



From: david wilson [REDACTED]
Sent: 06 July 2026 11:42
To: Local Plan
Cc: [REDACTED]
Subject: Consultation on the Proposed Main Modifications to the Newham Local Plan
Attachments: 26.07.06 Local Plan Review Main Mods issued.pdf

Dear Sir/Madam

Please find attached our response to the above consultation.

Regards
David

David Wilson MRTPI
Property Town Planner



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06 July 2026

Newham Local Plan: Consultation on the Proposed Main Modifications – November 2024

Dear Sir/Madam,

Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment upon the above.

As you will be aware, Thames Water are the statutory sewerage and water undertaker for the Borough and are hence a 'specific consultation body' in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments:

Mod Refs: MM108; MM111; MM118; MM125; MM128; MM131; MM133; MM142; MM149; MM153; MM166; MM205; and MM213

Section 4: Neighbourhoods of the draft Local Plan, includes modifications regarding the phasing and implementation of sites - "*Phasing of the site should take account of the likely requirement for water supply and wastewater infrastructure upgrades*".

The amendments to these allocations remove the requirement to take account of either/or both water supply and wastewater infrastructure text based on our most recent response. However, if the development proposal changes so could our response. We therefore consider that the policies should continue to cover both water supply and wastewater infrastructure. Depending on the timing of delivery and the scale of development which could change when a planning application is submitted, we would still want developers to engage with us regarding both water supply and wastewater infrastructure.

Thames Water reiterate the representation made previously at the Regulation 19 stage with respect to the need for early engagement between the developers and Thames Water to understand both water and wastewater infrastructure requirements.

Mod Refs: MM187 - Policy N11: Beckton

Thames Water supports the additional text that sets out the “*vision for Beckton will be achieved by “13. 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;”*

However, this does not go far enough to meet the tests of soundness included in the NPPF (paragraph 36). As we have been setting out in consultation responses/meetings for some time (such as the Statement of Common Ground and representations made in the Regulation 19 stage), the points that Thames water made are still relevant; namely that given the proximity to the STW it is highly unlikely that it will be possible to provide mitigation at the STW site to enable the scale of development envisaged.

Minimising odour through “*buffering and design solutions measures*” is vague and does not cover the requirements from the current Local Plan Inspector’s Report of November 2018 which “are necessary for the effectiveness of the Plan” and state at paragraph 134 that: “*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*

1. *Odour Impact Assessment, plus*
2. *necessary mitigation;*
3. *clarifies who is responsible for mitigation work; and*
4. *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.”

As previously mentioned in consultation responses to the Local Plan and at RDBROAPF meetings, given the past major odour mitigation works which have already been implemented, future mitigation options at Beckton STW are limited or may not even be feasible. The most odourous parts of the STW process are already covered and odour controlled i.e. the preliminary screening, primary treatment and sludge treatment is already covered and odour controlled.

Mitigation options are therefore very limited at Beckton. The majority of remaining uncontrolled emissions are from the secondary treatment plant which are very large surface area tanks, with low area odour emission rates. Secondary treatment tanks are generally not covered in the water industry due to the odour being so weak that there is no need to control it. Therefore, even if it was affordable and deliverable any reduction in odours is likely to be marginal and not affect the ability to bring forward development within the vicinity of Beckton STW. A technical odour study would be required to demonstrate this and determine whether there are any further odour mitigation options.

