

Bromsgrove District Council planning application 16/0085

Severn Trent Water PLC– Birmingham Resilience Project (BRP)

Response of Romsley Parish Council

22nd March 2016

Richard Arrowsmith, Romsley Parish Council Chair (Author)

This document outlines the Romsley Parish Council response to the Severn Trent Water PLC planning application to Bromsgrove District Council (planning application ref: 16/0085) for the Birmingham Resilience Project (BRP) which involves the building of a pipeline and significant above ground water treatment infrastructure in the parish of Romsley, Worcestershire.

Romsley Parish Council **objects** to the planning submission in its current form for the following reasons;

- A) The Break Pressure Tank (BPT) / Powdered Activated Charcoal (PAC) dosing site and its impact on the Romsley Parish community and its green belt rural environment. (page 3)
- B) The significant impact of constructing the Birmingham Resilience Project (BRP) on Romsley parish, its environment and its community. (page 9)
- C) Concerns arising from the Severn Trent consultation and communication exercise. (page 11)

The main body of this document will provide more detail against each of these reasons. However the Parish Council is prepared to withdrawal this objection between now and any Local Authority Planning Committee meeting, if progress can be made around a number of the issues and concerns identified within this document.

Before exploring these matters in depth the Parish Council would like to make the audience aware of a number of items that are deemed to be relevant background to the Parish Council decision.

The current Parish Council position to object has been arrived at after extensive consultation across our community. We have spoken to dozens of residents individually as well as capturing the views of residents at a number of Parish Council meetings, residents meetings and our own parish planning forums. Of these residents, the vast majority understand the importance of providing greater resilience to Birmingham's water supply and thus the need for this project*.

However, the Parish Council believes that all parties involved in submitting and considering this application must recognise that Romsley Parish residents will not be receiving any benefit, such as added water resilience, from this project. Yet as a parish we will suffer many months; if not years, of severe construction related disruption and our rural community in a green belt area will be permanently blighted with a semi-industrial water treatment facility.

**The author would also like to take this opportunity to state that they were employed as an Emergency Planning and Resilience Officer for Birmingham City Council and are currently employed as a senior manager with a national infrastructure operator so they also have a deep awareness of many of the issues surrounding this project and the urgency associated to it.*

Throughout the consultation period Severn Trent have been unwilling or unable to acknowledge this critical point with regard to Romsley and its residents. For example in their socio-economic report “*on route to final destination*”, where they describe the impact of the project on quality of life in affected communities, they include Kidderminster, Stourport on Severn, Wilden, Harvington, Chaddesley Corbett, Belbroughton & Frankley, but no assessment has been undertaken for Romsley, despite it having some of the most significant new surface infrastructure of the project.

Though this resilience project is of national importance, I am not aware that Severn Trent has received any special dispositions that absolve them of their responsibilities under planning or green belt guidelines that removes their need to act with full and reasonable consideration of the communities they are disrupting. Nevertheless, many Romsley residents feel that Severn Trent have so far acted in a high handed manner with an approach that can be described as “accept it and lump it”. Whether this is Severn Trent’s intention or not, the manner in which critical elements of community consultation have or have not been undertaken, such as the lack of close up artist impressions or the provision of easy to understand information about the size and true operational purpose of the Break Pressure Tank (BPT) / Powdered Activated Charcoal (PAC) dosing infrastructure, have only fuelled the miss-trust and negative view of Severn Trent’s motivations and approach.

The concerns of Romsley residents must not be dismissed as simple “NIMBIISM”. Our community is willing to accept the consequences and severe disruption associated with construction and operation from this infrastructure because of the wider regional benefits to Birmingham residents. But we do require Severn Trent to work with us to mitigate certain impacts and provide concrete assurances that the design choices Severn Trent have made; that negatively impact our Parish and its environment, are for legitimate technical reasons and are not just to ease the financial or project burden of Severn Trent and its shareholders.

Resolving matters – the way forward

As a Parish Council we will continue to try and establish a meaningful dialogue with Severn Trent and encourage them to work constructively with our community to review their proposals properly and where necessary make reasonable modifications to their project plans and infrastructure. To this end, Romsley Parish Council have suggested the establishment of a community working group, which involves representatives of Severn Trent, its contractors and community representatives working collaboratively to discuss, resolve and mitigate key issues surrounding the project and its impact on the Parish.

This community working group should operate under clear terms of reference, with pre-agreed mandates and recognised authorities for making or recommending reasonable and appropriate changes to the project, which all participating organisations and bodies must sign up and adhere to. In addition, every active member of this working group should operate in a spirit of cooperation, with a determination to move the project forward with mutual benefit. We believe that this working group should run for the full length of the construction and reinstatement period. We also believe that it should act as the focal point for liaising with the community around any practical issues that will occur during construction, and should oversee; and ultimately confirm, that Severn Trent has fulfilled its environmental and reinstatement obligations appropriately.

