Sara Chiong

From: david wilson <

Sent: 16 September 2024 10:29

To: Local Plan

Cc:

Subject: NEWHAM DRAFT SUBMISSION LOCAL PLAN (REGULATION 19) JUNE 2024 **Attachments:** 24.09 Reg 19 Part B Form Policy W4 Utilities.docx; 24.09 Reg 19 Part B Form

24.09 Reg 19 Part B Form Policy W4 Utilities.docx; 24.09 Reg 19 Part B Form Policy W4 Utilities Part 4.docx; 24.09 Reg 19 Part B Form W4 & BFN1.7 Beckton STW.docx; 24.09 Reg 19 Part B Form Policy GWS1 remove MOL .docx; 24.09 Reg 19 Part B Form Policy GWS3 SINC Beckton.docx; 24.09 Reg 19 Part B Form Policy GWS1 A Mills Green Space.docx; 24.09 Reg 19 Part B Form Policy D4 Tall building zone.docx; 24.09 Reg 19 Part B Form Policy CE1 Water Efficiency.docx; 24.09 Reg 19 Part B Form Policy CE7 Flood Risk CE8 SUDS.docx; 24.09 Reg 19 Part B Form Policy J1 SIL.docx; 24.09 Reg 19 Part B Form Policy D6 Neighbour.docx; 24.09 Reg 19 Part B Form Allocations Comms.docx; 24.09 Newham Local Plan Review SITES Table FV.docx; 24.09 Reg 19 Part B Form N17.SA1 Gallions Reach.docx; 24.09 Reg 19 Part B Form Policy D6 Reg 19 Part B Form Policy D7.SA1 Thames Gateway Bridge.docx; 24.09 Reg 19 Part B Form Policy

N11.SA3 Alpine Way.docx; 24.09 Reg 19 Part A Form issued.docx

Importance: High

Follow Up Flag: Follow up Flag Status: Flagged

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 water supply and sewerage undertaker for the Borough and are hence a "specific consultation body" in accordance with the Town & Country Planning (Local Planning) Regulations 2012.

Please find enclosed 1 completed Part A form and our completed Part B representation forms in relation to the Policies below:

PART 1 (Introduction, Vision and Objectives and Policies)

- 1. Policy W4: Utilities and Digital Infrastructure
- 2. Policy W4: Utilities and Digital Connectivity Infrastructure Part 4 Development within the vicinity of Beckton Sewage Treatment Works
- 3. Policy W4 & BFN1.7 Omission Beckton Sewage Treatment Works Wastewater Infrastructure
- 4. Policy GWS1: Green Spaces Northern Lagoon, Beckton Sewage Treatment Works (STW) Proposed MOL deletion
- 5. Policy GWS3: Biodiversity, urban greening, and access to nature
- 6. Policy GWS1: Green Space: Mill Meads Allotments Abbey Mills Sewage Pumping Station Proposed Green Space deletion
- 7. Policy D4: Tall Building Zone
- 8. Policy CE1: Environmental Design & Delivery Water Efficiency
- 9. Policy CE7: Managing Flood Risk & CE8: Sustainable Drainage
- 10. Policy J1 SIL
- 11. Policy D6: Neighbourliness

PART 2 – (NEIGHBOURHOODS AND APPENDICES)

- 12. Allocations/Neighbourhoods Growth Options Comments (including accompanying individual sites comments table)
- 13. N17: Gallions Reach N17.SA1 OBJECT
- 14. Policy N17.SA1 Beckton Riverside Beckton STW Thames Gateway Bridge Safeguarding Direction
- 15. N11.SA3 Alpine Way

We would welcome the opportunity to meet again with Newham and the GLA and other key stakeholders in due course to discuss the detail of our comments, particularly in relation to proposed development near Beckton Sewage Treatment Works.

Regards David

David Wilson MRTPIProperty Town Planner

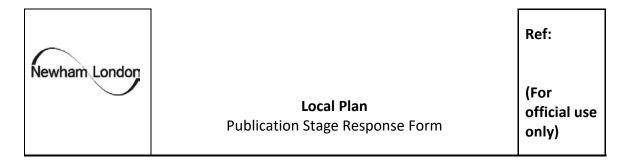
1st Floor West, Clearwater Court, Vastern Road, Reading, Berkshire, RG1 8DB



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Response Form for Regulation 19 Consultation.



Name of the Local Plan to which this representation relates:

Newham Draft Submission Local Plan

Privacy Notice

Who we are

London Borough of Newham (LBN) is registered with the Information Commissioner's Office (ICO) as a 'Data Controller' This privacy notice applies to you ('the service user') and LBN ('the Council'). The Council takes the privacy of your information very seriously.

This privacy notice relates to our functions relating to the Newham Local Plan Review Consultation (Regulation 19). It also provides additional information that specifically relates to this particular consultation, and should be read together with our <u>general privacy notice</u>, which provides further detail.

What data do we collect and process

We collect your name, contact details, email address, job title and organisation if applicable and demographic equalities data if you choose to share it.

Why we collect your data

The consultation is a requirement of the Town and Country Planning (Local Planning) (England) Regulations 2012. We collect your data so that we can get your views on the legal compliance or soundness of the Local Plan, as well as its compliance with the duty to co-operate.

The lawful basis for processing your data

The lawful basis we use to process your data as set out in UK data protection legislation is:

Article 6 (a) Consent: the individual has given clear consent for us to process their personal data for a specific purpose.

Article 9 (a) Explicit Consent: the data subject has given explicit consent to the processing of those personal data for one or more specified purposes.

We will only process personal data where we have consent to do so, and you can withdraw your consent at any time. By submitting your personal data in the response form you are consenting for us to process your data and/or consenting to be added to the database. If added to the database, they can be removed upon request.

You can withdraw your consent at any time.

How we use your data

This data is collected, collated and then submitted to the Secretary of State, who will appoint an Inspector to conduct an independent examination of the Local Plan. Demographic data will be processed anonymously to assess the effectiveness of our consultation.

Where you have consented, your contact details will be added to our consultation database for future consultations and updates on the Examination in Public.

At submission representations will be made public on the council's website, including name of person and organisation if applicable making representation. Other personal information will remain confidential.

Representations, in full, submitted along with the Local Plan, evidence base and documents Submission Draft Newham required by legislation to the Planning Inspectorate and to the person the Secretary of State appoints as the Planning Inspector. Contact details will be made available to the Inspector and Programme Officer so they can contact individuals to participate in the Examination.

Consultation database is stored on Mailchimp and accessed by planning policy team only. Mailchimp stores names and email addresses of those on the consultation database in line with Mailchimp policies, particularly its <u>data processing addendum</u>. Please be aware they may store personal data external to the UK specifically in the USA and/or EU.

Who we will share your data with

We will only share your data with the Planning Inspector appointed by the Secretary of State, the Programme Officer appointed by Newham, and within the planning policy team. Your name and organisation (if applicable) will be published on our website along with representations upon submission. Demographic data is not shared with the Planning Inspector or the Programme Officer.

We will not share your personal information with any other third parties unless you have specifically asked us to, or if we have a legal obligation to do so.

How long we will keep your data

We will keep your data safe and secure for a period of 15 year(s)in line with our retention Schedule. After this time, it will be securely destroyed.

How do we protect your data

We comply with all laws concerning the protection of personal information and have security measures in place to reduce the risk of theft, loss, destruction, misuse or inappropriate disclosure of information. Staff access to information is provided on a need-to-know basis and we have access controls in place to help with this.

See the <u>Planning Inspectorate Customer Privacy Notice</u> for details on how they keep your data safe and secure.

Know your rights

We process your data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Find out about your rights at <u>Your rights</u> — <u>Processing personal data privacy notice</u> — <u>Newham Council</u> or at https://ico.org.uk/your-data-matters/ If you have any queries or concerns relating to data protection matters, please email: dpo@newham.gov.uk

Response Form

For guidance on how to complete this representation form please view the Regulation 19 Consultation Guidance https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh.

This form has two parts –

(where relevant)

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A		
	ersonal Details*	2. Agent's Details (if applicable)
	ted, please complete only the Title, No plete the full contact details of the ag	Name and Organisation (if applicable) gent in 2.
Title	Mr	
First Name	David	
Last Name	Wilson	
Job Title	Town Planner	
(where relevant)	TI Water Duranti	
Organisation (where relevant)	Thames Water Property	
Address Line 1		
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone Number		
relephone Number		
E-mail Address		

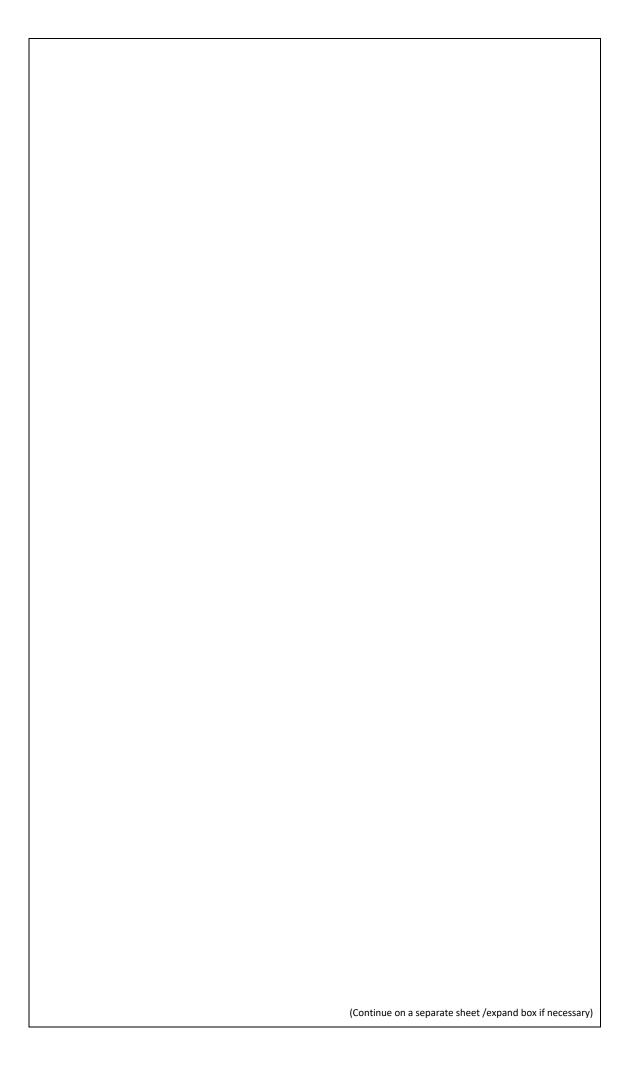
Part B – Please use a separate sheet for each representation

Thames Water			
Local Plan does this rep	resentation re	late? (Please b	oe as
Local Plan is :			
Yes		No	
Yes		No	
Yes		No	
	Local Plan does this rep Local Plan is: Yes Yes	Local Plan does this representation re	Local Plan does this representation relate? (Please below the property of the

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.



legally compliant and sound, in respect of any you have identified at 5 above. (Please note t co-operate is incapable of modification at exa each modification will make the Local Plan leg helpful if you are able to put forward your sug text. Please be as precise as possible.	that non-compliance with the duty to mination). You will need to say why gally compliant or sound. It will be
	(Continue on a constate sheet lowered by the continue of the continue on a constate sheet lowered by the continue on a continue on
	(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?				
No, I do not wish to participate in hearing session(s)	Yes, I wish to participate in hearing session(s)			
Please note that while this will provide an initial in hearing session(s), you may be asked at a later participate.				
8. If you wish to participate in the hearing session consider this to be necessary:	n(s), please outline why you			

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified about:

a.	the sul	omission of the local plan for independent examination
Ye	s 🗆	No □
b.	the pu	blication of the Inspector's report
Ye	s 🗆	No □
c.	the ad	option of the Local Plan
Ye	s 🗆	No □
	•	u like to be added to our consultation database to be notified about future y consultations?
	Yes □	No □

Please return to London Borough of Newham by 5pm 6th September 2024

Part B – Please use a separate sheet for each representation

Name or Organisation:	Thames Water			
3. To which part of the Local Plan does this representation relate? (Please be as specific as possible)				
Policy	W4: Utilities and Digi	tal Infrastruct	ure	
Implementation Text				
Paragraph				
Policies Map				
4. Do you consider the Local Plan is :				
4.(1) Legally compliant	Yes		No	
4.(2) Sound	Yes		No	Х
4 (3) Complies with the Duty to co-operate	Yes		No	

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

As you will be aware, Thames Water are the statutory water supply and sewerage undertaker for the Borough and are hence a "**specific consultation body**" in accordance with the Town & Country Planning (Local Planning) Regulations 2012.

