Statement of Common Ground

Between

London Borough of Newham

And

Thames Water Utilities Limited

Stage: Newham Submission Draft Local Plan (Reg. 19)

Date: 4th November 2025

1. Executive Summary

1.1. A statement of common ground is a written record of the progress made by plan-making authorities during the process of planning for strategic cross-boundary matters. It documents the strategic matters where effective cooperation has led to cross-boundary challenges and opportunities being identified, whether there is agreement between bodies in how these should be addressed, and how the strategic matters have evolved throughout the plan-making process. It is also a way of demonstrating at examination that plans are deliverable over the plan period, and based on effective joint working across local authority boundaries.

1.2. This Statement of Common ground addresses key strategic matters between the two signatories, the London Borough of Newham and Thames Water Utilities limited (Thames Water) as water and sewerage undertaker, as relevant to the preparation of the Newham Submission Draft Local Plan and its progression to public Examination.

1.3. Strategic matters overseen by other organisations will be addressed in other SoCGs, in order to streamline the process of reaching agreements with each party. Where key strategic issues overlap between different organisations that Newham have signed statements of common ground with (e.g. the delivery of housing targets), these interrelations are summarised in the Duty to Cooperate Statement (2024) and the Duty to Cooperate Addendum (2025).

1.4. The document is intended to be 'live', updated as circumstances change. Please see the Governance Arrangements section of the statement for more details.

2. Parties Involved

2.1. Newham Council, the Local Planning Authority for the London Borough of Newham, which is an inner London Borough in East London situated between three rivers: the Lea to the west, Thames to the south and Roding to the east. London Borough of Newham is bordered by several other London Boroughs, including Tower Hamlets, Hackney, Waltham Forest, Redbridge, and Barking and Dagenham. Across the River Thames lies the Royal Borough of Greenwich.

AND

2.2. Thames Water Utilities Limited (Thames Water), the statutory water supply and sewerage undertaker for the borough. They have primary responsibility for delivering and maintaining the main infrastructure that supplies water, they manage the water supply within the London Water Resource Zone (WRZ) which encompasses a large area of London and relies primarily on surface water from the River Thames and River Lee for its water supply. Thames Water has a desalination plant at Beckton in Newham which is designed to treat brackish estuarine water. They also deal with sewerage and wastewater treatment services. The borough falls under the Beckton sewage system for drainage and wastewater management.

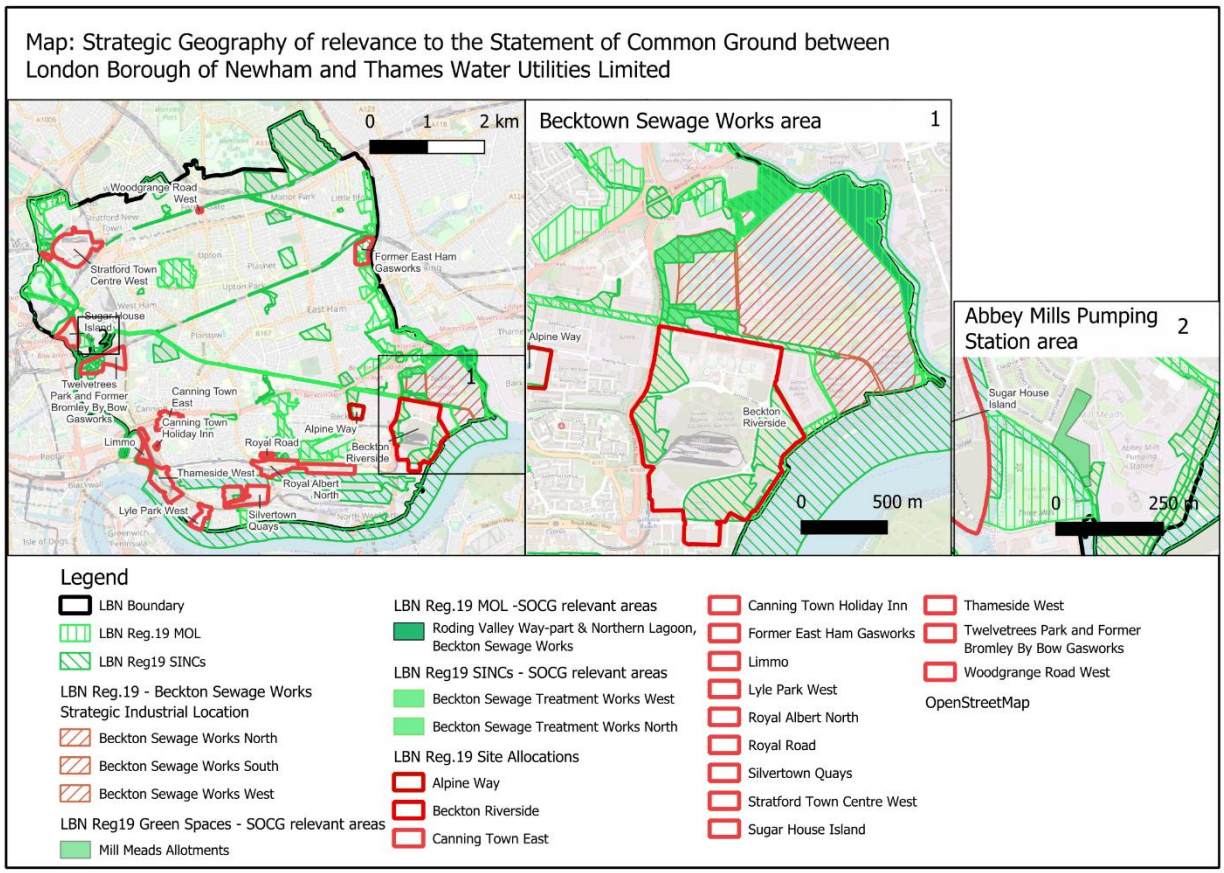
2.3. Newham is strategically located at the intersection of the London-Stansted-Cambridge-Peterborough Corridor, which is centred on enterprise and innovation within emerging sectors such as digital, media, life sciences, telecommunications and advanced manufacturing, and the Thames Estuary Creative and Cultural Industries Corridor, which adds to the borough's

significance. It contains three Opportunity Areas: the Olympic Legacy (which also includes parts of the other Host Boroughs) Poplar Riverside (which crosses the boundary with Tower Hamlets) and Royal Docks and Beckton, which is also the home of London's only Enterprise Zone and Europe's largest regeneration area.

3. Strategic geography

3.1. Figure 1 below identifies the spatial representation of the key strategic matters addressed – site allocations for which Thames Water have provided comments, Metropolitan Open Land (MOL) and SINC designations at Beckton Sewage Works, and green space designation at Abbey Mills Pumping Station – alongside the administrative area of the plan-making authority – London Borough of Newham.

Figure 1



3.2. Newham's administrative boundaries also contain 65% of the London Legacy Development Corporation (LLDC) area, which acted as the planning authority for the Queen Elizabeth Olympic Park and surrounding area until the return of planning powers to the boroughs on 1st December 2024. As such, key strategic matters for the parts of the LLDC Mayoral Development Corporation that fall within Newham's administrative boundaries are also addressed in the Newham Submission Draft Local Plan and are subject to the matters addressed in this statement of common ground. Where relevant, the Newham draft Local Plan has retained and evolved site allocations and designations from the LLDC Local Plan (2020).

3.3. The River Thames and two of its major tributaries (the Lee and Roding) and an extensive area of repurposed dock infrastructure that is now a significant focus for regeneration. Newham's watercourses also result in major growth areas falling within Flood Zones 2 and 3. Recent climate change projections suggest that London will experience changing rainfall patterns. This will mean more intense rainfall episodes for longer periods of time and sea level rise with potential for increased storm surges, including within the tidal Thames. Flood risk, both the likelihood and severity of occurrences, is therefore likely to increase from a range of sources: tidal, fluvial (rivers), rain (surface water), groundwater and sewer overflow.

3.4. Located within Newham is Beckton Sewage Treatment Works the largest sewage treatment works in the UK.

4. Background

4.1. Newham Council prepared the Submission Draft Local Plan and published it for consultation between 19th July and 20th September 2024. This is the version of the plan that the Council considers to be 'legally compliant' and 'sound', and which was submitted to the Planning Inspectorate for examination in July 2025. The council undertook two rounds of consultation prior to this, to inform the Newham Submission Draft Local Plan. These were:

- Issues and Options Consultation, which took place between 18 October and 17 December 2021; and
- Draft Local Plan Consultation (Regulation 18), which took place between the 9 January and 20 February 2023.

4.2. A Duty to Cooperate Statement (DtC Statement) was published as part of Newham's Reg. 19 consultation, which provides a summary of London Borough of Newham's engagement with Thames Water, as a Duty to Cooperate partner, as part of the preparation of the new Newham Local Plan. The table below provides an extract of the relevant key strategic matters identified as part of this process and the corresponding paragraphs in the Duty to Cooperate Statement.

Key Strategic Matter	**DtC Statement relevant paragraphs**
Thames Water assets and capacity	4.150-4.153
Beckton Sewage works odour	4.158-4.166
Metropolitan Open Land review	4.293, 4.294
Sites of Importance to Nature (SINCs) review	4.310-4.312

4.3. The national and regional policy context forming the background to this statement of common ground is also detailed in the Duty to Cooperate Statement (2024), under 'Chapter 2: Legislative and national policy context' and 'Chapter 3: Demonstrating compliance with the duty to cooperate'.

4.4. During the Reg. 19 consultation process, Thames Water submitted comments to Newham that retained and updated on the above topics of concern, and raised further concerns with regards to:

- Green space designation at Abbey Mills Pumping Station; and

- The need for water efficiency measures, and how they could be implemented in policy (such as BREEAM).
- Extending the Beckton Sewage Works odour concerns to the Alpine Way N11.SA3 site allocation

4.5. Following review of the above matters, London Borough of Newham initiated written engagement in February 2025 that helped clarify Thames Water's position with regards to the water and wastewater infrastructure requirements for site allocations. Modifications were made to the Submission Local Plan and submitted to the Planning Inspectorate in July 2025.

4.6. A meeting was held on 25th August 2025 to discuss the remaining strategic matters, and the agenda and notes of this meeting are attached as Appendix 1 and provide further background information. Following this meeting, further email engagement confirmed that the modification to site allocations infrastructure proposed by Newham in the Submission (Regulation 22) Local Plan updated the issue in relation to assets and capacity, and therefore this is not addressed in further detail in this statement of common ground. An extract of the relevant modifications is included as Appendix 2.

5. Key Strategic Matters

5.1. **Beckton Sewage Works odour impact on Beckton Riverside and Alpine Way site allocations**

5.2. Thames Water have raised ongoing concerns with regards to proximity of residential and other odour sensitive development, to the sewage works. Beckton Sewage Treatment works is the UK 's largest sewage processing plant. It is located within the Beckton Riverside Strategic Industrial Location and is adjacent to the Beckton Riverside site allocation. As the residential development capacity of the Beckton Riverside site allocation is part of the case for delivering a new DLR station at this location, this matter is of relevance to this statement of common ground.

5.3. Due to the timing of both the development of the Opportunity Area Planning Framework and planning application process, which ran alongside the development of the Local Plan, further discussions have taken place throughout the period 2022 to 2025 with Newham's planners, environmental health and regeneration colleagues, the GLA, Thames Water and the landowners, regarding the potential odour impact and potential need for an odour impact assessment.

5.4. Separate studies have been carried out by landowners St William, ABRDN and Thames Water. Due to the reports reaching different conclusions on the likely impact of odour on development at Beckton Riverside, it was agreed by LB Newham, TfL, landowners, GLA and Homes England that an independent verification of the existing studies was required. This was undertaken under the direction of Homes England and LB Newham by consultants Cogan, and the interim report was shared with Thames Water in early June 2025. The report has been further amended to include comments received from Thames Water, and this updated report (Beckton STW Phase 1 Odour Review) forms the basis of this statement of common ground, and is appended under Appendix 3. Thames Water were provided the updated report in September 2025. The updated report concludes that St William Phase 2 and Abrdn land will

require mitigation measures, and recommends that St William Phase 1 and GLA land have mitigation measures proportionate to the identified odour risk assessment. Mapping also indicates that Alpine Way site allocation is in an area of minimal odour risk from Beckton Sewage Works.

5.5. London Borough of Newham note that the Beckton Riverside site allocation has already been subject to examination as part of the adopted Local Plan (2018), including consideration of the odour matters for the site. The Inspector's Report recommended that the site allocation, as well as other development in the vicinity of the Beckton STW can proceed on the basis of policy requiring the undertaking of an Odour Impact Assessment, plus necessary mitigation at planning application stage. Newham further note that the Cogan odour report findings does not preclude the site coming forward and continues to recommend the approach of undertaking odour impact assessments to inform mitigation measures at application stage. Thames Water note that no odour mitigation feasibility assessment has been undertaken by Newham or the developers of the Beckton Riverside site allocation, and consider that this is urgently required to demonstrate that the development of the site is feasible.

5.6. Thames Water 2019 note that odour modelling and odour impact assessment was previously accepted by Newham as part of the current Beckton STW upgrade planning permission reference: 19/02768/FUL. However, LB Newham note that the odour impact assessment could not have been considered beyond the scope of the planning application for which it was submitted in 2019, and it was therefore only accepted for the purposes of determining that application. In addition, the odour impact assessments undertaken by landowners Abrdn and St William have been prepared at a later date, with the discrepancies between the studies having led to the Cogan odour review report, as mentioned above.

5.7. London Borough of Newham further comment that objections to site allocations related to odour have not been made by Thames Water to the Barking and Dagenham Local Plan, which were submitted in November 2021 as part of that Regulation 19 consultation. This is despite Thames Water's odour modelling from 2019 showing that sites to the east of the River Roading would also be within the adverse odour risk zone of over 3 OUE/m3 (as represented in the Cogan report, Figure 4.5). Thames Water note they have since raised odour concerns in relation to the Barking & Dagenham Thames Road Vision and Design Code SPD in September 2024, which resulted in the addition of a requirement for developers to engage with Thames Water on the need for an odour impact assessment in the adopted guidance.

5.8. In September 2025, Thames Water have updated their initial response to the consultation on the planning application for Beckton Riverside Phase 1 (application Ref: 24/00989/OUT) to object to the application on the basis that odour mitigation has not been put forward/tested. Newham note that the concerns relating to odour impacts on amenity have informed the determination process, and point to the 'update Letter to Applicant' (correspondence dated 19th March 2025, available on the public records for the application) which outlined the council's key concerns with the submitted proposal at that time, including masterplanning and odour. Following the findings of the Cogan's Beckton STW Phase 1 Odour Review, which concluded that the odour report submitted by St William is an accurate and fair reflection on the current conditions of the site and that concluded that the Beckton Riverside Phase 1 site boundary would be suitable for a residential-led mixed use development, discussions with the applicant progressed. The Strategic Development Committee on 23rd October 2025 resolved

to grant planning permission subject to GLA Stage 2 referral and completion of the s106. Newham note the decision is despite Thames Water's objection. The approval would be subject to mandatory conditions that include the need for Odour Impact Assessment and Mitigation Strategy for areas of the land subject to potential adverse odour risk of over 3 OUE/m3, and appropriate Design Code controls, including a design strategy for odour mitigation. Thames Water's view was that such conditions are not appropriate and that the feasibility of off-site odour mitigation should be tested before permission is granted.

5.9. Record of agreements and/or disagreements:

- London Borough of Newham and Thames Water agree with the methodology and the findings of the Cogan's Beckton STW Phase 1 Odour Review independent report, as amended following Thames Water's comments in June 2025 (Appendix 3).
- London Borough of Newham considers that there are sufficient policy requirements to ensure that odour and odour mitigation are considered at planning application stage, and no further amendments are necessary to Beckton Riverside or Alpine Way site allocations.
- Thames Water note that the Cogan report concludes that mitigation measures will be required for all of the strategic land at Beckton Riverside, but the extent of measures necessary will need to be established based upon the likely odour concentrations, which vary across the land, taking into account potential shielding by buildings and barriers. Introducing or accelerating potential odour reduction measures at Beckton STW is recognised in the report as not appearing to be a viable option currently. Robust mitigation measures will therefore need to be implemented within the strategic land by the applicants for the development of that strategic land to ensure that any potential for adverse amenity impact on future occupiers/users of the land is avoided or where appropriate, minimised. The next step will therefore be to establish appropriate mitigation measure principles for the strategic land.
- Thames Water have not yet seen any mitigation feasibility testing/assessment. **Thames Water's view is that such odour mitigation feasibility assessment** should be undertaken and agreed before any planning applications are submitted, or the current application for Phase 1 reference 24/00989/OUT is determined, as it may demonstrate that mitigation is not feasible and hence the amenity of the new development would be adversely impacted, making the development of odour sensitive development (including residential properties, schools, hospitals) untenable.

5.10. **Newham's Metropolitan Open Land review**

5.11. London Plan (2021) Policy G3, Metropolitan Open Land, of the London Plan sets out that Metropolitan Open Land (MOL) is afforded the same status and level of protection as Green Belt. Policy G3 requires boroughs to work with partners to enhance the quality and range of uses of MOL. The policy sets out that any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor of London and adjoining boroughs.

5.12. London Green Belt can be thought of as a permanent area of open land that surrounds the city, whereas MOL relates to strategic open land within the built environment of London.

5.13. In 2022/23 Jon Sheaff and Associates and London Wildlife Trust, undertook an initial review of Newham's Metropolitan Open Land to regularise the existing designations, understand if there were any omissions and to ensure that the existing designations met the criteria of the NPPF and London Plan. This work was revised and updated in 2024 and Newham's Metropolitan Open Land Review (2024) was published as evidence during the Regulation 19 Consultation.

5.14. Thames Water continue to object to the retention of the Northern Lagoon area at Beckton STW as a Metropolitan Open Land designation and consider that there are exceptional circumstances for its removal. This operational land TW retains expressly for the purpose of carrying out its statutory undertakings and so they consider that it should not be restricted by way of land use planning designations that do not reflect that agreed status. The Northern Lagoon area constitutes operational land associated with Beckton STW as defined in the Town and Country Planning Act and as confirmed by the Section 106 Legal Agreement between Thames Water and the London Borough of Newham associated with Beckton STW extension/Lee Tunnel planning permission reference 10/02061/LTGVAR/LBNM (March 2011).Furthermore, as part of its statutory role under the Water Industry Act 1991 and in response to the challenges identified in its adopted Water Resources Management Plan 2024, TW is investigating the means by which this area of operational land might contribute to the management and recycling of treated wastewater.

5.15. Newham considers that this change is not necessary, as the Green and Water Space policies would not prohibit the use of this site for future upgrades to essential sewerage infrastructure should certain policy criteria be met. The need for this site to be the location for sewage infrastructure would be assessed at the point an application is brought forward.

5.16. <u>Record of agreements and/or disagreements</u>:

- London Borough of Newham considers that the methodology and resulting designations of the Metropolitan Open Land Review are robust, and that there is no fully evidenced and justified exceptional circumstances to de-designate the 'Roding Valley Way-part & Northern Lagoon, Beckton Sewage Works' MOL area that is retained operational land.
- Thames Water consider that the MOL designation at the Northern Lagoon area does not meet the requirements of Part B of London Plan Policy G3 as set out in Reg 19 response and therefore it is considered that exceptional circumstances do exist to remove the MOL designation similar to the remainder of Beckton STW and previous MOL designation removal.

