

Q82 Are the Strategic Industrial Locations (SIL), Locally Significant Industrial Sites (LSIS) and Borough Employment Areas (BEA) shown on Figure 9.1 and the visions set out in Appendix 2 of the Plan justified and in general conformity with the London Plan? What are the implications of allowing offices (Class E (G)(i)) on BEA? Are any main modifications necessary for soundness?

Part of Thames Water's land is within the Bywater/Auckland Road LSIS shown in the Submission Plan updated Figure 9.1. Whilst Thames Water supports the inclusion of the land within the site allocation (which is the subject of the Local Plan Part 2 process), the designation of the land as 'LSIS' as per the submission version of the Plan appears to be erroneous.

This is because the land in question is storm tanks, which are a facility employed to store surface water during events of high rainfall, whereby there is insufficient capacity to deal with the increased quantity of water coming through the system. These tanks are used to store the water prior to it being sent for treatment, to ensure that the system is not overwhelmed. The tanks do not provide on-site treatment but are obviously providing environmental benefit by reducing risks of impacting sewers, treatment capacity and affecting the local population.

Therefore, these tanks would not fit the definition of LSIS as per the London Plan, which sets out that LSISs should be:

"locations that have particular local importance for industrial and related functions as Locally Significant Industrial Sites. These designations should be based on evidence in strategic and local demand assessments." (paragraph 6.6.1)

The policy wording itself refers to uses "**B1c/B2/B8 suitable for SMEs**", again, which does not apply to the lawful and existing use of the land as storm tanks.

We do not consider that storm tanks fulfil an industrial related function, and therefore should not be included within this designation. It is not common practice by other London LPAs for storm tanks to be designated within LSIS designations.

Therefore, a modification should be made to amend the policies map and figure within the Local Plan to remove the storm tanks from this designation. This has no bearing on the land being included as a site allocation under Local Plan Part 2.

Thames Water does not consider it is necessary to attend the Examination in this regard but would be grateful if this note could be shared with the Inspectors accordingly, and would welcome any specific questions should this be required.