The Parish Council would like to see the existence, functions and mandates of the community working group reinforced through the planning conditions, which if achieved, would be a significant step towards the Parish Council being able to withdrawal its current objection.

A) The Break Pressure Tank (BPT) / Powdered Activated Charcoal (PAC) dosing site and its impact on the Romsley Parish community and its green belt rural environment.

1) Break Pressure Tank (BPT) - location

1.1) Under Severn Trent's proposals a large, above ground and industrial piece of infrastructure called the Break Pressure Tank (BPT) will be built in the middle of Romsley Parish which is designated green belt, (LPA - C1 landscape protected & area of great landscape value) a status which is cherished by all the residents of our community.

1.2) It is the opinion of the Parish Council that the BPT facility is completely at odds with any other buildings or facilities in the immediate vicinity or wider Parish and appears to be in conflict with Bromsgrove's own LPA Policy C1 which clearly states **'proposals which ignore the character & quality of the area through ill-considered size, siting, colour, finish of form of development will be resisted'** and we believe that the absence from the planning application of close up or ground level artist impressions, with proper scaling features, for BPT site as part of does not permit planning authorities to fully gauge the suitability of the design for its green belt location.

1.3) The proposed site for the BPT is located off Putney Lane and is clearly visible from the B4551 Bromsgrove Road which is the main thoroughfare of the Parish and as such is a gateway to our community. The proposed site is located within 50 metres of a recognised Site of Special Scientific Interest (SSSI) and the site itself sits within a Natural England designated SSSI impact risk zone for planning applications (see Fig1).

1.4) The location also borders directly on to an area of common land known locally as the Marlhole which is rich in fauna and flora. The location is completely rural with the only buildings in immediate proximity being agricultural in design. However, the site is visible to a significant number of local residents living within a 500 metres radius.