As per our response to the Reg18 consultation, we support the policy W4 in principle and in particular Parts 1 and 2 in relation to Utilities Infrastructure but consider there should be a separate Policy covering Water Supply and Sewerage/Wastewater Infrastructure like in the London Plan (and numerous other Local Plans) and not 'hidden' within a general utilities policy.

Newham's Reg18 response for not including such a policy in Reg19 was that they "cannot deliver water metering and sewage capacity". Clearly Thames Water are not expecting Newham to deliver water/wastewater infrastructure but the Local Plan must plan for such infrastructure to be delivered in pace with new development in accordance with the policy below (just like the Local Plan has policies on new housing provision but Newham don't deliver most new housing directly).

Water and wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2023, states: "Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater..."

Paragraph 11 states: "Plans and decisions should apply a presumption in favour of sustainable

development. For plan-making this means that:

a) All plans should promote a sustainable pattern of development that seeks to: meet the

development needs of their area; align growth and infrastructure; improve the environment:

mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects"

Paragraph 28 relates to non-strategic policies and states: "Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure..."

Paragraph 26 of the revised NPPF goes on to state: "Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In

particular, joint working should help to determine where additional infrastructure is necessary...."

The web based National Planning Practice Guidance (NPPG) includes a section on 'water supply, wastewater and water quality' and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that "Adequate water and wastewater infrastructure is needed to support sustainable development" (Paragraph: 001, Reference ID: 34-001-20140306).

Policy SI5 of the London Plan 2021 relates to water and wastewater infrastructure and supports the provision of such infrastructure to service development.

It is important to consider the net increase in water and wastewater demand to serve the

development and also any impact that developments may have off site, further down the network. The new Local Plan should therefore seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to underestimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years. Sewage treatment works upgrades for our Beckton STW that serves the LB of Newham (and many other north London Boroughs) takes around 5-7 years to design and implement.

The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water's asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling.

As from 1st April 2018, the way Thames Water and all other water and wastewater companies

charge for new connections has changed. The changes mean that more of Thames Water's

charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us. The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges.

Information on how off site network reinforcement is funded can be found here https://developers.thameswater.co.uk/New-connection-charging

Thames Water therefore recommends that developers engage with them at the earliest

opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:

- The developments demand for water supply and network infrastructure both on and off site;
- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Thames Water offer a free Pre-Planning service which confirms if capacity

exists to serve the development or if upgrades are required for potable water, wastewater and surface water requirements. Details on Thames Water's free pre planning service are available at: https://www.thameswater.co.uk/developers/larger-scaledevelopments/planning-your-development/water-and-wastewater-capacity (Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In light of the above comments and Government guidance we consider that the New Local Plan should include a specific policy on the key issue of the provision of water and

sewerage/wastewater infrastructure to service development. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs).

We recommend the Local Plan include the following policy:

PROPOSED WATER SUPPLY/WASTEWATER INFRASTRUCTURE POLICY TEXT:

"Where appropriate, planning permission for developments which result in the need for

off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades."

"The Local Planning Authority will seek to ensure that there is adequate water and

wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development."

Local Authorities should also consider both the requirements of the utilities for land to enable them to meet the demands that will be placed upon them. This is necessary because it will not be possible to identify all the water and wastewater/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (AMPs). Thames Water are currently in AMP7 which covers the period from 1st April 2020 to 31st March 2025. AMP8 will cover the period from 1st April 2025 to 31st March 2030. The Price Review, whereby the water companies' AMP8 Business Plan will be agreed with Ofwat during 2024.

Hence, a further text should be added to Policy as follows:

will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised."
(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?				
No, I do not wis participate in hearing session		х	Yes, I wish to participate in hearing session(s)	
Please note that while this vin hearing session(s), you marticipate.				
8. If you wish to participate consider this to be necessar		(s), please o	outline why you	
To discuss the detail of water and	wastewater infratsructure			

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

- 9. Do you wish to be notified about:
 - a. the submission of the local plan for independent examination

Yes ⊠	No □
b. the p	ublication of the Inspector's report
Yes ⊠	No □
c. the a	doption of the Local Plan
Yes ⊠	No □
•	ou like to be added to our consultation database to be notified about future icy consultations?
Yes 🛭	☑ No □

Please return to London Borough of Newham by 5pm 6th September 2024

Part B – Please use a separate sheet for each representation

r				
Name or Organisation:	Thames Water			
3. To which part of the Local Plan does this representation relate? (Please be as specific as possible)				
Policy	Policy W4: Utilities a	and Digital Con	nectivity	
Implementation Text	Infrastructure Part 4 - Development Sewage Treatment W		nity of Beckto	n
Paragraph	5			
Policies Map				
4. Do you consider the Local Plan is :				
4.(1) Legally compliant	Yes		No	
4.(2) Sound	Yes		No	х
4 (3) Complies with the Duty to co-operate	Yes		No	

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

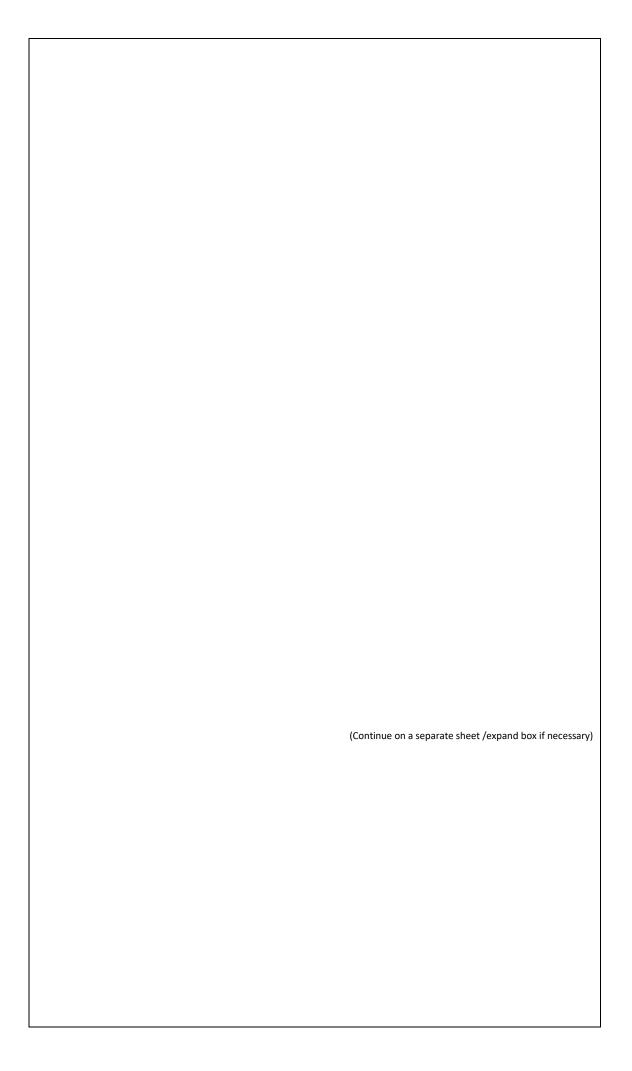
If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Part 4 of draft Policy W4 state '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.' We generally support part 4 of Policy W4 but consider that it should be strengthened to ensure that any required mitigation is in place ahead of development.

The new Local Plan should rightly continue to assess impact of any development within the vicinity of Beckton STW in line with the Agent of Change principle set out in the NPPF and Policy D13 of the London Plan 2021.

In general, where development is being proposed within 800m of a sewage treatment works, the developer or local authority should liaise with Thames Water to consider whether an odour impact assessment is required as part of the promotion of the site and potential planning application submission. Due to detailed odour modelling we have completed we advise that an odour impact assessment is required for all development proposed within the 3-odour unit isopleth as defined by our 2018/19 odour modelling for Beckton STW. The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a sewage treatment works.

Paragraph 174 of the NPPF, February 2021, sets out that: "Planning policies and decisions should contribute to and enhance the natural and local environment by:e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans..." Paragraph 185 goes on to state: "Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development...." The online PPG states at Paragraph: 005 Reference ID: 34-005-20140306 that: "Plan-making may need to consider:whether new development is appropriate near to sites used (or proposed) for water and wastewater infrastructure (for example, odour may be a concern).."



each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.			
The following text should be added to point 4 'The applicant (or 'agent of change') must provide suitable mitigation before development has been completed'.			
(Continue on a separate sheet /expand box if necessary)			

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?				
partio	do not wish to cipate in ng session(s)	х	Yes, I wish to participate in hearing session(s)	
	while this will provide an initial in s), you may be asked at a later p			
8. If you wish to p consider this to be	articipate in the hearing session necessary:	(s), please o	outline why you	
To discuss odour issue	es around Beckton STW			

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified about:
a. the submission of the local plan for independent examination
Yes ⊠ No □
b. the publication of the Inspector's report
Yes ⊠ No □
c. the adoption of the Local Plan
Yes ⊠ No □
10. Would you like to be added to our consultation database to be notified about future planning policy consultations?
Yes ⊠ No □

Please return to London Borough of Newham by 5pm 6th September 2024

Part B – Please use a separate sheet for each representation

Name or Organisation:	Thames Water					
3. To which part of the Local Plan does this representation relate? (Please be as specific as possible)						
Policy	Policy W4 & BFN1.7 Omission - Beckton Sewage Treatment Works Wastewater Infrastructure					
Implementation Text						
Paragraph						
Policies Map						
4. Do you consider the Local Plan is :						
4.(1) Legally compliant	Yes		No			
4.(2) Sound	Yes		No	Х		
4 (3) Complies with the Duty to co-operate	Yes		No			

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Beckton Wastewater/Sewage Treatment Works (STW) is Thames Water's largest sewage treatment works and a vital component of London's infrastructure. Utilities infrastructure is mentioned generally in Policy BFN1.7, but we consider that there should be a separate policy covering Beckton STW.

We therefore consider it essential that there is an associated development management policy regarding Beckton STW which supports future upgrades as there has been in previous Local Plans.

In relation to wastewater capacity at Beckton STW, the works has been significantly upgraded with an extension just to the north of the RDBROAPF in AMP5 (2010-2015) and is currently undergoing a further upgrade to the extension and inlet works during AMP7 (2020-2025). The AMP 7 growth upgrade has a design horizon of 2036.

In May 2023 we published our first Drainage and Wastewater Management Plans (DWMPs) which are a new long-term plans that will make sure we have a resilient and sustainable wastewater service for the next 25 years, and beyond. https://www.thameswater.co.uk/about-us/regulation/drainage-and-wastewater-management

We have prepared a long term adaptive plan for growth at Beckton up to 2100 as part of our DWMP. The details of the Adaptive Plan can be found in Technical Appendix G Adaptive Pathway Planning. https://www.thameswater.co.uk/media-library/home/about-us/regulation/drainage-and-wastewater/appendix-g-adaptive-pathway-planning.pdf

Please see Annex A for the specific Beckton STW example starting at page 67 and fig A.2 (pg.74) for the adaptive pathway figure (and copy below). We will update and revise this in 5 years as part of future iterations of DWMP. The next DWMP will be a statutory requirement and pending finalisation of the DWMP guidance from Defra, we intend to refresh this long term adaptive plan and republish it every 5 years.