In the likely scenario that sufficient mitigation cannot be implemented at the STW to enable the proposed scale of development then a much larger buffer will be required in line with odour contours and which may limit any odour sensitive development. Guidance on odour sensitive developments and less sensitive developments which may be acceptable in an odour buffer can be found in the IAQM document ‘guidance on the assessment of odour for planning’ <https://iaqm.co.uk/guidance/>

For example, it should not be assumed that public open space will be acceptable in an odour buffer, depending on the strength of the odour contours. The proposed allocation should demonstrate how this guidance has been considered in particular we refer the LPA to the IAQM table 2 receptor sensitivity to odours as copied below:

Table 2: Receptor sensitivity to odours

For the sensitivity of people to odour, the IAQM recommends that the Air Quality Practitioner uses professional judgement to identify where on the spectrum between high and low sensitivity a receptor lies, taking into account the following general principles:	
High sensitivity receptor	Surrounding land where: • users can reasonably expect enjoyment of a high level of amenity; and • people would reasonably be expected to be present here continuously, or at least regularly for extended periods, as part of the normal pattern of use of the land. Examples may include residential dwellings, hospitals, schools/education and tourist/cultural.
Medium sensitivity receptor	Surrounding land where: • users would expect to enjoy a reasonable level of amenity, but wouldn't reasonably expect to enjoy the same level of amenity as in their home; or • people wouldn't reasonably be expected to be present here continuously or regularly for extended periods as part of the normal pattern of use of the land. Examples may include places of work, commercial/retail premises and playing/recreation fields.
Low sensitivity receptor	Surrounding land where: • the enjoyment of amenity would not reasonably be expected; or • there is transient exposure, where the people would reasonably be expected to be present only for limited periods of time as part of the normal pattern of use of the land. Examples may include industrial use, farms, footpaths and roads.

The local authority and/or developer should continue to liaise with Thames Water in relation to an appropriate odour impact assessment and odour mitigation options study as part of the promotion of the site and at the earliest stage in advance of any allocation or future planning application submission/s.

Any proposed off site odour mitigation feasibility testing must be undertaken before any planning application is submitted 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.

Thames Water maintain that Policy N11 Beckton should include additional text to ensure that the policy is clearly written and unambiguous, as required by paragraph 16(d) of the NPPF, and is justified, as required by paragraph 36(b) of the NPPF.

Text/Modification to make the Policy N11: Beckton sound:

*'13. 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 **as identified through Odour Impact Assessment with the necessary mitigation and clarification who is responsible for mitigation work**;*

Mod Ref: MM108 - Policy N11: SA3 Alpine Way

We support the addition text on odour management but consider that this does not go far enough.

The site adjoins Beckton Sewage Treatment Works (STW) to the southwest. There is also a Municipal Waste Transfer Station site to north of Eric Clarke Lane which is also a source of odour.

*Desing principles - **“Design measures should minimise exposure to odour from Beckton Sewage Treatment Works, ensure an air quality neutral approach and minimise exposure to poor air quality as per Local Plan Policy CE6, particularly on Woolwich Manor Way.”***

Phasing and Implementation **“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.”**

In relation to the planning application for Phase 1 Ref:24/00989/OUT Thames Water have not yet seen any mitigation feasibility testing or assessment for the strategic land either at Beckton STW or off site mitigation. This is required to demonstrate that the current application is acceptable.

As we have previously set out in relation to the Local Plan, given the major odour mitigation works which have already been implemented, further mitigation options at Beckton STW are either very limited or not feasible. The most odorous parts of the STW process are already covered and odour controlled. This includes the preliminary screening, primary treatment and sludge treatment.

Mitigation options are therefore very limited at Beckton STW. The majority of remaining uncontrolled emissions are from the secondary treatment plant which comprises of very large surface area tanks, with low area odour emission rates. Secondary treatment tanks are generally not covered in the water industry due to the low odour, as reduction in low level odour over a large area is both expensive and difficult to achieve. Even if reduction was affordable and deliverable any reduction in odours is likely to be marginal and not affect the ability to bring forward development within the vicinity of Beckton STW.

Any off site odour mitigation feasibility testing must be undertaken before planning applications are submitted 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.