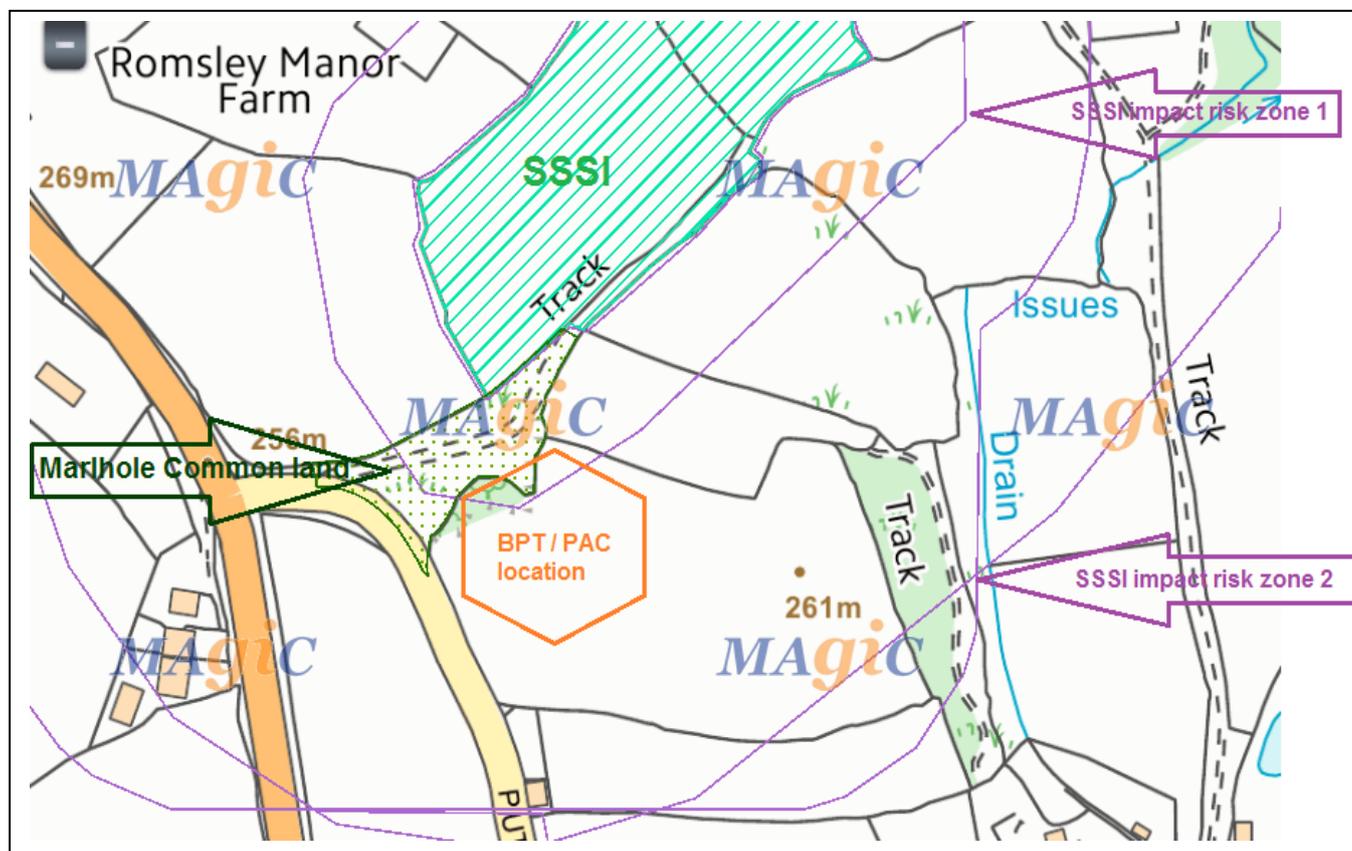


Fig 1 – location of BPT, Marlhole common land, SSSI and SSSI impact risk zone. (Obtained from Dept Environment, Food and Rural affairs GIS - MAGIC site March 2016) (<http://magic.defra.gov.uk/MagicMap.aspx>)

3) Break Pressure Tank (BPT) – Technology

3.1) For the record the Parish Council believes the true nature of the Break pressure Tank (BPT) facility has been misrepresented through the consultation and possibly the planning process. By continuously referring to the proposed infrastructure in Romsley as a Break Pressure Tank (BPT) and implying it was an underground storage reservoir Severn Trent reduced the level of community interest and associated controversy during the formative stages of the project.

3.2) However as already described in section 2 the primary purposes of the Romsley BPT is to act as water pre-treatment works for the removal of pesticides, nitrates and other contaminants from the water moving through the facility using Powdered Activated Charcoal (PAC) dosing and as such any examination of the operational impact of the BPT site must be from this perspective.

3.3) The majority of concerns identified by residents are associated with the above ground infrastructure at the BPT which is required to undertake Powdered Activated Charcoal (PAC) dosing. If these items were removed the majority of long term impacts would be removed.

3.4) From Severn Trent's own documentation it appears number of locations were identified for this facility all of which had to be sufficient distance from Frankly water treatment works to allow approximately 40 minutes from destination to allow this method of activated charcoal cleansing sufficient time to work. This is of course a complex and technical matter and we would look to Severn Trent to provide us with clear and transparent information about why this location is the most appropriate. However the Parish Council have contacted a number of other professional opinions who have suggested that a PAC dosing facility can be located as close as 15 minutes from its destination.

3.5) As a community we also require more detailed and transparent information about why the PAC dosing solution has been chosen as the preferred option for water treatment. The Parish Council have made preliminary enquiries with industry experts who have suggested that more modern technologies such as Granular Activated Carbon (GAC) filtration systems exist. These same professionals have identified that PAC dosing is an older technology the primary advantage of which is lower cost in comparison to GAC filters.

3.6) GAC filtration systems are smaller, more efficient and do not require powdered activated charcoal or the associated storage silos. GAC filters can be located at the water outfall location itself meaning that all the BRP project elements associated with water treatment could be located within the existing boundary of Frankly water works. Romsley could retain the BPT which we recognise needs to be placed at the highest point of the pipe line, but all of the associated PAC dosing machinery and infrastructure would not be required. This would remove many of our residents' concerns and would significantly reduce the long term impact on the greenbelt environment and only affect an existing Severn Trent brown field site.

3.7) This of course requires proper technical analysis but we would encourage the planning authorities to challenge Seven Trent to present their reasoning of the solution and explain what other technologies were considered, such as GAC filters, and the reasoning behind them not being used. This will at least prove to residents that the infrastructure and associated impact proposed for Romsley is technically necessary and not purely to reduce costs to Severn Trent and its Share Holders.

4) Break Pressure Tank (BPT) - operating concerns

4.1) Putting to one side our concerns over the appropriateness and therefore necessity of the PAC dosing solution. The Romsley community are asking for more clarity over a number of issues surrounding BPT site if it becomes operational.

4.2) Much of this information should have been openly and transparently presented to Romsley residents by Severn Trent as part of the consultation exercises. However sadly it has not and even trawling through the planning submissions it has been difficult to gain confidence around basic operational elements as critical information is missing. The community requires more understanding around the following matters:

- Noise pollution from operations. Especially with regard to machine and air compressor noise that appears to be required to operate the system. This is a quite rural location especially at night will this machinery noise be noticeable to receptors.
- What are the power demands of the site? and will this impact on the existing power grid in the Parish which is already under huge strain and regularly experiences power outages.
- Light pollution from operations, Severn Trent have stated that the security lights will only be on when the BPT site is operational, however what happens if there is a security or operational issue and who would give permission to allow Severn Trent to change its lighting policy.
- What is the volume and frequency of HGV operations to refill the silos
- Dust generation due to silo filling and emptying – Severn Trent’s own planning documentation indicates a medium health risk associated with these activities. Whilst report ES volume 4-18.1 references (sec 184) significant impacts on air quality for local receptors without mitigation. No statement of mitigation measures available. As such we need more information to understand what these means and who this applies.
- What are the emergency and contingency plans for the site if it experience catastrophic failure.