5.17. **Newham's Sites of Importance to Nature Conservation (SINCs) review**

5.18. SINCs are those areas of land which are recognised as being of particular importance for wildlife and biodiversity. Although a non-statutory designation, SINCs are afforded protection within the planning system through the NPPF 2023, under which the Newham Local Plan is being examined (paragraphs 180,181 and 186, and related Natural Environment guidance), and under London Plan Policy G6. The NPPF 2023 also highlights the broader importance of open space in delivering wider benefits to nature and helping to address the impact of climate change (paragraphs 8, 102).

5.19. London Plan Policy G6, Biodiversity and access to nature, sets out the Sites of Importance to Nature (SINCs) should be protected and that Borough, in developing Local Plans, should use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks.

5.20. An assessment of Newham's SINCs was undertaken by London Wildlife Trust between June-August 2022 to inform the Draft Local Plan. This involved a desk-top review of existing information about Newham's SINCs (including those within the area currently administered by the London Legacy Development Corporation) and analysis or aerial imagery followed by site visits to existing SINCs and other sites identified by the desk-top study.

5.21. The review has systematically looked at the current SINC designations and identified potential changes to boundaries or status, and justify these changes as necessary in relation to SINC designation criteria. It has also identified and justified potential new SINCs to reduce areas of deficiency, contribute to strategic green corridors or complement existing SINCs. Newham took the SINC Review (2022) to the September 2023 London Wildlife Sites Board. At this meeting, the work was praised for its quality and thoroughness. There was unanimous agreement from the Board to approve the Newham SINC Review (2022). Therefore, the existing SINC designations for Beckton Sewage Treatment Works were taken forward into the Submission Local Plan, including a proposed extension to the at Beckton Sewage Works West SINC (NeB18).

5.22. Thames Water object to the SINC designations at Beckton Sewage Works West SINC (NeB18) and Beckton Sewage Works North (NeB15), as shown on the Policies Map. Thames Water note that Beckton Sewage Works West (NeB18) areas have been allowed to re-generate naturally in accordance with the Lee Tunnel and Beckton STW extension scheme Landscape & Ecology Management Plan (LEMP), but this is a new landscape/habitat and will not currently have nature conservation value which justifies SINC designation. Further, part of the LEMP area is also being used for temporary construction depot area for current upgrades at Beckton Sewage Treatment Works.

5.23. London Borough of Newham note that NeB15 designation is an existing SINC under the existing Local Plan (2018), which is being carried forward. Further, Newham note that the creation of the new biodiversity area, which forms part the proposed amendment to the boundary of the adopted Beckton Sewage Works West SINC parcel (NeB18, formerly Beckton Sewage Treatment Works South NeBI18A), forms part of conditions for the approval of planning application 19/02768/FUL. Condition 19 required the pre-commencement approval of a Landscape and Ecology Masterplan and Management Plan (LEMP), to ensure the proposed scheme achieves a biodiversity net gain, and in the interests of biodiversity and safeguarding protected and sensitive species. The LEMP was approved by the council as part of application 20/02081/AOD and directs the use of the land at the Beckton Sewage Works West SINC as landscaped biodiversity land until such time as a further application is submitted and approved by the Council.

5.24. Beckton Sewage Treatment Works is of strategic importance to London's infrastructure and will continue to be required to be maintained and upgraded to accommodate population growth and to meet new treatment standards which will require undeveloped land. Hence,

Thames Water seek to minimise the restrictions on retained operational land to help facilitate the timely delivery of future upgrades.

5.25. London Borough of Newham has further reviewed the proposed extension to SINC parcel NeB18 with the consultant London Wildlife Trust (who conducted the SINC Review), and undertaken further engagement with Thames Water with regards to the evidence base and wider strategic context relating to this site. On balance, between the need to safeguard land for nature and the need to future-proof and protect key strategic utility infrastructure, and having regard to the Strategic Industrial Land (SIL) designation on part of the SINC parcel, Newham propose a modification to the boundary of the SINC parcel NeB18 to remove the land designated as SIL, as set out in Appendix 4 of this report. This will be put forward to the Inspector for consideration as part of the examination process.

5.26. Record of agreements and/or disagreements:

- London Borough of Newham considers that the methodology and resulting designations of the parcels NeB18 (Beckton Sewage Works West) and NeB15 (Beckton Sewage Works North) as a Site of Importance to Nature (SINCs) are robust and align with the GLA's guidance, as highlighted by the London Wildlife Sites Board's unanimous agreement to approve the Newham SINC Review. However, in order to balance competing priorities for the Beckton Sewage Works site, and following our further discussions with Thames Water regarding NeB18 parcel, we have put forward to the Inspector a modification to the boundary of this SINC to remove the portion of the proposed designation which overlaps the Strategic Industrial Land (SIL) designation, as set out in Appendix 4.
- Thames Water continue to disagree with the proposed SINC designation NeB18 (formerly Beckton Sewage Treatment Works South NeBI18A, extension to existing Beckton Meadows South SINC), as they consider that the proposed extended SINC designation has not been justified with supporting evidence in line with the GLA guidance. Just because they are required to be laid out as habitat areas under planning conditions does not mean they meet the requirements for SINC designation. The report EB070 does not provide any other evidence in relation to site reference NeB18. Hence, the designation should be removed so that it doesn't unnecessarily restrict future operational development.
- Thames Water continue to disagree with the continued designation of SINC at Beckton Sewage Works North, NeB15.

5.27. **Green Space designation at Abbey Mills Pumping Station**

5.28. The adopted LLDC Local Plan (2020) contains a Local Open Space designation for the Mill Mead allotments, which has been taken forward in the Newham Submission Local Plan.

5.29. Thames Water object to the green space designation at Mill Meads Allotments. The Abbey Mills Pumping Station site is either currently in operational use or retained for future operational use (including the site referred to as Mill Meads Allotments) and is of strategic importance to London's existing and future infrastructure requirements. Thames Water temporarily lease the site to be used as allotments, but the land has been retained for future operational use. It is important that the site is not constrained by unnecessary restrictions which could prevent future upgrades to this essential sewerage infrastructure.

5.30. Newham considers that all green spaces were appraised in Newham's Green and Water Infrastructure Study and that the Mill Mead allotments remain to be a green space and a functioning allotment. The need to designate this space is further substantiated by the lack of community growing space in the borough. Newham has 15 allotments and community growing spaces with a total area of 17.1 hectares. The National Allotment Society recommends the provision of 0.125 hectares per 1,000 residents. The borough currently provides 0.05 hectares per 1,000 residents. Both the current and projected rates of provision in 2038 are below the recommended standards. Spaces for community growing (including allotments) are important, not only do they deliver direct health and environmental benefits, but also enhance social connection and may deliver climate benefits through reduced food transportation and improved biodiversity. The Green and Water Space policies (GWS1, GWS3 and GWS4) would not prohibit the use of this site for future upgrades to essential sewerage infrastructure should certain policy criteria be met. The need for this site to be the location for sewage infrastructure would be assessed at the point an application is brought forward.

5.31. Record of agreements and/or disagreements:

- London Borough of Newham considers that the methodology and resulting green space designations of the Green and Water Infrastructure Study (2024) are robust, and that there is no fully evidenced and justified exceptional circumstances to de-designate the land that is retained operational land.
- Thames Water consider that Green Space is inappropriately designated as it is retained operational land (in temporary use as allotments) and the designation should be removed so that it doesn't unnecessarily restrict future operational development.

6. Governance agreements

6.1. This statement of common ground will be reviewed:

6.1..1. Whenever agreement is reached on any outstanding matters. Or

6.1..2. At key milestones in progress towards addressing strategic matters. Or

6.1..3. At each subsequent key stage of the plan making process, as it progresses towards adoption.

7. Signatories

7.1. We confirm that the information in this statement and referred to documents reflects the joint working to date undertaken between London Borough of Newham and Thames Water towards addressing the identified strategic matters.

Signed on behalf of London Borough of Newham: **Name:** Danalee Edmund **Date: 29/10/2025** **Position:** Interim Planning Policy Manager, Planning and Development Directorate	**Signed on behalf of Thames Water:** **Name: David Wilson** **Date: 04/11/2025** **Position: Property Town Planner**

Appendix 1: Agenda and minutes of Statement of Common Ground meeting held on 28th August 2025

Statement of Common Ground between:
London Borough of Newham (LBN) and Thames Water Utilities Limited (TW)

Meeting Date: 28.08.2025
Time: 10:00-10:45
Venue: Microsoft Teams

Present:
Danalee Edmund, Interim Planning Policy Team Manager, LBN
Jane Custance, Director of Planning and Development, LBN
Naomi Pomfret, Principal Policy Planner, LBN
Antonia Marjanov, Principal Policy Planner, LBN
David Wilson, Town Planner, TW
Nicky McHugh, Development Planning Manager, TW
Andrzej Nowosielski, Assistant Operations Planner for North of London, TW

Agenda and Notes

Agenda Item	**Notes** [context, position statements, areas of agreement and/or disagreement]	**Actions emerging** [what, who, and any deadline]
1. Introductions	• Self-introduction by the LBN and TW teams.	
2. Infrastructure requirements for water and wastewater on strategic sites - modifications proposed alongside the Submission Local Plan	• LBN thanked TW for their support in February 2025 to clarify their position on the infrastructure requirements for water and wastewater on strategic sites in their Regulation 19 comments, as compared to the Regulation 18. These comments have informed a series of modifications proposed to the submission Local Plan.	LBN to forward the modifications to TW. TW to review and confirm that the modifications meet the requirements set out in their Regulation 19 comments, as clarified in February 2025.
3. Beckton Sewage Works odour report and implications	• LBN stated that the Statement of Common Ground will be based on the latest odour report, Cogan (June 2025), Beckton STW Phase 1 Odour Review, for which Thames Water had provided comments. Thames Water noted they had not seen the updated report following the sharing of feedback on its content, but noted that the earlier draft report sets out that whole development area requires mitigation. • TW stated their position remains that there are significant odour constraints affecting Beckton Riverside site allocation, particularly in the areas of Adverse Odour Risk (3 OUE/m3 - 5 OUE/m3) and High Adverse Odour Risk (5 OUE/m3 - 10 OUE/m3). TW highlighted that there are no further efficient mitigation measures that can be	LBN to forward to TW the reference for the Beckton Riverside Phase 1 application alongside any comments received from TW on this. LBN to forward the latest Cogan Odour Report. TW to further review its comments on the

	provided 'on site', i.e. to improve the facilities at Beckton Sewage Works itself. Further, they are concerned that they have not seen any proposals for possible mitigation measures in these areas that can be effectively applied on-site, and they are not aware of any case studies from elsewhere. • LBN noted that the site allocation for Beckton Riverside set out broadly the mix of uses on the site and the principles of design, and that detailed mitigations and design measures will be sought as part of the masterplanning for the site and any future site application(s) in the areas affected by odour. Thames Water continue to object to the allocation as it proposes odour sensitive development in an area impacted by odour. • LBN queried whether TW had any concerns with regards to the Local Plan policies that address amenity impacts and agent of change, so policy D6 and the principles set out in the site allocation. TW confirmed that there are no concerns with the policies but continue to be concerned with the extent to which it is feasible to identify mitigation measures in the odour affected areas that would allow the type of mix of uses and scale described in the site allocation. • TW queried the timescale for development at Beckton Riverside, and whether there is an emerging application. LBN briefly outlined the Phase 1 proposal brought forward by developer St Williams. LBN indicated that mitigation would be resolved at application stage and would incorporate landscape buffers and mechanical ventilation. TW set out that mitigation feasibility testing should be undertaken prior to the application being submitted/determined as there is a risk it may not be feasible.	draft statement of common ground and re-share with LBN.
4. Beckton Sewage Works Sites of Importance for Nature Conservation (SINC) and Metropolitan Open Land (MOL) designations	• TW re-iterated its concerns that the MOL designation and the SINC extended designation are covering operational land, which in the long term may be required to update and future-proof the operation of the Beckton Sewage Works to respond to population growth, climate change adaptions, and changes in legislation or regulations. • LBN noted that the MOL is an existing designation. Under the London Plan, any de-designation of MOL would require robust evidence. The Newham Metropolitan Open Land Review report is a robust evidence base that proposes to retain the MOL. Similarly, LBN noted that the Newham Sites of Importance for Nature	LBN to share a link to the Newham Sites of Importance for Nature Conservation Review 2025 (PDF). LBN to review and confirm its position with regards to the SINC designation at Beckton Sewage Treatment Works West.

	Conservation Review has been a robust piece of evidence. Nevertheless, the policy allows for loss of designation in exceptional circumstances, which could allow future operational development of the land to come forward. • TW asked to review the evidence of the reasons for the SINC designation. LBN agreed to share a link to the report, and to also further review the reasons for the proposed extension of the SINC.	
5. Abbey Mills Pumping Station green space designation	• TW reiterated that the land the subject of the green space designation is long term operational land which has been temporarily leased to be used as an allotment. In the long term the land may be required to update and future-proof the operation of pumping station to respond to population growth, climate change adaptions, and changes in legislation or regulations. • LBN confirmed its position remains unchained regarding the need for a green space designation, similar to the reasons discussed in relation to Beckton Sewage Works.	
6. AOB, conclusions and actions	• Discussed aiming to finalise the statement of common ground before end of October 2025, to allow time for the Inspector to consider ahead of Local Plan examination. • Summarised action points from above discussion.	LBN to draft and circulate minutes for formal approval. Progress to signing a Statement of Common Ground to support Local Plan examination.

Appendix 2: Schedule of LBN proposed text modifications to the Regulation 19 Draft Submission Local Plan in response to Thames Water's comments

Modification proposed New text in **bold** and removed text in ~~strikethrough~~.	**Page number in** Regulation 22 Local Plan	**Part of the Plan** Paragraph number, policy reference and part, implementation text reference etc.	**Reason for modification being proposed**
Phasing of the site should take account of the likely requirement for water supply ~~and wastewater~~ infrastructure upgrades, which will need to reflect the cumulative impact of significant quantities of development in this location. This requires early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.	419	N2.SA1 Silvertown Quays, Phasing and implementation	Clarification of utility requirements following updated Thames Water position.
Phasing of the site should take account of the likely requirement for water supply ~~and wastewater~~ infrastructure upgrades through early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.	422	N2.SA2 Lyle Park West, Phasing and Implementation text	Clarification of utility requirements following updated Thames Water position.
Phasing of the site should take account of the likely requirement for water supply ~~and wastewater~~ infrastructure upgrades which will need to reflect the cumulative impact of significant quantities of development in this location.	429	N2.SA4 Thameside West, Phasing and implementation	Clarification of utility requirements following updated Thames Water position.
Phasing of the site should take account of the likely requirement for water supply ~~and wastewater~~ infrastructure upgrades, through early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.	439	N3.SA1 Royal Albert North, Phasing and implementation	Clarification of utility requirements following updated Thames Water position.
Phasing of the site should take account of the likely requirement for water supply ~~and wastewater~~ infrastructure upgrades, through early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.	445	N4.SA1 Canning Town East, Phasing and implementation	Clarification of utility requirements following updated Thames Water position.

Modification proposed New text in **bold** and removed text in ~~strikethrough~~.	**Page number in Regulation 22 Local Plan**	**Part of the Plan** Paragraph number, policy reference and part, implementation text reference etc.	**Reason for modification being proposed**
Phasing of the site should take account of the likely requirement for water supply ~~and wastewater~~ infrastructure upgrades, through early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.	450	N4.SA3 Canning Town Holiday Inn, Phasing and implementation text	Clarification of utility requirements following updated Thames Water position.
Phasing of the site should take account of the likely requirement for water supply ~~and wastewater~~ infrastructure upgrades which will need to reflect the cumulative impact of significant quantities of development in this location.	453	N4.SA4 Limmo, Phasing and Implementation	Clarification of utility requirements following updated Thames Water position.
Phasing of the site should take account of the likely requirement for ~~wastewater~~ **water supply** infrastructure upgrade, through early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.	469	N5.SA4 Royal Road, Phasing and Implementation	Clarification of utility requirements following updated Thames Water position.
Phasing of the site should take account of the likely requirement for water supply ~~and wastewater~~ infrastructure upgrades through early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.	484	N7.SA2 Twelvetrees Park and Former Bromley By Bow Gasworks, Phasing and implementation	Clarification of utility requirements following updated Thames Water position.
Phasing of the site should take account of the likely requirement for water supply ~~and wastewater~~ infrastructure upgrades through early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.	487	N7.SA3 Sugar House Island, Phasing and implementation	Clarification of utility requirements following updated Thames Water position.
Phasing of the site should take account of the likely requirement for water supply ~~and wastewater~~ infrastructure upgrades through early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.	507	N8.SA5 Stratford Town Centre West, Phasing and implementation	Clarification of utility requirements following updated Thames Water position.
Phasing of the site should take account of the likely requirement for water supply infrastructure upgrades, through early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.	5345	N11.SA3 Alpine Way, Phasing and implementation	Clarification of utility requirements following updated Thames Water position.

Modification proposed New text in **bold** and removed text in ~~strikethrough~~.	**Page number in** Regulation 22 Local Plan	**Part of the Plan** Paragraph number, policy reference and part, implementation text reference etc.	**Reason for modification being proposed**
Phasing of the site should take account of the likely requirement for water supply ~~and wastewater~~ infrastructure upgrades through early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.	559	N13.SA3 Former East Ham Gasworks, Phasing and Implementation	Clarification of utility requirements following updated Thames Water position.
~~Phasing of the site should take account of the likely requirement for wastewater infrastructure upgrade, through early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.~~	573	N15.SA2 Woodgrange Road West, Phasing and implementation	Clarification of utility requirements following updated Thames Water position.

Appendix 3: Cogan (June 2025), Beckton STW Phase 1 Odour Review

BECKTON STW

PHASE 1 ODOUR REVIEW

JUNE 2025

Cogan

Environmental Consulting

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AIR – ODOUR - CLIMATE

Cogan Environmental Consulting is an independent customer focussed company, providing bespoke air, odour and climate support using professional knowledge-based solutions.

Our trusted team of experts maintain the company's core values of quality, honesty, integrity, friendliness, and professionalism.

Document Control

Client	Reference	Author	QC	QA	Date
Homes England	COGAN_P1033O_A7	AC	AC	KC	17/06/2025

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Executive Summary

Odour evidence produced in relation to strategic land located close to the Beckton Sewage Treatment Works (STW) has been comprehensively reviewed.

The strategic land is owned by St William, Abrdn and the Greater London Authority (GLA). WSP have produced an odour impact assessment and addendum, and an updated assessment on behalf of St William, and Ramboll have produced an odour assessment on behalf of Abrdn. The findings of these assessments differ from odour modelling produced by Olfasense on behalf of Thames Water Utilities (TWU, the operator of Beckton STW).

