Community consultation strategy

Pre-application consultation on the Thames Tunnel proposal
# Thames Tunnel

## Community consultation strategy

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List of abbreviations

CCS Community consultation strategy
CSO combined sewer overflow
DCLG Department of Communities and Local Government
EIA Environmental Impact Assessment
GLA Greater London Authority
IPC Infrastructure Planning Commission
NSIP Nationally significant infrastructure project
SOCC Statement of community consultation
1 Community consultation strategy

1.1 Introduction

1.1.1 Thames Water proposes to design and build and operate a tunnel ("the Thames Tunnel") to capture untreated sewage, which currently flows directly into the River Thames after as little as 2mm of rainfall. This Community consultation strategy (CCS), summarised in the formal Statement of community consultation (SOCC), sets out our approach and timetable for consulting all those with an interest in the proposed Thames Tunnel ("the Project").

1.2 The proposed project

1.2.1 In April 2007, the Government asked us to make provision for the design, construction and maintenance of a scheme involving a full length storage tunnel to address overflows of sewage into the River Thames. We are also undertaking improvements to our five largest sewage treatment works which discharge into the Thames Tideway, and the construction of the Lee Tunnel from Abbey Mills Pumping Station to Beckton Sewage Treatment Works to capture overflow discharges to the River Lee. The Thames Tunnel and these additional projects are needed to ensure that London’s sewerage system complies with the EU Urban Waste Water Treatment Directive (UWWTD) and to assist in meeting the objectives of the EU Water Framework Directive. We currently aim to submit an application to the Infrastructure Planning Commission (IPC) (or its successor) for the Thames Tunnel in 2012. This is explained further in section 1.4.

1.2.2 We therefore propose to build and operate a 7.2m diameter tunnel constructed at a depth of up to 70m beneath London and broadly following the path of the River Thames from west to east. The Thames Tunnel project (referred to as ‘the Project’ within this document) will capture untreated sewage that currently flows directly into the River Thames from ‘combined sewer overflows’ (CSOs) along its route. The CSO discharges will then be stored and transported for treatment, bringing long-term benefits for the environment and people using the River Thames.

1.2.3 The Thames Tunnel project comprises two main elements:

- works to control and intercept the sewage from the worst polluting CSOs and transfer this untreated wastewater into the main tunnel
- works to build and operate the main tunnel that will provide the majority of the storage capacity and transfer the untreated sewage via the Lee Tunnel to Beckton Sewage Treatment Works (STW) in east London for treatment.

1.2.4 In addition, to integrate the Thames Tunnel project into the sewerage system, there will need to be some routine inspection of sewers and minor street works in the surrounding areas.

1.2.5 In broad terms, the Project will be designed to ensure that the most polluting CSOs in the tidal reach of the River Thames, as defined by the Environment Agency, will no longer frequently discharge into the river.
following rainfall, and that, in a typical year, they would only overflow four times on average compared with more than 50 times a year currently.

1.2.6 This will be one of the largest engineering projects in the capital. Our preferred route for the main tunnel starts in west London, at our existing operational site at Acton Storm Tanks and ends at Abbey Mills Pumping Station, in east London.

1.2.7 The Project is needed to help substantially reduce the volume of combined sewage discharged from London’s Victorian sewers into the River Thames. Projected population growth, increased urbanisation and impacts of climate change add to the need for urgent action to address the problem.

1.2.8 The construction work associated with the Project will take approximately seven years. The work will cause some disruption, particularly on and around the sites needed to construct and operate the tunnel (‘the sites’). However, we are committed to minimising inconvenience and adverse environmental effects. For example, where practicable and cost effective, we plan to maximise the use of the River Thames to transport construction materials and excavated soil.

1.3 The story so far

1.3.1 To date, we have:

- Consulted on and formally published our earlier Stakeholder and Community Engagement Strategy (May 2009)\(^1\) as a ‘live’ document. This was broadly endorsed by the relevant London local authorities and strategic pan-London stakeholders.

- Developed a detailed methodology to select the most suitable sites for the construction and operation of the Project. We consulted extensively on this with the potentially directly affected local authorities, along with other pan-London bodies, such as the Environment Agency and the Port of London Authority through two rounds of consultation which were undertaken in October 2008 and April 2009. We have amended our methodology to account for new legislation and guidance relating to consultation on major projects. Between June 2011 and July 2011 we re-consulted local authorities and pan-London strategic stakeholders on our amended methodology.

- Established the Thames Tunnel Forum (March 2009) to engage with the potentially directly affected local authorities and other pan-London stakeholders throughout the duration of the Project.

- Carried out engineering design work, together with assessments to identify suitable surface sites needed to construct and operate the tunnel and options for the route of the tunnel, to enable a preferred scheme to be identified.

- Consulted with local authorities and others on a draft shortlist of suitable sites and our approach to public consultation.

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\(^{1}\) Stakeholder and Community Engagement Strategy (05 06 09), Thames Water 2009
• Reviewed our approach to consultation and issued a revised consultation statement and strategy for comment in light of new government guidance on consultation (see section 1.4). This revised strategy became the draft formal SOCC, together with a draft CCS (the previous draft of this document). We undertook two rounds of consultation with potentially directly affected local authorities and other pan-London stakeholders on these two documents between December 2009 and March 2010 and again between May 2010 and June 2010. A report for each round of consultation setting out the comments received shows support for our approach, with some concerns for the targeting of interested parties, flexibility of approach and timing of presentation of environmental information.

• Issued the SOCC and accompanying CCS on 13 September 2010, which takes into account the comments made and the advice on consultation contained in the Infrastructure Planning Commission’s recent guidance on pre-application procedures and the Department for Communities and Local Government’s guidance on pre-application consultation.

• Held phase one consultation (between 13 September 2010 and 14 January 2011) on our initial proposals for the project and published a Report on phase one consultation. This sets out the feedback received and our response to the issues raised. How we undertook phase one consultation is set out in sections 3 and 5 of this CCS.

• Following feedback at phase one consultation, which resulted in amendments to the scope of future consultation, we revised our SOCC and CCS. We undertook a further round of consultation with the potentially directly affected local authorities and pan-London strategic stakeholders on the revised SOCC and CCS between June and July 2011. A separate report of the comments received shows that those who responded are broadly supportive of our approach to consultation.

1.3.2 We intend to carry out a further phase of consultation (phase two) and subsequently will publicise our proposed application. These steps are further described in Sections 3 and 5 below.