4.3) It should also be noted that the planning documentation is based around 50 days of operation every 2 years to support maintenance of the Elan Valley aqueduct. However for planning analysis this must be seen as the “best case” scenario. If due to unforeseen resilience purposes the system had to be used for a continuous period or because Severn Trent wanted to undertake maintenance for more than 50 days this would radically change the impact assessment. As such and to bring balance and transparency the planning application should also contain detail on this “worst case scenario”. It should also be clear who if any outside bodies would be required to give permission and regulate operations at the BPT/PAC in these scenarios.

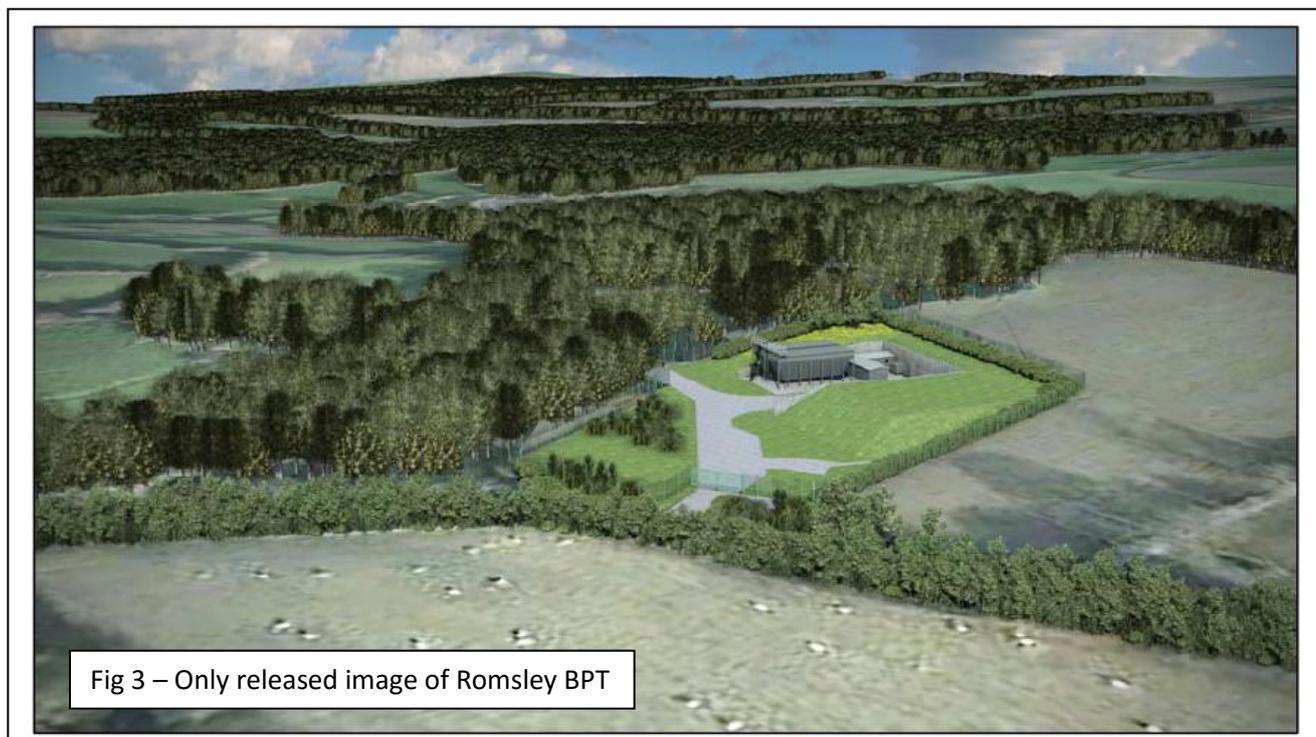
4.4) Finally there are a number of critical security issues that need to be acknowledged. The urgency of the BRP project is partially to overcome the single point of failure that currently exists with Birmingham’s water supply and the consequences if this deliberately targeted through criminal or malicious activity. As such the BPT will be a very visible part of Birmingham’s water infrastructure located in a remote and sparsely populated location. What are the implications for the community of Romsley if this BPT site itself becomes a target for criminal or malicious acts? Could Romsley residents be faced with ever increasing security fencing, permanent lighting or increased CCTV coverage if the security situation deteriorates? Or could their own safety be threatened?