The odour evidence produced to date by St William and Abrdn are considered appropriate and sufficiently robust for determination of the likely odour effects upon the strategic land.

For the odour evidence provided by TWU, although no reason has been provided, the TWU 2019 modelling results appear overstated and inconsistent with previous TWU modelling produced in 2008 and 2010. WSP have essentially replicated the TWU 2019 modelling and demonstrated significantly lower odour concentrations, which appear consistent with previous TWU modelling, also suggesting TWU's 2019 modelling results would benefit from further understanding. It should also be acknowledged that TWU's 2019 modelling results do not reflect local odour nuisance complaints nor the extensive field odour surveys conducted by WSP and Ramboll (whereas WSP's modelling does). In addition, WSP have undertaken substantial efforts to engage with TWU and Olfasense regarding their modelling, to date TWU and Olfasense have not provided sufficient information to fully replicate their model, nor provided their modelling files for direct comparison.

WSP have also produced a modelling sensitivity test where the odour emissions have been adjusted based upon the field odour survey results, the approach is abnormal compared to guidance and introduces uncertainty. Given that the WSP's replication of TWU's modelling and the extensive field odour surveys conducted by WSP and Ramboll provide robust conclusions, in the overall context of this the sensitivity test is not considered to provide more robust conclusions.

It is therefore recommended that the conclusions and mitigation are based upon WSP's initial odour modelling (replication of TWU 2019 modelling) and the findings from WSP's and Ramboll's field odour surveys.

From these it is reasonable to conclude that the Abrdn site will experience odour concentrations over 5 OU_E/m^3, St William Phase 2 will experience around 3-5 OU_E/m^3, and St William Phase 1 will experience 1.5-3 OU_E/m^3 (with the northern aspect to be just over 3 OU_E/m^3).

Mitigation measures will be required for all of the strategic land, but the extent of measures necessary will need to be established based upon the likely odour concentrations, which vary across the land, taking into account potential shielding by buildings and barriers.

While third-party funded potential odour reduction measures at Beckton STW may be possible at high costs, TWU anticipate a large technological challenge to implement measures. Robust mitigation measures will therefore need to be implemented within the strategic land to ensure that any potential for adverse amenity impact on future occupiers/users of the land is avoided or where appropriate, minimised.

The next step will therefore be to establish appropriate mitigation measure principles for the strategic land.

It should be noted that where effects are considered significant, it does not mean that a development proposal would be unacceptable, or a planning application refused; rather it means that careful consideration should be given to further mitigation and the balance with any wider environmental, social and economic benefits that a proposal would bring.

Contents

Glossary

Term	Meaning
ADMLC	Atmospheric Dispersion Modelling Liaison Committee, a group of representatives of government departments, utilities and research organisations
DLR	Docklands Light Railway
EA	Environment Agency, England's environmental regulator
FIDOL	A series of factors to describe odour characteristics (Frequency, Intensity, Duration, Offensiveness, and Location).
GLA	Greater London Authority, the devolved regional governance body of Greater London
IAQM	Institute of Air Quality Management, a professional body for odour practitioners which has published guidance on assessing odours.
LBN	London Borough of Newham
STW	Sewage Treatment Works
TWU	Thames Water Utilities, operator of Beckton Sewage Treatment Works
UKWIR	UK Water Industry Research

1 Introduction

1.1 Cogan Environmental Consulting Limited has been commissioned to provide odour support to the London Borough of Newham (LBN) regarding strategic land located close to the Beckton Sewage Treatment Works (STW) operated by Thames Water Utilities (TWU).

1.2 The strategic land is owned by St William, Abrdn and the Greater London Authority (GLA). WSP have produced an odour impact assessment and addendum, and an updated assessment on behalf of St William, and Ramboll have produced an odour assessment on behalf of Abrdn. The findings of these assessments differ from odour modelling produced by Olfasense on behalf of TWU.

1.3 This document provides a comprehensive review of odour evidence produced by St William, Abrdn, and TWU to date, including responses to clarification requests.

2 The Strategic Land – Setting the Scene

2.1 The land is allocated for development under the Newham Local Plan 2018[1] and the new draft Local Plan[2,3].

Newham Local Plan 2018

2.2 The land is allocated as 'Strategic Land S5 Beckton' within the adopted Newham Local Plan 2018. The land of interest is illustrated in Figure 2.1.

2.3 Within this, is the Strategic Site Allocation 'S01 Beckton Riverside' which covers land of interest and some surrounding area. This is presented in Figure 2.2.

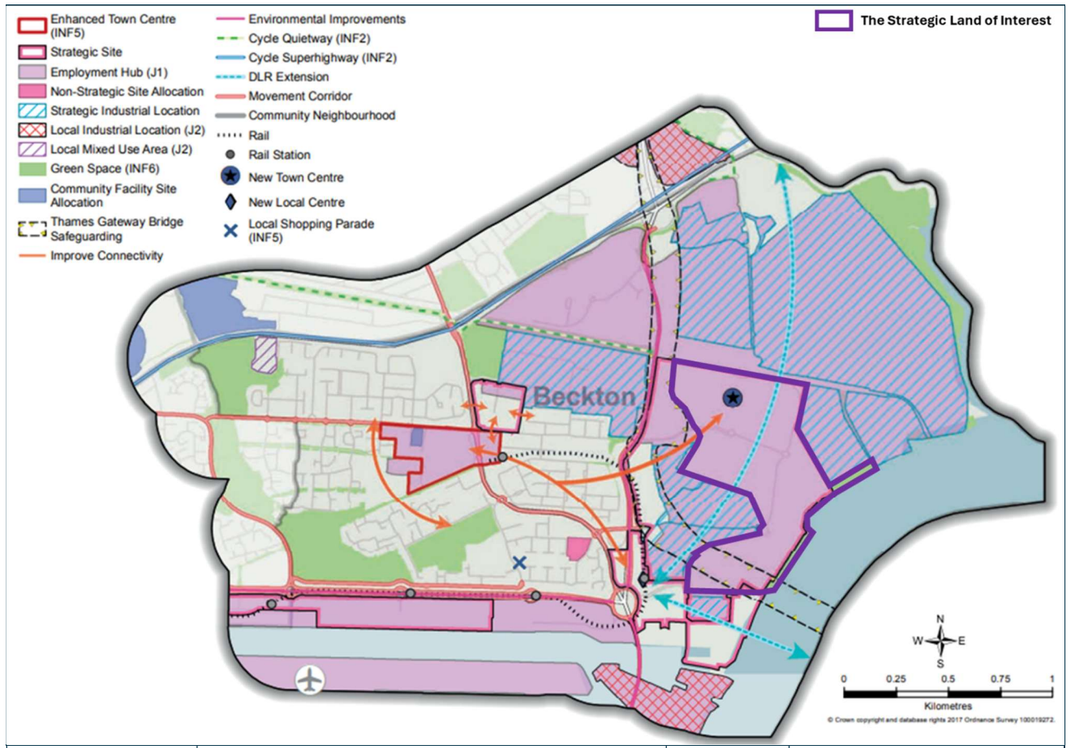
2.4 In relation to this, Spatial Policy S5 part 2 'Spatial Strategy' states:

"a. Beckton Riverside will provide a new hallmark mixed use area, building on the strengths of the riverside location, good Strategic Road Network access, [further] scope to extend MOL, continuous riverside access and optimal pedestrian and cycling permeability, and the established retailer commitment to the location, as well as extensive infrastructure investment yielding new connections including river crossings and station(s) and accessible community facilities commensurate with the scale of development. Gallions Reach Shopping Park will co-evolve and intensify to become a Major town centre for the area focused around a transport hub, in the mix of shops and wider offer provided, the variety of unit sizes, the connections with local residential areas including new housing in vertical mixed use formats within it, and reduction in the dominance of car parking…

g. Links will also be improved with surrounding areas, with the extension of the DLR network…

i. The area will continue to be important for utilities infrastructure, with ongoing investment in the capacity, efficiency and [on and off site] mitigation of environmental and spatial impact at the sewage treatment works, former gasworks, and DLR depot, ensuring that overall development capacity, including in the immediate vicinity, is maximised. Modern waste processing and recycling is also compatible with industrial permissions, and should make use of river transport where feasible…".

Figure 2.1: Strategic Land S5 Becton and Strategic Land of Interest



Cogan Environmental Consulting	Drawing Title:	Drawing Ref:	COGAN_P1033O_A7_Figure 2.1
	Strategic Land S5 Becton and Strategic Land of Interest	Author:	AC
		QA/QC:	KC / AC
Figure notes: Drawing obtained from the Newham Local Plan 2018.		Date:	17/06/2025

2.5 In addition, there are several Infrastructure Policies that are relevant:

2.6 INF3 - Waste and Recycling states:

"…Development at Beckton Riverside will include a waste facility with capacity to meet strategic waste needs unless it is demonstrated that there is no longer a need for such a facility in that location (through updated evidence concerning strategic need via an updated Joint Waste Plan or submission of equivalent robust evidence)…".

[1] Newham (2018). Newham Local Plan 2018, A 15 year plan looking ahead to 2033.
[2] Newham (2024). Our Newham Local Plan, Draft Submission Local Plan (Regulation 19) June 2024.
[3] Newham (2025). Appendix 2 Table of Minor Modifications to the Regulation 19 Draft Submission Local Plan.

2.7 INF4 - Utilities Infrastructure states:

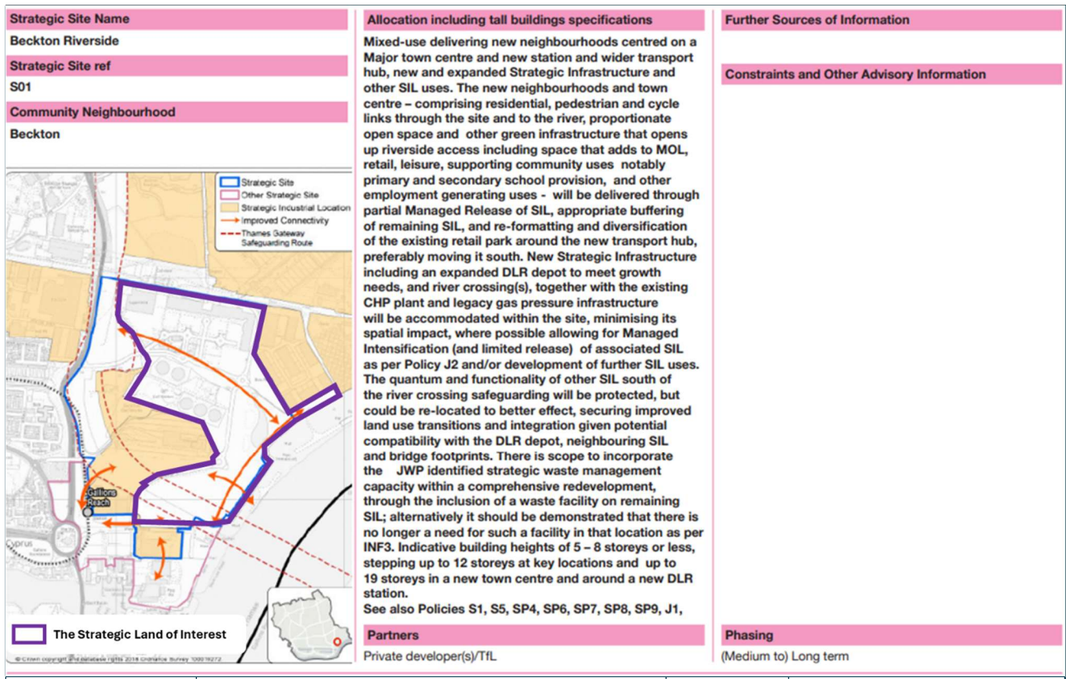
"…Development in the vicinity of Beckton STW should undertake an Odour Impact Assessment and respond with appropriate mitigation as necessary as per the guidance cited in policy SP8…".

2.8 With the justification that:

"Utilities infrastructure in London is already stretched; the levels of growth expected in Newham, and specifically in the Arc of Opportunity, means capacity of multiple kinds must be increased to facilitate the creation of new neighbourhoods (such as Beckton Riverside) and take up of economic opportunities (for example in the Royal Docks Enterprise Zone) that have a significant local and regional role. Known issues include water supply and sewage handling in the Thames Water area generally, energy supply/transmission infrastructure in the Royal Docks and the need to extend super-fast broadband, as per the IDP. If growth expectations are to be met, utilities enhancements must also work in tandem with new development in an already heavily-urbanised area and minimise land take as well as other spatial and environmental impacts (including noise, smell, and visual intrusion). Such pressure also extends to the increasing need to decommission and remediate the now unnecessary multiple gas holders in the area, which consume considerable areas of land, with legacy gas pressure (etc.) infrastructure being far more modest.

This policy contributes to all plan objectives, seeking to enable economic growth (objective 1), create high quality places that do not suffer the effects of utilities shortfall (objective 2), deliver "good growth" by embedding utilities needs and future-proofing to avoid further works and improve construction efficiency (objective 3), and balance local and strategic needs, for example in recognising that whilst facilities like Beckton Sewage Treatment Works may need to expand to meet [local and] strategic needs, that this should be counterbalanced by the minimisation of local impacts (Objective 4)…".

Figure 2.2: Strategic Site Allocation and Strategic Land of Interest



Cogan Environmental Consulting	Drawing Title:	Drawing Ref:	COGAN_P1033O_A7_Figure 2.2
	Strategic Site Allocation and Strategic Land of Interest	Author:	AC
		QA/QC:	KC / AC
Figure notes: Drawing obtained from the Newham Local Plan 2018.		Date:	17/06/2025

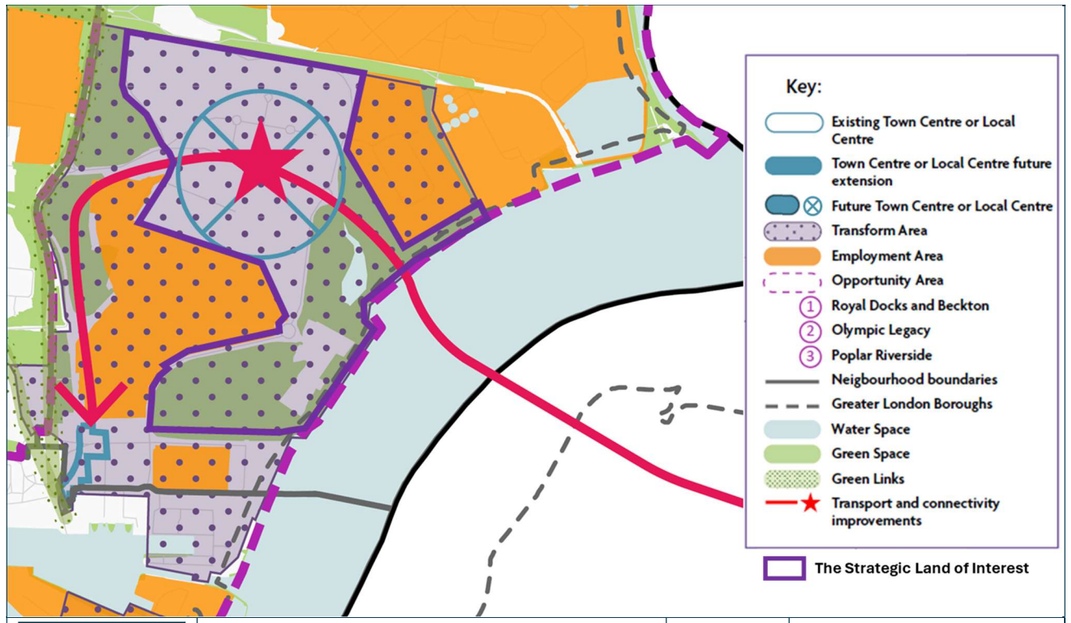
New Draft Local Plan

2.9 Newham are currently updating their Local Plan, so that they can plan to 2038 to deliver their key objectives. This includes meeting growth requirements of Newham and targets set out in the London Plan[4,3]. A Draft Local Plan has been produced, consulted upon and is currently undergoing Regulation 19 consultation for legal compliance, prior to submission for examination.

2.10 This includes a key diagram setting out the spatial vision for the borough. This is presented in Figure 2.3 for the land of interest and immediate surroundings. For the land of interest, the vision includes transformation of the area, green space, a future town centre or local centre future extension, and transport/connectivity improvements.

[4] GLA (2021). The London Plan, The Spatial Development Strategy for Greater London.

Figure 2.3: Key Diagram and Strategic Land of Interest



Cogan Environmental Consulting	Drawing Title:	Drawing Ref:	COGAN_P1033O_A7_Figure 2.3
	Key Diagram and Strategic Land of Interest	Author:	AC
		QA/QC:	KC / AC
Figure notes: Drawing obtained from LBN.		Date:	17/06/2025

2.11 The new local plan sets out that growth within the borough should be delivered in a fair way and includes four policies for building a fairer Newham. Of note, BFN1: Spatial strategy states:

"1. Development will be directed to all of Newham's 17 neighbourhoods to distribute the benefits of growth, achieve Community Wealth Building outcomes and create a network of successful and well-connected neighbourhoods. This will be achieved through…directing significant levels of growth to…the six neighbourhoods in the Royal Docks and Beckton Riverside Opportunity Area, which have the potential to deliver 36,000 new homes and 55,000 new jobs up to 2041, unlocked by an extension to the DLR and the delivery of two new DLR stations…".

2.12 When considering the implementation of this, BFN1.7 of the new local plan states:

"Newham is home to a significant number of strategic utilities and infrastructure facilities – including Beckton Sewage Treatment Works, transport depots, wharves and pylons. Development in close proximity to strategic utilities and infrastructure must ensure the new development does not impact on its long term function and that the design of any new development mitigates any potential noise, dust, odour, light and other pollution from these existing strategic facilities on the users of new development, in line with the agent of change principle. The Council will continue to work with utilities providers and other public sector bodies to reduce the impact of these facilities and ensure improvements, including their decarbonisation and expansions, are supported, as required".