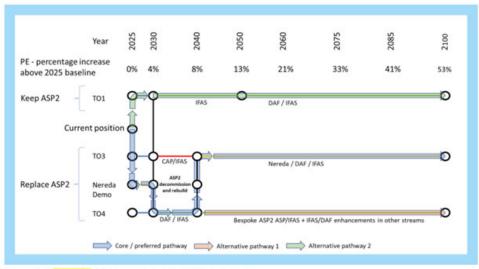
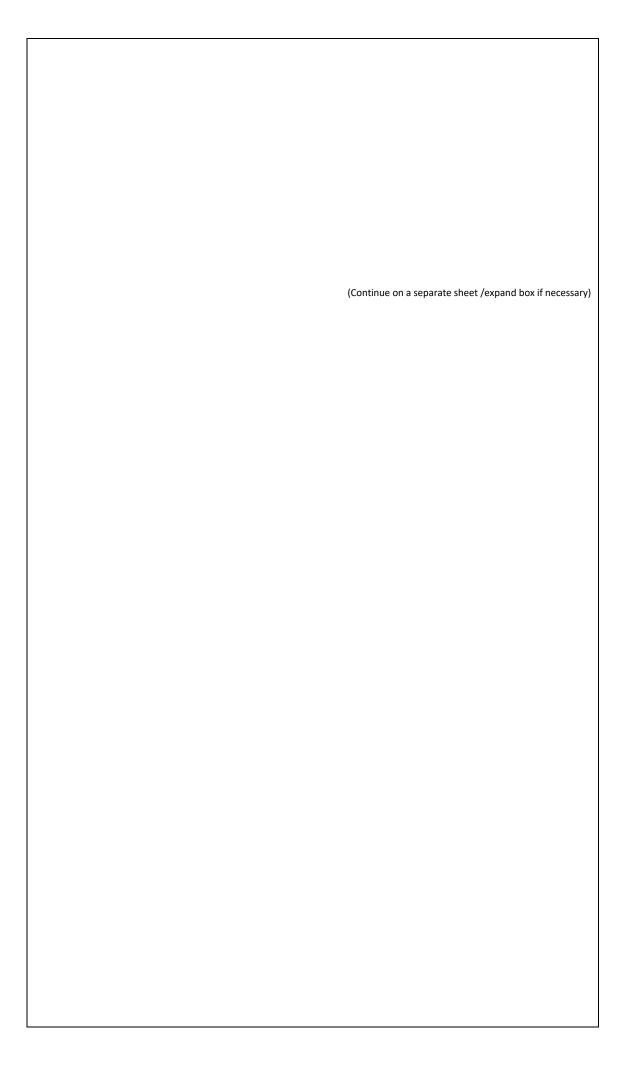


Figure A-2 Beckton STW adaptive pathway line diagram

It should also be acknowledged that most of the remaining unused areas of land at Beckton STW are covered by the Landscape and Ecology Management Plan. It is likely that any future infrastructure upgrades on these areas are likely to require biodiversity replacement off site and this should be recognised in the new Local Plan.
Thames Water are committed to reducing their greenhouse gas emissions and transforming the way they create and use energy. In 2022/23, Thames Water self-generated 536GWh of renewable energy (which is 27 per cent of their electricity needs) from renewable sources including sludge, wind and solar power.
Most of the renewable electricity Thames Water self-generate comes from the treatment of sewage sludge via anaerobic digestion, but at Beckton there is also wind, solar and waste to energy. We are also exploring new opportunities such as heat recovery and these should be supported in accordance with the London Plan and NPPF 2023 which sets out at paragraph 148 that the planning system should support renewable and low carbon energy and associated infrastructure.



legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
Reinstate development management policy regarding Beckton STW which supports future upgrades as there has been in previous Local Plans
It should also be acknowledged that most of the remaining unused areas of land at Beckton STW are covered by the Landscape and Ecology Management Plan. It is likely that any future infrastructure upgrades on these areas are likely to require biodiversity replacement off site and this should be recognised in the new Local Plan.

6. Please set out the modification(s) you consider necessary to make the Local Plan

	(Co	ntinue on a separ	ate sheet /expand	box if necess

make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

		No, I do not wish to participate in	х	Yes, I wish to participate in		
		hearing session(s)		hearing session(s)		
i	Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.					
	8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:					
Т	o discuss im	portance of Beckton STWE to London's infrastru	ucture			
Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.						
9. Do you wish to be notified about:						
	a. the s	ubmission of the local plan for independ	dent exami	nation		
	Yes ⊠	No □				
	b. the p	oublication of the Inspector's report				

Yes ⊠	No □
c. the ad	option of the Local Plan
Yes ⊠	No □
-	u like to be added to our consultation database to be notified about future cy consultations?
Yes ⊠	No □

Please return to London Borough of Newham by 5pm 6th September 2024

Part B – Please use a separate sheet for each representation

Г							
Name or Organisation:	or Organisation: Thames Water						
3. To which part of the Local Plan does this representation relate? (Please be as specific as possible)							
Policy	Policy GWS1: Green Spaces - Northern Lagoon, Beckton						
Implementation Text	Sewage Treatment Works (STW) – Proposed MOL deletion						
Paragraph							
Policies Map	Proposed MOL deletion Beckton STW						
4. Do you consider the Local Plan is :							
4.(1) Legally compliant	Yes		No				
4.(2) Sound	Yes		No	Х			
4 (3) Complies with the Duty to co-operate	Yes		No				

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

In relation to the current Local Plan, we supported the deletion of the MOL designation on the site and security centre at Beckton STW. However, as previously promoted, we consider it is important that MOL is removed from the whole of the Northern Lagoon area at Beckton STW.

The Northern Lagoon area (previously known as GS178) 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).

The S106 Agreement states in Schedule 2, Section 4.2.6 that: "and shall be prepared recognising and acknowledging that the Northern Lagoon is Operational Land that may need to be utilised in the future by Thames Water at its discretion for the purposes of meeting and discharging its statutory undertaking and duties." And at Section 4.4 that: "Thames Water shall maintain the Northern Lagoon until needed for development further to Thames Water's duty as a statutory sewerage undertaker and having reasonable regard to the status of Operational Land in accordance with the terms of the Landscape and Ecology Masterplan approved further to paragraph 3.1....".

By its very status, this area is therefore land which TW retains expressly for the purpose of carrying out its statutory undertakings and so should not be restricted by way of land use planning designations that do not reflect that agreed status. Furthermore, as part of its statutory role under the Water Industry Act 1991 and in response to the challenges identified in its adopted WRMP24 TW is investigating the means by which this area of operational land might contribute to the management and recycling of treated wastewater.

Water Resources Management Plan 2024

Our draft Water Resources Management Plan 2024 (WRMP24) builds on our current plan (WRMP19) and reflects the draft South East regional plan. It sets out how we'll keep taps flowing for customers like you over the next 50 years, looking ahead to 2075.

Our draft plan highlights the significant future shortfall in water resources in our supply area and the actions we plan to take to maintain the balance between water supply and demand. It sets out how we're going to tackle leaks, make every drop count and invest in new water infrastructure. We must make bold decisions and act now to ensure we have the water we need in generations to come.

We published our draft Water Resources Management Plan (WRMP24) for consultation between 13 December 2022 and 21 March 2023.

In August 2023, we published a report, called the Statement of Response, which set out our consideration of the feedback we received and changes made to our draft plan in response. These changes have been included within our revised draft WRMP24. This has also been published. We are awaiting a response from Ofwat on the draft WRMP.

Further information can be found at: https://www.thameswater.co.uk/about-us/regulation/water-resources

Thames Water have been working with Water Resources South East (WRSE) to develop integrated plans to address the region's future water resources challenges and help protect London from the risk of drought. This work has identified the need for new projects to improve drought resilience in response to population and climate change. In the shorter term, Thames Water are currently proposing a new river abstraction on the River Thames at Teddington which will be supported by water recycling, and provision of a new reservoir near Abingdon (South East Strategic Reservoir Option) which would store water from the River Thames during the winter then release water back into the river (when levels fall or demand increases) for re-abstraction downstream. Both projects will ensure a reliable water supply during drought periods for residents, businesses, schools, hospitals and other essential services across London.

Our WRMP24 also includes a proposal for a wastewater re-use plant on the northern lagoon site at Beckton STW for longer term water supply.

Case for Removal of Operational Site from MOL

It is considered that there are exceptional circumstances to remove the northern lagoon site from MOL in association with the current Local Plan review.

As previously indicated, the remainder of Beckton Sewage Treatment Works (STW) has been similarly removed from MOL as part of the previous Core Strategy/Newham Local Plan Review and parts of operational/built up Crossness STW have recently been removed from MOL in the recently adopted Bexley Local Plan Review.

Policy G3 of the London Plan sets out that "... C Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs. MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B."

It is therefore important that this opportunity to de designate the northern lagoon site through the current Local Plan review is not missed as a future Local Plan review may be too late.

Thames Water and the other water companies, plan for infrastructure in 5 year periods know as Asset Management Plans (AMP). We are currently in AMP7 (the 7th since privatisation) which runs from 1st April 2020 to 31st March 2025. AMP 8 will run from 1st April 2025 to 31st March 2030 and the draft Business Plans has been submitted to Ofwat who made a draft determination in July 2024 as part of the Price Review (PR24). Therefore, the AMP period process does not match up with the Local Plan Review process and it is important that the current opportunity to remove the site from MOL is not missed.

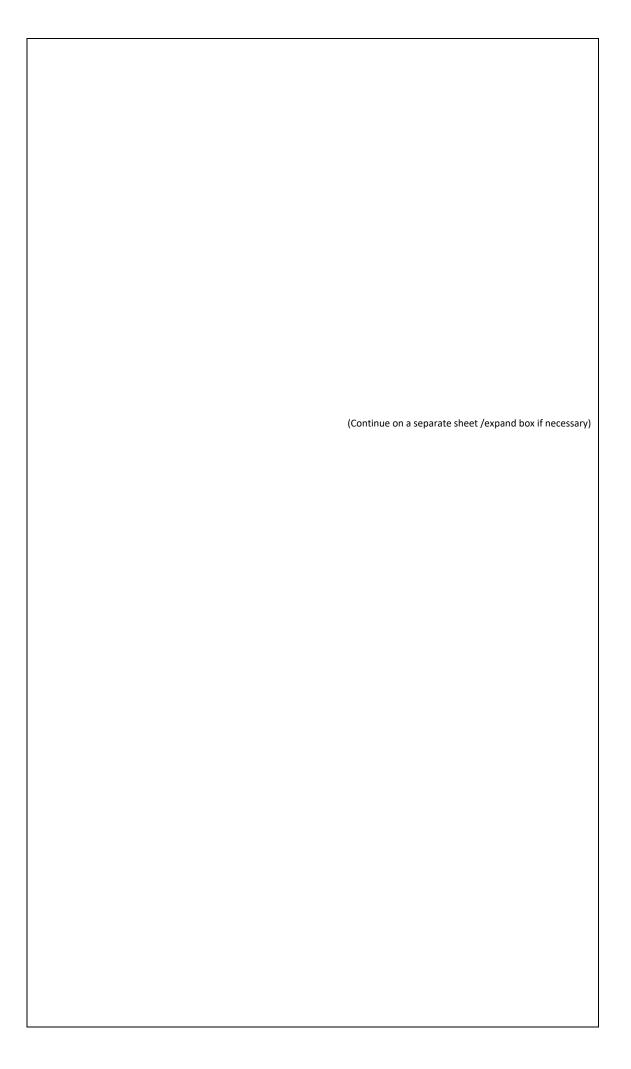
It is considered that the MOL designation at the Thames Water Northern Lagoon are at Beckton STW does not meet the requirements of Part B of Policy G3 as set out below and therefore it is considered that exceptional circumstances do exist to remove the MOL designation similar to the remainder of Beckton STW and land at Crossness STW:

- 1) The site is not distinguishable from the built-up area. The site forms part of operational Beckton STW site.
- 2) There is no public access to the Thames Water operational land for health and safety and security reasons (other than the new permissive footpath along the northern boundary of Thames Water's landholdings and outside of the operational site fencing).

The site does not include any open-air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London.

3) The site is previously developed with sewerage infrastructure and does not

contain any features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value. 4) The site is not green infrastructure as it is retained operational land. Therefore, it does not form part of a strategic corridor, node or a link in the network of green infrastructure and meets none of the above criteria. The removal of the MOL designation would facilitate any new operational buildings in the future which would otherwise have to justify very special circumstances. In our experience, such operational development within the MOL/Green Belt can be delayed by having to demonstrate a very special circumstances case.
It is therefore considered that exceptional circumstances do exist to remove the northern lagoon area from MOL in accordance with Policy G3, as was the case in relation to the main Beckton STW site and Crossness STW.



each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
It is therefore considered that exceptional circumstances do exist to remove the northern lagoon area at Beckton STW from MOL in accordance with Policy G3, as was the case in relation to the main Beckton STW site and Crossness STW.
(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?				
	No, I do not wish to participate in hearing session(s)	х	Yes, I wish to participate in hearing session(s)	
	that while this will provide an initial ession(s), you may be asked at a late			
-	sh to participate in the hearing sessi s to be necessary:	on(s), please o	outline why you	
To discuss the	importance of removing MOL from Beckto	n STW		

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified about:
a. the submission of the local plan for independent examination
Yes ⊠ No □
b. the publication of the Inspector's report
Yes ⊠ No □
c. the adoption of the Local Plan
Yes ⊠ No □
10. Would you like to be added to our consultation database to be notified about future planning policy consultations?
Yes ⊠ No □

Please return to London Borough of Newham by 5pm 6th September 2024

Part B – Please use a separate sheet for each representation

Name or Organisation:	Thames Water			
3. To which part of the Local Plan does this representation relate? (Please be as specific as possible)				
Policy	Policy GWS3: Biodive	ersity, urban	greening, and a	ccess to
Implementation Text				
Paragraph				
Policies Map				
4. Do you consider the l	Local Plan is :			
4.(1) Legally compliant	Yes		No	
4.(2) Sound	Yes		No	X
4 (3) Complies with the	V			
Duty to co-operate	Yes		No	

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Thames Water object to the proposed amendment to Beckton Meadows South SINC (renamed as Beckton STW West SINC).