5) Break Pressure Tank (BPT) - Community consultation concerns

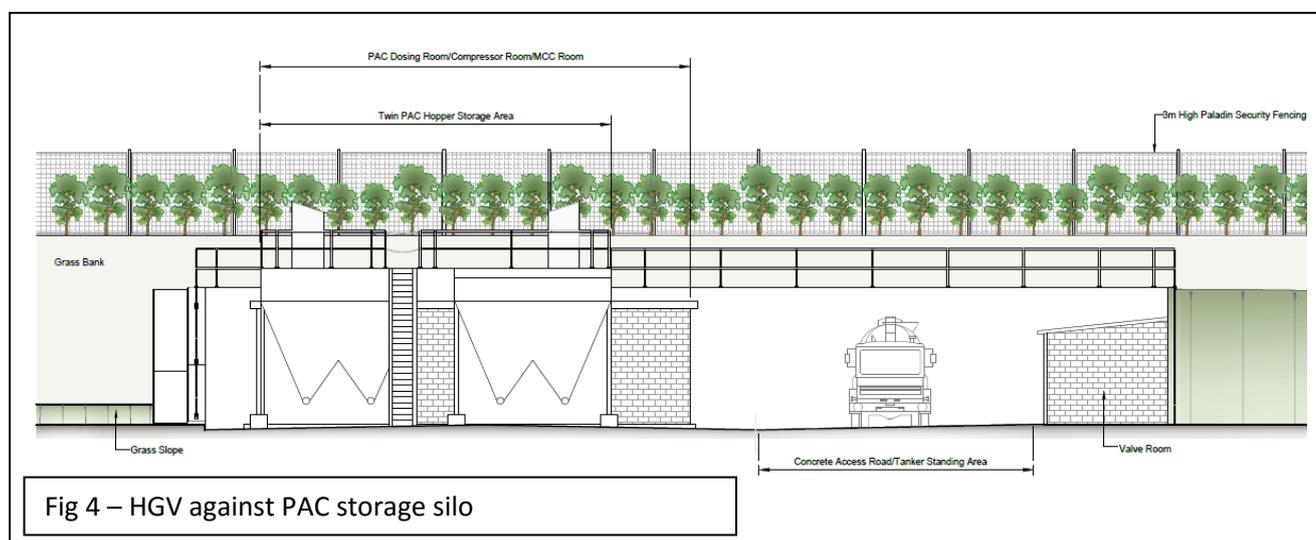
5.1) At no point in the consultation exercise undertaken by Severn Trent has straightforward information about the BPT design and its operation been made available to the Romsley community in an appropriate and easy to access format. Perhaps of even greater concern, given the none technical background of residents, is that no close up or ground level artists impressions for the BPT have been provided, (for example in the Environmental Statement figures 3-9.19 to 3-9.12 provide detailed photomontage of the proposed development along the major points of construction & route; with the exception that no information is provided on the Romsley BPT & site.)

5.2) In the first stages of consultation (pre Nov 2015) there were no pictures or significant references made to the BPT or its design. A point acknowledged by the Severn Trent team at the Parish Council meeting with them of 4th November 2015.

5.3) Shortly after this a long distance aerial impression as shown in fig 3 was released which remains the only image of the BPT that has been made widely available. However this shows no real detail, the landscape is inaccurate and misleading, and it includes nothing that can give a proper sense of scale to residents about the size of the BTP site, such as the inclusion of one of the HGV’s that will regularly service it.



5.4) When challenged over this lack of meaningful information by the Parish Council, Severn Trent stated that all the relevant information is available in the planning documentation submitted in February 2016. However, even in this planning submission there are few easy to interpret images of the BTP site that are really accessible unless you have a technical or professional background, this being said there are some stark images that show the true scale of the BTP facility. For example fig 4 shows a HGV in context to the right of the two PAC storage silos which are more than 6 metres high and the fence at the top being 3 metres high.



5.5) The Parish Council believes that it is completely unreasonable to expect residents to voice concerns about something they have no awareness of. It is also not acceptable to expect residents without a technical background to trawl through detailed planning documentation to get basic answers to reasonable questions on the look, size, scale and operational details of the industrial infrastructure associated with the BTP.

5.6) Given that our community did not have full and complete knowledge of the BTP site it has severely downgraded and in many cases removed the community's ability to understand and react to the BTP facility on our Parish during the formative stages of the project. As such the Parish Council questions the legitimacy of the consultation exercises undertaken by Severn Trent on this matter and thus the validity of these elements of the planning submission.

5.7) This being said, since January 2016 community awareness has started to grow rapidly as a result of a resident's action group on this matter. As a consequence the Parish Council has been approached by many residents who are questioning the suitability of the design for a green belt location and believe it to be completely out of character with the rest of our Parish.

5.8) There is also great confusion over the dimensional information that has been provided and the associated visual impacts on receptors; with a complete lack of clarity over whether the measurements provided in planning documentation refer to the BPT, the PAC dosing plant, the PAC storage silos, the security fencing or lighting columns.

5.9) Once they have gained clarity on the scale of the BPT, many residents are raising concerns about the potential visual impacts of the BPT site and are worried that the views from their properties will be permanently blighted and require clarity. Sadly they cannot gain the answers they need from the planning documentation because it lacks critical information for the BPT in Romsley or the information is confusing and contradictory.