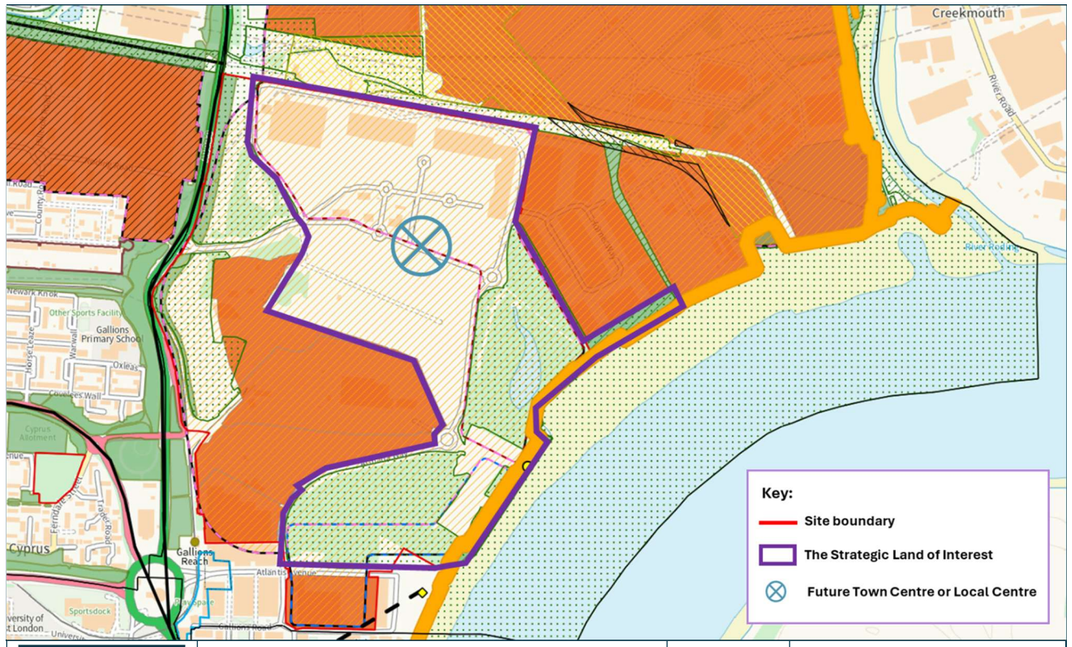
2.13 In relation specifically to the Beckton STW, the new local plan includes Policy W4: Utilities and Digital Connectivity Infrastructure, which states:

"…All development within 800m (including on site allocations) of Beckton Sewage Treatment Works will be required to undertake an Odour Impact Assessment and respond with appropriate mitigation…".

2.14 Newham's 17 neighbourhoods include 'N17 Gallions Reach', includes the strategic site allocation of N17.SA1 Beckton Riverside. The Beckton Riverside allocation and the strategic land of interest is illustrated in Figure 2.4. The neighbourhood profile for Gallions Reach states that:

"The Council, Greater London Authority, Transport for London, Homes England, St William, ABRDN, the Thamesmead Waterfront Joint Venture and the London Borough of Greenwich are proposing to extend the DLR through the neighbourhood and deliver a new DLR station at Beckton Riverside".

Figure 2.4: N17.SA1 Beckton Riverside Allocation and Strategic Land of Interest



Cogan Environmental Consulting	Drawing Title:	Drawing Ref:	COGAN_P1033O_A7_Figure 2.4
	N17.SA1 Beckton Riverside Allocation and Strategic Land of Interest	Author:	AC
		QA/QC:	KC / AC
Figure notes: Drawing obtained from LBN.		Date:	17/06/2025

2.15 The vision for Gallions Reach states:

"Gallions Reach will be transformed into a new neighbourhood through the delivery of an extended DLR line and new DLR station or a similarly transformative (as confirmed by Transport for London) public transport intervention at N17.SA1 Beckton Riverside. The new neighbourhood will include a large number of homes, new and intensified employment uses and the creation of a new town centre and a new neighbourhood parade…

…The sewage works will be retained and any environmental impacts will be mitigated through appropriate buffering and design responses…

…The vision for Gallions Reach will be achieved through…appropriate mitigation and buffering between residential and industrial uses…mitigating the odour impacts of the sewage treatment works ahead of the occupation of developments in the vicinity through appropriate buffering and other design solutions…".

2.16 The design principles for the site state:

"Design measures should minimise exposure to odour from Beckton Sewage Treatment Works and poor air quality on Royal Docks Road…

…Phasing of the site should take account of the likely requirement for water supply and wastewater infrastructure upgrades through early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development…".

2.17 In addition, the phasing and implementation for the site state:

"Any necessary mitigation to address odour impact from existing odorous uses in the vicinity, including the Beckton Sewage Treatment Works, should be completed ahead of the occupation of development".

2.18 The Planning Inspectorate's Report on the Examination of the Newham Local Plan Review[5] also considers potential odours from Beckton STW upon the strategic land, stating:

"Some concerns were raised over the proximity of an expanding STW to the development of nearby residential uses within the proposed Beckton Riverside Development. In response, MM28 introduces a change in the implementation section of policy INF4, which ensures that new development proposals in the vicinity of Beckton STW should undertake Odour Impact Assessment, plus necessary mitigation; clarifies who is responsible for mitigation work; and ensures that the living conditions of future inhabitants in the Riverside area will not be adversely affected by reason of odour. These are necessary for the effectiveness of the Plan. Policy INF4 also provides for sufficient capacity to meet the needs of development of utilities infrastructure over the appropriate time horizon".

[5] The Planning Inspectorate (2018). Report to the London Borough of Newham Council, Report on the Examination of the Newham Local Plan Review, File Ref: PINS/G5750/429/10.

East London Joint Waste Plan

2.19 Given the context being wastewater, it is also relevant to consider the East London Joint Waste Plan[6] (ELJWP), which sets out the strategy of how wastewater will be managed in East London (including within Newham). This includes Policy JWP3, which states:

"Proposals for non-waste development in proximity to safeguarded waste management sites and wastewater treatment facilities must demonstrate that they would not prejudice the current or future committed operation of the safeguarded site, including through incorporation of measures to mitigate and reduce their sensitivity to operation of the safeguarded site through applying the 'Agent of Change' principle".

2.20 It continues to explain that:

"To ensure that existing safeguarded waste management and wastewater treatment facilities are safeguarded from nearby development that may limit or hinder their normal operation

… Existing waste management and wastewater treatment facilities can be adversely affected by non-waste development (i.e. development other than that which is principally intended for the management of waste or treatment of wastewater and sewage sludge) in proximity to them, even where this does not involve direct loss of an existing site. Some non-waste land uses, such as residential, can be sensitive to the impacts arising from the normal operation of waste management and wastewater treatment, including noise, odour and transport and are unlikely to be compatible with a nearby existing waste management site or wastewater treatment facility. 'Normal operations' relate to the operations at a site associated with its day to day running and not that associated with breakdowns or unforeseen events which effect the effective operation of the site. This can lead to unacceptable living conditions and resultant complaints, which may lead to constraints being imposed, such as restriction of operating hours or vehicle movements, which can reduce their current and future operations, with associated effects on available capacity.

The 'agent of change' principle in national policy (NPPF paragraph 200) and the London Plan (Policy D13) reflects this and requires new development that may be sensitive to the impacts of existing businesses (particularly noise but also other nuisances) to mitigate this through design.

…

Planning applications for development within at least 250m of safeguarded waste management sites and wastewater treatment facilities (except Beckton Sewage Treatment Works for which a distance of 800m is applied) will need to demonstrate that impacts, e.g. noise, dust, odour, light and air emissions, that may reasonably arise from the normal activities taking place at a safeguarded site, including from transport, would not be experienced at a level which was unacceptable to the occupants of the proposed development and that vehicle access to and from the facility would not be constrained by the development proposed. Measures to

[6] London Boroughs of Barking and Dagenham, Havering, Newham, and Redbridge (2025) ELJWP, East London Joint Waste Plan, Regulation 19 Submission Plan, Version: Final 12.02.25

mitigate potential adverse effects should be incorporated into the design and layout. Development proximate to a wastewater treatment facility may, in particular, be affected by odour arising from their operations".

2.21 In addition, Policy JWP2B states:

"As development land in East London becomes scarcer it will be necessary for any proposals to ensure the efficient use of land is maximised and environmental impacts are compatible with closer neighbours. Policy JWP4 is intended to ensure that new or extended wastewater treatment infrastructure is designed in a way that ensure unacceptable adverse impact on communities and the environment do not occur".

London Plan Guidance

2.22 In May 2023 the Mayor of London published the Royal Docks and Beckton Riverside Opportunity Area Planning Framework (OAPF) as London Plan Guidance[7]. This sets out a 20-year planning strategy for the Beckton Riverside Opportunity Area up to 2041. It recognises that the area presents one of the largest regeneration areas in London and has the potential to become a major town centre around a new DLR station, with a mix of uses, spaces and new connections.

2.23 This highlights that there is *"Smell from Beckton Sewerage Plant Gallions Reach area. Strong bad smell at Gallions Reach Retail Park. Residential development would be unsuitable unless there are further interventions to address odours"* and *"Odour testing to determine position and scale of mitigation between new development and Sewage Treatment Works, aligned with Agent of Change principles".*

2.24 It also sets out that light industrial uses could be located along the north of the site, buffering new residential homes from Beckton STW, and that upgrades to existing sewage treatment works will be required to manage odours.

2.25 In addition, the OAPF states:

"When proposing development close to the Beckton Sewage Treatment Works (STW) (such as residential uses) a technical assessment should be undertaken by the developer in consultation with Thames Water.

The technical assessment should confirm that either: (a) there is no adverse amenity impact on future occupiers/users of the proposed development or; (b) the development can be conditioned and mitigated to ensure that any potential for adverse amenity impact is avoided or where appropriate, minimised. This should include but is not limited to amenity impacts from odour and transport movements associated with the STW. Odour in particular is expected to require robust mitigation measures. As the Agent of Change, the developer is required to provide suitable mitigation before the development has been completed. Any assessment and if required, mitigation, should be assessed and designed in conjunction with Thames Water prior to any planning application being submitted".

Figure 2.5: Beckton Riverside OAPF and Strategic Land of Interest

FIG 4.49 High-level strategies that illustrate how the OAPF could be delivered in Beckton Riverside

Cogan Environmental Consulting	Drawing Title:	Drawing Ref:	COGAN_P1033O_A7_Figure 2.5
	Beckton Riverside OAPF and Strategic Land of Interest	Author:	AC
		QA/QC:	KC / AC
Figure notes: Drawing obtained from the GLA Royal Docks and Beckton Riverside OAP.F.		Date:	17/06/2025

[7] GLA (2023). Royal Docks and Beckton Riverside Opportunity Area Planning Framework, May 2023.

Key Odour Requirements

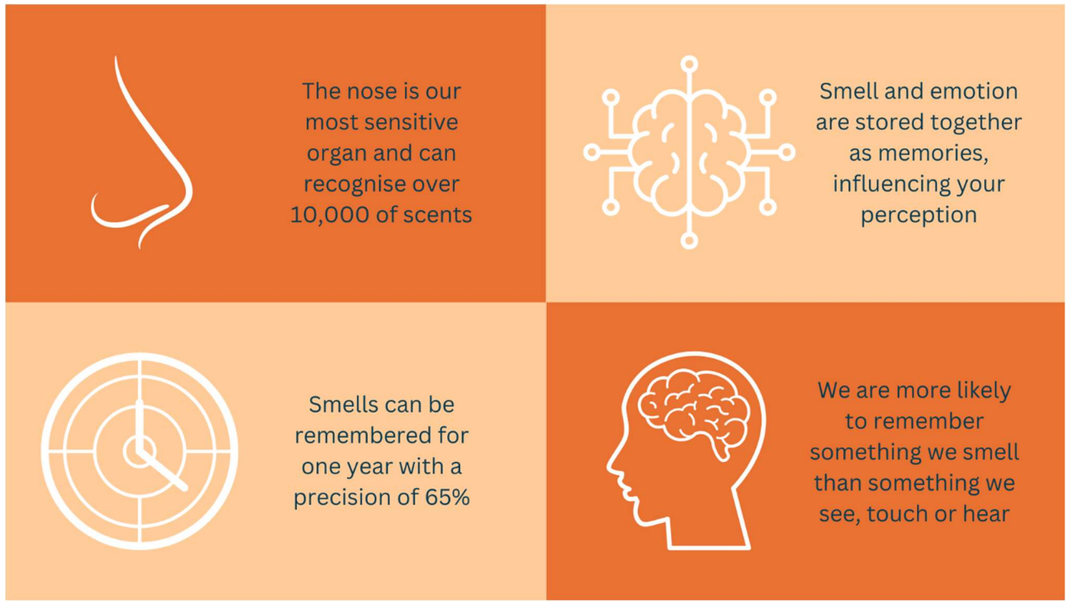
2.26 The checklist below sets out the key requirements stated in the London Plan Guidance[7] with regards to odour for the strategic land of interest. Any development proposal put forward for the strategic land of interest should be considered with regard to these requirements.

A technical odour assessment must be undertaken by the developer in consultation with TWU prior to any planning application being submitted	
The assessment must confirm there is no adverse amenity impact on future occupiers/users of the proposed development, or the development can be conditioned and mitigated to ensure that any potential for adverse amenity impact is avoided or where appropriate, minimised	
Robust odour mitigation measures are required, through appropriate buffering and other design solutions	
Odour testing is required to determine position and scale of mitigation between new development and Beckton STW, aligned with Agent of Change principles	
Mitigation should be designed in conjunction with TWU prior to any planning application being submitted	
Ideally, light industrial uses should be located along the north of the site, buffering new residential homes from Beckton STW	
Upgrades to Beckton STW will be required to manage odours	
Development in close proximity to Beckton STW must ensure the new development does not impact on its long-term function	

3 Odour Briefing

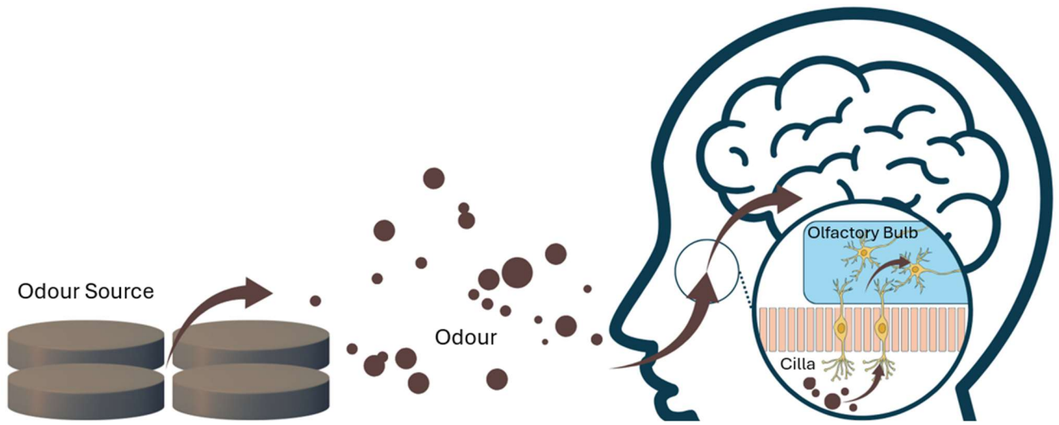
What is odour

3.1 The sense of smell, or olfaction, is the sense through which odours (smells) are perceived. Odours are chemicals in air which may be gases or particles. Humans have a sensitive sense of smell and can detect odour even when chemicals are present in very low amounts.



How is it smelled

3.2 When breathed in through the nose, the odours contact cilla on the inner surface of the nose cavity, which transmit signals to the olfactory bulb and onto the brain.



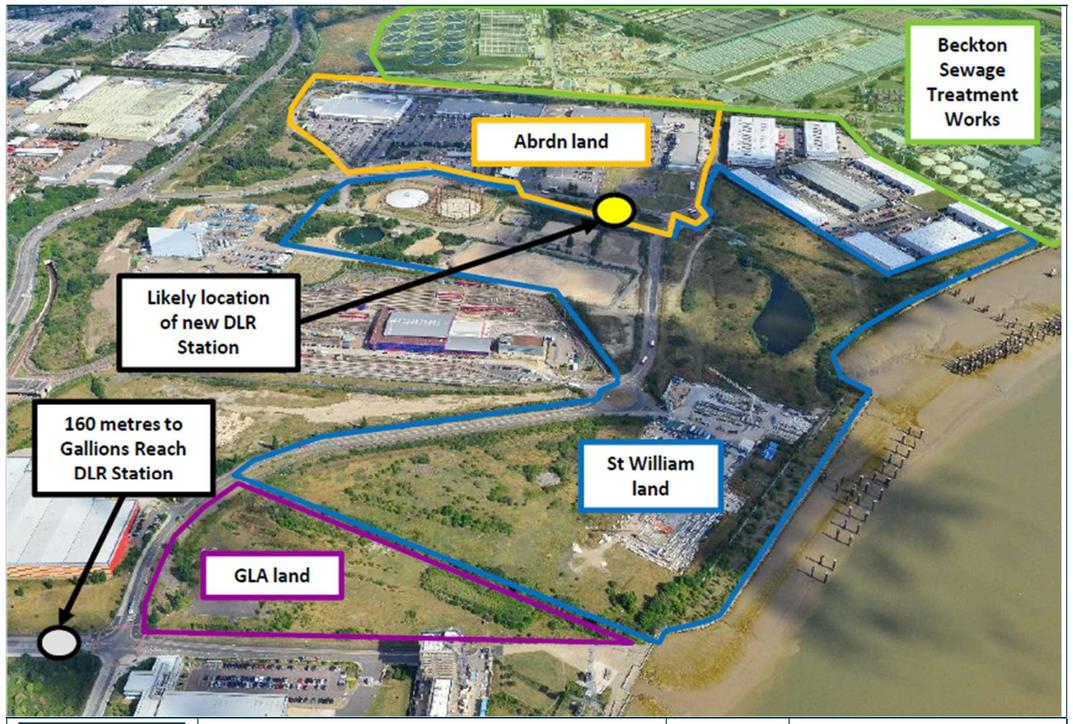
Where does odour come from

3.3 The key odour source in question in relation to the land is the Beckton STW, location to the northeast of the land. For context, this is the second largest STW in Europe. The area also includes other sources of odour, such as waste transfer facilities and fast-food restaurants.

3.4 The location of the Beckton STW in relation to the land of interest (and ownership) is shown in Figure 3.1.

3.5 Wastewater enters the STW, sludge and other solid matter is separated and stored, and the remaining water is cleaned. All aspects of the process are odorous. STWs smell because of the decomposition of organic materials, which produce gases that can smell unpleasant. This typically includes hydrogen sulphide (smells like rotten eggs), amines (smells like urine), and mercaptans (smells like rotting food).

Figure 3.1: Land Context



Cogan Environmental Consulting	Drawing Title:	Drawing Ref:	COGAN_P1033O_A7_Figure 3.1
	Land Context	Author:	AC
		QA/QC:	KC / AC
Figure notes: Image obtained from WSP reporting.		Date:	17/06/2025

How does odour travel

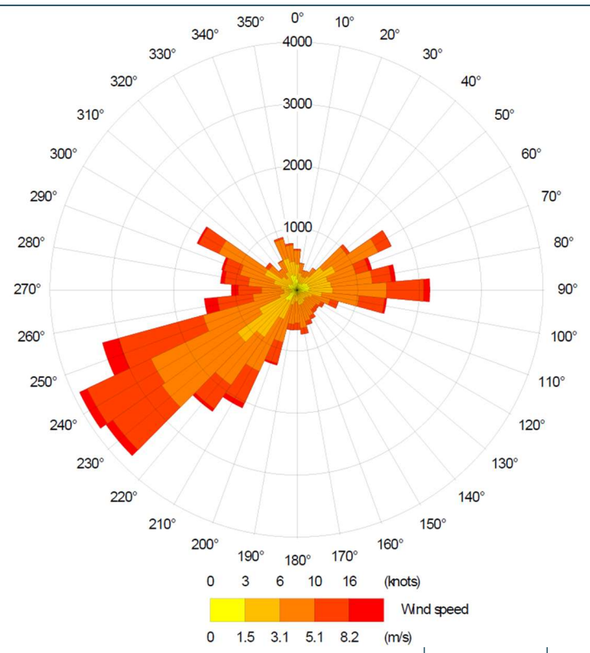
3.6 The odorous gases rise from the wastewater and associated matter into the air (these are emissions) and then dilute with distance away from the odour source. The distance and direction to which the odour travels depends on weather conditions, mainly wind speed and wind direction.

