

Please return to Havering Town Hall, RM1 3BD by 30 June 2025.

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Part A – Contact Details

	Personal details* <i>*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in the second column.</i>	Agent details (if applicable)
Title	Mr	
First Name	David	
Last Name	Wilson	
Job Title (where relevant)	Town Planner	
Organisation (where relevant)	Thames Water Utilities Limited	
Address Please include post code		
Telephone Number		
Email address		
In which local authority do you live?	<input type="checkbox"/> Barking and Dagenham <input type="checkbox"/> Havering <input type="checkbox"/> Newham <input type="checkbox"/> Redbridge <input type="checkbox"/> Other Local authority <input checked="" type="checkbox"/> I am responding on behalf of an organisation	

Part B - Your representation (please use a separate sheet for each representation you wish to make)

Name or Organisation: Thames Water Utilities Limited

1. Which part of the East London Joint Waste Plan does this representation relate to? (Please be as specific as possible)

Policy	JWP4: Design of Waste Management and Wastewater Treatment facilities	Implementation Text / Paragraph / Table / Figure / Policies Map	
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2. Do you consider the East London Joint Waste Plan: (please tick as appropriate)

a. Legally compliant	Yes		No	
b. Sound	Yes		No	x
c. Complies with Duty to Cooperate	Yes		No	

3. Please give details of why you consider the Waste 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 Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy JWP4 has been updated to include wastewater treatment facilities (previously it only referred to the Design of Waste Management Facilities). It is also noted that since the earlier draft, this policy now has the additional requirements 'to protect historic environment' and the need to ensure development is 'secure in accordance with Secure by Design principles'.

Part A of Policy JWP4 lists numerous development management criterion that development proposals will need to achieve in order to be permitted. It is considered that the policy duplicates local policy that is already in place, and more thoroughly covered, in the relevant borough Development Plan, as well as in the overarching London Plan (2021), the NPPF and various environmental/building regulations.

For example:

A1 – covers the requirement for all major wastewater proposals to achieve net-zero carbon standards

which is set out in the London Plan (2021) under Policy S1 2 and Policy 36: Low carbon design and renewable energy in the Havering Local Plan (2021).

A3 – Seeks to reduce impacts on the local environment and amenity with appropriate storage and management of waste. This replicates Policy SI 8 Waste capacity and net waste self-sufficiency in the

London Plan (2021), and Policy INF3 Waste and Recycling in the Newham Local Plan (2018).

A7 – requires proposals to protect the historic environment, but protection can already be found within

the London Plan (2021), HC1 Heritage conservation and growth Barking and Dagenham's plan (2024)

in Policy DMD 4: Heritage assets and archaeological remains.

Part B refers to development proposals demonstrating access to employment opportunities 'in accordance with relevant Local Plan policy' and is also required in the London Plan, Policy E11 Skills

and opportunities for all and in Havering Local Plan (2021) under Policy 22 - Skills and Training.

Part C unnecessarily duplicates the protections for designated habitats and species of European importance afforded under the Conservation of Habitats and Species Regulations 2017 (as amended). It is also important to note that as many environmental protections are likely to be changing soon, it could lead to confusion for developers and decision-makers at the application stage if there are different regulations in place to that referred to within the design policy.

4. Please set out the modification(s) you consider necessary to make the East London Joint Waste 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 Waste 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 the context of wastewater facilities, we request that Policy JWP4 is deleted as it unnecessarily duplicates national and local policy and therefore does not serve a clear purpose. Further, as local plans are updated, the policy within JWP4 may become out of date and conflict with future local plan policy and is likely to create uncertainty when being applied alongside existing borough and London Plan policies that cover the same topics.

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.**

5. If your representation is seeking a modification, do you consider it necessary to participate in examination hearing session(s)? (please tick as appropriate)

x

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 indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

6. 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 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.

7. Do you wish to be notified about:

a. the submission of the Joint Waste Plan for independent examination

Yes ☒ No ☐

b. the publication of the Inspector's report

Yes ☒ No ☐

c. the adoption of the Joint Waste Plan

Yes ☒ No ☐

If you have further questions about the consultation, please get in touch with the team at eljointwasteplan@haverling.gov.uk