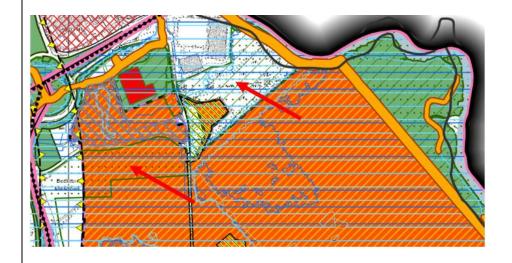
Compared to the previous Local Plan proposals map, it appears that the areas of SINCs within Beckton STW have been extended to include additional areas;

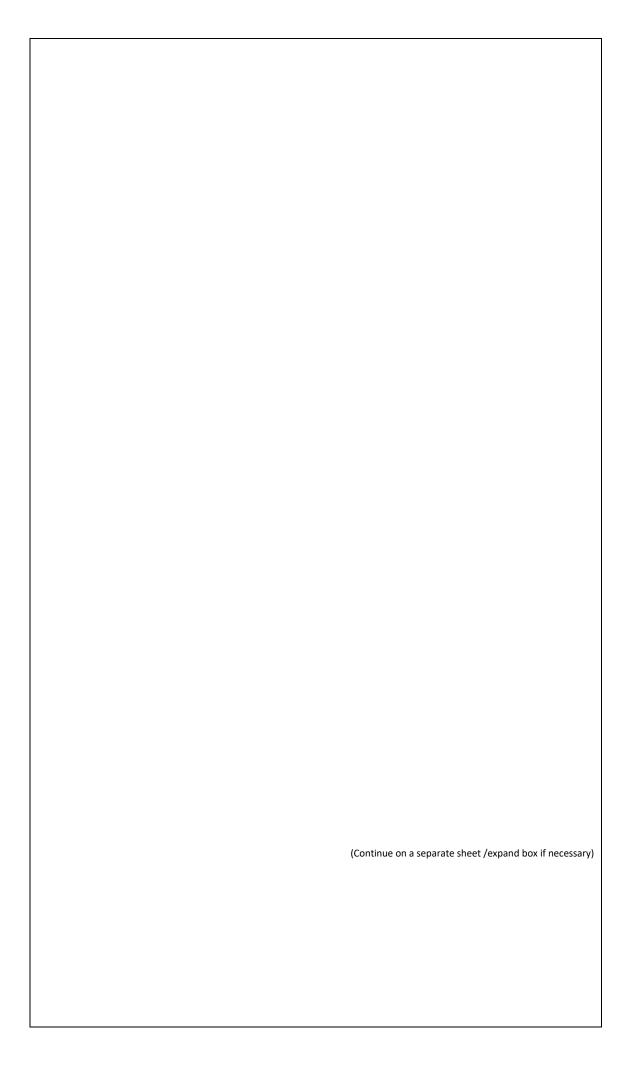
- Land to the South of Eric Clark Lane and to the north of ASP4.
- It also appears that an additional area around the inlet works has been added.



We consider that there is no technical evidence to support the change of boundary to the SINC. We object to the extended designation as it will have implications for any future development at the Beckton STW site within and adjacent to this SINC.

There is also considered to be no justification for designating the northern lagoon site and the area to the north of the Beckton STW extension and south of Eric Clarke Lane as SINC/proposed SINC (see extract from policies map below with red arrow pointing to the two SINC areas). These areas have been allowed to re-generate naturally in accordance with the Lee Tunnel and Beckton STW extension scheme Landscape & Ecology Management Plan, but this is a new landscape/habitat and will not have nature conservation value which justifies SINC designation. It is therefore considered that the SINC designations should be removed from these areas.





you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
Remove SINC designation at Beckton STW
(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?				
No, I do not wish to participate in hearing session(s) Yes, I wish to participate in hearing session(s)				
	that while this will provide an initial indession(s), you may be asked at a later p			
	sh to participate in the hearing session(s to be necessary:	s), please o	outline why you	
To discuss imp	ortance of removing unjustified SINC designati	on from strat	tegic infrastructure site	

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified about:

a.	the sul	bmission of the local plan for independent examination
Yes	s 🗵	No □
b.	the pu	blication of the Inspector's report
Yes	s 🗵	No □
C.	the ad	option of the Local Plan
Yes	s 🗵	No □
	•	u like to be added to our consultation database to be notified about future y consultations?
	Yes ⊠	No □

Please return to London Borough of Newham by 5pm 6th September 2024

Part B – Please use a separate sheet for each representation

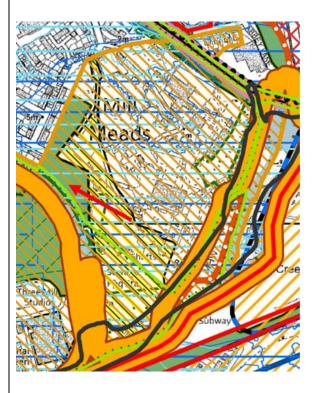
Name or Organisation:	Thames Water				
3. To which part of the Local Plan does this representation relate? (Please be as specific as possible)					
Policy	Policy GWS1: Green Space: Mill Meads Allotments –				
Implementation Text	Abbey Mills Sewage Space deletion	Pumping Stat	ion – Proposed	Green	
Paragraph					
Policies Map					
4. Do you consider the Local Plan is :					
4.(1) Legally compliant	Yes		No		
4.(2) Sound	Yes		No	X	
4 (3) Complies with the					
Duty to co-operate	Yes		No		

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Part of Thames Water's Abbey Mills Pumping Station (PS) site (Mill Meads Allotments) is designated as Green Space. Thames Water object to this designation as the land is retained operational land (see extract from policies map below with red arrow pointing to open space).

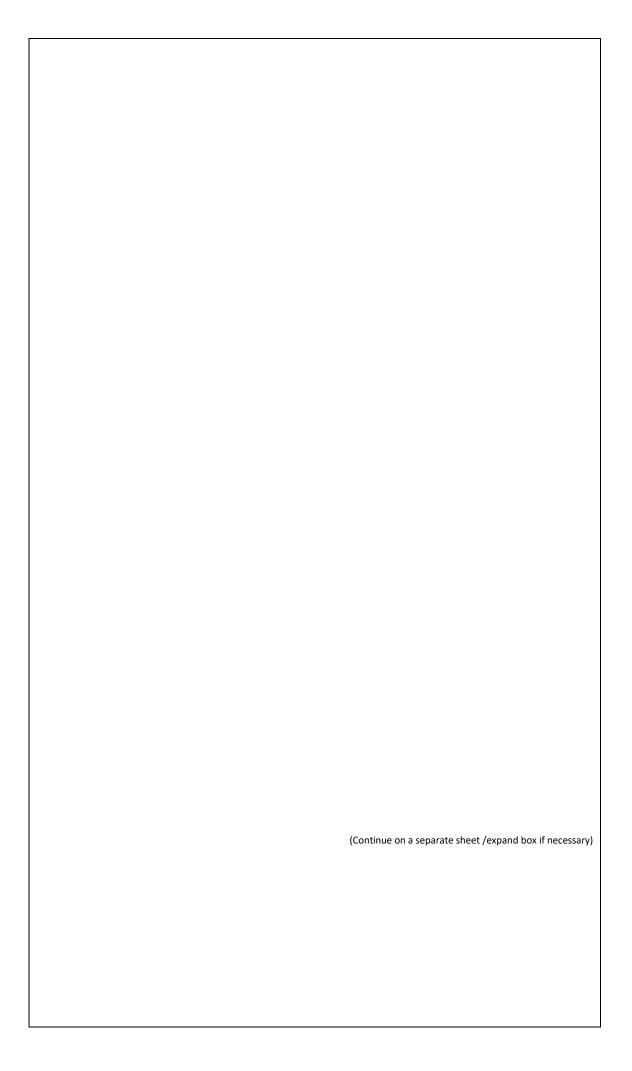


The Abbey Mills PS site is either currently in operational use or retained for future operational use (including the site referred to as Mill Meads Allotments) and is of strategic importance to London's existing and future infrastructure requirements. Thames Water temporarily lease the site to be used 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.

The Lee Tunnel has recently been constructed from Beckton Sewage Works to the open area to the south of the Abbey Mills PS buildings. The Lee Tunnel is now operational and captures around 16million tonnes of storm water sewage each year from the largest sewer overflow point in north London and transfers the flows to Beckton Sewage Works for treatment. The Thames Tideway Tunnel (TTT) also connects at Abbey Mills and will transfer its flows to Beckton Sewage Works for treatment. The TTT is a major new sewer that will help tackle the problem of overflows from the capital's Victorian sewers and will protect the River Thames from increasing pollution for at least the next 100 years. The TTT Development Consent Order was approved in September 2014 and the TTT is being constructed.

Both the Lee Tunnel and TTT DCO consents have secured various landscaping and public access via the Long Wall Path around the site. The Abbey Mills site also has land retained for future operational use. This may be required for future wastewater or water infrastructure to cater for growth, mitigate the impacts of climate change or catering for tighter environmental regulations.

Given the strategic importance of the site, the scale of infrastructure development at Abbey Mills PS and the potential for future infrastructure investment at the site it is important that the site is not is not constrained by unnecessary planning policy restrictions, such as Local Open Space designation and Policy BN.7, which could prevent future upgrades to essential infrastructure.



each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
Delete the Green Space designation from the Abbey Mills PS site. If for any reason this is not accepted, the Policy should be amended so as to recognize the need for future operational development at the Abbey Mills PS site.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?				
No, I do not wish to participate in hearing session(s)	х	Yes, I wish to participate in hearing session(s)		
Please note that while this will provide an initial in in hearing session(s), you may be asked at a later participate.				
8. If you wish to participate in the hearing session consider this to be necessary:	(s), please o	outline why you		
To discuss need to remove Green Space Designation				

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified about:
a. the submission of the local plan for independent examination
Yes ⊠ No □
b. the publication of the Inspector's report
Yes ⊠ No □
c. the adoption of the Local Plan
Yes ⊠ No □
10. Would you like to be added to our consultation database to be notified about future planning policy consultations?
Yes ⊠ No □

Please return to London Borough of Newham by 5pm 6th September 2024

Part B – Please use a separate sheet for each representation

Thames Water				
Local Plan does this repr	esentation r	elate? (Please I	be as	
Policy D4 : Tall Build	ing Zone			
1. Do you consider the Local Plan is :				
Yes		No		
Yes		No		
Yes		No		
	Policy D4 : Tall Build Local Plan is : Yes Yes	Policy D4 : Tall Building Zone Local Plan is : Yes Yes	Policy D4 : Tall Building Zone Local Plan is : Yes No Yes No	

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

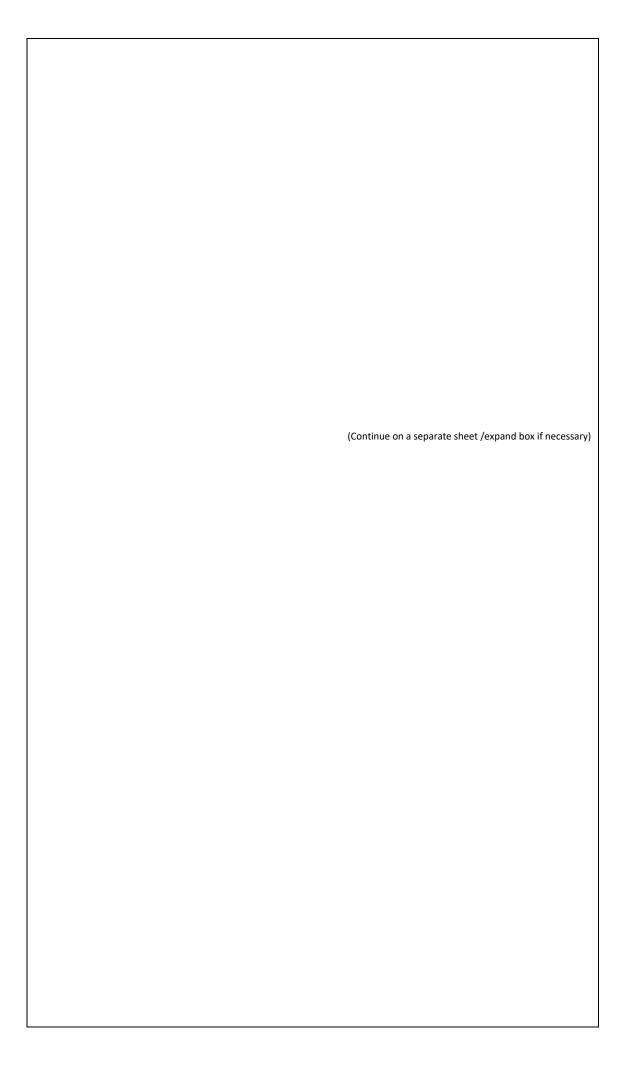
If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Beckton STW is located in an area where the maximum height allowance 32m (TBZ5: Gallions Reach). There are existing buildings within Beckton STW that have flue stacks that exceed this height. For example, Beckton STW ESDF heating building flue stack is 48m AOD and the Beckton STW ESDF ventilation exhaust stack is 35m AOD.