3.7 In Newham, the wind most often blows from the southwest towards to the northeast (see Figure 3.2). Thus, most of the time, odour from the STW would be blown away from the land of interest.

3.8 At other times, the wind may blow in other directions, including blowing odour from the STW towards the land of interest. In addition, during calm conditions (little to no wind) odours would disperse in all directions, this includes from the STW towards the land of interest.

3.9 While it would be fair to say that that most of the odour from the STW will not travel to the land of interest, even a few occasions with strong odours could lead to potential complaints and may be considered significant. However, it should also be acknowledged that odour generation is not uniform across Beckton STW, and the strategic land is located close to the inlet works (where wastewater flows into the STW) which is one of the stronger odour sources within the STW.

Figure 3.2: London City Airport Measured Wind Directions (Blowing From) and Speeds 2018-2022



Cogan Environmental Consulting	Drawing Title:	Drawing Ref:	COGAN_P1033O_A7_Figure 3.2
	London City Airport Measured Wind Directions (Blowing From) and Speeds 2018-2022	Author:	AC
		QA/QC:	KC / AC
Figure notes: Image obtained from Ramboll		Date:	17/06/2025

3.10 It should also be noted that the wind conditions and odour emissions may both change to some extent in the future due to effects associated with climate change. It is expected that this would be considered within development applications, particularly with regard to continued effectiveness of any mitigation measures proposed.

How are odour impacts assessed

3.11 Odour impacts will only occur where there is odour exposure, i.e. where there is an odour emission source, a pathway for odour to travel through the air, and the presence of sensitive receptors (people) to detect the odour.

3.12 Odour assessments should take account of the FIDOL factors. These are the Frequency, Intensity, Duration, Offensiveness and Location of each source. The FIDOL factors provide a characterisation of the odour sources. A summary of this for Beckton STW as a whole is set out in Table 3.1.

Table 3.1: FIDOL Summary

Frequency	Intensity	Duration	Offensiveness	Location
All year round	Highly intense odours likely	Continuously releasing odours	Highly unpleasant odours	NE of the land of interest
Overall, it would be considered a Large unpleasant odour source.				

3.13 There are multiple tools that can be used to assess odour impacts, and it is good practice to used multiple tools in an assessment. In the water industry, odour is usually assessed through the analysis of complaints, field odour surveys (‘sniff-tests’), and dispersion modelling. This is sometimes supplemented by onsite odour concentration monitoring.

3.14 The overall effects should be considered for both individual tools and taking account of multiple tools, forming an overall judgement based on professional experience. The overall significance is a binary judgement: either it is ‘significant’ or it is ‘not significant’. Concluding that an effect is significant should not mean, of itself, that a development proposal is unacceptable and the planning application should be refused; rather, it should mean that careful consideration needs to be given to the consequences, scope for securing further mitigation, and the balance with any wider environmental, social and economic benefits that the proposal would bring.

What is an odour unit

3.15 An odour unit (OU) is a numerical value that measures the strength of an odour. A single odour unit represents the strength needed to make the odour detectable by humans (based on a panel of average people).

3.16 In the UK, odours are typically presented as European Odour Units per cubic meter (OU_E/m^3). This defines a concentration of odour, i.e. the amount within a standard volume of air.

3.17 For odour dispersion modelling, the assessment involves calculating the 98th percentile of 1-hour mean odour concentrations. This means calculating odour concentrations for every hour of a year, ranking them from lowest to highest concentration, removing the highest 2% of concentrations, and then taking the maximum of the remaining 98% of values as the result. Note the highest 2% represents concentration levels that a population would adversely respond to but occur infrequently enough to not be considered a restricting issue.

Testing standards

3.18 In the UK, there are no statutory standards covering the release or subsequent impacts of odours, nor any formal assessment criteria for quantifying odours. In the absence of formal criteria, assessments should follow good practice guidance. Relevant guidance is available from (but is not limited to) UKWIR[8,9], IAQM[10], ADMLC[11], EA[12,13], and TWU[14]. In general, it is good practice to review all relevant guidance, consider case law, and use professional judgement.

3.19 There are varied odour exposure level criterions set out in guidance for wastewater facilities, ranging between 1.5 to 5 OU_E/m^3. Lower values (e.g. 1.5 OU_E/m^3) represent lower odour concentrations and if used as a criterion will provide a more stringent threshold to meet. Higher values (e.g. 5 OU_E/m^3) represent higher odour concentrations and if used as a criterion will provide a less stringent threshold to meet, enabling exposure to higher odour levels to be experienced. Stricter criteria has previously been deemed more appropriate where there is a history of odour complaints. The same is true for case law, where the criterion varies between the same range and is applied appropriately to the setting, depending on the scale of the facility, locality of exposure and history of complaints.

3.20 As there have been odour complaints within the land of interest, it is considered that a 5 OU_E/m^3 is not sufficiently stringent to minimise unmitigated risk upon future users of the land.

3.21 TWU's 'risk assessment for odour encroachment' guidance states:

"After extensive analysis of complaints across our area, we've set a threshold at 3.0 OU_E/m^3 as the likely odour level at which customers' living arrangements are affected. We therefore use this figure to establish our 'cordon sanitaire' for a wastewater site".

3.22 On this basis, it is recommended that an unmitigated odour exposure level criterion of 3 OU_E/m^3 is considered appropriate for the land of interest. This is in relation to locations with a high sensitivity to odour exposure, such as residential properties, schools, and hospitals, where people would expect enjoyment of a high level of amenity. If such locations of high sensitivity are exposed to odour concentrations exceeding this criterion without any mitigation, then disamenity would be expected. Where this occurs, mitigation would be required.

3.23 Other types of locations, such as industrial use, may be allowed to experience a lower level of amenity, as would be expected in such as location. This means that a higher odour exposure level criterion, such as 5 OU_E/m^3, would be appropriate for such a location.

How accurate

3.24 Assessments always involve a range of uncertainties, such as model input assumptions and the model's treatment of presenting real world conditions. Although there is uncertainty inherently associated with odour modelling, when coming to a conclusion on odour impact, a practitioner needs to give the right amount of weight to the results provided by each tool according to how well-suited it is to the study scenario in question. This should include:

- describing the assumptions, limitations and uncertainties of the assessment tools;
- explaining how these may impact on the conclusions; and
- justifying their conclusions in light of any assumptions, limitations or uncertainty.

Subjectivity

3.25 Odour is a highly subjective topic, with one person's perception of smell being different from another. Guidance states that odour should be assessed with reference to an average person's perception.

[8] UKWIR (2004). Odour Standards for the Wastewater Industry, Report Ref. No. 04/WW/13/6.
[9] UKWIR (2014). Odour Control In Wastewater Treatment – A Technical Reference Document.
[10] IAQM (2018). Guidance on the assessment of odour for planning.
[11] ADMLC, A Review of Approaches to Dispersion Modelling of Odour Emissions and Intercomparison of Models and Odour Nuisance Assessment Criteria, ADMLC/2021/4.
[12] Environment Agency (2011) Additional guidance for H4 Odour Management, How to comply with your environmental permit.
[13] Environment Agency (2007). Review of odour character and thresholds, Science Report: SC030170/SR2.
[14] TWU (2020). Risk assessment for odour encroachment.

4 Review of Odour Reports

4.1 A comprehensive review of odour evidence produced by TWU, St William and Abrdn to date has been carried out. The review has considered the appropriateness of assessments undertaken, whether they have been undertaken accurately, and whether the conclusions are sound.

TWU Odour Evidence

4.2 Olfasense, on behalf of TWU, have undertaken dispersion modelling of odours from Beckton STW upon the local area. This includes covering the land of interest. Most recently, modelling was produced in 2008, 2010 and 2019 to support several planning applications by TWU to make improvements at Beckton STW (08/01162/FUL, 10/01713/LTGDC and 19/02768/FUL).

TWU 2008 Modelling

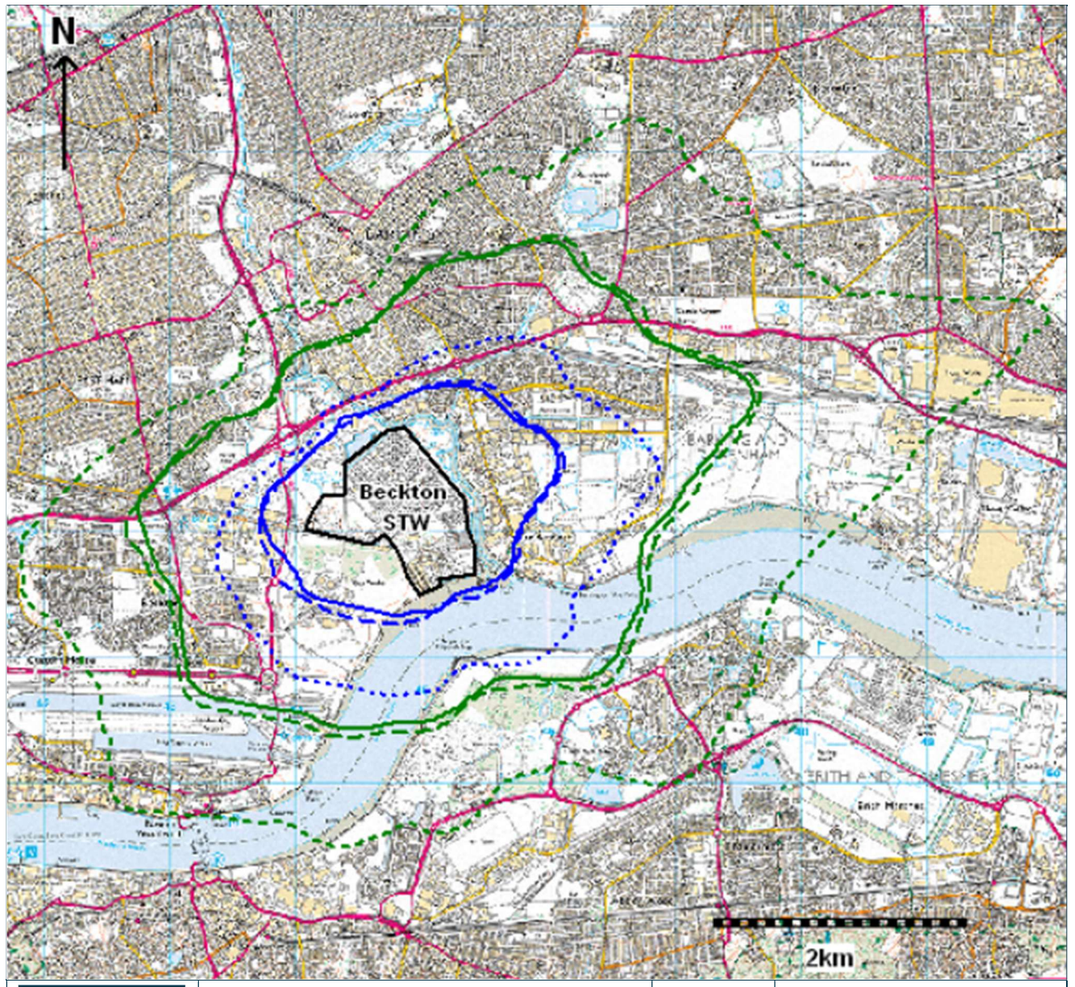
4.3 The odour assessment in 2008 included odour dispersion modelling of existing (2008) and future (2013) baseline odour concentrations across the strategic land, as well as modelling the approved development (the Beckton STW extension, including odour control measures).

4.4 The predicted odour concentrations are shown in Figure 4.1, with green lines representing an odour concentration of 1.5 OU_E/m^3 and blue lines representing 5 OU_E/m^3. The contours for the approved development are presented by the solid lines, the future baseline as dashed lines, and the existing baseline as dotted lines. While the results do not present an odour exposure level criterion of 3 OU_E/m^3, this is expected to fall somewhere between the 1.5 OU_E/m^3 and 5 OU_E/m^3 contour lines.

4.5 The dispersion model applied in the assessment was the Industrial Source Complex Short Term Model (version 3) (ISCST3) published by the US Environmental Protection Agency. This model was historically often used to assess odours impacts from STWs in the UK and is the same model that had been used to assess odour issues at Beckton STW since 2003. This model was appropriate for use at the time, although it should be noted that alternative more detailed models would have been available.

4.6 Based upon the information available, the assessment is considered appropriate, and the conclusions appear sound.

Figure 4.1: TWU Predicted Odour Concentrations – 2008 Modelling



Cogan Environmental Consulting	Drawing Title:	Drawing Ref:	COGAN_P1033O_A7_Figure 4.1
	TWU Predicted Odour Concentrations – 2008 Modelling	Author:	AC
		QA/QC:	KC / AC
Figure notes: Contour provided by TWU (08/01162/FUL).		Date:	17/06/2025

Final Business Plan Submission

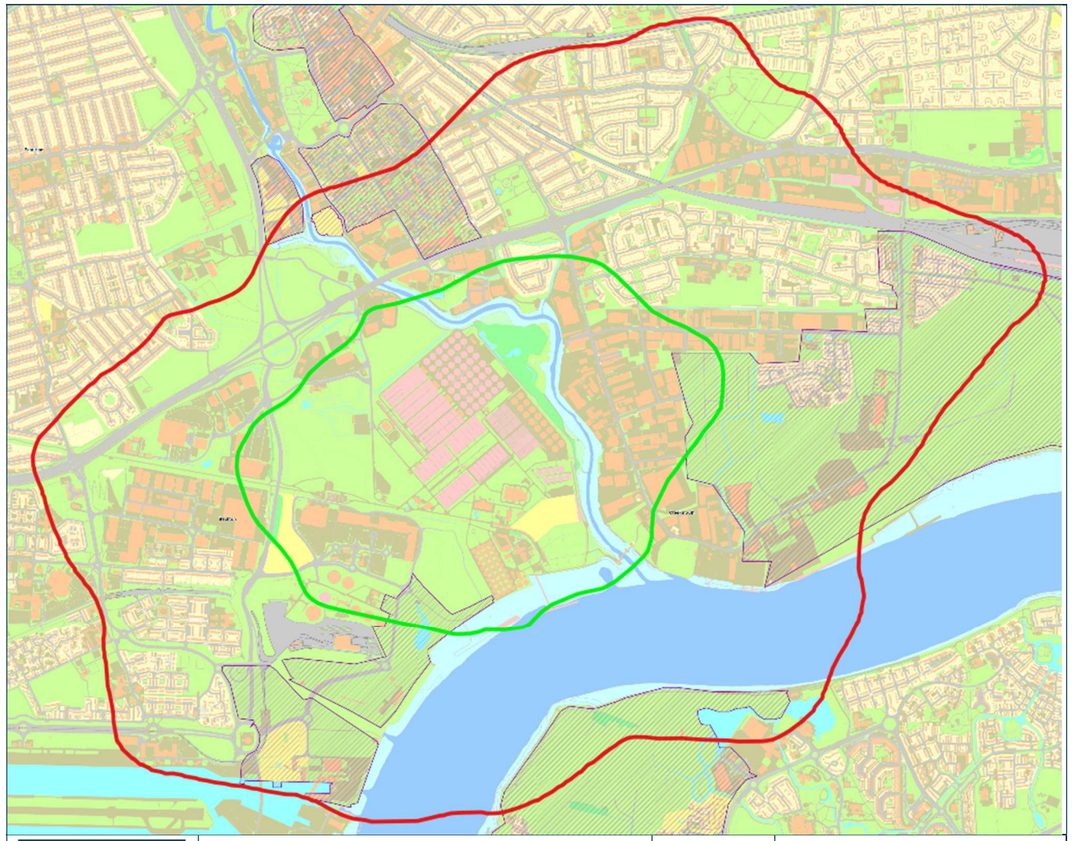
4.7 TWU have also provided their Final Business Plan Submission for the 2009 Price Review, which states:

"for the final Business Plan we have focused on using current populations impacted to determine the level of investment. In the case of Beckton, we have been advised that planning permission for the sewage treatment upgrade (necessary to accept flows from the Lee Tunnel and meet new consents) will not be granted without the planned steps being taken to manage odour issues at the site".

4.8 In addition, TWU have provided a PR09 Supplementary Report and maps, which include predicted odour contours. Details of the odour dispersion modelling were not provided, but the odour contours are shown in Figure 4.2, with the 1.5 OU_E/m^3 and 5 OU_E/m^3 contour lines presented in red and green respectively.

4.9 These contours were produced in 2008 and appear identical to the approved development contours set out in the TWU 2008 modelling. Hence, this was the expected odour situation with the necessary Beckton STW upgrade implemented.

Figure 4.2: TWU Predicted Odour Concentrations – Final Business Plan Submission



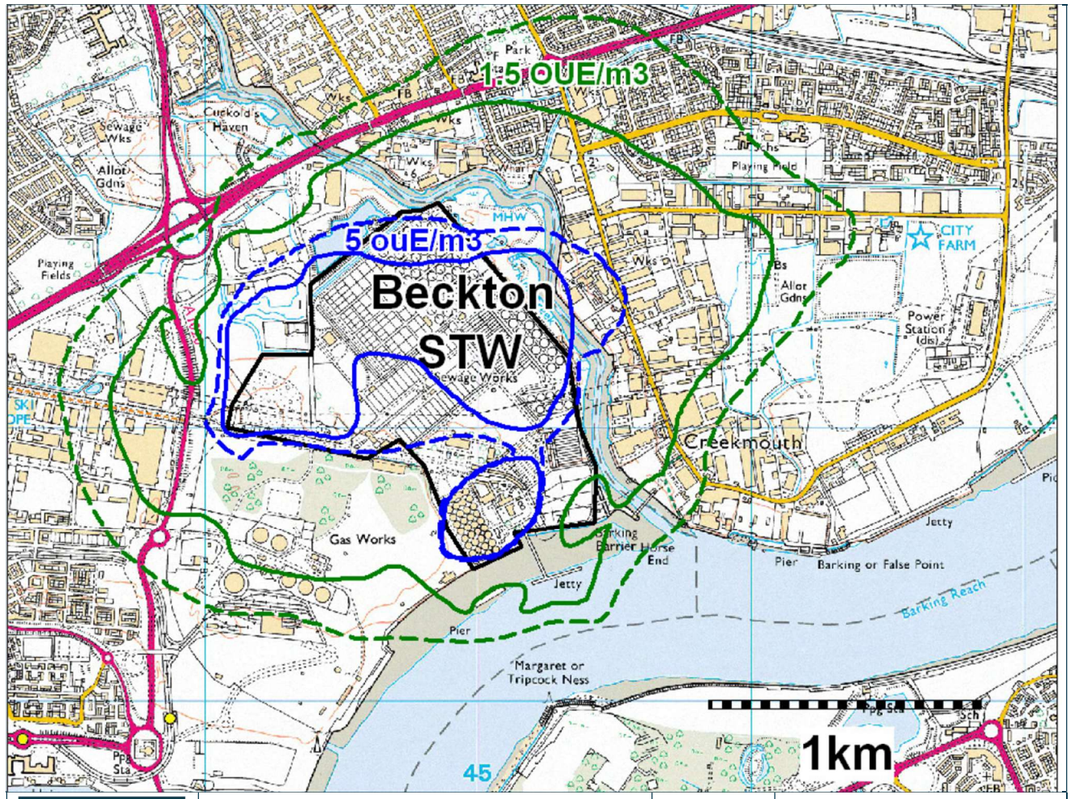
Cogan Environmental Consulting	Drawing Title:	Drawing Ref:	COGAN_P1033O_A7_Figure 4.2
	TWU Predicted Odour Concentrations – Final Business Plan Submission	Author:	AC
		QA/QC:	KC / AC
Figure notes: Contour provided by TWU. Bolder contour lines overlaid by Cogan Environmental Consulting Limited to aid visibility of contours.		Date:	17/06/2025

TWU 2010 Modelling

4.10 The odour assessment in 2010 comprised odour dispersion modelling. The approach was identical to that previously applied to the approved Tidal Thames Quality Improvements, which was based largely on odour surveys conducted at Beckton STW between 2005 and 2007, involving field odour surveys ('sniff-tests') and collection of air samples. The 2010 modelling further incorporated odour emission reductions that were expected to be delivered as a result of the proposed improvements. The predicted enhancements were compared against the future baseline of the Lee Tunnel and Beckton Extension Project (TWU 2008 modelling).