1.3.3 Phase one of our pre-application consultation on the Project took place between 13 September 2010 and 14 January 2011. During this phase, we consulted on the need for the Project and the main options considered for the route of the tunnel and the sites from which to construct it and to build connections to the CSOs. We identified the preferred route and sites alongside the others considered. We also sought views on information relating to the engineering, environment, community, planning and

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2 Local authority and stakeholder consultation report (ref 100-RG-PNC-00000-000039-AA) published on 16 April 2010 and Local Authority and Stakeholder Consultation Feedback Report (August 2010), available from Thames Water.  
3 IPC Guidance Note 1 on pre-application stages, Revision 2, dated August 2011.  
property issues considered during site selection work and our initial ideas on the permanent look and use of each site post construction.

1.3.4 During phase two of our pre-application consultation in autumn 2011, we will consult on the need for the Project and our preferred tunnel route, including the proposed limits of deviation for the tunnel. With regard to our sites, we will consult on our preferred sites for the construction and permanent works, the detailed proposals for those works, which take into account results of phase one consultation and further technical work undertaken. We will also be consulting on the effects of the Project as reported in our Preliminary environmental information report.

1.3.5 When we undertake section 48 publicity, due to be held in summer 2012, we will publicise our proposed application in accordance with the requirements of the Planning Act 2008.

1.3.6 This Strategy is concerned with all consultation and engagement activities that relate to the preparation and submission of an application for the proposed tunnel and post-submission activity.

1.4 Route to consent

1.4.1 Since we began our engineering design and site selection work, the Planning Act 2008 has become law and provided a new route for nationally significant infrastructure projects (NSIPs). The Act provides a new development consent system for nationally significant transport, energy, water, wastewater and waste infrastructure projects. It also makes provision for a new independent body, the IPC, which has taken over responsibility for examining applications for such projects. The Government has announced that the IPC will be incorporated into the Planning Inspectorate, which will be responsible for examining applications, with the final decision on whether or not to grant permission being made by government ministers.

1.4.2 In March 2010, the previous Secretary of State wrote to the potentially directly affected local authorities and made an announcement in Parliament to the effect that he was ‘minded to direct applications for the tunnel to the IPC, under Section 35 of the Planning Act’. His reasons included that he believes that this is likely to be the most ‘appropriate and effective way of reaching a decision on this unique and complex project’.

In further written ministerial statement on 7 September 2010 the current Secretary of State further reinforced this approach stating that she is also ‘minded that development consent for the project should be dealt with under the regime for nationally significant infrastructure projects established by the Planning Act 2008’. In addition the Secretary of State also confirmed she will be ‘considering the appropriate mechanism under the 2008 Act to ensure the Thames Tunnel project is considered under this national level regime and intends to include consideration of the

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6 Full details of the Secretary of State’s comments are published in Hansard (1 March 2010) at: http://www.publications.parliament.uk/pa/cm200910/cmhansrd/cm100301/wmstext/100301m0001.htm#10030110000004

7 Full details of the Secretary of State’s comments are available via the Defra website at: http://ww2.defra.gov.uk/2010/09/07/tunnel-sewers/
Thames Tunnel in the draft National Policy Statement for waste water. At that time the intention was to present this mechanism before both Houses of Parliament later in the autumn of 2010.

1.4.3 On 16 November 2010, the Secretary of State made a written ministerial statement to Parliament that she intends to bring the Project within the direct scope of the Planning Act 2008. This intention is reflected in the draft National Policy Statement for Waste Water, which was published in autumn 2010 and Defra’s recent consultation on including proposed major wastewater transfer and storage infrastructure projects within the scope of the Planning Act 2008 through amendments to sections 14 and 29 of that Act. The proposed changes would mean that the Thames Tunnel would become a nationally significant infrastructure project within this regime. These amendments are proposed to be made by way of an order under section 14(3) of the Planning Act 2008. The draft section 14(3) order includes a supplemental provision which in effect allows the pre-application consultation requirements established by the Planning Act 2008 to be treated as having been complied, to the extent that anything done before the order takes effect would have amounted to compliance with those requirements had the regime applied. As a result, we are undertaking our pre-application consultation on the Project so that it is consistent with the requirements of the Planning Act 2008.

1.4.4 If the application for development consent is dealt with under the Planning Act 2008, the IPC or its successor will be responsible for examining the proposals for the Project and will either determine the application itself or make recommendations to the Secretary of State as to how she should determine them. Among the matters to be considered by the IPC is whether pre-application consultation has been sufficient.

1.4.5 Given the statutory context set out above, we intend to consult on the project consistent with the Planning Act requirements. Such an approach is consistent with the supplemental provision contained within the draft section 14(3) order. Our approach is consistent with the guidance on pre-application consultation issued in September 2009 by the Department for Communities and Local Government (DCLG)\textsuperscript{8}, IPC Guidance Note 1 on pre-application stages and IPC advice note 6: Preparation and submission of application documents.

2 Aims and approach

2.1 Introduction

2.1.1 This section sets out the purpose behind our approach and how we will undertake consultation in order to ensure anyone interested in the Project has an opportunity to be involved.

\textsuperscript{8} Planning Act 2008, Guidance on pre-application consultation (Sept 2009), Dept Communities and Local Government
2.2 Aim

2.2.1 The overriding aim of our pre-application consultation is to ensure that both community and technical consultees have a chance to be informed and to influence the proposals for the Thames Tunnel. This means that:

- The local and strategic impacts and benefits of the Project relating to river water quality should be explained in order for all parties to form a clear view of the need for the Thames Tunnel.

- Members of the public, across the route as a whole and in the vicinity of the sites, should be consulted during the evolution of the Project, enabling them to have a meaningful say and to influence its development.

- All parties, ranging from statutory interests through to business, local communities, harder to reach groups and individual residents, should have good access to accurate and high-quality information on the Project, communicated at all stages of the planning process and beyond.

2.3 Approach

2.3.1 Our approach to consultation is informed by our experience of previous public and stakeholder engagement programmes for major development projects, our knowledge of the various London local authorities likely to be affected by the development of the proposed Thames Tunnel, and by best practice.

2.3.2 We recognise that to achieve effective consultation, we will need to take into account the characteristics of specific sites and communities and the phase the Project has reached. Although we provide information here on the broad range of consultation techniques we intend to implement (see sections 5 and 6), the Strategy is designed to allow some flexibility of approaches, taking into account local needs and changing requirements as the Project progresses.

2.3.3 Due to the expected high level of interest in the Project across a wide geographical area, we require a range of communication, engagement and consultation approaches. In some cases, we are providing information to stakeholders, whereas in others we are looking also to engage with stakeholders and communities to gather views and opinions.

2.3.4 In parallel with the proposed public consultation activities, we are also committed to ongoing consultation and engagement with statutory and other stakeholders on technical issues relating to engineering, property, planning, environmental and community aspects of the Project. This includes working closely with local authorities and other statutory parties to ensure:

- our consultation methods are appropriate to the community concerned
- we identify harder to reach groups and appropriate methods to communicate with such groups, including any need for translated material
• our consultation periods avoid, wherever possible, other major consultation exercises with a given community near a proposed site.

