STATEMENT OF COMMON GROUND

BETWEEN

THE NORTH LONDON BOROUGHS

AND

THAMES WATER

This Statement of Common Ground has been prepared to identify areas of agreement between the Boroughs working on the North London Waste Plan ("the North London Boroughs") and Thames Water. The North London Boroughs are Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest. The Statement of Common Ground is on matters relating to Thames Water's representations on the Proposed Submission North London Waste Plan (2019) to assist the Inspector during the examination of the North London Waste Plan.

Thames Water representations

Thames Water's representations relate to textual updating and clarification but are not related to the soundness of the North London Waste Plan (NLWP).

Thames Water's representations are set out in full in Appendix A, alongside the section of the NLWP they refer to.

Areas of Agreement

The proposed modifications to the Proposed Submission NLWP set out in Appendix B are sufficient to meet Thames Water's points on accuracy and clarity.

Signed on behalf of the North London Boroughs	**Signed on behalf of Thames Water**
Signed:	Signed:
Archie Onslow Programme Manager, North London Waste Plan	Eliot Williams Head of Property, Thames Water
Date:	Date: 1/10/19

Appendix A: Representations from Thames Water

Code	Section	Policy / Para	Representation	Met by modification in Appendix B
1-1/5	5	5.26	We support paragraphs 5.26 in principle, but it requires minor updating/clarification as set out below: "5.26 Waste Water Treatment Works in North London are operated by Thames Water. The main Thames Water Waste Water/sewage treatment facility in North London is Deephams Sewage Treatment Works (STW), which is the ninth largest in England. The site is to be retained and improved for waste water use and planning permission has been granted for an upgrade to the **effluent** ~~sewage sludge~~ treatment stream. Thames Water anticipates that the recently ~~approved~~ **constructed** upgrade to Deephams STW will provide sufficient effluent treatment capacity to meet their needs **into the next decade** ~~during the plan period~~. **However, this will be reviewed in future AMP periods to ensure ongoing capacity in relation to population growth.** Further details can be found in section 8."	1
1-2/5	7	7.31	We support paragraphs 7.31 in principle, but it requires minor updating/clarification as set out below: "7.31 The main Thames Water sewage treatment facility in North London is Deephams Sewage Treatment Works (STW), operated by Thames Water. Work to upgrade this facility was **largely** completed in 2017. Thames Water anticipates this will provide sufficient effluent treatment capacity to meet its needs **into the next decade** during the plan period. **However, this will be reviewed in future AMP periods to ensure ongoing capacity in relation to changing population growth predictions.** ~~Thames Water is also proposing an upgrade to the sewage sludge treatment stream at the site which will be sufficient to meet its needs during the plan period~~. It is therefore not necessary to identify additional land for this waste stream in the NLWP, however any new facility for waste water will be assessed against Policy ~~8~~ **7.**"	2
1-3/5	8	8.8 - 8.9	We support paragraphs 8.8-8.9 in principle, but they require updating/clarification as set out below:	3

Code	Section	Policy / Para	Representation	Met by modification in Appendix B
			"8.8 Deephams Sewage Treatment Works is a waste water treatment facility in Edmonton. The works serves a large area of north east London, both inside and outside the M25 corridor. The Environment Agency has issued a significantly tighter environmental permit in respect of sewage treatment standards that came into force in March 2017 and requires Thames Water to make improvements to the quality of the discharged effluent. The need for an effluent upgrade to Deephams Sewage Treatment Works (STW) is highlighted in the National Planning Statement on Waste Water, and planning permission for this work was granted by Enfield Council on 20th February 2015. **The upgrade was largely constructed by March 2017 and being completed during 2018/2019**.~~Work has started and is expected to continue for a minimum of 7 years.~~ 8.9 ~~Thames Water is also proposing an upgrade to the sewage sludge treatment stream at Deephams STW during its 2015 to 2020 business plan period by providing enhanced sludge treatment plant within the boundaries of the existing site~~. Enfield Council will continue work with Thames Water and the Environment Agency to ensure that adequate and appropriate waste water treatment infrastructure is provided. Any new waste water facility will be assessed under Policy 7."	
1-4/5	9	9.62 - 9.63	We support paragraphs 9.62-9.63 in principle, but they require updating/clarification as set out below: "9.62 Waste Water Treatment Works in North London are operated by Thames Water, with the main facility being Deephams Sewage Treatment Works (STW), which is the ninth largest in England. ~~Deephams STW serves a Population Equivalent (PE) of 891,000 (as at 2011).~~ Works to Deephams STW **to** ~~are planned to commence in 2018 Providing~~ **provide** sufficient capacity to meet Thames Water's projections of future requirements into the next decade **were largely constructed by March 2017 and being completed during 2018/2019. The upgrade increased capacity from a Population**	4