4.11 The results are shown in Figure 4.3. The contours for the approved development are presented by the solid lines and the future baseline (2013) as dashed lines. While the results do not present an odour exposure level criterion of 3 OU_E/m^3, this is expected to fall somewhere between the 1.5 OU_E/m^3 (green) and 5 OU_E/m^3 (blue) contour lines.

Figure 4.3: TWU Predicted Odour Concentrations – 2010 Modelling



Cogan Environmental Consulting	Drawing Title:	Drawing Ref:	COGAN_P1033O_A7_Figure 4.3
	TWU Predicted Odour Concentrations – 2010 Modelling	Author:	AC
		QA/QC:	KC / AC
Figure notes: Contour obtained from TWU reporting (10/01713/LTGDC).		Date:	17/06/2025

4.12 Note, the baseline modelling differs from the TWU 2008 modelling. The TWU 2010 modelling includes some changes to the odour emission sources modelled, reflecting changes to the primary settlement tanks, desludge chambers and integrated sewage channels. This results in reduced spatial extents of the contours.

4.13 The dispersion model applied in the assessment was the Industrial Source Complex Short Term Model (version 3) (ISCST3) published by the US Environmental Protection Agency. This model was historically often used to assess odours impacts from STWs in the UK and is the same model that had been used to assess odour issues at Beckton STW since 2003. This model was appropriate for use at the time, although it should be noted that alternative more detailed models would have been available.

4.14 Based upon the information available, the assessment is considered appropriate, and the conclusions appear sound.

TWU 2019 Modelling

4.15 The 2019 odour assessment also comprised odour dispersion modelling. The approach was largely based upon measurement surveys at Beckton STW between 2018 and 2019, involving field odour surveys ('sniff-tests') and collection of air samples. The 2019 modelling further incorporated odour emission reductions that were expected to be delivered as a result of the proposed improvements.

4.16 The dispersion model applied in the assessment was the US Environmental Protection Agency (US EPA) AERMOD dispersion model (version 8.0.1.15). The EPA adopted AERMOD as its preferred regulatory model in 2005. While this differs from the ISCST3 model used in the TWU 2010 modelling, it is widely accepted as being superior to ISCST3. In recent years, including 2019, AERMOD along with CERC's ADMS dispersion models are considered the most appropriate models to use for assessments in the UK and are generally the only two models accepted by regulators for odour modelling. The AERMOD model was appropriate for use at the time.

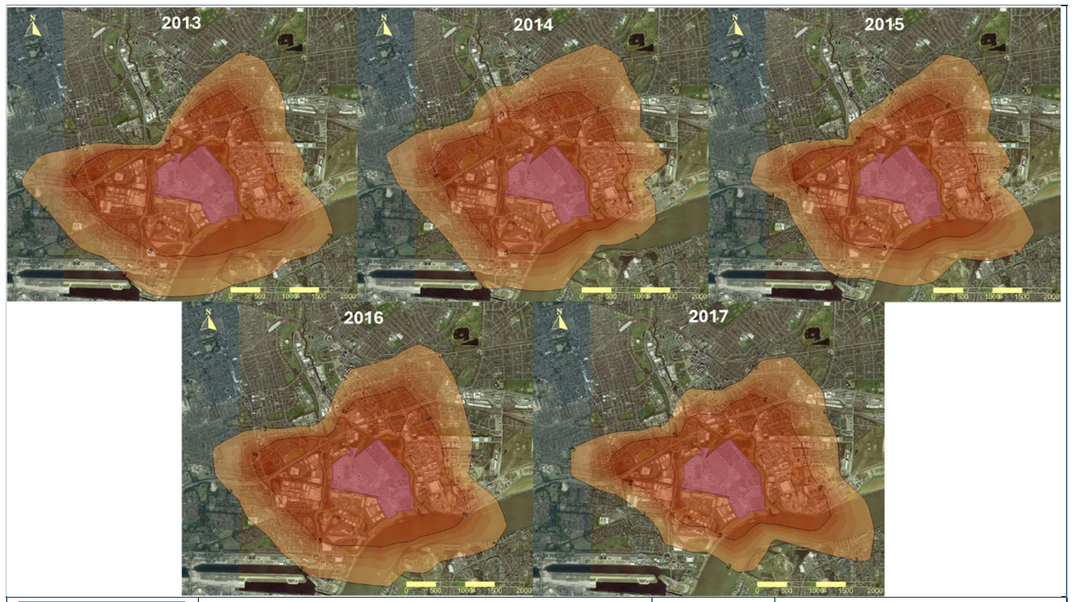
4.17 Compared to the TWU 2010 modelling:

- the STW equipment appears to have been modelled in more detail;
- the odour emission rates are based upon different onsite measurements and assumptions;
- in general, the odour emission rates are either the same or higher;
- AERMOD was used instead of ISCST3, and AERMOD is known[15,16] to predict different concentrations than ISCST3.

4.18 While there are differences in the modelling, taken in isolation the modelling appears appropriate. Based upon the information available, the assessment is considered appropriate, and the conclusions appear sound.

4.19 The resulting odour contours are shown in Figure 4.4. This shows predicted concentrations for 5 years to take account of variations in weather conditions, following good practice.

Figure 4.4: TWU Predicted Odour Concentrations – 2019 Modelling (Years 2013 to 2017)



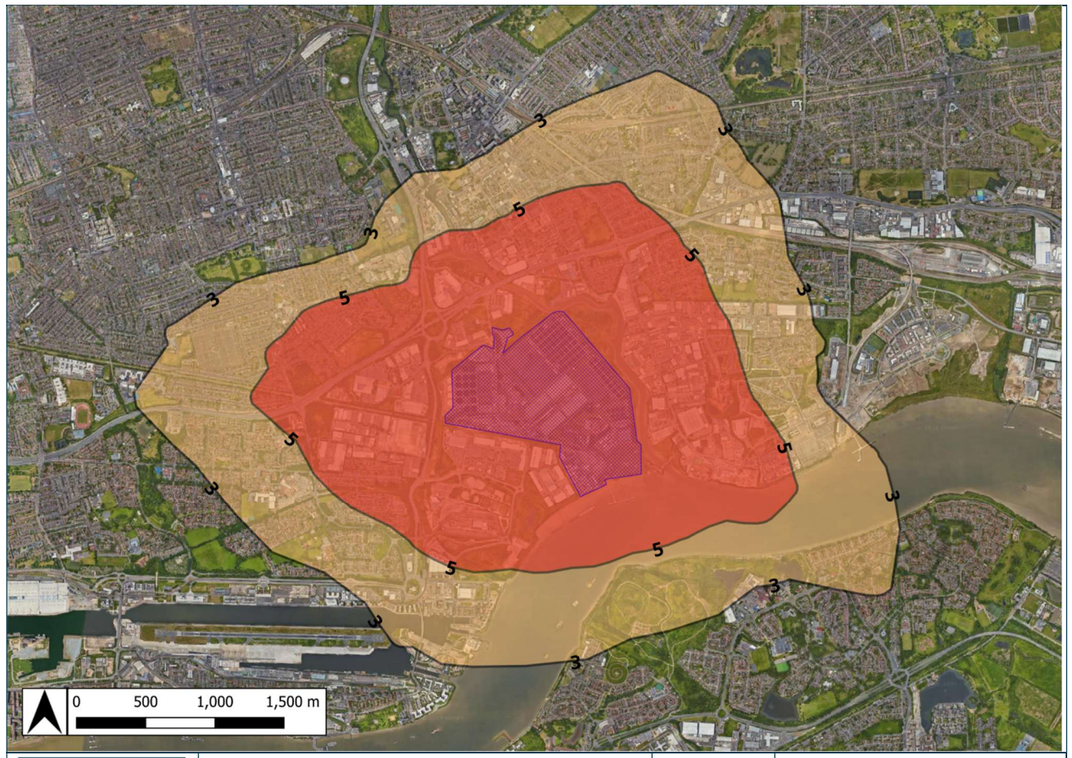
Cogan Environmental Consulting	Drawing Title:	Drawing Ref:	COGAN_P1033O_A7_Figure 4.4
	TWU Predicted Odour Concentrations – 2019 Modelling (Years 2013 to 2017)	Author:	AC
		QA/QC:	KC / AC
Figure notes: Contours obtained from TWU reporting (19/02768/FUL).		Date:	17/06/2025

4.20 While the conclusions of the assessment focus on the year of 2016 to demonstrate the potential changes from the proposed improvements, for the purpose of this review, it is important to consider the maximum spatial extents of the contours. This has been determined and is shown in Figure 4.5.

[15] Porter, R. C., & Elenter, D. (2007). Comparison of Odor Impacts from a Wastewater Treatment Plant Using the ISCST3 and AERMOD Dispersion Models. In WEFTEC 2007 (pp. 7637-7654). Water Environment Federation.

[16] Porter, R. C., & Chartrand, D. (2012). Model Dependence on Predicted Odor Impacts. In Odors and Air Pollutants Conference 2012. Water Environment Federation.

Figure 4.5: TWU Predicted Odour Concentrations – 2019 Modelling (Maximum of all years)



Cogan Environmental Consulting	Drawing Title:	Drawing Ref:	COGAN_P1033O_A7_Figure 4.5
	TWU Predicted Odour Concentrations – 2019 Modelling (Maximum of all years)	Author:	AC
		QA/QC:	KC / AC
Figure notes: Imagery © 2025 Google, Map data © 2025. Contour created by Cogan Environmental Consulting Limited, taking the maximum spatial extents of TWU contours.		Date:	17/06/2025

4.21 It is noted that the spatial extents of the odour exposure level criterion contour of 3 OU_E/m^3 clearly extends further than previously modelled in the TWU 2010 modelling. As mentioned above, there are differences between the 2010 and 2019 modelling and these differences would lead to higher concentrations and hence larger spatial extents.

4.22 TWU have stated that *"The primary difference from 2010 to 2019 is the significant investment made to mitigate odour between 2010 and 2015"*. However, this ought to have resulted in reduced odour contour extents compared to those predicted in the 2010 modelling.

4.23 TWU have also stated that their approach to odour dispersion modelling is realistic although slightly conservative, intentionally due to the nature of the impact that odour could cause to their neighbours. They also note that the science of dispersion modelling and the size of Beckton STW both contribute the technical challenges of completing odour dispersion modelling at scale. They have therefore been collaborating with Olfasense for over a decade to ensure that their approach is realistic.

4.24 Given there are clear differences in the baseline and with scheme contours for 2008, 2010 and 2019 TWU modelling, and all reporting of modelling appears sound, consideration has been given to how the contours differ with respect to the total odour emissions predicted to be released from Beckton STW. These emissions are set out in Table 4.1 for each of the scenarios modelled. For comparison, the corresponding 5 OU_E/m^3 odour contours are displayed in Figure 4.6.

4.25 The contours from the TWU 2019 modelling (both baseline and proposed development scenarios) have a similar spatial extent as the 2008 TWU modelling – 2008 baseline, despite the total odour emission modelled in the TWU 2019 modelling being approximately 60% lower. Although there are some differences in the modelling approaches, these are not considered to likely cause such an extensive difference in the spatial extent of contours.

4.26 Conversely, the contours from the 2010 TWU modelling have a smaller spatial extent compared to the 2008 TWU modelling and have been modelled with lower emissions, producing spatial extents that would be comparatively expected.

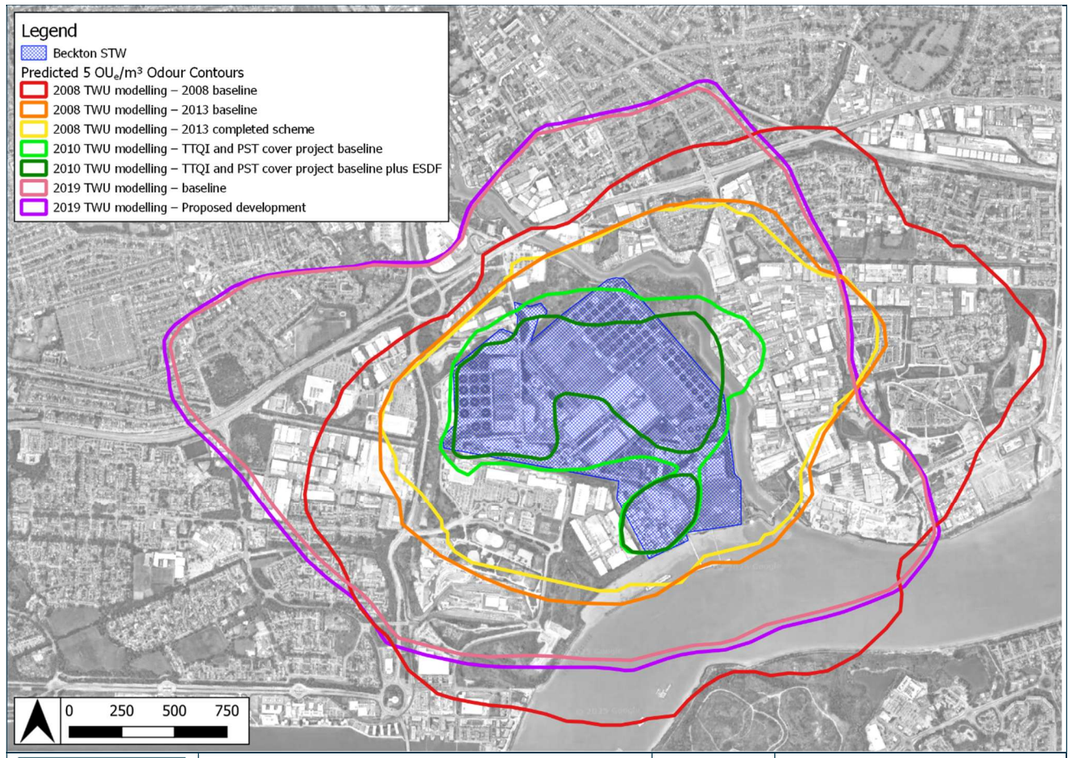
4.27 The main difference in modelling approach appears to be the type of dispersion models used, with AERMOD used for the TWU 2019 modelling and ISCST3 used for the TWU 2008 and 2010 modelling. Other than the emission sources, all other input parameters remain similar. Research[15,16] suggests that AERMOD has a tendency to overpredict concentrations for area sources and underpredict for vents/stacks, by a factor of 2 shift in predicted concentrations, and for STWs the use of AERMOD has been demonstrated to result in 26-33% lower concentration and contours will smaller spatial extents. Hence, the use of AERMOD in the TWU 2019 modelling should have resulted in reduced contour spatial extents compared to the 2008 and 2010 contours, and therefore does not explain why the TWU 2019 modelling has resulted in such large contour spatial extents.

4.28 Given that the TWU 2019 modelling emissions are lower than those for the 2008 and 2013 scenarios, and there is no clear reason for higher predictions, it is reasonable to conclude that the TWU 2019 modelling is inconsistent with previous modelling of Beckton STW and carries a fair degree of uncertainty.

Table 4.1: Emission Comparison

Model Scenario	Total time weighted emission (OU_E/s)
2008 TWU modelling – 2008 baseline	1710736
2008 TWU modelling – 2013 baseline	932854
2008 TWU modelling – 2013 completed scheme	884467
2010 TWU modelling – TTQI and PST cover project baseline	366212
2010 TWU modelling – TTQI and PST cover project baseline plus ESDF	281130
2019 TWU modelling – baseline	654233
2019 TWU modelling – Proposed development	677041

Figure 4.6: TWU Predicted 5 OU_E/m^3 Odour Contours – 2008, 2010 and 2019 Modelling



Cogan Environmental Consulting	Drawing Title:	Drawing Ref:	COGAN_P1033O_A7_Figure 4.6
	TWU Predicted 5 OU_E/m^3 Odour Contours – 2008, 2010 and 2019 Modelling	Author:	AC
		QA/QC:	KC / AC
Figure notes: Imagery © 2025 Google, Map data © 2025. Contours created by Cogan Environmental Consulting Limited, based upon TWU contours.		Date:	17/06/2025

St William Odour Evidence

4.29 WSP, on behalf of St William, have undertaken an odour assessment of odours from Beckton STW upon the local area, including the land of interest and in particular Phase 1 of Beckton Riverside. The WSP odour assessment includes:

- Initial odour dispersion modelling, using TWU odour details.
- Field odour surveys ('sniff-tests').
- Odour dispersion modelling sensitivity test, calibrated to field odour survey findings.

Initial odour dispersion modelling

4.30 The dispersion model applied in the assessment was AERMOD, the same as used in the TWU 2019 modelling. The AERMOD model was appropriate for use.

4.31 The odour emission rates, odour source parameters, and surface characteristic data were provided by Olfasense, on behalf of TWU, to WSP and were stated to be those for the TWU 2019 modelling. This data was stated to not include any updates or additional information beyond that in the TWU 2019 modelling. TWU have confirmed that *"there have not been any significant changes to the Beckton STW site operation since then, therefore we believe this is the most up to date and accurate modelled view of the situation at Beckton"*.

4.32 This data combined with weather data were modelled. The weather data used was from the same meteorological station (London City Airport) as used in the TWU 2019 modelling, but different years of data was used, 2019 to 2022 (as compared to 2013 to 2017). This will have led to minor differences in the predicted spatial distribution of odour across the local area.