Policy D4 and the accompanying Local Plan proposals map designation should be amended to either have Beckton STW within its own 'tall building' designation or for TBZ5 to be amended to refer to Beckton STW to recognise that fuel stacks and other related structures at Beckton STW will exceed 30m.

Draft Policy D4 is not sound (justified or effective) as it does not reflect an appropriate or deliverable strategy for Beckton STW, which is located within TBZ5 (as depicted on the Draft Newham Local Plan Regulation 19 (2024) – Proposal Map). Zone TBZ5 and Policy D4, does not take account of evidence that there are buildings within Beckton STW, which for operational reasons, have structures attached to buildings i.e. flue stacks which exceed 32m. Policy D4, is therefore unnecessarily restrictive in terms of future development at Beckton STW which may to exceed 32m.



helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
The policy and designation must be amended to either include Register STM within its own
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 fuel stacks and other related structures will exceed 32m.
(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

based on the matters and issues he or she identifies for examination.					
	presentation is seeking a mo o participate in examination			do you consider it	
Х	No, I do not wish to participate in hearing session(s)			Yes, I wish to participate in hearing session(s)	
	that while this will provide ession(s), you may be asked				te
•	sh to participate in the hear s to be necessary:	ing session((s), please o	outline why you	

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified about:
a. the submission of the local plan for independent examination
Yes ⊠ No □
b. the publication of the Inspector's report
Yes ⊠ No □
c. the adoption of the Local Plan
Yes ⊠ No □
10. Would you like to be added to our consultation database to be notified about future planning policy consultations?
Yes ⊠ No □

Please return to London Borough of Newham by 5pm 6th September 2024

Part B – Please use a separate sheet for each representation

Name or Organisation:	Thames Water			
3. To which part of the specific as possible)	Local Plan does this rep	resentation re	elate? (Please I	oe as
Policy	Policy CE1: Environn	nental Design	& Delivery - V	Water
Implementation Text	Efficiency			
Paragraph				
Policies Map				
1. Do you consider the Local Plan is :				
4.(1) Legally compliant	Yes		No	
4.(2) Sound	Yes		No	X
4 (3) Complies with the Duty to co-operate	Yes		No	^

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

As previously set out in relation to the Reg18 consultation, Policy CE1 Part 5 in relation to water efficiency is supported in principle but needs to be strengthened to ensure the targets are met in line with current Building Regulations.

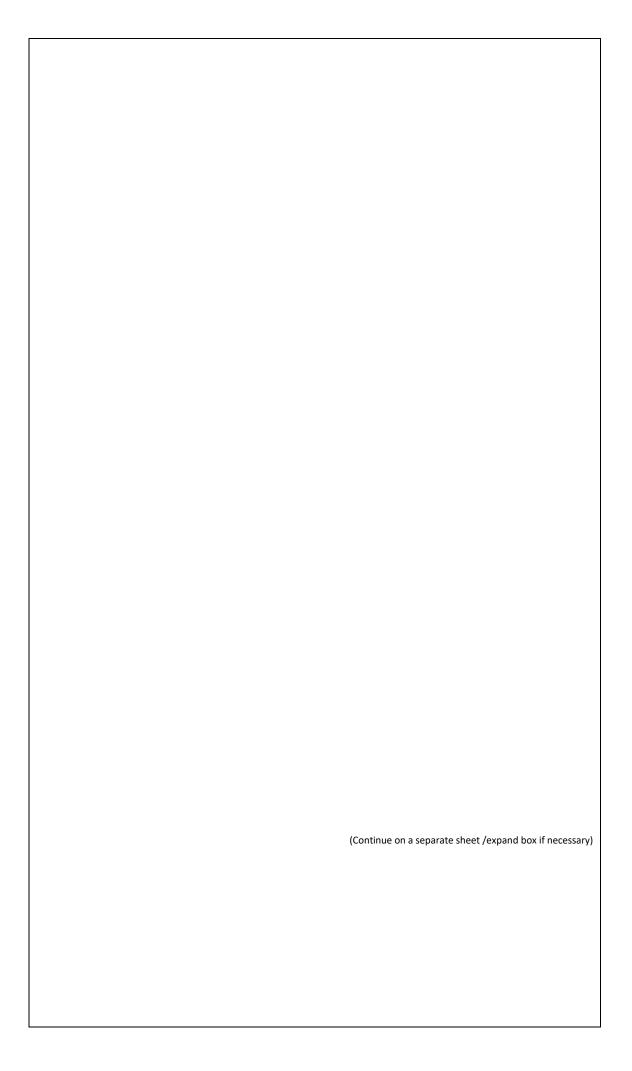
The Environment Agency has designated the Thames Water region to be an area of "serious water stress" which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change. On average our customers each use 30% more water than they did 30 years ago. Therefore water efficiency measures employed in new development are an important tool to help us sustain water supplies for the long term.

Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in Policy.

Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on our website via the following link: https://www.thameswater.co.uk/Be-water-smart

It is our understanding that the water efficiency standards of 110 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.

Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the 'Calculation Method' or the 'Fittings Approach' (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels.



legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
We therefore consider that text in line with the following should be included in the Local Plan: "Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the 'Fittings Approach' in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met."

6. Please set out the modification(s) you consider necessary to make the Local Plan

	(Continue on a se	eparate sheet /ex	pand box if nece

make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

		No, I do not wish to participate in	х	Yes, I wish to participate in
		hearing session(s)		hearing session(s)
i		e that while this will provide an initial inc ession(s), you may be asked at a later p		
		sh to participate in the hearing session(is to be necessary:	(s), please o	outline why you
	o discuss im	portance of water efficiency		
ŀ	near those nearing ses	the Inspector will determine the most of who have indicated that they wish to po sion(s). You may be asked to confirm yo as identified the matters and issues for	articipate in our wish to	participate when the
9.	Do you wi	sh to be notified about:		
	a. the s	ubmission of the local plan for independ	dent exami	nation
	Yes ⊠	No □		
	b. the p	ublication of the Inspector's report		

Yes ⊠	No □
c. the ad	option of the Local Plan
Yes ⊠	No □
-	u like to be added to our consultation database to be notified about future cy consultations?
Yes ⊠	No □

Please return to London Borough of Newham by 5pm 6th September 2024

Part B – Please use a separate sheet for each representation

Name or Organisation:	Thames Water				
3. To which part of the I specific as possible)	Local Plan does this rep	resentation re	late? (Please b	oe as	
Policy	Policy CE7: Managin	g Flood Risk &	է CE8: Sustair	nable	
mplementation Text					
Paragraph					
Policies Map					
I. Do you consider the Local Plan is :					
4.(1) Legally compliant	Yes		No		
4.(2) Sound	Yes		No	Х	
4 (3) Complies with the Duty to co-operate	Yes		No		

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

In relation to flood risk, the National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".

When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.

Flood risk policies should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.

With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer in accordance with the drainage hierarchy. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

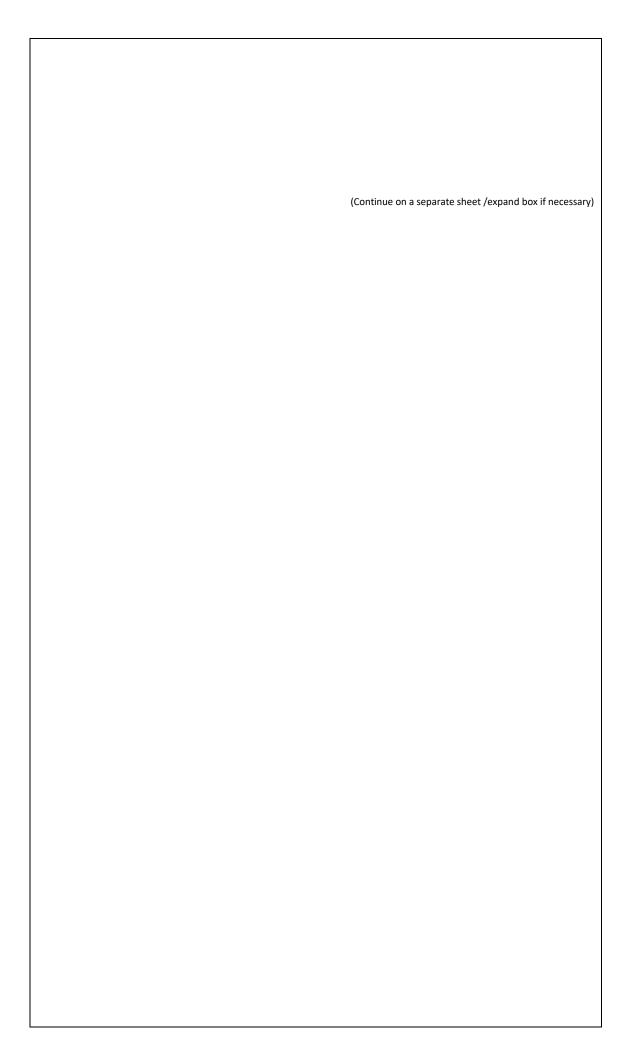
SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.

Basements – Sewage Flooding

Thames Water's main concerns with regard to subterranean development are:

- 1) The scale of urbanisation throughout London is impacting on the ability of rainwater to soak into the ground resulting in more rainfall in Thames Water's sewerage network when it rains heavily. New development needs to be controlled to prevent an increase in surface water discharges into the sewerage network.
- 2) By virtue of their low lying nature basements are vulnerable to many types of flooding and in particular sewer flooding. This can be from surcharging of larger trunk sewers but can also result from operational issues with smaller sewers

such as blockages. Basements are generally below the level of the sewerage network and therefore the gravity system normally used to discharge waste above ground does not work. During periods of prolonged high rainfall or short duration very intense storms, the main sewers are unable to cope with the storm flows.
The policy should therefore require all new basements to be protected from sewer flooding through the installation of a suitable (positively) pumped device. Clearly this criterion of the policy will only apply when there is a waste outlet from the basement i.e. a basement that includes toilets, bathrooms, utility rooms etc. Applicants should show the location of the device on the drawings submitted with the planning application.



6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
With regard to surface water drainage, Thames Water request that the following paragraph should be included in Policy wording or supporting text: "It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."
In relation to basement developments: Require the inclusion of positive pumped devices in any basement development that is connected to the drainage network in order to protect the development from risks of sewer flooding.