2.3.5 In developing this Strategy, we have taken into account the requirements of Chapter 2 of Part 5 of the Planning Act 2008 and relevant subordinate legislation. We have also taken account of relevant local and central government policy and guidance for stakeholder and community consultation, in relation to the development of major infrastructure projects, to ensure that our approach is in line with legislation, policy requirements and recognised best practice, including:

• relevant local authorities’ Statements of Community Involvement
• Consultation Institute/RTPI Consultation Charter (2009)
• PPS 12: Local Spatial Planning (2008), including guidelines on the development of Statements of Community Involvement
• Cabinet Office - Code of Practice on Consultation (2008)
• Code of practice on the dissemination of information (1999)
• DCLG - The Planning Act 2008, Guidance on pre-application consultation (2009)
• IPC Guidance Note 1 on pre-application stages (August 2011)

3 What we will consult on

3.1 Introduction

3.1.1 This section covers what we consulted on at phase one, what we will be consulting on at phase two and when we publicise our proposed application.

3.1.2 It is important to point out that the nature and objectives of the Project means that it is engineering led and driven by a requirement to pick up CSOs in fixed locations. This means the selection of the route and the final shortlist of sites is more constrained than might be the case for other types of infrastructure projects.

3.1.3 During phase one, we consulted on a preferred scheme consisting of a series of sites (the ‘preferred sites’) and a route (the ‘preferred route’). We presented other shortlisted sites and routes considered. We set out our judgement based on the work we had carried out prior to September 2010. To arrive at a preference, we took expert advice from engineering, property, planning, environment and community specialists.

3.1.4 The scale and nature of the Project means that a full Environmental Impact Assessment (EIA) will be undertaken and this will accompany our application when it is made. During phase one of our consultation, we set out the environmental issues we considered as part of our site selection work. During phase two of our consultation, we will consult on the effects

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Community Consultation Strategy

3.2 Phase one consultation

3.2.1 As part of the phase one consultation, we set out the background to the Project as a whole, covering information such as:

- The need for the Thames Tunnel and the problem it addresses.
- The early feasibility work that led to the Government requesting us to develop a tunnel solution in response to the requirements of the UWWTD.
- The alternatives to the tunnel solution.

3.2.2 In phase one, we consulted on:

- The need for the Thames Tunnel to reduce the amount of untreated sewage overflowing into the River Thames from London’s Victorian sewers.
- The conclusions of our work up to September 2010, to establish our preferred route for the tunnel. We provided information on the other route options considered and sought views on both our preferred route and the main alternative routes considered.
- The conclusions of our work up to September 2010 to establish our preferred sites for the construction and operation of the tunnel and connections between the tunnel and CSOs. We provided information on other site options that had previously been considered and sought views on both our preferred sites and the main alternative sites considered.
- Information relating to the engineering, environment, community, planning and property issues that were identified and considered during our site selection work.
- Initial ideas on the permanent look and use of each site after all construction work is complete. While most of the built development of the Thames Tunnel will be underground, there will be some permanent above-ground structures. We consulted on our preliminary design concepts for these structures.

3.3 Phase two consultation

3.3.1 In phase two, we will consult on the need for the Project and our preferred tunnel route and sites, after taking into account the feedback from phase one consultation, preliminary environmental information and the technical information at our disposal.

3.3.2 As a result of comments received during phase one consultation and further technical work we have identified a number of new sites as potentially suitable alternatives and for some sites we are considering works of a different nature or intensity.

3.3.3 In phase two, we will consult on:
• the need for the project, including whether a tunnel is the most appropriate solution
• our preferred tunnel route, including detailed alignment of the tunnel
• our preferred sites for the construction and permanent works
• the detailed proposals for our preferred sites, which take into account the results of our phase one consultation and further, more detailed, technical work undertaken.
• the effects of the project as reported in our Preliminary environmental information report.

3.3.4 We are consulting on the need for the project and the most appropriate solution at phase two consultation because since phase one consultation, we are proposing new preferred sites. This may result in people not familiar with the project responding to the consultation. We consider that it is only fair, that those responding to consultation on the project for the first time are provided the same opportunity as those at phase one consultation to comment on the need and solution for the project.

3.3.5 We may need to amend our scheme after the commencement of our phase two consultation. Should this be necessary, we would consider on a site by site basis whether our changes would affect the nature of the comments received from the public at phase two consultation and where appropriate undertake further targeted consultation. This would comprise public exhibitions and provision of written material, and would be for a period of not less than 28 days. We would also give 14 days notice through the publishing of local adverts and provision of information on our website: www.thamestunnelconsultation.co.uk.

3.4 Section 48 publicity

3.4.1 When we undertake section 48 publicity, we will publicise our application in the prescribed manner, including placing a formal notice within specified newspapers.

3.4.2 A period of six weeks will be allowed for receipt of comments on the proposed application.

4 Who we will consult

4.1 Introduction

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

• Community consultees, including the general public, people living in the vicinity of the project, local businesses, community representatives and groups, including hard-to-reach groups.

• Technical consultees, including local authorities, other statutory consultees, utilities and pan-London strategic stakeholders.
• Landowners and significantly affected persons including property owners and lessees of the shortlisted sites, and occupiers of properties above and adjacent to the potential tunnel routes.

### 4.2 Community consultees

4.2.1 We have defined community consultees as the ward councillors, the local MP and MEPs and other community representatives, individuals or organisations that formally or informally represent local interests including, but not exclusively:

- individuals, businesses and groups based, or living, in the vicinity of (but not on) each site
- individuals, owners/occupiers, businesses and groups who live or work further away, but have, or represent, an interest in a given site
- local people living nearby, using or overlooking a given site
- local environmental groups
- voluntary organisations (including residents’ associations and black and minority ethnic support groups)
- faith communities
- schools and colleges in the immediate vicinity
- local hospitals, care homes and private healthcare organisations in the immediate vicinity.

4.2.2 We have carried out a community audit to identify all those groups noted above with a potential interest in a site. We have also asked the relevant local authorities for their input into the community audit and will continue to seek their views on the best ways to engage particular audience groups.

4.2.3 We propose to use a distance of at least 250m from the boundary of each site as a benchmark for identifying community consultees who we will consult. In respect of the tunnel routes, we will notify community consultees who fall within a broad corridor along each route. We will, however, apply this benchmark flexibly, according to the scale and nature of the proposed works and taking account of the surrounding area.

### 4.3 Technical consultees

4.3.1 In addition to the community, we are targeting the technical consultees, defined as local authorities, the Greater London Authority (GLA) and other statutory consultees as listed in Appendix 1.