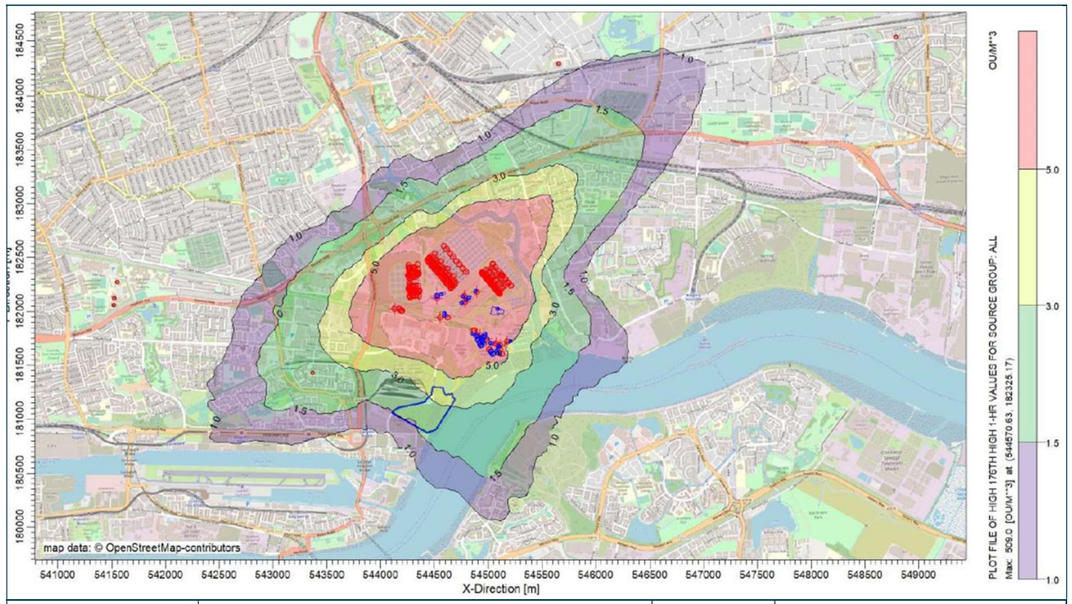
4.33 The model should have also included terrain data and building downwash effects, but no terrain data or buildings were included. Given the location is relatively flat and no receptors will be located close to Beckton STW buildings/structures, the effect of these being omitted from the modelling is likely to be insignificant.

4.34 The predicted concentrations are stated to be significantly lower than those of the TWU 2019 modelling and WSP state in their odour assessment that the TWU 2019 modelling is overpredicted, due to *"an unjustified inclusion of additional odour emission sources at Beckton STW within Olfasenses [2019] odour model, as opposed to odour emission sources within the earlier 2010 odour model. This then had a significant, and once again unjustified, impact on the predicted 98th percentile of hourly odour concentrations across the area, implying that odour emissions from Beckton STW would have routinely attracted multiple odour complaints, which were in fact not forthcoming".*

- It is true that additional odour sources were included in the TWU 2019 modelling.
  - It is not possible to determine from the evidence whether these would have caused odour impacts to be overpredicted.
- It is true that these sources are included without any stated specific justification and is inconsistent with previous TWU modelling.
  - This, however, does not imply that it was wrong for them to be included.
- It is true that nuisance complaints would have likely arisen if such high odour levels existed.
  - Based upon the information provided, there has not been sufficient nuisance complaints to suggest the presence of such high odour levels.
  - TWU have stated *"In our experience, odour complaints do not align closely to a specific odour contour, and for some locations complaints regularly occur below 5 OU_E/m^3 while at other locations no complaints are received for 5 OU_E/m^3. For Beckton STW our experience is that the 5 OU_E/m^3 does not align to odour complaints. It is important to note that demographics, property ownership, working patterns, land use, residential access to green space, and a myriad of other measures are all factors that can affect odour complaints".*

4.35 WSP identified that there is some data omissions in the information provided by Olfasense, resulting in total emissions being underpredicted by less than 1%. While requests have been made for this information, neither TWU nor Olfasense have responded. The overall effect of these being omitted from WSP's modelling is considered to likely be insignificant.

Figure 4.7: WSP Predicted Odour Concentrations – 2022 Modelling



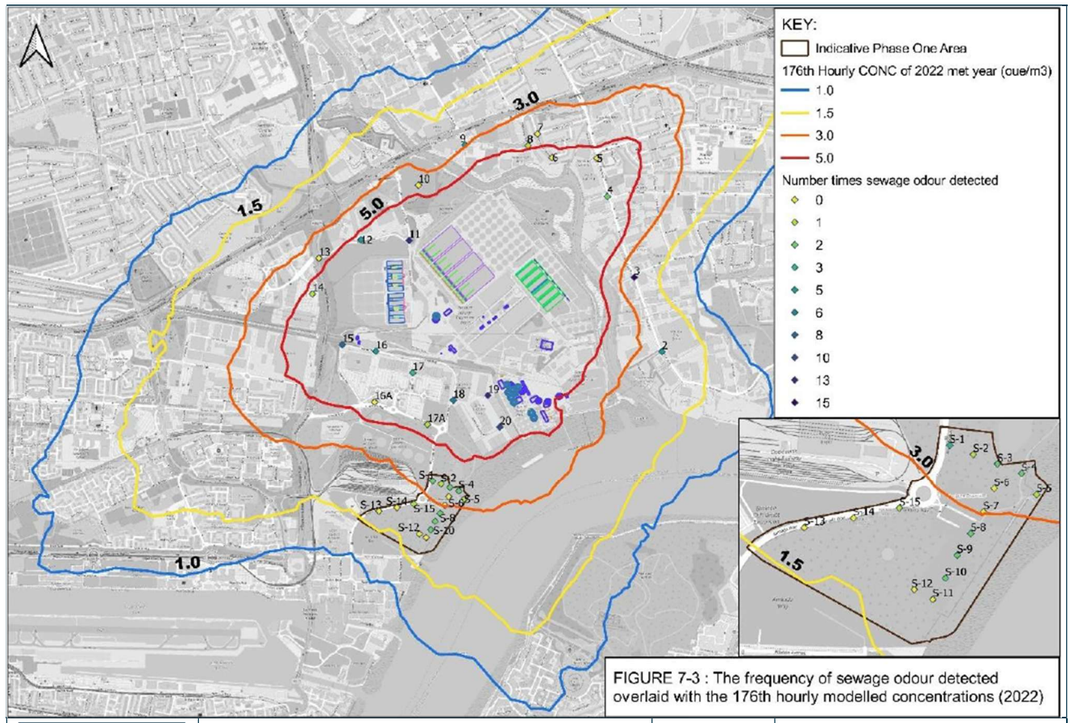
Cogan Environmental Consulting	Drawing Title:	Drawing Ref:	COGAN_P1033O_A7_Figure 4.7
	WSP Predicted Odour Concentrations – 2022 Modelling	Author:	AC
		QA/QC:	KC / AC
Figure notes: Contours obtained from WSP.		Date:	17/06/2025

Field odour surveys

4.36 Two WSP employees carried out 'sniff-tests' over 30 site visits, covering different weather conditions and variations of odour releases from Beckton STW. Sniff-tests were conducted at locations surrounding Beckton STW and within the boundary of the application site (along the site boundaries nearest Beckton STW and a transect through the site). The surveys included when wind was blowing odours from Beckton STW towards the application site. The approach to the surveys followed the sniff-testing procedure set out in IAQM guidance (good practice guidance) and is considered appropriate.

4.37 The recorded odour intensities and sewage odour detections have been spatial compared to Beckton STW, see Figure 4.8. These demonstrate that there were more sewage odours detected and with higher intensities close to Beckton STW, which decreased with distance away from Beckton STW; this aligns with what would generally be expected.

Figure 4.8: WSP Number of Sewage Odour Detections and 2022 Modelling



Cogan Environmental Consulting	Drawing Title:	Drawing Ref:	COGAN_P1033O_A7_Figure 4.8
	WSP Number of Sewage Odour Detections and 2022 Modelling	Author:	AC
		QA/QC:	KC / AC
Figure notes: Image obtained from WSP.		Date:	17/06/2025

4.38 The surveys demonstrate sewage odour was detected with very weak to very strong odour intensities on up to 8 occurrences out of 30 surveys at the land owned by Abrdn, which is located adjacent to Beckton STW. WSP's modelling predicts odour concentrations to be over 5 OU_E/m^3 at these sniff-test locations, which seems appropriate based upon the survey results.

4.39 Regarding St William Phase 1 application site, the survey results demonstrate sewage odour was detected at most sniff-test locations within the application site, resulting in moderate to substantial adverse odour impacts. However, these impacts only occurred once or twice out of the 30 surveys, with the impacts for all other surveys being negligible. Given the extensive survey undertaken and infrequency of sewage odours, WSP concluded the overall odour effects at the site to be 'not significant', which is considered reasonable. WSP's modelling predicts odour concentrations to range between 1.5-3 OU_E/m^3 across the site, with the northern aspect to be just over 3 OU_E/m^3; which is considered consistent with the survey results.

4.40 The surveys also detected sewage odour once out of two sniff-test locations during the 30 surveys at the St Williams Phase 2 site, demonstrating a low frequency of odour effects at this parcel of land, despite WSP's model predicting odour concentrations in the range of around 3-5 OU_E/m^3 for this land.

Odour dispersion modelling sensitivity test

4.41 WSP also produced a sensitivity test, adjusted their modelling based upon the results of the field odour surveys.

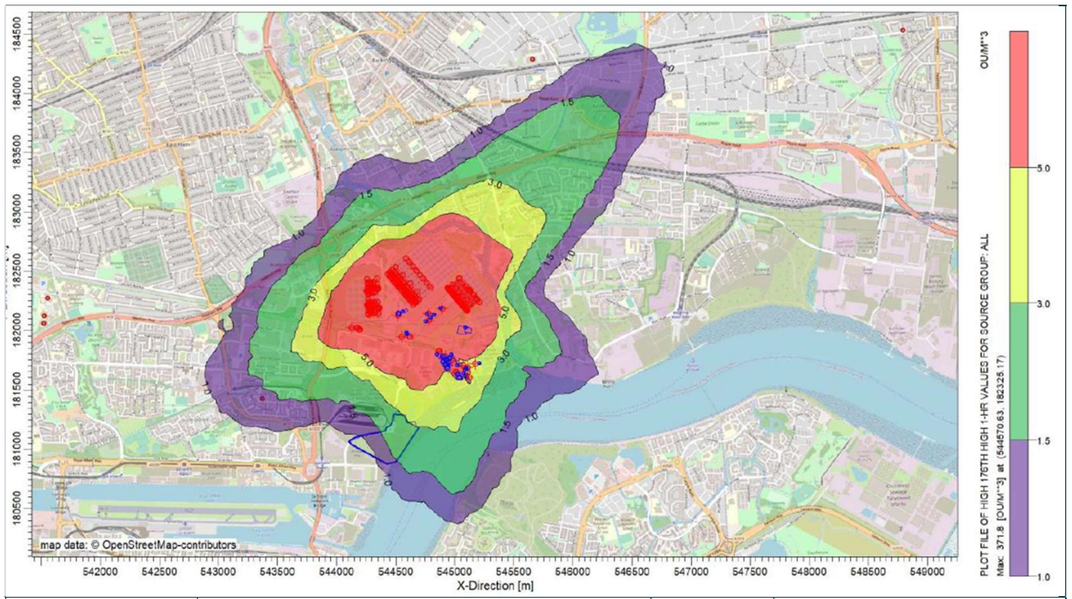
4.42 The approach of adjusting dispersion modelling to match field odour surveys is not recommended in guidance, however if implemented appropriately it may be considered a sensible way to account for model inaccuracies.

4.43 The method used by WSP to do the model adjustment relies on a relationship between odour concentrations and odour intensities which applies to clean laboratory settings, i.e. where no other odours are present, and a group of panel odour assessors are used. The relationship is not for outdoor (ambient) environments, where other odours are present (making low intensity odours difficult to assess) nor intended for individual/several odour assessors. It cannot be directly aligned with intensity levels for outdoor air. While there is no guidance on how such a relationship could be used for outdoor environments, it would be sensible to assume that an odour detection threshold of 1 OU_E/m^3 would not be possible to establish in outdoor environments.

4.44 WSP acknowledge that the adjustment approach is abnormal for odour assessments, but provided justification of the methodology applied.

4.45 The adjustment compared 24-hour average modelled odour concentrations against intensities from field odour surveys (5-minute snapshots). Based upon the findings of this, WSP considered a 50% reduction in modelled odour emissions appropriately represented the survey intensities. This is shown in Figure 4.3.

Figure 4.9: WSP Predicted Odour Concentrations – 2022 Modelling Sensitivity Test



Cogan Environmental Consulting	Drawing Title:	Drawing Ref:	COGAN_P1033O_A7_Figure 4.9
	WSP Predicted Odour Concentrations – 2022 Modelling Sensitivity Test	Author:	AC
		QA/QC:	KC / AC
Figure notes: Contours obtained from WSP.		Date:	17/06/2025

4.46 When considering the adjustment approach used:

- Comparing such different timescales will result in high uncertainty. There are 288 5-minute periods within 24 hours. Taking an example, if no odour was detected during the 5-minute period when the survey was carried out but it so happened that strong sewage odour was present the other 287 periods of the day, the model would have been adjusted to match no odour, completely misrepresenting the daily conditions.
- It is unclear why 24-hour average concentrations have been used. Given that the model was run for every hour of the year, a more appropriate approach would have been to compare 1-hour average concentrations to the field odour surveys. This would have reduced the uncertainty mentioned above 24-fold, meaning that the adjustment would have had a better chance of representing surveyed conditions (1 in 12 probability) compared to using 24-hour averages (1 in 288 probability).
- By using 24-hour averages, the spatial distribution of odours will have been smoothed out compared to what likely occurred during each hour when the surveys were conducted. Thus, even if the average direction of odour dispersion modelled matched that which would have potentially occurred during the survey period, the distance to which it spatially extends from the STW would be reduced.

- The method applied has adjusted 24-hour average concentrations, which is not the same as what the odour modelling reports (98th percentile of 1-hour mean concentrations). It is unclear why a 24-hour average adjustment has been applied. It would have been more appropriate to have derived a 1-hour mean concentration adjustment and applied this, from which the 98th percentile could then be calculated.

4.47 These uncertainties have been raised with WSP, who responded stating:

"Sniff tests across all sites were undertaken over a 6 hour site visit period. Should each individual sniff test outcome be linked to an individual hourly wind direction and wind speed meteorological conditions at the time could potentially result in errors and a congested report. Mapping sniff test results against daily meteorological conditions was considered to allow for variability across the sniff test day and provide a clearer illustration of relationship between odour intensity and meteorological conditions".

4.48 While WSP have justified the adjustment approach used, it should be recognised that it is abnormal and the approach taken includes uncertainties. Overall, it is considered that the sensitivity test does not provide more robust modelling than the initial modelling. It is therefore recommended that the initial modelling is taken forward, providing a level of conservatism and hence protection for future development at the site.

Abrdn Odour Evidence

4.49 Ramboll, on behalf of Abrdn, have undertaken an odour assessment of odours from Beckton STW upon the local area, including the land of interest and in particular the land owned by Abrdn. The Ramboll odour assessment includes Field odour surveys ('sniff-tests'), which is considered appropriate given the proximity of the Abrdn land to the Beckton STW.

Field odour surveys

4.50 Six Ramboll employees carried out 'sniff-tests' over 6 site visits, covering worst-case weather conditions when wind was blowing from Beckton STW towards the Abrdn site. Sniff-tests were conducted at a grid of locations across the site and along Armada Wy, through St William Phase 1 and Phase 2 sites. The approach to the surveys followed the sniff-testing procedure set out in IAQM guidance (good practice guidance) and is considered appropriate.

4.51 The surveys demonstrate sewage odours were detected at the Abrdn site and St William Phase 2 site, but not the St William Phase 1 site. The odour effects at the Abrdn site were determined to include 483 negligible effects, 114 slight adverse effects, 54 moderate adverse effects, and 9 substantial adverse effects. The most significant effects were identified to occur along the boundary of the site adjacent to Beckton STW. The frequency of significant odour effects, taking into account annual meteorology, are presented spatially in Figure 4.10. This demonstrates a variable spatial pattern of frequencies across the site; sniff-test locations shielded by the existing retail buildings experienced lower frequencies, while locations unshielded experienced higher frequencies. This highlights how buildings and barriers can play an important role in reducing odour effects.

4.52 Ramboll also demonstrate the odour effects for medium sensitivity receptors, stating that *"significant effects at the site are unlikely for medium sensitivity uses such as retail (which is consistent with the current use of the site), places of work or playing/recreational areas"*. While the results suggest this, there are several locations towards the south of the site where significant odour effects were identified for medium sensitivity receptors, so a pre-cautionary approach for these uses should be taken.

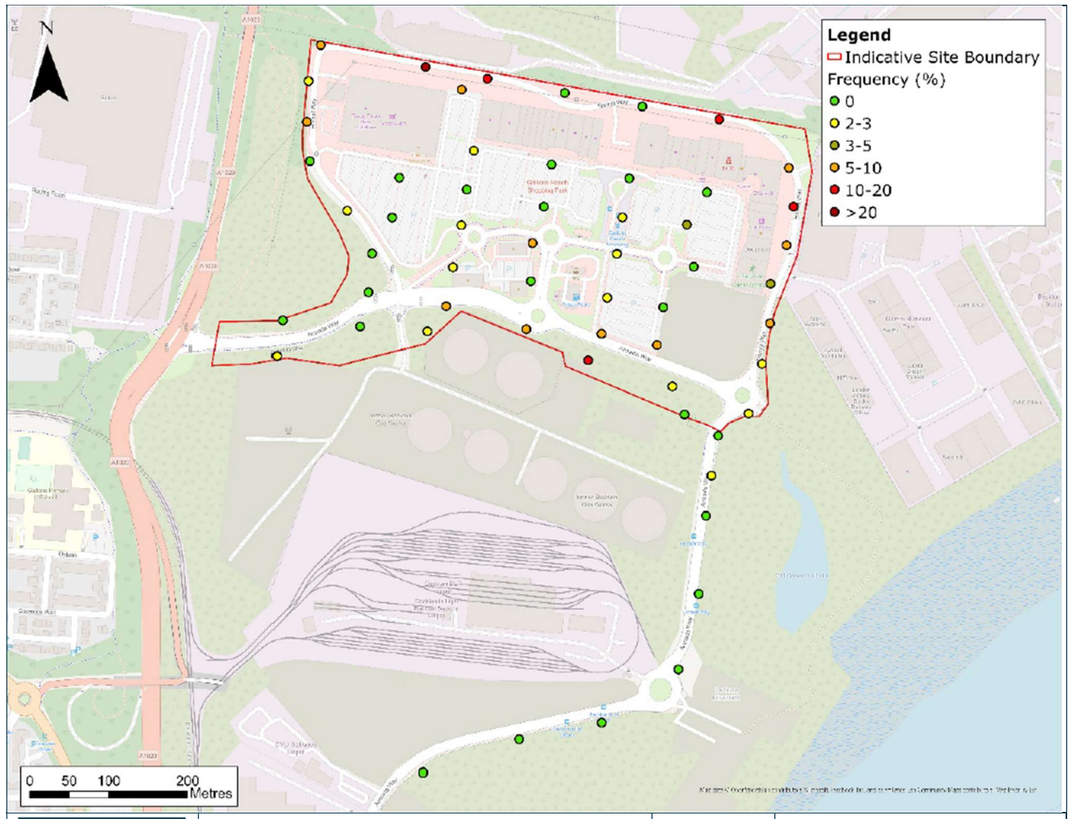
4.53 The report concludes that mitigation measures would be required. The following is stated for consideration:

- *"Either improving existing odour control measures or implementing additional odour control measures on the STW".*
- *"Building facades facing the STW and locations of significant odour effects would likely need to be sealed with air intakes treated to remove odour whilst taking into account mitigation against noise and overheating".*
- *"The provision of appropriate outdoor residential amenity space could involve the use of winter gardens, but these would need to be carefully designed/located".*

4.54 Ramboll also state *"As demonstrated by the sniff testing results, odour within the site is impacted by the presence of buildings and therefore the design of mitigation needs to be undertaken in conjunction with the master planning of the site. The use of computational fluid dynamics (CFD) modelling may be beneficial in this regard"*.