- The visual impact assessments concentrate on the pipeline elements of the project, but the above ground BPT site does not appear to carry the same emphasis.
- Construction information at the BPT considers the closest receptors to the BPT to have neutral or slight adverse views. However this contradicts statements in the BRP environmental statement (p217) '*permanent impacts from the proposed facility building at the BPT & earthworks that shape the site area to achieve a level site*' and (P218) '*permanent impacts from the BPT security fencing & lighting, with access road & parking*'.
- Further conflicting information (or confirmation that its pipeline only) is given in the same BRP environmental statement. (P236) '*the effect of the BPT is likely to remain moderate adverse until the mitigation vegetation has reached maturity*'. Year 2033. (P241) '*there would be a moderate effect at the BPT site on opening year*'. Strangely these comments refer to aerial assessment only and not the ground level perspective of which there is no comment.

5.10) From March 2016 Severn Trent placed markers at the proposed location to try to provide some clarity a move we welcome. However this has not been backed up with contextual documentation or artists impressions that would allow the untrained eye to interpret the impact of these properly. There is a lack of clarity in the community over whether these markers are showing hoppers, tanks, fencing or lighting and even when referencing the planning application schematics it is difficult to accurately interpret what the BPT/PAC Dosing site will actually look like. For example BPT lighting plan TLL0159679-ext BPT-RB-011015 confirms 25 lights at 4 & 6 metres heights but no side elevations that show the impact are available. It should also be noted that this action was only done after the planning application was submitted; raising significant questions over the validity of the consultation reports.

5.11) The proposed mitigation from tree planting appears insufficient. The planning documentation appears to suggest that they will be planted as 30cm saplings with a planned 15 year cycle to reach maturity. As such residents will have to wait many years before the facility is appropriately covered and Severn Trent must be asked to reconsider these elements of their proposal.

6) Break Pressure Tank (BPT) - Environmental impacts

6.1) We understand from its literature that Severn Trent claims to take its environmental and post project reinstatement responsibilities seriously. However Romsley residents are extremely sensitive and somewhat dubious over these claims as our community is still living with the consequences of a Severn Trent engineering project from 2012 in which there are still many outstanding reinstatement issues which were not resolved. As such our community requires additional assurances from Severn Trent that they will protect our environment during construction and return the environment in our Parish to its previous state.

6.2) The BPT site is within 50 metres of a recognised SSSI and as a result it sits within a Natural England designated SSSI impact risk zone for planning applications, (see fig 1) and the Parish Council is surprised that this is not recognised or acknowledged in the planning documentation submitted by Severn Trent.

6.3) In addition the Parish Council deeply concerned about an area of common land called the Marlhole which borders the proposed location for the BPT site. The Marlhole also directly borders the SSSI site and as a result shares much of the Fauna and Flora associated with the SSSI but also adds additional increased environmental diversity to the area. (see fig 1)

6.4) Given the importance of this location and its proximity to the BPT site we are surprised that so little reference is made to the Marlhole in the Environmental Surveys. For Example ES volume 4-7.18 reptile survey report, ES volume 4-7.16 greater crested newt report & ES volume 4-7.15 pond habitat survey report have all omitted the common land registered as the 'Marlhole' in Putney Lane.

- The area of the Marlhole must be protected and given its proximity to the BPT site we believe a specific and specialist Environmental survey that establishes accurate “ground truth” is undertaken to ensure that no construction activity adversely affects this site. This survey should be the base level for all assessments going forward and any reinstatement works.
- It is the Parish Councils understanding that for the results of the an environmental survey to be legitimate and valid for planning purposes any specific environmental survey that is establishing “ground truth” must have the permission of the land owner to enter and undertake the survey.
- The ownership of the Marlhole has been unclear for a number of years, however the Parish Council has now established ownership (Bromsgrove District Council) and from conversations with them it does not appear that they gave formal permission to any organisation to enter the Marlhole and undertake the necessary surveys.
- However, the Parish Council has now secured permission from them to undertake the appropriate ground truth survey, which we will make available to Severn Trent and the planning authorities. The Survey will be undertaken by Worcestershire Wildlife Consultancy who is a recognised and experienced organisation for undertaking such surveys.

B) The significant impact of constructing the Birmingham Resilience Project (BRP) on Romsley parish, its environment and its community.

7.1) This is a very complex project that will take multiple years to complete. The scale of activity will be daunting and will impose significant disruption and adverse effects on the community of Romsley for many months and years. We have repeatedly asked Severn Trent for clarity and assurance about a number of aspects of the project in an attempt to understand, work with and mitigate the worst aspects of the construction phase. Sadly we have not received sufficient or satisfactory answers to these questions.

7.2) On too many occasions the Parish Council has received the stock answer to our question that “these are contained in the planning submission” For many questions this is simply not true and the planning documentation does not contain all the answers we require. But it is simply unacceptable for Severn Trent to not be transparent about the impact of construction in a manner that is easy to access and does not require the community to trawl through hundreds of complex planning documents. As such the Parish Council will not support the planning application until Severn Trent fully recognise and discharges their responsibilities properly buy providing the community with basic information about the impact of construction impact and more importantly the mitigations they have put in place.