### 4.4 Landowners and significantly affected persons

4.4.1 We will consult landowners, including property owners, lessees, tenants and those with a property interest in the land potentially affected by our proposals, together with occupiers of properties above and adjacent to the potential tunnel routes and associated sites. At phase one consultation, we asked them to comment on the proposals and attend the exhibitions. The same approach will be followed for phase two consultation.
4.4.2 For phase two consultation, we have carried out comprehensive land referencing of all property interests within 100m of the ‘main site working area’ around each preferred site. The boundary of the ‘main site working area’ is taken to be the site hoarding or for foreshore sites, the edge of the cofferdam or campshed. We have also carried out land referencing of those property interests that lie above and in the vicinity of the preferred tunnel route.

5 How we will consult community consultees, landowners and significantly affected persons

5.1 Introduction

5.1.1 This section describes our wider communications programme throughout the Project and provides more detail on how we consulted the public in phase one and how we propose to consult the public at phase two consultation. It also explains our proposals for section 48 publicity.

5.2 Communications programme

5.2.1 Our communications programme will aim to raise awareness and understanding of the need and rationale for the proposed tunnel and to support the consultation process. The programme will also help to place the Thames Tunnel in the context of our wider investment programme, including work to reduce sewer flooding to local homes, to extend the capacity of London’s five principal sewage treatment works and the Lee Tunnel. Activities will include:

- attendance at open events, such as the Mayor’s Thames Festival
- media relations work
- the provision of information via our website, including, for example, an updateable calendar of engagement activities
- a rolling programme of ongoing talks and briefings for a wide range of stakeholder groups which began in 2008
- a regular newsletter which includes the latest updates on the Project
- regular updates on our website
- updates on the Project on Twitter
- measures for raising awareness of the Project with Thames Water wastewater customers who live outside the communities defined in paragraphs 4.2.1 – 4.2.3 above, and outside London.

5.3 Phase one public consultation on the Project

5.3.1 Our phase one consultation lasted 18 weeks having been extended from 14 weeks. The aim of this phase was to ensure people had the opportunity to see and comment on the conclusions of the work we had undertaken up to September 2010. This included members of the public who had an interest in, or may be affected by, the use of or activity on one of more of the preferred sites, the preferred route or by the Project as a whole.
5.3.2 Views expressed during this first phase helped to inform our decisions on the tunnel route, the sites to be used, and the future appearance and use of sites after construction; refer to the Report on phase one consultation, which can be found on our website (www.thamestunnelconsultation.co.uk) for more details. We also took into account the engineering, planning, property, environmental, community and technical requirements of the Project. These views have fed into our choice of scheme to take forward for phase two consultation.

Activities

5.3.3 During phase one consultation, we used a range of approaches designed to meet the requirements of the audiences we need to engage. We based our approach on the following four main elements:

- further development of the Thames Tunnel consultation website
- briefing with local stakeholder representatives in each of the potentially affected communities
- provision of written information
- a programme of public exhibitions where people had the opportunity to meet staff from the Project team, ask questions and provide feedback.

Website

5.3.4 At the start of our phase one consultation, we launched our dedicated consultation website. This presented information on the preferred tunnel route and each of the preferred sites, as well as the alternative tunnel routes and shortlisted sites previously considered.

5.3.5 The consultation website included an interactive map, designed to help members of the public identify the sites of most interest to them. Throughout the consultation period, information was provided to encourage feedback. This included a summary of our proposals, background briefing papers and links to other web pages.

5.3.6 We sought to meet best practice standards in terms of accessibility and usability. Pages were devoted to the pre-application process, exhibition dates, information on the preferred sites, frequently asked questions and the Project timetable. We made available online all of the information available at the exhibitions plus more detailed technical information.

5.3.7 The website included a ‘Have your say’ section, with a number of consultation questions asking for opinion and comment on key aspects of the proposals, including:

- the tunnel as a solution to the problem of untreated sewage going into the Thames
- the route of the tunnel
- the construction sites being considered
- the proposed future appearance and use of sites after construction of the tunnel has finished.
Phase one stakeholder briefings

5.3.8 For each of the preferred construction sites, we offered community stakeholder representatives (as defined in paragraph 4.2.1) a face-to-face briefing before the commencement of consultation activities with the local communities likely to be affected.

5.3.9 The aim of these briefings was to ensure that community representatives, both formal and informal, understood our proposals and had a suitable level of information on the Project to enable them to pass on factual information to interested members of the local community and help to ensure they were accurately informed. The briefings were also aimed at explaining the Project early on to community representatives, in recognition that they may receive a number of enquiries about the Project from local residents.

5.3.10 We also discussed with these community stakeholders our proposals for consulting the communities in the vicinity of a specific site, or groups of sites.

5.3.11 We used the stakeholder audits (see paragraph 4.2.2) to identify the individuals who would be invited to the briefing sessions, together with input from the relevant local authority officers.

5.3.12 The initial briefings covered a range of topics, including: explanation of the Project as a whole, the site selection methodology, the process of identifying the preferred list of sites and route, our assessment of the current social and community use of the site, and the communications and information programme with local communities.

5.3.13 We held these briefings at the venues being used for the public exhibitions immediately prior to them opening for the local community.

Feedback forms

5.3.14 While we encouraged consultees to visit our website to give their comments, we also made paper feedback forms available to all those visiting our public exhibitions who wished to comment on our proposals. We also ensured that the feedback forms were available to community representatives at the stakeholder briefings.

Information on the Project

5.3.15 We provided written information on the Project, and details of the consultation, to all communities living within the vicinity of the preferred construction sites or shortlisted sites previously considered. This written information consisted of two items:

- an invitation letter to attend a public exhibition, to be held in the vicinity of each of the preferred sites
- a more detailed leaflet, providing background information on the Project as a whole, to give additional context for the proposed construction work at a specific site.
5.3.16 Both the invitation and leaflet provided details of the helpline and website which the public could use to access further information and provide feedback.

5.3.17 In addition to the above, we also issued information to the *Evening Standard*, local press and other media. We worked with communications personnel at the London local authorities and strategic pan-London stakeholders to ensure information on the consultation cascaded via relevant publications and websites to the individuals likely to be interested in the Project. We also made information on the consultation and feedback methods available in libraries, local authority offices and community facilities local to the proposed worksites.

5.3.18 We provided a range of written information in the form of general briefing notes to support the consultation, which were available at the public exhibitions and on the websites. The general briefing notes covered topics such as:

- the Project concept and why a deep sewer storage and transfer tunnel is the right solution to reducing the amount of untreated sewage overflowing into the River Thames from London’s Victorian sewers
- our approach to the environment and sustainability and to managing the effects of construction including, where economic and practicable, use of the River Thames for transporting construction materials and excavated material
- our site and scheme selection process and development of the tunnel route
- the proposed future appearance and use of sites after construction of the tunnel has finished
- the environmental issues identified and considered at site selection stage.