For the reasons set out above and in previous representations made at the Regulation 19 stage and in the Thames Water Statement of Common Ground, Thames Water maintain that the policy is not sound. The points that Thames water made previously are still relevant. Requiring non-STW development to “minimise exposure to odour” is vague and would therefore not meet the requirements of paragraph 16(d) of the NPPF, where plans should contain policies that are clear and unambiguous, so it is evident how a decision maker should react to development proposals. As drafted it is not clear within Policy N11.SA3 who is responsible providing mitigation and it is not clear if mitigation is feasible to make the site viable, as set out in previous representations.

As set out in previous representations, Policy N11.SA3 has not been drafted with sufficient and effective engagement with Thames Water, as required under Paragraph 16(c) of the NPPF i.e. Thames Water has not seen any mitigation feasibility testing/assessment to demonstrate that development of the site is feasible.

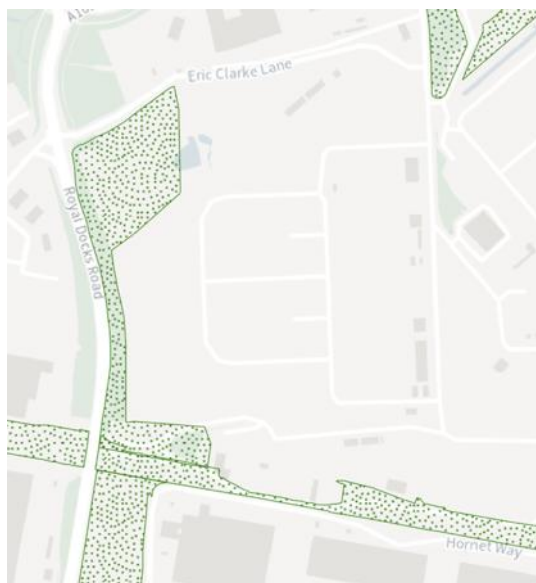
For the reasons identified in previous representations made by Thames Water, Policy N11.SA3 is not positively prepared as it would not achieve sustainable development, it is not justified as it does not represent an appropriate strategy for development, nor is it effective as the Alpine Way site may not be deliverable or consistent with national policy i.e. is not consistent with the Agent of Change principle (NPPF, paragraph 200).

Text/Modification to make the Policy N11 sound:

“Design measures should minimise exposure to odour from Beckton Sewage Treatment Works (as identified through Odour Impact Assessment with the necessary mitigation and clarification of who is responsible for mitigation work),

Mod Ref: PM36 - Proposed changes GWS1/ Policies Map

Thames Water support for this modification and that the SINC must avoid the SIL area for the reasons set out in previous representations and the Statement of Common Ground.



Proposed SINC allocation - Extract from the Draft Local Plan Examination Policies Map (2026)

Mod Ref: MM222 – Policy N17.SA1 Beckton Riverside

We support this modification to remove the Thames Gateway Bridge Safeguarding Direction.

Mod Ref: MM18- Policy D4: Table 1: Tall Building Zones

Thames Water maintain their previous representation regarding policy D4, that the policy and designation must be amended to either include Beckton STW within its own 'tall building' designation or for TBZ5 to be amended to refer to Beckton STW to recognise that flue stacks and other related structures will exceed 32m for operational purposes.

It is not clear if within TBZ5 if Beckton STW is included in the area where buildings could reach over 40m or 50m, this should be clarified.

For the reasons set out previously, amendments are required to make Policy D4 sound i.e. justified and effective as it does not currently reflect an appropriate deliverable strategy for Beckton STW, an operational sewage treatment works, which is allocated as a strategic industrial site (Policy J1).

Suggested modification

TBZ5 – Beckton STW may include infrastructure such as flue stacks which for operational purposes exceed 32m or provide clarification that Beckton STW is included in the area where buildings could reach over 40m or 50m.

Mod Ref: MM215- Policy N17 Gallions Reach

Thames Water submitted representations at the Regulation 19 Stage, whereby Thames Water objected to Policy N17.