	(Co	ontinue on a separa	ate sheet /expand	opand box if necessal	
	,				

make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

x	No, I do not wish to participate in		Yes, I wish to participate in			
^	hearing session(s)		hearing session(s)			
Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.						
•	sh to participate in the hearing session(s to be necessary:	(s), please o	outline why you			
hear those w hearing sess	the Inspector will determine the most of who have indicated that they wish to posion(s). You may be asked to confirm your identified the matters and issues for a	articipate in our wish to	participate when the			
9. Do you wis	sh to be notified about:					
a. the su	ubmission of the local plan for independ	dent exami	nation			
Yes ⊠	No □					
b. the p	ublication of the Inspector's report					

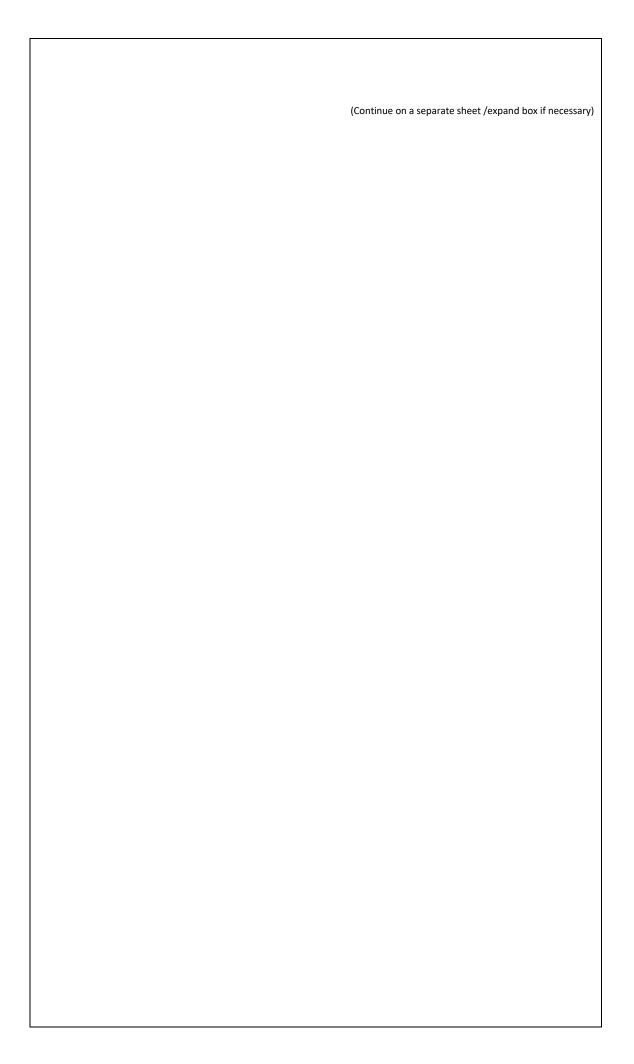
Yes ⊠	No □
c. the ad	option of the Local Plan
Yes ⊠	No □
-	u like to be added to our consultation database to be notified about future cy consultations?
Yes ⊠	No □

Name or Organisation:	Thames Water					
3. To which part of the Local Plan does this representation relate? (Please be as pecific as possible)						
Policy	Policy J1 – SIL					
Implementation Text						
Paragraph						
Policies Map						
4. Do you consider the Local Plan is :						
4.(1) Legally compliant	Yes		No			
4.(2) Sound	Yes	Х	No			
4 (3) Complies with the Duty to co-operate	Yes		No			

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

Thames Water support the continued allocation of Beckton Sewage Treatment Works (STW) within the Beckton Riverside Strategic Industrial Location (SIL 5) where the 'priority uses' are for large scale industrial with a focus on, amongst other things, utilities infrastructure.



legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?					
Х	No, I do not wish to participate in hearing session(s)			Yes, I wish to participate in hearing session(s)	
	that while this will provid ession(s), you may be ask				
	sh to participate in the he is to be necessary:	earing session((s), please o	utline why you	

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified about:

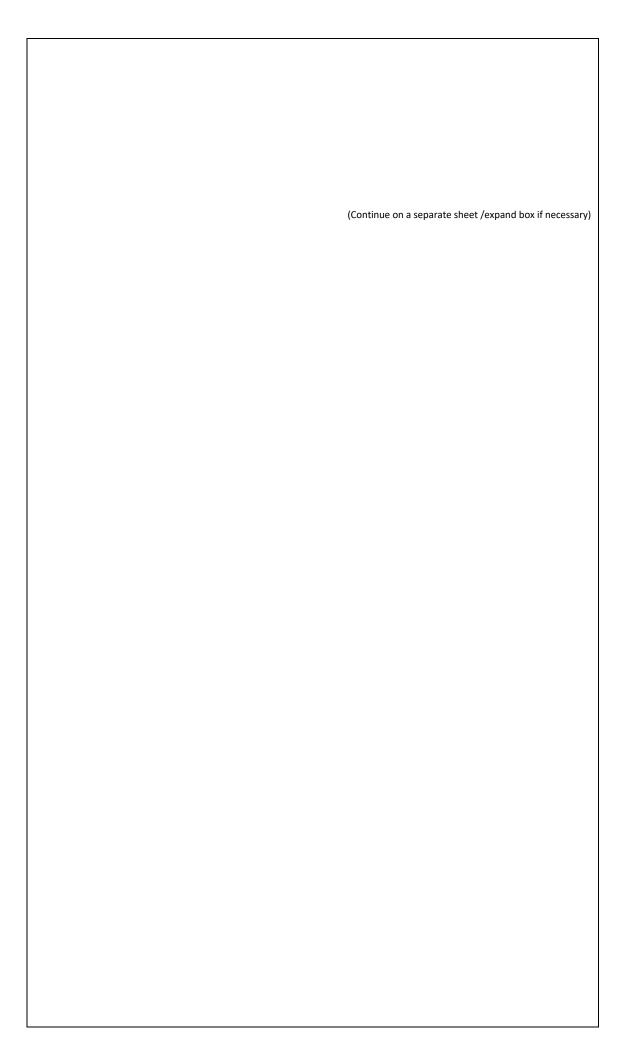
a.	the su	bmission of the local plan for independent examination
Ye	es 🗵	No □
b.	the pu	blication of the Inspector's report
Ye	es 🗵	No □
C.	the ad	option of the Local Plan
Ye	es 🗵	No □
	=	ou like to be added to our consultation database to be notified about future by consultations?
	Yes ⊠	No □

Name or Organisation:	Thames Water					
3. To which part of the Local Plan does this representation relate? (Please be as specific as possible)						
Policy	Policy D6: Neighbour	liness				
Implementation Text						
Paragraph						
Policies Map						
4. Do you consider the I	Local Plan is :					
4.(1) Legally compliant	Yes		No			
4.(2) Sound	Yes		No	Х		
4 (3) Complies with the Duty to co-operate	Yes		No			

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

It is considered that this policy should be made stronger to ensure there is adequate policy protection for Thames Water for the development of neighbouring land uses. This is particularly in relation to the proposed allocation at N17.SA1 Beckton Riverside, which includes residential development as well as a town centre, education, sports and recreation etc. next to Beckton STW.
The NPPF sets out at paragraph 193 that: 'Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed'



6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
Currently, Draft Policy D6 is not sound as it is not consistent with national policy. The following suggestions are made for Draft Policy D6: Neighbourliness: 'In line with the Agent of Change principle, development for new or re-provided uses that are sensitive to noise and other nuisance must include provide suitable mitigation before development has been completed, for managing the amenity impacts generated by existing lawful neighbours and established land uses' The supporting text to draft Policy D6, recognises that: 'When industrial/employment and residential uses are to be co-located in the same site, or when residential uses are proposed adjacent to a Strategic Industrial Location or Local Industrial Location, a non residential stacked light industrial/employment building is considered the most appropriate typology to provide a buffer for the heavier industrial uses and mitigate any impact on residential amenities.'
It is considered that this supporting text to be part of the policy to ensure that SILs – which includes Beckton STW – do not have unreasonable restrictions placed on them as a result of development permitted after they were established.

	(Continue	on a separate sheet /exp	oand box if necessa

make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)	х	Yes, I wish to participate in hearing session(s)			
Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.					
8. If you wish to participate in the hearing session consider this to be necessary:	(s), please o	outline why you			
To discuss impact of Beckton STW					
Please note the Inspector will determine the most of hear those who have indicated that they wish to post hearing session(s). You may be asked to confirm you inspector has identified the matters and issues for each of the matters.	articipate in our wish to	participate when the			
9. Do you wish to be notified about:					
a. the submission of the local plan for independ	dent exami	nation			
Yes ⊠ No □					
b. the publication of the Inspector's report					

Yes ⊠	No □
c. the ad	option of the Local Plan
Yes ⊠	No □
-	u like to be added to our consultation database to be notified about future cy consultations?
Yes ⊠	No □

Name or Organisation:	Thames Water			
3. To which part of the Local Plan does this representation relate? (Please be as specific as possible)				
Policy	Allocations/Neighbou	ırhoods - Grow	th Options Co	mments
Implementation Text				
Paragraph				
Policies Map	Allocations/Neighbou	urhoods - Grow	th Options Co	mments
4. Do you consider the Local Plan is :				
4.(1) Legally compliant	Yes		No	
4.(2) Sound	Yes		No	Х
4 (3) Complies with the Duty to co-operate	Yes		No	

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.

The attached table provides Thames Water's site-specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.

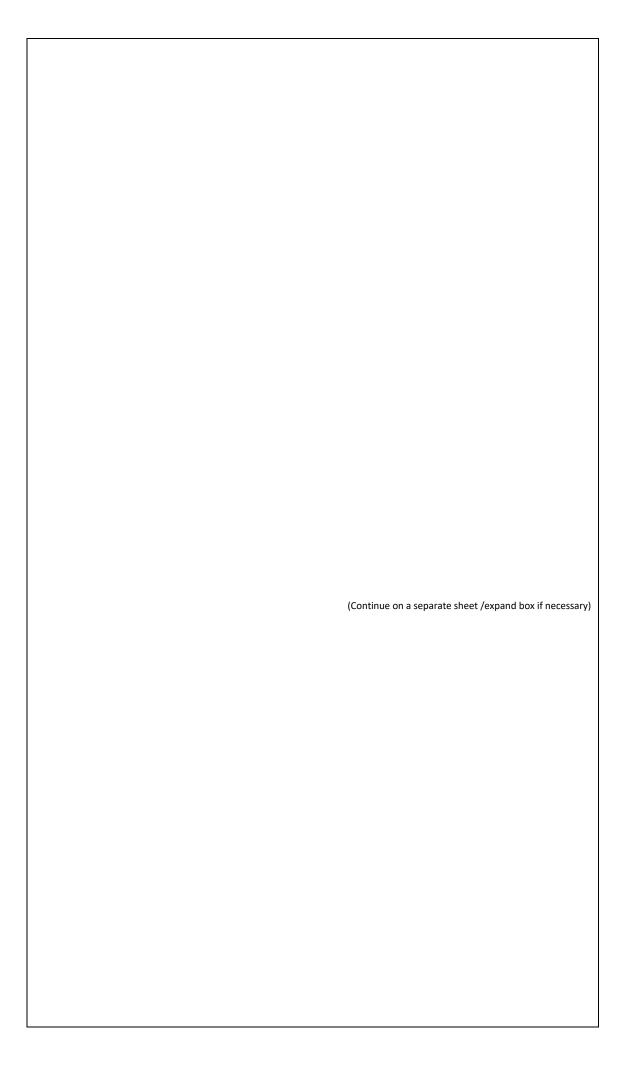
Early engagement between the developers and Thames Water would be beneficial to understand:

- What drainage requirements are required on and off site
- Clarity on what loading/flow from the development is anticipated
- Water supply requirements on and off site

The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months -3 years for local upgrades and 3-5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.

To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when.

Link here > https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity
We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.



legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
Make reference to Thames Water free pre-application advice service and that applicants should include Thames Water response with their planning applications. Make reference to specific infrastructure issues identified in attached table in site allocations.
site allocations.

6. Please set out the modification(s) you consider necessary to make the Local Plan

(Continue on a separate sheet /expand box if neces

modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to X participate in hosping sossion(c)		Yes, I wish to participate in		
Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.				
8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:				
Please note the Inspector will determine the most of hear those who have indicated that they wish to post hearing session(s). You may be asked to confirm you inspector has identified the matters and issues for a	articipate in our wish to	participate when the		
9. Do you wish to be notified about:				
a. the submission of the local plan for independ	dent exami	nation		
Yes ⊠ No □				
b. the publication of the Inspector's report				

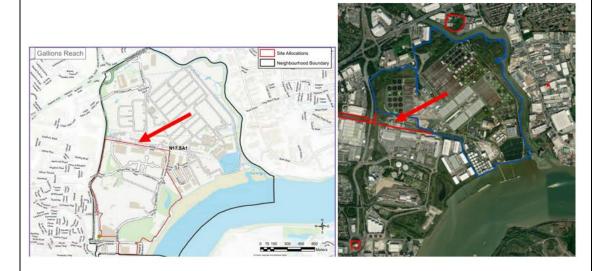
Yes ⊠	No □
c. the ad	option of the Local Plan
Yes ⊠	No □
-	u like to be added to our consultation database to be notified about future cy consultations?
Yes ⊠	No □

Name or Organisation:	Thames Water			
3. To which part of the I specific as possible)	Local Plan does this rep	resentation re	elate? (Please k	oe as
Policy	N17: Gallions Reach I	N17.SA1 - OE	ВЈЕСТ	
Implementation Text				
Paragraph				
Policies Map				
4. Do you consider the I	_ocal Plan is :			
4.(1) Legally compliant	Yes		No	
4.(2) Sound	Yes		No	X
4 (3) Complies with the Duty to co-operate	Yes		No	

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

The site allocation N17.SA1 adjoins Beckton Sewage Treatment Works (STW), the largest in the country, but this is not clear from the site N1.SA1 allocation plan on Page 232 which is therefore misleading – see comparison with aerial photo below (Beckton STW outlined blue on aerial photo and red arrow points to Beckton STW inlet works were sewage flows enter the STW and are screened to remove litter and grit):



There is also a Municipal Waste Transfer Station site to north of Eric Clarke Lane which is also a source of odour.