Code	Section	Policy / Para	Representation	Met by modification in Appendix B
			Equivalent (PE) of 891,000 (as at 2011) to 989,000 PE. At the time the Upgrade was designed (in line with population predictions at the time) it was envisaged the Upgrade will accommodate population growth up until at least 2031. However, treatment capacity will be reviewed in future AMP periods to ensure ongoing capacity in relation to changing population growth predictions. 9.63 The Environment Agency has issued a significantly tighter environmental permit that came into force in March 2017 and **required** ~~requires~~ Thames Water to make improvements to the quality of the discharged effluent. The need for an effluent upgrade to Deephams STW is highlighted in the National Planning Statement on Waste Water, and planning permission for this work was granted by Enfield Council in 2015. The site is to be retained for waste water use and Thames Water anticipates that the approved **recent** upgrade to Deephams STW will provide sufficient effluent treatment capacity to meet their needs **into the next decade** ~~during the plan period~~." 	
1-5/5	9	Policy 7	We support Policy 7 relating to the development of new waste water and sewage treatment works. We also support paragraph 9.65 relating to support for new waste water and sewage treatment works, extensions to existing works and facilities for co-disposal. A key sustainability objective for the preparation of Local 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), February 2019, 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 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*	

Code	Section	Policy / Para	Representation	Met by modification in Appendix B
			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).	

Appendix B: Proposed Modifications

No	Section	Proposed change	Representation code
1	5.26	5.26 Waste Water Treatment Works in North London are operated by Thames Water. The main Thames Water Waste Water/sewage treatment facility in North London is Deephams Sewage Treatment Works (STW), which is the ninth largest in England. The site is to be retained and improved for waste water use and planning permission has been granted for an upgrade to the effluent ~~sewage sludge~~ treatment stream. Thames Water anticipates that the recently ~~approved~~ constructed upgrade to Deephams STW will provide sufficient effluent treatment capacity to meet their needs into the next decade ~~during the plan period~~. However, this will be reviewed in future AMP periods to ensure ongoing capacity in relation to population growth. Further details can be found in section 8.	Thames Water (Rep 1-1/5)
2	7.31	7.31 The main Thames Water sewage treatment facility in North London is Deephams Sewage Treatment Works (STW), operated by Thames Water. Work to upgrade this facility was largely completed in 2017. Thames Water anticipates this will provide sufficient effluent treatment capacity to meet its needs into the next decade during the plan period. However, this will be reviewed in future AMP periods to ensure ongoing capacity in relation to changing population growth predictions. ~~Thames Water is also proposing an upgrade to the sewage sludge treatment stream at the site which will be sufficient to meet its needs during the plan period~~. It is therefore not necessary to identify additional land for this waste stream in the NLWP, however any new facility for waste water will be assessed against Policy ~~8~~ 7.	Thames Water (Rep 1-2/5)
3	8.8 - 8.9	8.8 Deephams Sewage Treatment Works is a waste water treatment facility in Edmonton. The works serves a large area of north east London, both inside and outside the M25 corridor. The Environment Agency has issued a significantly tighter	Thames Water (Rep 1-3/5)

		environmental permit in respect of sewage treatment standards that came into force in March 2017 and requires Thames Water to make improvements to the quality of the discharged effluent. The need for an effluent upgrade to Deephams Sewage Treatment Works (STW) is highlighted in the National Planning Statement on Waste Water, and planning permission for this work was granted by Enfield Council on 20th February 2015. The upgrade was largely constructed by March 2017 and being completed during 2018/2019.~~Work has started and is expected to continue for a minimum of 7 years.~~ 8.9 ~~Thames Water is also proposing an upgrade to the sewage sludge treatment stream at Deephams STW during its 2015 to 2020 business plan period by providing enhanced sludge treatment plant within the boundaries of the existing site~~. Enfield Council will continue work with Thames Water and the Environment Agency to ensure that adequate and appropriate waste water treatment infrastructure is provided. Any new waste water facility will be assessed under Policy 7.	
4	9.62 - 9.63	9.62 Waste Water Treatment Works in North London are operated by Thames Water, with the main facility being Deephams Sewage Treatment Works (STW), which is the ninth largest in England. ~~Deephams STW serves a Population Equivalent (PE) of 891,000 (as at 2011).~~ Works to Deephams STW **to** ~~are planned to commence in 2018 Providing~~ provide sufficient capacity to meet Thames Water's projections of future requirements into the next decade were largely constructed by March 2017 and being completed during 2018/2019. The upgrade increased capacity from a Population Equivalent (PE) of 891,000 (as at 2011) to 989,000 PE. At the time the Upgrade was designed (in line with population predictions at the time) it was envisaged the Upgrade will accommodate population growth up until at least 2031. However, treatment capacity will be reviewed in future AMP periods to ensure ongoing capacity in relation to changing population growth predictions. 9.63 The Environment Agency has issued a significantly tighter environmental permit that came into force in March 2017 and required ~~requires~~ Thames Water to	Thames Water (Rep 1-4/5)

		make improvements to the quality of the discharged effluent. The need for an effluent upgrade to Deephams STW is highlighted in the National Planning Statement on Waste Water, and planning permission for this work was granted by Enfield Council in 2015. The site is to be retained for waste water use and Thames Water anticipates that the approved recent upgrade to Deephams STW will provide sufficient effluent treatment capacity to meet their needs into the next decade ~~during the plan period~~.	