5.3.19 A specific briefing note on each preferred site was produced which included:

- the significance of the site in relation to the preferred and alternative tunnel routes and the preferred method for constructing the tunnel
- provisional justification for initially selecting a site in preference to any other potential local sites, and an overview of the outline proposals for the site
- maps and plans to put the sites and their operation in context with the local area
- images based on architects’ drawings of potential above-ground structures and use of sites after construction of the tunnel
- drawings showing the potential shaft location, site access and the operational areas.

5.3.20 Other key project documents, such as a background technical paper, the *Statement of community consultation* and a summary report providing an
overview of the Project to date were available to the public at the exhibitions and via the website.

Access for all

5.3.21 We sought to ensure that responding to our consultations was equally possible for everyone and offered a range of solutions for people requiring additional assistance. For example: consultation information was available in large print, Braille, or in an audio format upon request. Our Customer Centre also offered a telephone service translating consultation materials to different languages on request.

Communication with elected representatives

5.3.22 Local councillors, MPs and MEPs as elected representatives are an important channel for passing on information to the public and encouraging them to give us their comments. We anticipated that ward councillors would take a keen interest, if not a leadership role, in co-ordinating community feedback on our proposals.

5.3.23 Precisely how we communicated with elected representatives depended on the protocols in place for each of the relevant local authorities, and the expectations of MPs and MEPs. We were keen to progress opportunities for all elected representatives to get involved and to keep abreast of developments. We did this:

- through local authority officer briefings
- through holding regular liaison meetings with the local authority (where this is local authority policy)
- through holding pre-planned senior officer workshops (where this is local authority policy)
- by inviting representatives to the initial briefings of community stakeholder representatives
- through providing to representatives copies of the letters and leaflets sent to the public in the vicinity of the preferred site – these materials were sent directly to their Town Hall mailbox as well as by email, where this was appropriate
- by inviting representatives to the relevant public exhibitions.

Programme of phase one public exhibitions

5.3.24 We staged a public exhibition in the vicinity of each of the preferred sites, or groups of sites, required to construct the Thames Tunnel. These exhibitions were held in accessible venues which are well known to the local community.

5.3.25 We promoted the exhibitions directly via letters and leaflets delivered to properties in the immediate vicinity of each selected site (ie, within at least 250m of each site, which was applied flexibly from the site boundary, depending on the scale and nature of the works proposed and the character of the surrounding area). We also advertised the venue, date and time of exhibitions in the local press.
5.3.26 Members of the Project team were available to answer questions, assist with interpreting materials or completing feedback forms, and to encourage people to give their views. Exhibitions were, where possible, open to the public for three consecutive days in each location, during the day and into the evening.

5.3.27 We displayed information at each exhibition to inform visitors about the Project and the local site(s). The information was the same as that used for the Project and site specific briefing notes, and on the consultation website (see paragraphs 5.3.18 and 5.3.19 above).

5.3.28 We encouraged members of the public to use our consultation website to register their comments. A paper feedback form was also available at the exhibitions and on request. In addition and where requested, respondents were given support to fill in the questionnaire. The deadline for comments from all parties, including local authorities and other stakeholders, was 18 weeks from the publication of the SOCC.

5.4 Interim engagement between phase one and phase two consultation

5.4.1 As a result of feedback from phase one and ongoing technical work, we have identified a number of new sites as potentially suitable alternatives to the preferred sites at phase one. In addition, for some sites we are considering works of a different nature or intensity to that proposed at phase one. We have sought to engage informally with community consultees, technical consultees and landowners on the potential material changes before the formal phase two consultation.

5.4.2 We provided an opportunity for community consultees to review and discuss our proposals with representatives of the project team at:

- Community liaison meetings – at which we gave presentations to local community groups
- Drop-in sessions - where information on the alternative site or change in use of the site was made available

5.4.3 These events were publicised using a variety of communication methods, including:

- Our consultation website.
- Letters were delivered (by a mail delivery contractor) to all residential and business properties within a 250m of the sites. The letters explained the proposals and available opportunities for the local community to learn more about, and to provide their feedback, on our proposals.
- Posters advertising the events were also put up in a selection of venues close to each of the sites, such as in libraries and visible outdoor locations.
- Adverts in the local press.
5.4.4 At the community liaison meetings and drop-in sessions, comment cards were made available. These provided those attending with an opportunity to express their view on the alternatives we are considering and to provide information that we should consider as we develop our proposals.

5.4.5 An *Interim engagement report* has been produced which summarises the key issues raised as part of the interim engagement. The report can be found on our website ([www.thamestunnelconsultation.co.uk](http://www.thamestunnelconsultation.co.uk)).

5.4.6 For details of the methods we used for technical consultees and landowners refer to section 6.

### 5.5 Phase two public consultation on the Project

5.5.1 Phase two consultation will last 14 weeks and will start in autumn 2011.

5.5.2 The aim of this second phase of public consultation is to ensure all members of the public, including those who have an interest in or may be affected by the Project have the opportunity to review and comment on:

- the need for the project, including whether a tunnel is the most appropriate solution
- our preferred tunnel route, including detailed alignment of the tunnel
- our preferred sites for the construction and permanent works
- the detailed proposals for our preferred sites, which take into account the results of our phase one consultation and further, more detailed, technical work undertaken.
- the effects of the project as reported in our Preliminary environmental information report.

#### Detailed activities

5.5.3 In phase two public consultation, we plan to undertake the activities described in sections below.

#### Information giving

5.5.4 We will provide written information on the Project, and details of the consultation, to all interested parties living within approximately 250m of the sites and within a broad corridor along the tunnel routes considered. This written information will consist of two items:

- an invitation letter to attend a public exhibition, to be held in the vicinity of each of the preferred sites
- a more detailed leaflet, providing background information on the Project as a whole, to give additional context for the proposed work at a specific site.

5.5.5 Both the invitation and leaflet will provide details of the helpline and websites which the public can use to access further information and provide feedback.

5.5.6 In addition to the above, we will also issue information to the *Evening Standard*, local press and other media. We will work with personnel at the
local authorities and strategic pan-London stakeholders to ensure information on the consultation cascades via relevant publications and websites to the individuals likely to be interested in the Project. We will also, where appropriate, make information on the consultation and feedback methods available in libraries and community facilities local to the proposed worksites.

5.5.7 We will provide a range of written information in the form of general briefing notes to support the consultation, which will be available at the public exhibitions and on the website. The project information papers will cover topics such as:

- why the Project is needed including an explanation of the current situation and why we need to act; the options considered to address the current situation and why a storage and transfer tunnel is the right solution
- the process for choosing our sites including how we selected our preferred sites
- how we will construct the Project, explaining what we need to do at each of our sites and what typical activities will be undertaken
- how construction will be managed, including the approach we will take to minimise effects on the surrounding area
- our approach to developing the design for the permanent structures required at our sites.