4.55 The conclusions and mitigation measures suggested are considered appropriate.

Figure 4.10: Ramboll Frequency of Significant Odour Effects



Cogan Environmental Consulting	Drawing Title:	Drawing Ref:	COGAN_P1033O_A7_Figure 4.10
	Ramboll Frequency of Significant Odour Effects	Author:	AC
		QA/QC:	KC / AC
Figure notes: Image obtained from Ramboll. Frequency presented is for High Sensitivity Receptors (i.e. residential use).		Date:	17/06/2025

5 Review against requirements – St William Beckton Riverside Phase 1

A technical odour assessment must be undertaken by the developer in consultation with TWU prior to any planning application being submitted	✓	
The assessment must confirm there is no adverse amenity impact on future occupiers/users of the proposed development, or the development can be conditioned and mitigated to ensure that any potential for adverse amenity impact is avoided or where appropriate, minimised	✓	Mitigation needed
Robust odour mitigation measures are required, through appropriate buffering and other design solutions	✗	No mitigation measures specified at this stage
Odour testing is required to determine position and scale of mitigation between new development and Beckton STW, aligned with Agent of Change principles	✓	
Mitigation should be designed in conjunction with TWU prior to any planning application being submitted	✗	No mitigation measures specified at this stage
Ideally, light industrial uses should be located along the north of the site, buffering new residential homes from Beckton STW	N/A	Phase 1 land is located to the south
Upgrades to Beckton STW will be required to manage odours	N/A	TWU have no odour reduction planned and cannot accept third party acceleration investiment (see paragraph 8.2)
Development in close proximity to Beckton STW must ensure the new development does not impact on its long-term function	?	Will depend on mitigation measures

6 Review against requirements – Abrdn

A technical odour assessment must be undertaken by the developer in consultation with TWU prior to any planning application being submitted	✓	
The assessment must confirm there is no adverse amenity impact on future occupiers/users of the proposed development, or the development can be conditioned and mitigated to ensure that any potential for adverse amenity impact is avoided or where appropriate, minimised	✓	Mitigation needed
Robust odour mitigation measures are required, through appropriate buffering and other design solutions	?	Suggested mitigation is appropriate. No specific mitigation measures specified at this stage
Odour testing is required to determine position and scale of mitigation between new development and Beckton STW, aligned with Agent of Change principles	✓	
Mitigation should be designed in conjunction with TWU prior to any planning application being submitted	✗	No specific mitigation measures specified at this stage

Ideally, light industrial uses should be located along the north of the site, buffering new residential homes from Beckton STW		Will depend on the development design
Upgrades to Beckton STW will be required to manage odours	N/A	TWU have no odour reduction planned and cannot accept third party acceleration investiment (see paragraph 8.2)
Development in close proximity to Beckton STW must ensure the new development does not impact on its long-term function		Will depend on mitigation measures

7 Drawing a Conclusion

7.1 The odour evidence produced to date by St William and Abrdn are considered appropriate and sufficiently robust for determination of the likely odour effects upon the strategic land.

7.2 For the odour evidence provided by TWU, although there is no clear reason, the TWU 2019 modelling results appear overstated and inconsistent with previous TWU modelling. WSP have essentially replicated this modelling and demonstrated significantly lower odour concentrations, which appear consistent with previous TWU modelling, also suggesting TWU's 2019 modelling results would benefit from further understanding. Upon correspondence between Cogan Environmental Consulting and TWU, it was confirmed that the primary difference between TWU's 2010 and 2019 modelling was the significant investment made to mitigate odour between 2010 and 2015, Hence, it would be expected that odour concentrations would be lower in the 2019 modelling, yet TWU's 2019 modelling conversely results in higher odour concentrations.

7.3 It should also be acknowledged that TWU's 2019 modelling results do not reflect local odour nuisance complaints nor the extensive field odour surveys conducted by WSP and Ramboll (whereas WSP's modelling does).

7.4 WSP have undertaken substantial efforts to engage with TWU and Olfasense regarding their modelling, to date TWU and Olfasense have not provided sufficient information to fully replicate their model, nor provided their modelling files for direct comparison.

7.5 WSP have also produced a modelling sensitivity test where the odour emissions have been adjusted based upon the field odour survey results, the approach is abnormal compared to guidance an introduces uncertainty. Given that the WSP's replication of TWU's modelling and the extensive field odour surveys conducted by WSP and Ramboll provide robust conclusions, in the overall context of this, the sensitivity test is not considered to provide more robust conclusions.

7.6 It is therefore recommended that the conclusions and mitigation are based upon WSP's initial odour modelling and the findings from WSP's and Ramboll's field odour surveys.

7.7 From these it is reasonable to conclude that the Abrdn site will experience odour concentrations over 5 OU_E/m^3, St William Phase 2 will experience around 3-5 OU_E/m^3, St William Phase 1 will experience 1.5-3 OU_E/m^3 (with the northern aspect to be just over 3 OU_E/m^3), and the GLA land will experience 1-1.5 OU_E/m^3.

8 Mitigation Measures

8.1 The odour evidence to date does not specify any particular mitigation measures that will be incorporated. It is expected that these will be determined by St William and Abrdn as part of the detailed design process for developments at the sites. Although it should be noted that Ramboll have suggested suitable mitigation approaches that could be taken forward.

8.2 Regarding whether there are potential measures that could be suggested for implementation within Beckton STW to reduce potential odour effects. TWU has stated that *"There are no odour reduction activities planned for Beckton STW. Where there is investment at the site, we will ensure the project yields a 'no-detriment' approach to our baseline odour assessment"*. When considering whether current odour improvement measures being implemented at Beckton STW, TWU have stated that *"Third party funded mitigation is possible. We anticipate a large technological challenge mitigation on the STW site due to the extensive mitigation already implemented but minor improvements (at high costs) may be implementable"*. It would therefore appear that improving existing odour control measures or implementing additional odour control measures at Beckton STW may be challenging.

8.3 Robust mitigation measures will therefore need to be implemented within the strategic land to ensure that any potential for adverse amenity impact on future occupiers/users of the land is avoided or where appropriate, minimised.

8.4 In general, mitigation measures can be linked to modelled odour concentrations. An overview of this is provided in Table 8.1.

8.5 Although the GLA land and most of St William Phase 1 will experience acceptable odour levels without mitigation (i.e. below 3 OU_E/m^3), it is recommended that good design principles are still included where possible.

8.6 Good design principles are expected to include:

- Vegetation barriers between proposals and Beckton STW;
- Orientating buildings and/or including sufficient barriers within the design such that primary windows do not directly overlook Beckton STW; and
- Where there is a high adverse odour risk, including solid barriers within the design between locations of exposure and Beckton STW to shield areas of exposure from higher odour concentrations.

8.7 Where effects would be adverse, buildings should include mechanical ventilation with odour filtration and avoid openable windows where feasible. It is expected that evidence would be provided to demonstrate any odour filtration proposed will reduce odours to acceptable levels.

8.8 Where effects would be too adverse outdoors (e.g. for high adverse odour risk areas), outdoor areas should be mitigated as far as possible to minimise odour. Where possible, this may include shielding using barriers, but in most instances outdoor areas should be avoided (i.e. indoor amenity spaces would be more appropriate).

Table 8.1: Mitigation Overview

Minimal Odour Risk <3 OU_E/m^3	Adverse Odour Risk 3 OU_E/m^3 - 5 OU_E/m^3	High Adverse Odour Risk 5 OU_E/m^3 - 10 OU_E/m^3	Extreme Adverse Odour Risk >10 OU_E/m^3
Odour effects would be negligible but good design principles should be adopted. Land suitable for development of dwellings, hospitals, schools, tourist locations, and cultural locations. Properties should be designed to not overlook Beckton STW. This may include orientating buildings such that main windows do not face the STW and/or barriers blocking the view (such as buildings or trees). Land would also be suitable for all other uses.	Unless robust interventions are implemented to address odour, the effects would be too adverse for high sensitivity exposure, and hence not suitable for development of dwellings, hospitals, schools, tourist locations, and cultural locations. Land suitable for development of places of work, commercial and retail premises, and amenity space. Good design principles should be adopted. Where possible, properties should be designed to not overlook Beckton STW. This may include orientating buildings such that main windows do not face the STW and/or barriers blocking the view (such as buildings or trees). Where possible, mechanical ventilation including odour filtration should be adopted for new buildings. Land would also be suitable for industrial use, farms, footpaths and roads. Where possible, odour control improvements should be made at Beckton STW.	Unless robust interventions are implemented to address odour, effects would be too adverse for high sensitivity exposure, and hence not suitable for development of dwellings, hospitals, schools, tourist locations, and cultural locations. Unless robust interventions are implemented to address odour, the land would also likely be unsuitable for places of work, commercial and retail premises, and amenity space. Land suitable for development of industrial use, farms, footpaths and roads. Land could be used for landscaping, vegetation barriers, biodiversity net gain, and sustainable drainage systems. Where possible, odour control improvements should be made at Beckton STW.	Odour effects would be too adverse for any land use where human exposure is relevant. No buildings should be built. Land could be used for landscaping, vegetation barriers, biodiversity net gain, and sustainable drainage systems.

9 Next Steps

The following next steps for determining the appropriate form of development and any mitigation are set out below:

- Production of a plan of the strategic land marking up the odour buffer zones of <3 OU_E/m^3, 3-5 OU_E/m^3, 5-10 OU_E/m^3, and >10 OU_E/m^3, to help inform mitigation measure principles, based upon WSP's initial modelling.
- Mitigation measure principles to be further refined for each odour buffer zone, each site of the strategic land, and each allocated land use.
- Undertake a review of the odour reduction effectiveness of mechanical ventilation odour filtration and other mitigation options.
- Review TWU's consultee responses and odour mitigation consented for planning applications of other land near Beckton STW and Crossness STW.

10 Technical Appendix

Annex 1: Professional Competence

Dr Austin Cogan

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Austin is Director and Practice Manager at Cogan Environmental Consulting Limited. He is a Chartered Environmentalist with over 17 years' experience in environmental sciences, covering indoor and outdoor air quality, odour, dust, bioaerosols, greenhouse gases and climate change. He is a former committee member of The Council of Property Search Organisations and has developed a number of guidance documents in the industry, including on indoor and outdoor air quality and most recently on odour.

Last year, he was a reviewer of the International Handbook on the Assessment of Odour Exposure by using Dispersion Modelling. This year, he is currently co-chair of the Institute of Air Quality Management's odour working group, developing updated odour guidance for planning in the UK.

Throughout his career, he has been involved in over 1,000 projects across the UK and abroad, focusing on supporting planning applications and environmental permit applications. His expertise covers a diverse range of sectors, including residential, student, commercial, retail, leisure, community, education, healthcare, distribution, and hospitality developments, industrial, waste, agricultural, power generation, and utility projects, and defence, aviation, and infrastructure schemes. These have included technical reviews for both indoor and outdoor air quality assessments, and climate change assessments for aviation, as well as the provision of expert witness services for air quality and odour.

He has a long history of supporting local authorities with local air quality concerns, including Clean Air Zones, Local Plans, Air Quality Management Areas, Air Quality Action Plans, and feasibility studies involving microsimulation modelling. Austin has also been involved in multiple projects for JNCC, EA, GLA, National Highways and NGOs, undertaking research and development activities. He is an experienced business manager, having managed multiple high-profile projects as well as operating multiple environmental businesses, where he previously led the development of licensed meteorological data which is widely used by the industry.

He has also supported the public sector with odour concerns, including on behalf of local authorities, parish councils, and regulatory bodies. This has involved field odour surveys, facility visits, dispersion modelling, odour strategies, technical reviews, and expert advice. His experience for the public sector covers sewage treatment works, quarries, landfill sites, energy from waste facilities, tarmacking plant, manufacturing facilities, waste management sites, and vehicle repair shops.

Austin is also an international expert in the field of climate change, having monitored greenhouse gases globally. He pioneered research in satellite observations and instrument design at the UK's Space Research Centre, where he was involved in software and algorithm development, instrumentation design, data analysis and collaboration with many internation bodies, including NASA, JAXA, CNES and ESA. He has produced numerous scientific papers and presented at conferences both nationally and internationally.

Katya Cogan

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Katya is a Senior Consultant at Cogan Environmental Consulting Limited. She has over 5 years' experience in environmental sciences, covering indoor and outdoor air quality, odour, dust, bioaerosols, greenhouse gases and climate change. She completed BSc Medical Biochemistry at the University of Leicester and continued her studies at the University of Warwick to complete a MBChB Medicine, working as a Doctor in the Southwest Deanery afterwards. Her focus has subsequently involved sales and business development, and most recently environmental sciences.

Throughout her career, she has been involved in a diverse range of projects for planning applications, environmental permit applications, including management, and nuisance assessments, as well as monitoring for COSHH, indoor air quality support for BREEAM, WELL, DREAM, HQM and several research projects. Her experience covers residential, student, commercial, retail, leisure, community, education, healthcare, distribution, and hospitality developments, industrial, waste, agricultural, mineral, power generation, and utility projects, and defence and infrastructure schemes.

She has supported multiple local authorities with LAQM duties, including Local Plans, Air Quality Management Areas, Air Quality Action Plans, and Annual Status Reports. Katya has also been involved in multiple projects for JNCC, EA, and NGOs, undertaking research and development activities. She is an experienced sales and business development manager, having taken on several commercial management roles including indoor air quality business development, the sale of monitoring and diagnostic instruments as well as meteorological data.

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AIR QUALITY	ODOUR	CLIMATE
Air Quality Assessments for Planning and EIAs Feasibility Risk Assessments Air Quality Neutral Assessments Air Quality Positive Statements Air Quality Monitoring Surveys Planning Condition Support Ventilation Strategies Emission Mitigation Statements Damage Cost Assessments Air Quality Dust Management Plans (AQDMP) Dust Monitoring Expert Witness Services Technical Review Services LAQM Technical Support and Clean Air Zones Air Emissions Risk Assessments (Environmental Permitting) Infrastructure Assessments Indoor Air Quality Support (BREEAM, HQM, WELL, DREAM) COSHH Surveys (Air, Fumes, Dust, Bioaerosols)	Odour Assessments for Planning Nuisance Complaint Support Commercial Kitchen Risk Assessments Environmental Permitting Support Odour Management and Control Public Sector Services Expert Witness Services Technical Review Services Qualitative Desktop Assessments Field Odour Surveys ('Sniff-Tests') Odour Dispersion Modelling Odour Monitoring / Sampling Kitchen Risk Assessments Council, Regulator and Consultee Liaison Odour Abatement Advice Odour Management Plans	Greenhouse Gas Calculations and Assessments for Planning Greenhouse Gas ES Chapters Greenhouse Gas Monitoring Surveys H1 Calculations for Environmental Permitting UK ETS Advice Resilience and Adaptation ES Chapters Climate Management Plans Expert Witness Services Technical Review Services Net Zero Carbon Assessments for Planning Net Zero Plans for Planning Business Carbon Footprints Business Net Zero Assessments Business Net Zero Plans Business Climate Risk Assessments Business Climate Adaptation Plans
GENERAL ENVIRONMENTAL		
Construction Environmental Management Plans (CEMP) Environmental Permitting Applications and Management Meteorological Monitoring Surveys and Data Provision		

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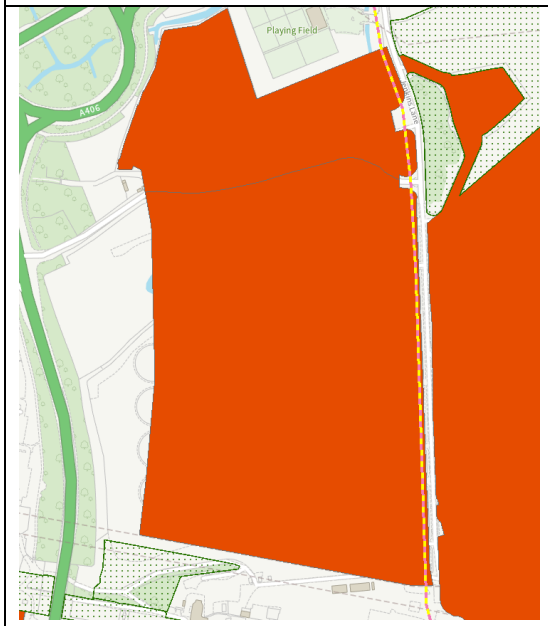
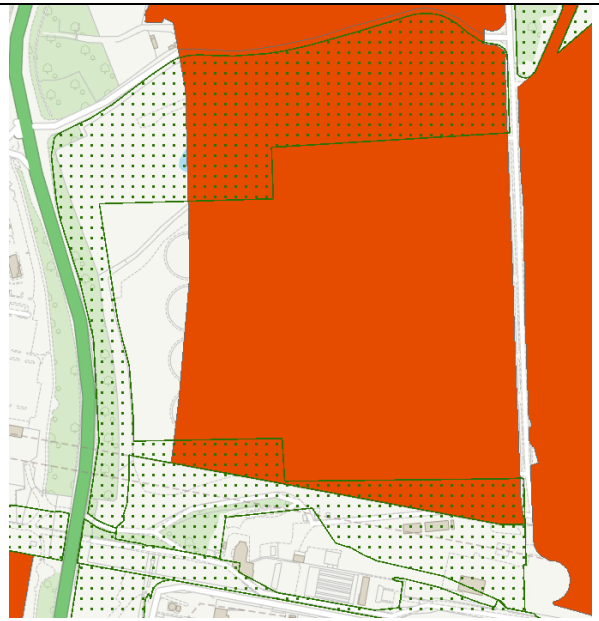
Appendix 4: Schedule of LBN proposed mapping modification to the Regulation 19 Draft Submission Local Plan in response to Thames Water's comments

Adopted SINC and SIL (Local Plan, 2018)	Regulation 19, SINC NeB18 and SIL	Proposed amendment to SINC NeB18, Google satellite
		 The above revision to the proposed SINC boundary NeB18 (blue area) seeks to align with the Landscape Ecological Management Plan (LEMP) being delivered with the planning application 19/02768/FUL, but it is also mindful of the designated Strategic Industrial Land (SIL) – removing the SIL from the proposed SINC parcel. The LEMP, which is being delivered in accordance with the approved planning application 19/02768/FUL, is delivering habitat of SINC value.