7.3) The Parish Council have repeatedly asked for a simple but specific Construction Traffic Plan for the Parish detailing the egress and access routes for vehicles associated with construction so we can understand if these are suitable for HGV's and plant movement. We have many narrow lanes in the Parish with close proximity housing. As such we require clarity over routes and travel windows to ensure that minimise noise, vibration and congestion impacts are minimised.

7.4) Much of the pipeline work is to be undertaken on agricultural fields so sharply turning vehicles at site access points as well as the build up of mud, debris and dust will bring significant additional hazards to our roads. To help understand and mitigate these risks we have asked for detail about access and egress locations as well as proposed mitigations such as additional road cleansing to remove mud. We have received no specific or useful information on these matters to date. It should also be noted that we can find no reference in the BRP environmental statement to mud impact on the roads near the proposed BPT site or pipeline mobilisation yards in the Parish; or the mitigation measures to combat the effects of this.

7.5) Severn Trent's own documentation indicates that the Parish will experience an additional sixty (60) Heavy Goods Vehicles (HGV) movements per day, or one (1) every twelve (12) minutes over a twelve (12) hour period. In the BRP environmental statement chart 16.5 (P.433) on HGV construction traffic identifies an increase of 41.82% on the B4551 money lane/Bromsgrove rd and in the conclusion of the report of traffic it states that 'some locations exceed the 30% threshold requiring a detailed environmental impact study'. But then states that due to the short periods of time in locations due to the moving pipeline, such a study should not be required. This statement simply does not apply for the BPT site as it's an 18 month construction window therefore the study is imperative, particularly in view of the traffic turning into & out of the Bromsgrove Road at Putney Lane which is in close proximity to a known accident black-spot at the T-junction of Bromsgrove Road and Day House Bank.

7.6) The Parish Council have also asked for clarification around the numbers of construction workers employed within the Parish as this could have a dramatic effect on traffic volumes and a significant impact on Parish services. Once again we have not received a clear response to this. However the Severn Trent planning documentation indicates numbers of more than 150 workers at the BPT construction site alone, which could result in 300 additional vehicles across peak periods through a Village where we already have significant congestion especially at school drop off and pick up periods.

7.7) Significant numbers of constructions workers may bring some economic benefits to shops in the parish, a point we welcome. But it also will place huge pressure on local infrastructure and services. We already have significant and disruptive problems with parking at the Parish shops and could not cope with many more cars and mobile phone coverage is already poor. The community needs to understand how these will be mitigated.

7.8) The project will require significant use of plant such as excavators and lifting cranes. These generate noise, exhaust emissions and vibrations. The BPT site will also be built on sandstone and is likely to require pile driving. Overall the quality of information provided on these matters is insufficient or appears to be inaccurate; it is certainly in a difficult format for residents to understand and comprehend, for example

- Reporting ES volume 4-17.3 makes reference to construction noise assessment information for environmental impact (specific to the plant & machinery used at each location). This is for Lickhill river intake pumping station, Trimpey PAC dosing & Frankley WTW upgrade. The assessment also includes the transfer pipeline route works. No assessment is showing for the Romsley BPT.
- BPT environmental statement (p481) provides 'predicted noise' from construction at the BPT site. Table 17.5 predicts that the bulk excavation, compaction & backfilling & BPT installation noise will be 20% lower (41-43db), compared to the current measured ambient (average) noise of 55db in the surrounding area. (For some unexplained reason it does not use the same terms of reference of the construction noise assessment report referred to above (4-17.3) & neither does it state the machinery used & associated sound levels.) However this conflicts with information in table 17.6 which 'predicts' the decibel noise at houses directly opposite at 71db. This is 16 db higher than the measured ambient (average) noise for the surrounding area. (Please note that a 10% noise increase is in fact a doubling of the noise & the figure is nearly 30% higher than the World Health Organisation guidelines for serious annoyance for daytime & evening outdoor living.)

- Several references are made to vibration within the BRP scoping report to the need for piles driving with the effects are described as potential for structural damage. Sadly no detailed construction data is available for the proposed piling sites and no data is available for predicted vibration levels at vulnerable receptors. But Page 510 of the BRP environmental statement, states 'monitoring has already been taken committed to undertaking pre-condition structural surveys on some properties'. Page 434 quotes liaison with people on building damage. If pile driving is indeed to take place at Romsley BPT to my knowledge receptors in the vicinity have been contacted about building damage or been surveyed.

7.9) To ensure residents are not overly blighted we have asked for clarity from Severn Trent on permitted working windows, this has been difficult to obtain but from the planning documentation it appears that 7:00am to 7:00pm with an option for seven (7) day a week is has been proposed, (with the additional provision for some 24 hour working periods). When questioned on this, a Severn Trent representative told a resident living close to the BPT that this is application is based on it being a "non-residential area".

