

# Bircham Dyson Bell

Solicitors and  
Parliamentary Agents

Mr Graham Groom  
Programme Officer  
Persona Associates  
West Piont  
Springfield Road  
Horsham  
West Sussex RH12 2PD

Your Ref

Our Ref

SEW/ENB/Y045415

Date

19 July 2005

50 Broadway  
London  
SW1H 0BL

**Tel +44 (0)20 7227 7000**

Fax +44 (0)20 7222 3480  
DX 2317 Victoria  
[www.bdb-law.co.uk](http://www.bdb-law.co.uk)

Dear Mr Groom

## Thames Gateway Bridge

Further to our recent correspondence, please find enclosed an outline objection providing further details of our client's concerns in relation to the proposed Thames Gateway Bridge. This outline objection identifies which of the Promoter's witnesses our client may wish to cross-examine during Phase 2 of the Inquiry.

Yours sincerely

## Sarah Wotton

Direct Line: +44 (0)20 7170 1170  
Direct Fax: +44 (0)20 7233 1351  
Email: [sarahwotton@bdb-law.co.uk](mailto:sarahwotton@bdb-law.co.uk)

A list of the partners of Bircham Dyson Bell is available for inspection at the above address and at [www.bdb-law.co.uk](http://www.bdb-law.co.uk).

<b>Brussels</b>	Rond Point Schuman 6, box 5 1040 Brussels Belgium	Tel +32 2 234 6306	Fax +32 2 234 7911
<b>Cardiff</b>	Temple Court Cathedral Road Cardiff CF11 9HA	Tel +44 (0)29 2078 6574	Fax +44 (0)29 2078 6573
<b>Edinburgh</b>	1-3 St Colme Street Edinburgh EH3 6AA	Tel + 44 (0)131 220 8294	Fax +44 (0)131 220 8394

Bircham Dyson Bell is regulated by the Law Society. Member of Lexwork International, an association of independent law firms.

**The A2012 GLA Road (Thames Gateway Bridge) Compulsory Purchase Order 2004**  
**The A2012 GLA Road (Thames Gateway Bridge) Special Roads and Bridge Scheme 2004**  
**The A2012 GLA Road (Thames Gateway Bridge) (Side Roads) Order 2004**  
**The A2012 GLA Road (Thames Gateway Bridge) Toll Order 2004**

**Thames Water Utilities Limited**

**Outline Objection**

**1 Introduction**

- 1.1 Thames Water Utilities Limited (“TWUL”) is a water and sewerage undertaker having statutory powers and duties with regard to the supply of water and the treatment and discharge of sewage.
- 1.2 TWUL submitted to the Secretary of State for Transport a formal objection to the A2012 GLA Road (Thames Gateway Bridge) Compulsory Purchase Order 2004, the A2012 GLA Road (Thames Gateway Bridge) Special Roads and Bridge Scheme 2004, the A2012 GLA Road (Thames Gateway Bridge) (Side Roads) Order 2004 and the A2012 GLA Road (Thames Gateway Bridge) Toll Order 2004 (“the Orders”), and also to the related planning applications, on 6 June 2005.
- 1.3 TWUL had previously submitted objections in respect of the Orders and planning applications to the London Borough of Newham and the London Borough of Greenwich but the Secretary of State was not notified of these objections. Consequently, TWUL submitted its objections of 6 June 2005 outside the formal objection period and asked that these objections be considered.
- 1.4 TWUL sets out below a summary of its objection to the Orders.

**2 Summary of objection**

- 2.1 The nature of the concerns of TWUL are summarised in the formal letters of objection dated 6 June 2005.
- 2.2 TWUL has concerns that the construction and use of the Thames Gateway Bridge and the related highway works (“the Proposed Development”) will have wide-ranging impacts on TWUL’s statutory functions and may not provide adequate safeguards and protection to allow TWUL to exercise those functions properly.
- 2.3 Specifically, the TWUL has concerns over issues arising out of the construction of the Proposed Development and the ability of TWUL to carry out its functions in the long term. These include:
  - (a) Impacts on sewerage operations and apparatus

TWUL has particular concerns regarding its sewerage apparatus located to the north side of the River Thames. This is the location of the North Woolwich

Rising Mains, the Northern Outfall Sewer and the outfall for the Gallions Discharge Mains and related apparatus, all of which are important operational apparatus for TWUL and which may be adversely affected by the Proposed Development. In addition, TWUL has concerns regarding continued access to its apparatus under the proposed new bridge and its valve chambers along the route of its apparatus.

(b) Impacts on water supply apparatus

The Proposed Development is in an area of residential and commercial development. TWUL have identified a number of water mains on the north side of the River Thames and a 450 mm main on the south side which would need to be diverted as a result of the Proposed Development.

(c) Impacts upon operations

The Proposed Development is located in area of considerable development potential and activity. TWUL has concerns that there is a lack of cohesivity between the Proposed Development and other developments within this area, and that this lack of co-ordination may result in TWUL being required to remove, replace or divert its apparatus on more than one occasion. To do so would have considerable impact upon its operations as a water and sewerage undertaker.

(d) Unnecessary acquisition of rights and land

The Order provides for the permanent acquisition of parts of TWUL's land and rights over its land (as outlined in Schedule 1 to the Order and the Order Plan). TWUL does not believe that rights over plots 206, 209, 210 and 211 are required as the plots identified form part of an existing public highway.

With regards to permanent acquisition, TWUL does not believe that it is necessary for there to be permanent acquisition of any of its land in order to carry out the Proposed Development; it believes that temporary possession or rights would be sufficient.

- 2.4 The concerns outlined above indicate a particular need for protective provisions and safeguards.
- 2.5 TWUL hopes that its concerns will be dealt with by way of discussion and negotiation with the Promoters of the Order, though at this time such discussions have not taken place between the parties.
- 2.6 In the event that agreement cannot be reached, TWUL has indicated its intention to give evidence during Phase 2 of the Inquiry. In this event, TWUL may wish to cross-examination the Promoter's witnesses on issues of Highway and Bridge Engineering, Design and Project Strategy and Programme.

**Bircham Dyson Bell**  
**19 July 2005**