanta's consultation programme is effective and reaches the relevant people, the company met with both the relevant planning officers and the communication officers at Merthyr Tydfil and Caerphilly councils to discuss the proposed programme. The vast expertise both authorities have in consulting with their respective residents – particularly on significant matters - enabled them to provide valuable feedback to Covanta's plans.

As part of the consultation process, Covanta will publish a Statement of Community Consultation (SoCC) which will outline its proposed actions with regard to consulting the local communities. The SoCC will be published in both English and Welsh.

Each local authority was invited to comment on the draft SoCC prior to its publication in relevant local newspapers. This involvement on the part of the local authorities was discussed at the meetings. The response received from the local authorities has been incorporated into the SoCC and this consultation strategy.

It is proposed that as Covanta progresses with its consultation activity for Brig y Cwm it will continue to liaise closely with the relevant corporate communications officers at each local authority. This will be in addition to the liaison Covanta is engaged in with relevant planning officers and other technical specialists at each local authority.

Proposed Communication and Consultation Methods

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 it intends to deploy are:

- Covanta will deliver a letter explaining the proposed application to addresses within a 5km radius of the project (NB. the 5km radius will be extended where application of a rigid distance would cut through communities, for example to include the settlements of Heolgerrig, Winchfawr, Castle Park, Gellideg, Cefn

Coed and Trefechan). This is expected to encompass approximately 25,000 homes and businesses. The letter will provide details of the planned consultation days and information on how people can respond to consultation about the project. Covanta will employ the services of an experienced local distribution company to deliver the letters.

- Consultation days will be held explaining the project and the IPC application process. The days will provide opportunities for members of the local communities to provide feedback on the project and to respond to the consultation. Those attending will be encouraged to complete and submit a feedback form before the consultation closing date.
- Documents, plans and maps showing the nature and location of the proposed development will be available for inspection at the consultation days. The majority will be available in English and Welsh. Hard copies will also be made available on request. However, Covanta may impose a reasonable copying charge for larger documents.
- It is proposed that the consultation days will be held during the day and early evening of weekdays and also on Saturdays. Dates, locations and times will be published in the SoCC.
- Taking on board feedback received from the information days held in 2009, the consultation days will also be held at communities slightly further afield from the proposed site but who still may feel they would be impacted by the development. In arriving at the proposed locations, the views of the local authority communications managers on community identity have been taken into account.
- The consultation days will be staffed by professionals who are able to describe the project and the application process. It will be possible to speak to the project team on a one-to-one basis and they will be able to make a note of any comments received. A Welsh speaker will also be available.
- The consultation days will be publicised via a media release to the local news media, including local radio and television. A notice will also be placed in local newspapers and posters will be displayed throughout the locality. This will include community notice boards, where available.
- Covanta will also work with local community groups e.g. Communities First – to raise awareness about the consultation days.
- To ensure people working in the locality are also aware of the consultation days, Covanta will place copies of the SoCC in buildings employing large numbers of people i.e. T-Mobile, Welsh Assembly Government, Orbit Business Centre. It will also place copies of the SoCC at newsagents, libraries, medical surgeries, leisure centres etc located throughout the locality.

- Covanta will write directly to key stakeholders, such as local councillors, MPs, AMs and CLP members advising them of the days
- Covanta's consultation process on this project will provide feedback on views expressed by people so far and how they have been taken into account through a formal Consultation Report that will be submitted to the IPC with the DCO application.
- Covanta will continue to hold meetings with the CLP during the consultation process and, afterwards, during the application for the DCO. Agendas and notes from the CLP meetings will continue to be made available by means of the project website.
- Covanta will also continue to respond to any enquiries received through the dedicated telephone / e-mail services provided.

Preliminary Environmental Information

As the proposed Energy from Waste Facility at Brig y Cwm constitutes a development requiring Environmental Impact Assessment, Covanta is currently undertaking an Environmental Impact Assessment. The community consultation will include consultation on the Preliminary Environmental Information, which reports on the information gathered so far and the preliminary findings based on the emerging scheme.

A non technical summary of the Preliminary Environmental Information will be made available in both English and Welsh, and there will be clear information provided as to how people should provide feedback. The availability of this material and the deadline by which feedback will be required will be publicised by way of formal notices in the local press as required under section 48 Planning Act 2008.

Media Relations

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 for the project in January 2009 and maintains contact with journalists researching and writing on the topic.

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

- 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

- issue media releases concerning matters such as consultation days and public engagement; and
- provide a press enquiry service to answer any media questions about the proposal, the company and its worldwide activities.

The media programme – pro-active and reactive – will be conducted through WEPR, who are accountable to the project's Senior Planning Manager (Anne Dugdale), who will ensure the programme meets the planning requirements. WEPR is highly experienced in this work, and conducts similar projects for major utility companies.

Press materials, media monitoring, media enquiries and strategic media advice will be provided by WEPR.

Managing Director Malcolm Chilton is most likely to act as the company's spokesperson during the consultation period. Alternatives include Project Manager Jason Baldwin, Senior Planning Manager Anne Dugdale and Marketing Manager Dan Carbery. Covanta will determine which person is the most appropriate voice on any given matter.

Media releases will be sent to contacts within the corporate communication teams of Merthyr Tydfil Council and Caerphilly Council at the time of their release to the media. It will be a matter for those officers to determine any wider circulation within their respective areas.

If either council wishes to obtain materials (words or images) they can use WEPR who will also assist them on matters of detail, accuracy or further information.

Covanta welcomes a climate in which it can share information concerning media activity with the two councils in an open manner in the interests of public understanding of the application. The main PR contact for this is Gwyn Thomas who can be contacted on 02920 556145 or gwyn.thomas@wepr.co.uk

It is intended that this Consultation Strategy will be published along with the SoCC on the Brig y Cwm webpage.

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