7.10) The consensus amongst the community is that these working windows are too long, and our residents will require extended periods free from vehicle movements, construction noise, dust and emissions. As such we feel that the working window should be limited to 8:00am through to 6:00pm and there should be no weekend working without adequate notice and community agreement. There must be no 24 hour construction activity

7.11) The community has also identified a number of concerns around aspects of security for the construction and storage areas. Clearly large amounts of valuable equipment will be stored and constructions sites are a strong temptation to young people.

- Clarity on the use of security lighting at compounds and along the pipeline route and the visual impact of this.
- Clarity on the measures that will be in place to provide adequate security to prevent our young people being exposed to the construction environment.
- How changes to security requirements will be regulated and under whose authority this sits. For example if Severn Trent wishes to increase the number or lights or the periods and locations of permanent illumination because of an increase in thefts or vandalism.

C) Concerns arising from the Severn Trent consultation and communication exercise

8.1) Throughout this document repeated reference has been made to concerns over the quality and legitimacy of consultation process that has taken place to date. Any organisation that is intending to deliver a large scale infrastructure project that will lead to significant disruption to communities is duty bound to be open, transparent and effective in its consultation and communication activities. To date Severn Trent's consultation and communication on this project has not met the needs of the Romsley residents and there remain too many unknowns or areas lacking precise answers about matters that will affect our residents for us to accept the planning proposal as it stands.

8.2) At times their approach has appeared to be deliberately obfuscating with information being presented in a way that steers residents away from controversial areas. The lack of appropriate artist's impressions of the Break Pressure Tank (BPT) that is proposed to be built in the parish and the lack of accurate and transparent information about its true water treatment purpose throughout the consultation period are examples of this. This issue avoidance and lack of transparency is the underlying issue that has caused many of the problems that have been referred to in previous sections of this document and, as a result, Romsley residents currently feel angry and frustrated by Severn Trent's approach.

8.3) Given it has been so difficult for the community to obtain robust and straightforward information about the true impact of this project it is impossible to accept Severn Trent's claims that there are few meaningful objections or concerns in the Romsley community. This is simply not true, any absence in raising concerns or questions was due to our residents not being given sufficient insight in to the project and its impact and once awareness of the issues surrounding the Birmingham Resilience Project (BRP) have emerged the residents of Romsley are now voicing very serious concerns.

8.4) Due to the way in which Severn Trent has undertaken the consultation, much of this community concern has only emerged after the planning documentation was submitted As such the Parish Council believe Severn Trent should be asked to modify and resubmit those elements of the planning documentation dealing with consultation to capture and describe the feedback they have now received from Romsley since February so it provides a fully representative account of all of the consultation and communications they have received. This is particularly important for referencing the issues that emerged from the additional community consultation that they held on Friday 11th March.

8.5) The two consultation meetings run by Severn Trent prior to February 2016 or the leaflets distributed by them in this period, never exposed residents to the true impacts or scale of the construction phase. They were particularly devoid of meaningful information about the size, scale or true purpose of the BPT.

8.6) Many residents failed to receive any leaflets or information about these sessions and given our Parish receives no free newspapers advertising a consultation session in these was of little value. In addition the second of these drop-in sessions was held during a week day when the vast majority of parish residents were at work and could not attend.

8.7) In an attempt to progress and resolve the problems identified by residents in a reasonable and constructive way, the Parish Council have met with, and written to Severn Trent on several occasions during the past four months to outline the community concerns and suggest ways of mitigating these. Sadly we failed to receive any appropriate or substantive responses that addressed the concerns outlined in these letters. None of this correspondence or the issues raised were mentioned or acknowledged in the consultation documents submitted as part of the planning application.

8.8) Despite being told of the growing concerns in the community, Severn Trent refused to participate in a Parish Council chaired public meeting on March 14th to present to residents their proposals and listen to concerns in a formal and minuted environment, citing they would rather deal with individuals despite our offer to agree meeting controls and Chair the meeting to ensure it remained constructive. This choice led to huge resentment amongst residents and reinforced their negative view of Severn Trent's approach.

8.9) Severn Trent then decided to go ahead with a 3rd additional consultation session on March 11th which appears to be as a direct result of the community pressure that was being placed upon them and we welcomed this, and verbally advised them of areas they should provide details on if they were to help overcome the community concerns. We emphasised the absolute need to provide residents with more detailed artists impressions of the BPT from a realistic ground level perspective along with practical information about its design and its operation, perplexingly Severn Trent failed to do this despite it being the fundamental issue at the heart of our communities concerns.

8.10) Our figures suggest that over 150 residents attended this 3rd consultation session which is significantly higher than the other sessions. Such was the frustration and anger within our community the Parish Councillors witnessed over 90 residents attending simultaneously to raise their concerns and ask specific questions. Severn Trent representatives were unable to answer many of these straightforward questions to the satisfaction of residents but they did take an action away to answer each of them.

Document ends