Policy N17 Part 14 states: "mitigating the odour impacts of the sewage treatment works through appropriate buffering and other design solutions". Policy N17.SA1 Beckton Riverside states: "Design measures should minimise exposure to odour from Beckton Sewage Treatment Works and poor air quality on Royal Docks Road."

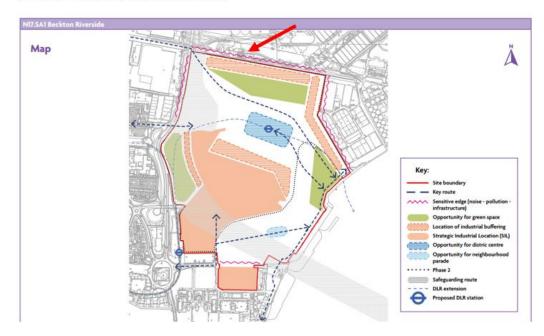
However, as we have been setting out in consultation responses/meetings for some time, given the proximity to the STW it is highly unlikely that it will be possible to provide mitigation to enable the scale of development envisaged. We therefore object to the level of development envisaged and as set out on the concept plan below until it can be demonstrated that it will not be impacted by odour.

In relation to minmising odour as referred to in N17.SA1 "design 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
- 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."

N17.SA1 Beckton Riverside Concept Plan, page 592 of draft Local Plan (red arrow indicates Beckton Sewage Works Inlet Works):



The N17.SA1 allocation proposes significant new housing, employment development and a new town centre/High Street to the southwest of Beckton STW. Given the proximity of this site it is essential that an 'appropriate' odour impact study is undertaken and agreed as soon as possible in accordance with the requirements of P6 6.2 - Water Supply and Wastewater Infrastructure and the London Plan to determine what odour mitigation is feasible. Despite making consultation responses that an appropriate Odour Impact Assessment should be undertaken for some years, Thames Water only received a draft OIA from a developer in June 2024. However, this OIA was not completed using our approach and methodologies and therefore is not accepted. Also to date no analysis of this OIA has been provided by Newham Council. Therefore points 1 &2 of the current Local Plan Inspectors Report paragraph 134 have not been complied with.

Also no clarification has been provided to date as to what mitigation is available and who is responsible for this in accordance with point 3 of the current Local Plan Inspectors Report paragraph 134.

As previously mentioned in consultation responses 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.

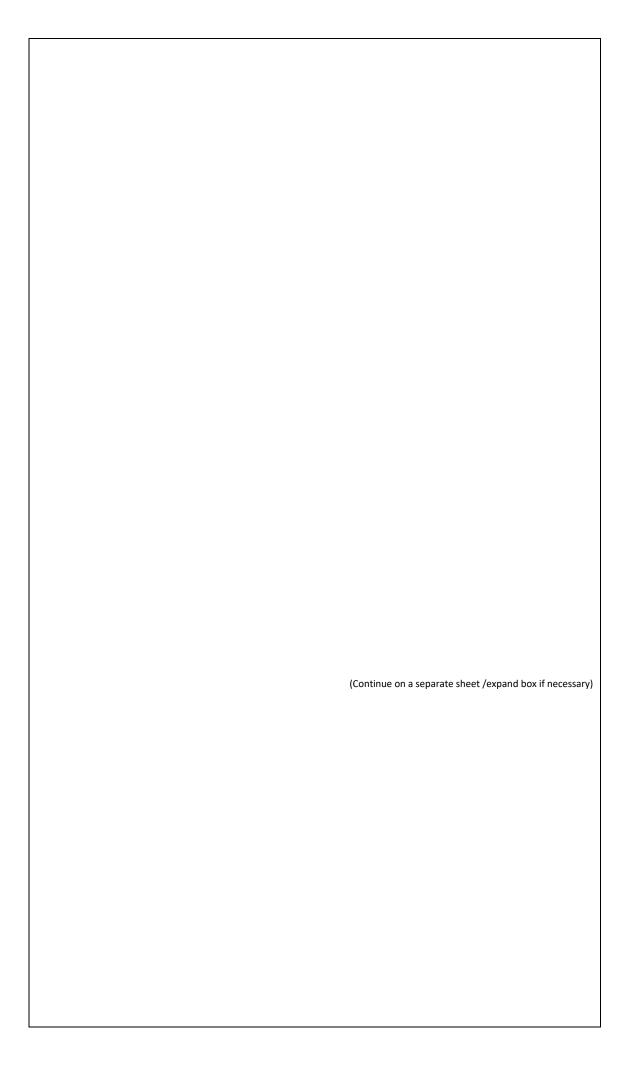
In the likely scenario that sufficient mitigation cannot be implemented at the STW to enable the proposed scale of development then a much larger buffer will be required in line with odour contours and which may limit any odour sensitive development. Guidance on odour sensitive developments and less 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 Surrounding land where: users can reasonably expect enjoyment of a high level of amenity; and receptor · 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 | Surrounding land where: users would expect to enjoy a reasonable level of amenity, but wouldn't reasonably expect to receptor 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 Surrounding land where: · the enjoyment of amenity would not reasonably be expected; or receptor • 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. The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers. As currently proposed those new occupiers would be located in closer proximity to a sewage treatment works and Thames Water's current position in the absence of any further evidence is that the proposed allocation and development would be unacceptable.



co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
Amend policy in light of odour comments above
(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?					
No, I do not wish to participate in hearing session(s) Yes, I wish to participate in hearing session(s)					
8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:					
development close to Beckton ST	w				
	cipate in examination hearing do not wish to cipate in ing session(s) while this will provide an initity, you may be asked at a law participate in the hearing sesse necessary:	do not wish to cipate in the hearing session(s)? do not wish to X X while this will provide an initial indication of (s), you may be asked at a later point to corporation of the cor			

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified about:
a. the submission of the local plan for independent examination
Yes ⊠ No □
b. the publication of the Inspector's report
Yes ⊠ No □
c. the adoption of the Local Plan
Yes ⊠ No □
10. Would you like to be added to our consultation database to be notified about future planning policy consultations?
Yes ⊠ No □

_					
Name or Organisation:	Thames Water				
3. To which part of the Local Plan does this representation relate? specific as possible)				e as	
Policy	Policy N17.SA1 Bed			V —	
Implementation Text	Thames Gateway Bridge Safeguarding Direction				
Paragraph					
Policies Map	Policy N17.SA1 Bed Thames Gateway Br			V —	
4. Do you consider the Local Plan is :					
4.(1) Legally compliant	Yes		No		
4.(2) Sound	Yes		No	Х	
4 (3) Complies with the Duty to co-operate	Yes		No		

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

The Thames Gateway Bridge Safeguarding Direction (as shown on the adopted Local Plan Policies Map) was made on 4th May 2001 and came into force on 8th May 2001. It has therefore blighted operational land on the western side of Beckton STW for over 20 years and it is understood that there are still no plans for such a bridge.

It is understood that TfL are focusing on the Silvertown Tunnel as the top priority road scheme, which is now under construction at the other end of the Royal Docks, and it is planned to open in 2025.

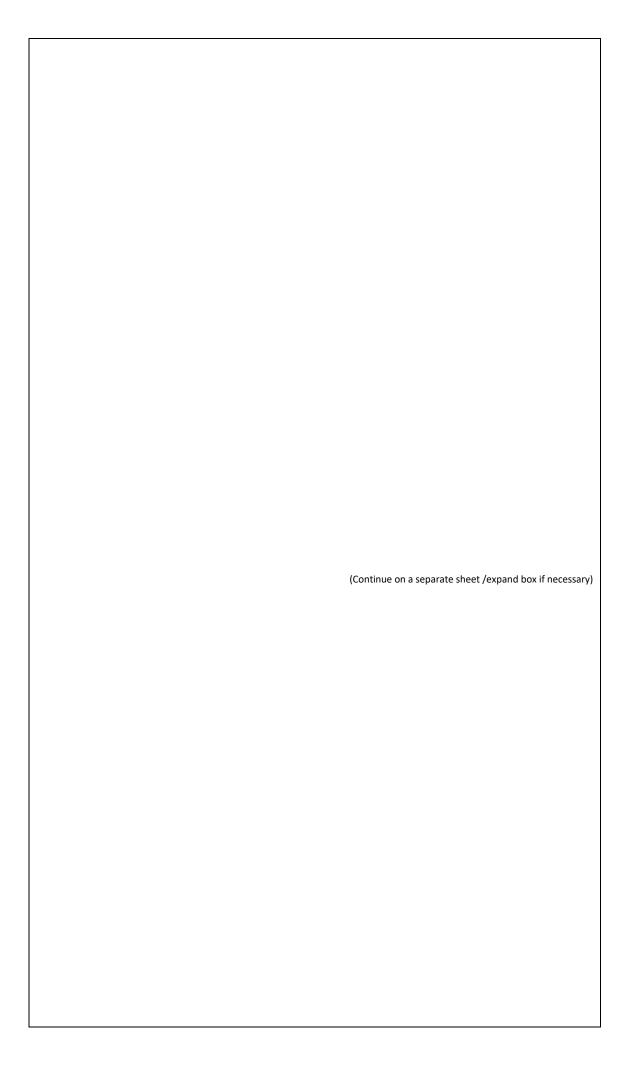
We consider that to continue the ongoing retention of the safeguarding in the Local Plan which affects the western side of Beckton STW, evidence to justify the ongoing safeguarding must be provided. To date, we have not seen such evidence in the Local Plan Review consultation document and we would be grateful for any update on progress/new evidence.

Unless there are any firm plans/evidence for a new strategic river crossing it is considered that the Safeguarding Direction and designation on the Local Plan policies map should be removed.