5.5.8 A site information paper on each preferred site will be prepared which will include:

- why a worksite is needed in the proposed location
- the shortlisted sites we have considered including justification for our preferred site
- activities that will be undertaken at each phase of construction
- the potential effects of our works during construction and how we propose to address them
- the design of our permanent works, potential effects of our works during operation and how we propose to address them.

5.5.9 We will also publish technical documents including our Preliminary environmental information report.

Website

5.5.10 At the start of our phase one consultation, we launched our dedicated consultation website. For phase two consultation, the consultation material (as set out in paragraphs 5.5.4 – 5.5.9) on the Project will be published on our website, which includes our Preliminary environmental information report. The information that is available online will be the same as the information available at our public exhibitions. The material from phase one consultation will also be available on our website for reference.
5.5.11 The website will provide a ‘Have your say’ section, with a number of consultation questions asking for opinion and comment on key aspects of the proposals, including:

- the tunnel as a solution to the problem of untreated sewage going into the Thames
- the routes considered for the tunnel including the alignment of the tunnel along our preferred tunnel route
- the sites proposed for the construction and permanent works
- the potential effects of our construction and operational works and how we propose to address them and any additional effects we have not identified.

**Phase two stakeholder briefings**

5.5.12 For each of the preferred sites, we will offer community stakeholder representatives (as defined in paragraph 4.2.2) a dedicated briefing at our public exhibitions.

5.5.13 The aim of these briefings is again to ensure that community representatives, both formal and informal, understand the proposals and have a suitable level of information on the Project to enable them to cascade factual information to interested members of the local community and help ensure that they are not misinformed.

5.5.14 We will send invitations to all those who attended briefings during phase one, or their successors where personnel changes have occurred. We will also invite other community representatives who have become known to us during the phase one consultation and will be updating our community audits (see paragraph 4.2.2) in consultation with the potentially directly affected local authorities.

5.5.15 At these second round briefings, we will provide feedback on how the phase one consultation helped inform scheme development, details of how our preferred sites will be used to construct the tunnel and information on the likely after-use structures which will be required on site.

**Programme of phase two exhibitions**

5.5.16 Following the same format as the phase one consultation, we will hold a second round of public exhibitions in the vicinity of each of the preferred sites prior to submission of our application.

5.5.17 These exhibitions will again be held in accessible venues which are well known to the local community and as close as reasonably possible to the preferred sites – where possible and feasible, making use of venues used for the phase one consultation.

5.5.18 We will promote the exhibitions directly via letters and leaflets delivered to properties in the immediate vicinity of each site (i.e. within at least 250m of each site, to be applied flexibly from the site, depending on the scale and nature of the works proposed and within a broad corridor along the tunnel routes). We will ensure that all properties notified at phase one consultation and as part of our interim engagement will be notified at
phase two consultation. In addition to sending letters and leaflets, we will advertise the venue, date and time of the exhibitions in the local press and public buildings in the local area and we will endeavour to display site notices and posters locally.

5.5.19 Each exhibition, which will be open during the day and into the evening, and for at least two consecutive days, will be fully staffed. As a result of feedback from phase one consultation, we are increasing the number of locations that we are proposing to hold exhibitions. Overall, the total exhibition days will not be less than at phase one consultation. The exhibitions will provide the local community and stakeholders with a summary of the proposed project, supporting studies, and a summary of the comments received during the phase one consultation. The exhibitions will also provide details of the preliminary environmental information we have compiled, revised visual materials and plans to show our proposals for use of each of the preferred sites and the likely form of any after-use structures.

5.5.20 An additional exhibition will be held in a central London location, for a minimum of two days, to provide further opportunity for interested parties to comment on our proposed scheme.

Other measures

5.5.21 As for phase one consultation, we will also undertake to communicate with elected representatives. Refer to paragraphs 5.3.22 – 5.3.23 for further details.

5.5.22 Information on the project will also be made available at town halls in potentially directly affected local authorities and libraries close to proposed sites. This will include project and site information papers, a non-technical summary of the Preliminary environmental report with CD of the full report.

5.5.23 Paper feedback forms will again be available at the exhibitions, stakeholder briefings and on request. However, we will encourage members of the public to use our consultation website to provide comments on our preferred scheme.

5.5.24 We will also seek to make sure that this phase of consultation is accessible to all. We will follow the steps set out in paragraph 5.3.21.

5.6 Section 48 publicity

5.6.1 Section 48 publicity will last for six weeks from the date of the first newspaper advert and is expected to be undertaken in summer 2012. During this period we will publicise our proposed application in accordance with section 48 of the Planning Act 2008 and the Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009.

5.6.2 We will publish a notice for two successive weeks in the Evening Standard and once in a national newspaper and the London Gazette which includes prescribed details. We will also make available documents, plans and maps showing the nature and location of the Project. Our public notice will specify where this material will be available for inspection (including places and times) and details of how to make comments.
5.6.3 The documents, plans and maps will be made available at local libraries and town halls and our website. This includes the Report on phase two consultation (see section 7.2 for further details).

6 How we will consult technical consultees

6.1 Introduction

6.1.1 This section describes specific consultation activities for the local authorities potentially directly affected by the Project and neighbouring local authorities and other stakeholder bodies. Due to the complexity of the Project and the fact that the proposed sites potentially directly affect 14 different local authorities, there is a need to hold ongoing technical briefings and discussion with them. These technical briefings will be in addition to any involvement local authorities will have in the public consultation, described in Section 5 above.

6.1.2 In addition to the above, we will be holding regular meetings with the GLA, other London local authorities and pan-London strategic stakeholders with an interest in the Project.

6.2 Ongoing dialogue

6.2.1 Throughout the site selection period and beyond, we will ensure an ongoing and constructive dialogue between our project team and the relevant London local authorities and other stakeholders. This has already begun and will continue throughout the Project’s development and after we submit our application. These discussions will cover, among other things:

- general updates on project progress, including the Project programme and the consultation approach on specific sites and areas
- emerging planning and design matters
- conformity with planning policy
- Code of Construction Practice
- (between phases one and two) scoping procedures relating to the Environmental Impact Assessment
- preliminary environmental information arising out of the assessment work
- proposed mitigation measures
- transportation and highway matters
- asset protection
- the timetable, progress and matters relating to consultation as they may affect a particular local authority.

6.2.2 We envisage that these discussions will take various forms, depending upon the issues to be discussed, including:
• the quarterly Thames Tunnel Forum (established in March 2009), involving the potentially directly affected London local authorities, together with strategic pan-London stakeholders with an interest in the route and sites. This involves senior decision makers from all the organisations listed in Appendix 1
• workshops and meetings within individual relevant London local authorities (cross departmental)
• working groups to which other targeted stakeholders will be invited, such as the Environment Agency, Natural England and English Heritage, depending on issues to be discussed
• formal and informal meetings with individuals from potentially directly affected London local authorities
• in addition to the above, the relevant local authorities will be specifically invited to all public consultation events in phases one and two (see Section 5).