MM215 includes the following additional text:

'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'

However, this does not go far enough to meet the tests of soundness included in the NPPF (paragraph 36). As we have been setting out in consultation responses/meetings for some time (such as the Statement of Common Ground and representations made in the Regulation 19 stage), the points that Thames water made are still relevant; namely that given the proximity to the STW it is highly unlikely that it will be possible to provide mitigation at the STW site to enable the scale of development envisaged.

Minimising odour through “*buffering and design solutions measures*” is vague and does not cover the requirements from the current Local Plan Inspector’s Report of November 2018 which “are necessary for the effectiveness of the Plan” and state at paragraph 134 that: “*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*

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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.”

As previously mentioned in consultation responses to the Local Plan and at RDBROAPF meetings, given the past major odour mitigation works which have already been implemented, future mitigation options at Beckton STW are limited or may not even be feasible. The most odourous parts of the STW process are already covered and odour controlled i.e. the preliminary screening, primary treatment and sludge treatment is already covered and odour controlled.

Mitigation options are therefore very limited at Beckton. The majority of remaining uncontrolled emissions are from the secondary treatment plant which are very large surface area tanks, with low area odour emission rates. Secondary treatment tanks are generally not covered in the water industry due to the odour being so weak that there is no need to control it. Therefore, even if it was affordable and deliverable any reduction in odours is likely to be marginal and not affect the ability to bring forward development within the vicinity of Beckton STW. A technical odour study would be required to demonstrate this and determine whether there are any further odour mitigation options.

In the likely scenario that sufficient mitigation cannot be implemented at the STW to enable the proposed scale of development then a much larger buffer will be required in line with odour contours and which may limit any odour sensitive development. Guidance on odour sensitive developments and less sensitive developments which may be acceptable in an

odour buffer can be found in the IAQM document 'guidance on the assessment of odour for planning' <https://iaqm.co.uk/guidance/>

For example, it should not be assumed that public open space will be acceptable in an odour buffer, depending on the strength of the odour contours. The proposed allocation should demonstrate how this guidance has been considered in particular we refer the LPA to the IAQM table 2 receptor sensitivity to odours as copied below:

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Any proposed off site odour mitigation feasibility testing must be undertaken before any planning application is submitted 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.

Thames Water maintain that Policy N17 should include additional text to ensure that the policy is clearly written and unambiguous, as required by paragraph 16(d) of the NPPF, and is justified, as required by paragraph 36(b) of the NPPF.

Text/Modification to make the Policy N17: Gallions Reach sound:

*'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 **as identified through Odour Impact Assessment with the necessary mitigation and clarification who is responsible for mitigation work**;*

MM23 - Policy D6: Neighbourliness

Thames Water reiterate their previous representation in that MM23 has not updated Policy D6 to reflect the comments made at the Regulation 19 stage. Further, it could also be considered that the modified text is unclear and ambiguous. It is not clear if it is the

developer of the vulnerable use, that needs to undertake 'The assessments and mitigations to reflect a reasonable worst-case scenario for the base line amenity impacts...' Thames Water could reiterate, that it should be the developer of the vulnerable use that undertakes these assessments and implements the required mitigation prior to occupation.

Thames Water Regulation 19 comments - where modifications have not been made to the Local Plan

Thames Water wish to reiterate their Regulation 19 representations in relation to the following policies not amended to reflect Thames Water's comments:

- Policy W4: Utilities and Digital infrastructure
- Policy W4: Utilities and Digital Connectivity Infrastructure Part 4 - Development within the vicinity of Beckton Sewage Treatment Works
- Policy W4 & BFN1.7 Omission - Beckton Sewage Treatment Works Wastewater Infrastructure
- Policy GWS1: Green Spaces - Northern Lagoon, Beckton Sewage Treatment Works (STW) – Proposed MOL deletion
- Policy GWS1: Green Space: Mill Meads Allotments – Abbey Mills Sewage Pumping Station – Proposed Green Space deletion
- Policy CE1: Environmental Design & Delivery - Water Efficiency

Yours faithfully,

David Wilson
Thames Water Property Town Planner