Policy N17.SA1 sates: "Development proposals within the part of the site safeguarded for the Thames Gateway Bridge must be referred to Transport for London and the Mayor of London for confirmation it will not preclude the delivery of a road crossing, until the safeguarding

is removed as directed by the Secretary of State, following recommendation by Transport for London and the Mayor of London"

N17 states "10. supporting the removal of the Thames Gateway Bridge Safeguarding (by the Secretary of State, following recommendation by Transport for London and the Mayor of London)"



each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
Remove Thames Gateway Bridge Safeguarding Direction from Policies Map and Beckton STW.
(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?				
	No, I do not wish to participate in hearing session(s)	х	Yes, I wish to participate in hearing session(s)	
Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.				
8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:				
To discuss nee	ed to remove blight caused by safeguarding dire	ection for sch	eme with no plans	

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified about:
a. the submission of the local plan for independent examination
Yes ⊠ No □
b. the publication of the Inspector's report
Yes ⊠ No □
c. the adoption of the Local Plan
Yes ⊠ No □
10. Would you like to be added to our consultation database to be notified about future planning policy consultations?
Yes ⊠ No □

Part B – Please use a separate sheet for each representation

Name or Organisation:	Thames Water					
3. To which part of the Local Plan does this representation relate? (Please be as specific as possible)						
Policy	N11.SA3 Alpine Way					
Implementation Text						
Paragraph						
Policies Map						
4. Do you consider the l	Local Plan is :					
4.(1) Legally compliant	Yes		No			
4.(2) Sound	Yes		No	X		
4 (3) Complies with the Duty to co-operate	Yes		No			

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

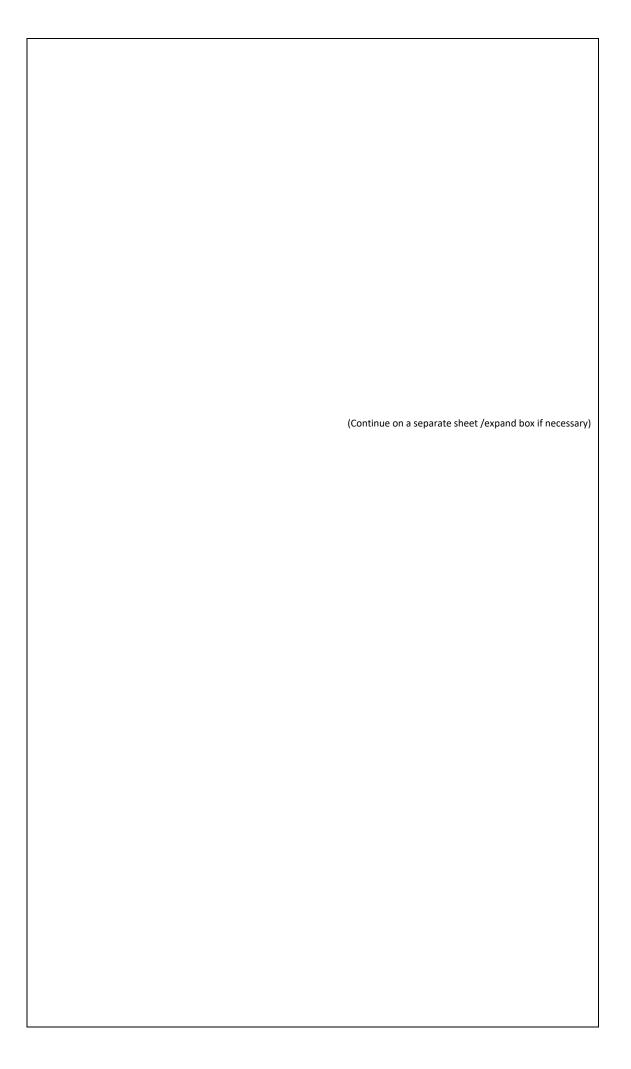
If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The site allocation N11.SA3 is located within 800m of Beckton Sewage Treatment Works (STW) and therefore may be impacted by odour. The site is therefore subject to similar requirements as per our response to Allocation N17: Gallions Reach N17.SA1.

The site should be subject to similar requirements from the current Local Plan Inspector's Report of November 2018 in relation to Site N17.SAI 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."



each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
Amend policy in light of odour comments above.
Amena policy in light of odour confinents above.
(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?					
No, I do not wish to participate in hearing session(s)	х	Yes, I wish to participate in hearing session(s)			
Please note that while this will provide an initial in in hearing session(s), you may be asked at a later participate.					
8. If you wish to participate in the hearing session consider this to be necessary:	(s), please o	outline why you			
To discuss location near Beckton STW					

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified about:

a.	the su	bmission of the local plan for independent examination
Ye	es 🗵	No □
b.	the pu	blication of the Inspector's report
Ye	es 🗵	No □
C.	the ad	option of the Local Plan
Ye	es 🗵	No □
	=	ou like to be added to our consultation database to be notified about future by consultations?
	Yes ⊠	No □

Please return to London Borough of Newham by 5pm 6th September 2024

Site ID	Site Name	Water Response	Waste Response	Additional Comments
56626	Alpine Way	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	

56625	Land South Of	The scale of development/s in this catchment is likely to require	The scale of development/s is likely to require	Also see objection to Policy
	Gallions	upgrades of the water supply network infrastructure. It is	upgrades to the wastewater network. It is	N17 Gallions Reach in relation
	Reach,	recommended that the Developer and the Local Planning	recommended that the Developer and the Local	to odour etc
	Armada Way,	Authority liaise with Thames Water at the earliest opportunity to	Planning Authority liaise with Thames Water at the	
	Beckton,	agree a housing phasing plan. Failure to liaise with Thames	earliest opportunity to agree a housing and	
	London E6	Water will increase the risk of planning conditions being sought	infrastructure phasing plan. The plan should	
	7FB	at the application stage to control the phasing of development in	determine the magnitude of spare capacity currently	
		order to ensure that any necessary infrastructure upgrades are	available within the network and what phasing may	
		delivered ahead of the occupation of development. The housing	be required to ensure development does not	
		phasing plan should determine what phasing may be required to	outpace delivery of essential network upgrades to	
		ensure development does not outpace delivery of essential	accommodate future development/s. Failure to	
		network upgrades to accommodate future development/s in this	liaise with Thames Water will increase the risk of	
		catchment. The developer can request information on network	planning conditions being sought at the application	
		infrastructure by visiting the Thames Water website	stage to control the phasing of development in order	
		https://developers.thameswater.co.uk/Developing-a-large-	to ensure that any necessary infrastructure	
		site/Planning-your-development.	upgrades are delivered ahead of the occupation of	
			development. The developer can request	
			information on network infrastructure by visiting the	
			Thames Water website	
			https://developers.thameswater.co.uk/Developing-a-	
			large-site/Planning-your-development.	

73140	N1.SA1 S04 North Woolwich Gateway	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	
66072	N1.SA2 Rymill Street	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	

74193	N10.SA1 Balaam Leisure Centre	On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	
74225	N10.SA2 Newham Sixth Form College	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	

74195	N10.SA3 Newham Leisure Centre	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	
74196	N10.SA4 Balaam Street Health Complex	On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	

74197	N11.SA1 East	The scale of development/s in this catchment is likely to require	The scale of development/s is likely to require	This is based on the residential
	Beckton Town	upgrades of the water supply network infrastructure. It is	upgrades to the wastewater network. It is	element. Require more detail on
	Centre	recommended that the Developer and the Local Planning	recommended that the Developer and the Local	any other uses to fully assess
		Authority liaise with Thames Water at the earliest opportunity to	Planning Authority liaise with Thames Water at the	impact.
		agree a housing phasing plan. Failure to liaise with Thames	earliest opportunity to agree a housing and	
		Water will increase the risk of planning conditions being sought	infrastructure phasing plan. The plan should	
		at the application stage to control the phasing of development in	determine the magnitude of spare capacity currently	
		order to ensure that any necessary infrastructure upgrades are	available within the network and what phasing may	
		delivered ahead of the occupation of development. The housing	be required to ensure development does not	
		phasing plan should determine what phasing may be required to	outpace delivery of essential network upgrades to	
		ensure development does not outpace delivery of essential	accommodate future development/s. Failure to	
		network upgrades to accommodate future development/s in this	liaise with Thames Water will increase the risk of	
		catchment. The developer can request information on network	planning conditions being sought at the application	
		infrastructure by visiting the Thames Water website	stage to control the phasing of development in order	
		https://developers.thameswater.co.uk/Developing-a-large-	to ensure that any necessary infrastructure	
		site/Planning-your-development.	upgrades are delivered ahead of the occupation of	
			development. The developer can request	
			information on network infrastructure by visiting the	
			Thames Water website	
			https://developers.thameswater.co.uk/Developing-a-	
			large-site/Planning-your-development.	

73279	N11.SA2 Cyprus: Land At Ferndale Street, Beckton, London, E6(PENDING)	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	
56630	N13.SA1 East Ham Western Gateway	On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	

74199	N13.SA2 East Ham Primark	On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way,	
			Rickmansworth, Hertfordshire, WD3 9SQ	
71263	N13.SA3 Former East Ham Gasworks	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	

74226	N14.SA2 Shrewsbury Road Health Complex	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	
74227	N15.SA1 Lord Lister Health Centre	On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	

68190	N15.SA2 Woodgrange Road West	On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	
56606	N2.SA2 Lyle Park West	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	

61856	N2.SA4 Thameside West, North Woolwich Road, London, E16 1YZ	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	This is based on the residential element. Require more detail on any other uses to fully assess impact.
77534	N2.SA5 Excel Western Entrance	No water supply requirements identified at this stage	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	

56624	N3.SA1 Royal Albert North	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	This is based on the residential element. Require more detail on any other uses to fully assess impact.
56607	N3.SA3 Connaught Riverside	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	This is based on the residential element. Require more detail on any other uses to fully assess impact.

56613	N4.SA1 Canning Town East	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	
56614	N4.SA2 Silvertown Way East	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	This is based on the residential element. Require more detail on any other uses to fully assess impact.

53999	N4.SA3 Canning Town Holiday Inn	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	
74217	N4.SA4 Limmo	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	

56619	N4.SA5 Canning Town Riverside	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	
56617	N5.SA1 Custom House - Land Surrounding Freemasons Road, Canning Town, LONDON, E16 3AR	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	This is based on the residential element. Require more detail on any other uses to fully assess impact.

56620	N5.SA2 Custom House – Coolfin North PHASE 2	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	
68844	N5.SA4 Royal Road - Land At Leyes Road And, Royal Road, West Beckton, London, E16 3HE	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	This is based on the residential element. Require more detail on any other uses to fully assess impact.

74223	N5.SA8 Custom House Phase 3	On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way,	
56599	N7.SA1 Abbey Mills	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	Rickmansworth, Hertfordshire, WD3 9SQ On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	

56610	N7.SA2 Twelvetrees Park and Former Bromley By Bow Gasworks	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	This is based on the residential element. Require more detail on any other uses to fully assess impact.
77536	N7.SA3 Sugar House Island	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	This is based on the residential element. Require more detail on any other uses to fully assess impact.

77538	N8.SA1	The scale of development/s in this catchment is likely to require	The scale of development/s is likely to require	This is based on the residential
	Stratford	upgrades of the water supply network infrastructure. It is	upgrades to the wastewater network. It is	element. Require more detail on
	Central	recommended that the Developer and the Local Planning	recommended that the Developer and the Local	any other uses to fully assess
		Authority liaise with Thames Water at the earliest opportunity to	Planning Authority liaise with Thames Water at the	impact.
		agree a housing phasing plan. Failure to liaise with Thames	earliest opportunity to agree a housing and	
		Water will increase the risk of planning conditions being sought	infrastructure phasing plan. The plan should	
		at the application stage to control the phasing of development in	determine the magnitude of spare capacity currently	
		order to ensure that any necessary infrastructure upgrades are	available within the network and what phasing may	
		delivered ahead of the occupation of development. The housing	be required to ensure development does not	
		phasing plan should determine what phasing may be required to	outpace delivery of essential network upgrades to	
		ensure development does not outpace delivery of essential	accommodate future development/s. Failure to	
		network upgrades to accommodate future development/s in this	liaise with Thames Water will increase the risk of	
		catchment. The developer can request information on network	planning conditions being sought at the application	
		infrastructure by visiting the Thames Water website	stage to control the phasing of development in order	
		https://developers.thameswater.co.uk/Developing-a-large-	to ensure that any necessary infrastructure	
		site/Planning-your-development.	upgrades are delivered ahead of the occupation of	
			development. The developer can request	
			information on network infrastructure by visiting the	
			Thames Water website	
			https://developers.thameswater.co.uk/Developing-a-	
			large-site/Planning-your-development.	

77543	N8.SA10 Chobham Farm North	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	This is based on the residential element. Require more detail on any other uses to fully assess impact.
61070	N8.SA2 LAND ADJACENT TO MERIDEIAN STEPS, ANGEL LANE, STRATFORD CITY, LONDON	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website	This is based on the residential element. Require more detail on any other uses to fully assess impact.

			https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	
71961	N8.SA3 Greater Carpenters District	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	This is based on the residential element. Require more detail on any other uses to fully assess impact.

74191	N8.SA4 Stratford High Street Bingo Hall	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	This is based on the residential element. Require more detail on any other uses to fully assess impact.
77539	N8.SA6 Stratford Waterfront South	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	This is based on the residential element. Require more detail on any other uses to fully assess impact.

38876	N8.SA7 Rick Roberts Way	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	This is based on the residential element. Require more detail on any other uses to fully assess impact.
77540	N8.SA8 Bridgewater Road	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	

77541	N8.SA9 Pudding Mill	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	This is based on the residential element. Require more detail on any other uses to fully assess impact.
51886	N9.SA1 Plaistow North	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	This is based on the residential element. Require more detail on any other uses to fully assess impact.

63311	Silvertown Quays Bounded By Royal Victoria Dock Connaught Bridge Mill Rd, LONDON (APPROVED)	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	
38872	WESTFIELD STRATFORD CITY, MONTIFCHET ROAD, LONDON (PENDING) *SPZ ZONE 2*	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	This is based on the residential element. Require more detail on any other uses to fully assess impact.