6.3 Preparation of report on selected scheme and letter to consultees

6.3.1 Once feedback from the phase two consultation process has been considered, we will issue a report on the selected sites and route to the relevant London local authorities and pan-London strategic stakeholders.

6.3.2 In the period between the selected scheme being confirmed and our application being submitted, there will be a need for communication with local planning officers and councillors and other identified stakeholders. This period will also provide the opportunity to review the phase two consultation report (see Section 7.2) and the proposed activities post submission and post approval with the Thames Tunnel Forum.

7 Respondents’ comments: capture, recording and feedback

7.1.1 We are committed to recording and providing feedback on the comments received during our two pre-application consultation phases. Our preferred method of collecting comments is by way of a dedicated consultation website. However, for those who prefer, there will also be a number of other channels, for example:
• we will use leaflets/newsletters and our website to encourage comments and also provide feedback to communities on the comments received at exhibitions and other public events
• outside of exhibitions, our Customer Centre will be available to answer general questions about the Project
• we will summarise all comments received and our decisions relating to them in the consultation report to be submitted with the application (see section 7.3).

7.1.2 We will also capture feedback on the Project received via letters, emails and other forms of feedback correspondence.
7.2 Reports on phase one and phase two consultations

7.2.1 Following phase one and phase two consultations, we will review all comments received and take them into account, having regard to the engineering, planning, property, environmental and technical requirements of the Project.

7.2.2 As a result of the feedback received to phase one consultation, we have produced a Report on phase one consultation which sets out the feedback received and our response to the issues raised. A summary report has also been produced. After phase two consultation, a Report on phase two consultation will be produced. These reports will be available on our website and upon request.

7.2.3 The findings from phase one and phase two will be incorporated into our Consultation Report which will accompany our application (see section 7.3).

7.3 Consultation report

7.3.1 We will produce a Consultation Report, having regard to IPC Advice note 14: Compiling the consultation report, which will summarise the comments from the phase one and phase two consultations and section 48 publicity. It will also give details of feedback we received from informal stakeholder briefings and engagement with local authorities, other pan-London stakeholders, and the public prior to submission of our application.

7.3.2 The Consultation Report, which will be accompanied by an accessible summary, will:

- provide a general description of the consultation process
- set out specifically what we have done in compliance with sections 42, 47 and 48 of the Planning Act and how we have had regard to relevant published guidance relating to pre-application consultation
- set out how we have taken account of consultation with local authorities on what should be in our Statement of Community Consultation
- set out a summary of responses to both phases of the consultation and section 48 publicity
- provide a description of how our application was influenced by the responses received
- if appropriate, provide an explanation as to why we did not follow any significant relevant responses, including advice on impacts from statutory consultees
- provide explanation for any actions taken which have not followed the advice of the local authorities involved or relevant guidance.

7.3.3 The Consultation Report will accompany our application, be made available on our website and paper copies will be provided on request.
8 Post-submission and approval

8.1 Introduction

8.1.1 This section of the Strategy relates to communication and engagement activities following formal submission of the application for planning approval and formal approval of the Project under the Planning Act 2008. We believe it will be important during this period to maintain communication and engagement with the stakeholders and communities with whom we developed relationships during the pre-application phase.

8.1.2 The type of activities that we envisage undertaking include the following:

- ongoing technical liaison with local planning officers and councillors and relevant pan-London strategic stakeholders
- ongoing liaison with community stakeholders
- information bulletins (web and paper versions).

8.2 Ongoing technical and community liaison

8.2.1 In the months following the submission of the application, we envisage communication with local planning officers and councillors to answer questions in relation to the application, together with a level of ongoing information-giving with the communities around the selected sites.

8.2.2 The aim of this communication will be to respond to enquiries made by the community, continue discussions around potential mitigation and compensation measures and generally to keep the community up to date with the progress of the application through the determination process. We are committed to ongoing communication with the communities likely to be affected by the proposed development of the Thames Tunnel.

8.2.3 Assuming a positive determination of the application, we would continue to communicate with stakeholders and communities in relation to the project and provide an estimated timeline for the start and duration of construction works. This will include an education initiative working closely with teachers in the context of the national curriculum.

8.2.4 For the communities living near sites, the construction phase is likely to be of interest. We are committed to maintaining proactive and open communication so that communities are aware of the timing and nature of work to take place, the measures being taken to reduce disruption and details of where to go for further information. Likely specific activities will include:

- issue of a generic leaflet to notify local communities of the determination of our application, setting out next steps in the initiation of the construction phase and timeline
- circulation of information concerning the Code of Construction Practice, setting out a series of commitments in terms of our site work practices designed to minimise levels of disruption
• further site specific information leaflets to communicate ahead of the main phases/changes in the construction process at a site

• further series of ongoing face-to-face liaison with local community stakeholders (or liaison committee) on the carrying out of the construction works, to address areas of interest or concern and keep the local community up to date on timings and progress

• ongoing liaison with relevant local authority officers over the effects, progress and duration of construction works.
Appendix A: List of consultees

Potentially directly affected London local planning authorities:

- City of London Corporation
- London Borough of Ealing
- London Borough of Greenwich
- London Borough of Hammersmith and Fulham
- London Borough of Hounslow
- Royal Borough of Kensington and Chelsea
- London Borough of Lambeth
- London Borough of Lewisham
- London Borough of Newham
- London Borough of Richmond upon Thames
- London Borough of Southwark
- London Borough of Tower Hamlets
- London Borough of Wandsworth
- City of Westminster
- London Thames Gateway Development Corporation
- Olympic Delivery Authority Planning Decisions Team

Neighbouring London planning authorities:

- London Borough of Barking and Dagenham
- London Borough of Barnet
- London Borough of Bexley
- London Borough of Brent
- London Borough of Bromley
- London Borough of Camden
- London Borough of Croydon
- London Borough of Enfield
- London Borough of Hackney
- London Borough of Haringey
- London Borough of Harrow
- London Borough of Havering
- London Borough of Hillingdon
- London Borough of Islington
• Royal Borough of Kingston Upon Thames
• London Borough of Merton
• London Borough of Sutton
• London Borough of Waltham Forest
• London Borough of Redbridge
• Elmbridge Borough Council
• Spelthorne Borough Council
• Surrey County Council
• Hertfordshire County Council
• Buckinghamshire County Council
• Essex County Council
• Epsom & Ewell Borough Council
• Mole Valley District Council
• Reigate & Banstead Borough Council
• Tandridge District Council
• Sevenoaks District Council
• Dartford Borough Council
• Three Rivers District Council
• South Bucks District Council
• Slough Borough Council
• Broxbourne Borough Council
• Welwyn Hatfield District Council
• Hertsmere Borough Council
• Thurrock Borough Council
• Epping Forest District Council
• Kent County Council
• Brentwood Borough Council

Other consultees:
• Department of Communities and Local Government
• Department of Culture, Media and Sport
• DEFRA
• Infrastructure UK, HM Treasury
• HM Treasury
• Government Office for London
• Theatres Trust
• Greater London Authority
• Health and Safety Executive
• NHS London
• Strategic Health Authority for London
• Natural England
• English Heritage
• English Heritage – Maritime Archaeology Team
• London Fire Brigade
• London Fire and Emergency Planning
• London Resilience Team
• Metropolitan Police Authority
• City of London Police
• Environment Agency
• CABE at the Design Council
• Sport England
• London Port Health Authority
• London Development Agency
• Equality and Human Rights Commission
• Sustainable Development Commission
• Homes and Communities Agency
• The Joint Nature Conservation Committee
• Maritime and Coastguard Agency
• Marine Management Organisation
• Civil Aviation Authority
• The Highways Agency
• Department for Transport
• Transport for London
• Rail Passenger Council
• Disabled Persons Transport Advisory Committee
• Office for Rail Regulation
• Network Rail Infrastructure Ltd
• Network Rail (CTRL) Ltd
• Crossrail
• Docklands Light Railway (DLR)
• London Underground Ltd (LUL)
• OFGEM
• OFWAT
• BRB Residuary Limited
• NATS En-Route (NERL) Safeguarding
• Essex and Suffolk Water
• East London Waste Regulation Authority
• North London Waste Regulation Authority
• West London Waste Regulation Authority
• Western Riverside Waste Regulation Authority
• British Waterways Board
• Trinity House
• Health Protection Agency
• London Rail
• Port of London Authority
• Royal Mail Group Ltd
• Crown Estate
• Forestry Commission
• London Chamber of Commerce
• London Councils
• Thames Estuary Partnership
• The Coal Authority
• The Duchy of Cornwall
• Ancient Monuments Society
• The Council for British Archaeology
• The Georgian Group
• The Society for the Protection of Ancient Buildings
• The Victorian Society
• The 20th Century Society
• 186K
• AboveNet Communications UK Ltd
• BT Group plc
• Cable and Wireless
• COLT (City of London Telecommunications)
• ComSol Communications Solutions Limited
• ConocoPhillips
• Easynet Telecom
• Fibernet
• FibreSpan
• Gamma Telecommunications
• GEO Networks Ltd
• Global Crossing (UK) Telecoms Ltd
• GO Mobile (UK) Ltd
• H20 Networks Ltd
• Hutchison 3G UK Ltd
• Interoute Communications Ltd
• J.C Decaux (UK) Ltd
• Kingston Communications Group
• KPN Telecom UK Ltd
• Level (3) Communications
• MCI/Worldcom Ltd
• More Group UK
• O2 (UK) Ltd
• Orange Telecom
• Vodafone UK Ltd
• Vtesse Networks Ltd
• Spectrum Interactive
• TATA group
• TeliaSonera
• Thus plc
• T-Mobile (UK) Ltd
• Verizon Business
• Virgin Media
• Dalkia Utilities services plc
• E.ON
• EDF Energy
• Gas Transportation Company
• National Grid
• Scottish & Southern Energy plc
• Serco Gulf Engineering LTD
• Shell Gas Direct
• Southern Gas Network
• British Gas Pipelines Limited
• Energetics Gas Limited
• ES Pipelines Ltd
• Fulcrum Pipelines Limited
• GTC Pipelines Limited
• Independent Pipelines Limited
• Intoto Utilities Limited
• Infolines Public Network
• Post Point 308a/01, Telephone Exchange
• LNG Portable Pipeline Services Limited
• National Grid Gas Plc (NTS)
• National Grid Gas Plc (RDN)
• Quadrant Pipelines Limited
• Scotland Gas Networks Plc
• Southern Gas Networks Plc
• SSE Pipelines Ltd
• The Gas Transportation Company Limited
• Utility Grid Installations Limited
• Wales and West Utilities Ltd
• Citigen (London) Limited
• GDF Suez Marketing Limited
• ECG (Distribution) Limited
• UK Power Networks (IDNO) Limited
• Energetics Electricity Limited
• Independent Power Networks Limited
• Southern Electric Power Distribution Plc
• The Electricity Network Company Limited
• TC Robin Rigg OFTO Limited
- GL Industrial Services UK Ltd
- Total Fina Elf Pipelines
- City & Hackney Primary Care Trust
- Westminster Primary Care Trust
- Ealing Primary Care Trust
- Lambeth Primary Care Trust
- Hammersmith & Fulham Primary Trust Care
- Hounslow Primary Care Trust
- Lewisham Primary Care Trust
- Newham Primary Care Trust
- Richmond and Twickenham Primary Care Trust
- Southwark Primary Care Trust
- Wandsworth Primary Care Trust
- Kensington and Chelsea Primary Care Trust
- East London NHS Foundation Trust
- Central and North West London NHS
- Royal Brompton and Harefield NHS
- The Royal Marsden NHS Foundation Trust
- South London and Maudsley NHS
- Whittington Hospital NHS Trust
- National Institute for Health and Clinical
- National Patient Safety Agency
- National Treatment Agency for Substance Misuse
- NHS Litigation Authority
- The Health and Social Care Information Centre
- Barking, Havering and Redbridge
- Newham University Hospital NHS Trust
- Barts and The London NHS Trust
- Homerton University Hospital NHS
- Imperial College Healthcare NHS Trust
- University College London Hospitals
- Chelsea and Westminster Hospital NHS Foundation Trust
- Ealing Hospital NHS Trust
- Moorfields Eye Hospital NHS Foundation Trust
• Guy's and St Thomas' NHS Foundation Trust
• West Middlesex University Hospital NHS Trust
• St George's Healthcare NHS Trust
• King's College Hospital NHS Foundation Trust
• Lewisham Healthcare NHS Trust
• South London Healthcare NHS Trust
• Oxleas NHS Foundation Trust
• Great Ormond Street Hospital For Children NHS Trust
• Royal Free Hampstead NHS Trust
• Tavistock and Portman NHS Foundation Trust
• NHS Barking & Dagenham
• South West London Mental Health NHS Trust Headquarters
• South West London and St George's Mental Health NHS Trust
• London Ambulance Service NHS Trust
• NHS City and Hackney Commissioning
• NHS Ealing
• NHS South East London
• NHS London Health Urban Development Unit
• NHS Tower Hamlets
• West London Mental Health NHS Trust
• NHS Greenwich
• NHS Lambeth
• NHS Newham
• NHS Westminster