

**LONDON BOROUGH OF NEWHAM**

**LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC**

**WRITTEN STATEMENT**

**MAIN MATTER 15 -WASTE MANAGEMENT**

**&**

**MAIN MATTER 16- OTHER SOUNDNESS LEGAL COMPLIANCE**

**ISSUES**

**WE ARE NEWHAM.**

## **M15. Waste management**

### **W1 Waste management capacity**

Q15.1 Is policy W1 justified, effective and consistent with national policy, the adopted Joint East London Waste Plan and the London Plan? In particular:

- a) The waste sites designated on the policies map
- b) The requirement in part 3 for all existing waste sites to be retained in waste management use.

#### **Council Response:**

- 1.1 a) Yes. The waste sites designated on the policies map are those identified through the Evidence Base for the East London Joint Waste Plan (EB095).
- 1.2 All schedule 1 sites in the East London Joint Waste Plan 2012 are identified through the policies map layer, albeit it is noted that Mayer Parry Recycling Ltd has subsequently gained permission to relocate to Standard Industrial Estate, considered under planning application references 24/01753/FUL and 24/00088/FUL. Newham's Schedule 2 at Beckton Riverside is also no longer identified on the policies map. This is because the evidence base that has informed the East London Joint Waste Plan Regulation 19 Submission Plan shows that East London has a significant waste management capacity surplus for apportioned and Construction, Demolition and Excavation waste (see EB097, paragraphs 4.4 and 4.5, pp.54-55). Therefore, there is no longer a need to identify land for additional waste management capacity.
- 1.3 Since the publication of this evidence base, significant progress has been made on the preparation of the revised Joint Waste Plan, which underwent Regulation 19 consultation in summer 2025. Accordingly, the implementation text for Policy W1 contains caveats around the list of existing safeguarded waste sites being updated as the Joint Waste Plan refresh is progressed. However, the Council considers an update to the list of safeguarded waste sites, reflecting the safeguarded sites list in the East London Joint Waste Plan Regulation 19 Submission Plan (EB097, Appendix 2, pp.123-124) could improve the clarity of policy W1 and the site allocation requirements relevant to waste uses.
- 1.4 Therefore, if the Inspector considers the draft Joint Waste Plan has sufficiently progressed to update the site allocation and policies map, the Council would be supportive of these modifications being made.
- 1.5 b) The London Plan Policy SI 9.C (EB001, p.378) is clear that waste plans should be adopted before considering the loss of waste sites. Therefore, before the adoption of the new East London Joint Waste Plan, the Local Plan policy reflects the requirements of the London Plan through Part 4. Any proposed loss of existing waste sites will only be considered through the review of the East London Joint Waste Plan, which is expected to be submitted to the Planning Inspector in quarter 4 of financial year 2025/26. For context, the East London Joint Waste Plan Regulation 19 Submission Plan (2025) (EB0097) seeks to meet the apportionment target in the London Plan (EB001, Table 9.2, p.372). To note, the London Plan apportionment targets have been updated since the adoption of the East London Joint Waste Plan in 2012.

- 1.6 The Local Plan approach to safeguarding waste uses also supports the broader principles set out in the National Planning Policy for Waste, which requires boroughs to:
- identify the tonnages and percentages of municipal, and commercial and industrial, waste requiring different types of management in their area over the period of the plan (In London, waste planning authorities should have regard to their apportionments set out in the London Plan when preparing their plans); and
  - work collaboratively in groups with other waste planning authorities, and in two-tier areas with district authorities, through the statutory duty to cooperate, to provide a suitable network of facilities to deliver sustainable waste management; and
  - consider the extent to which the capacity of existing operational facilities would satisfy any identified need.

## **W2 New or improved waste sites**

Q15.2 Is policy W2 justified, effective and consistent with national policy, the adopted Joint East London Waste Plan and the London Plan?

### **Council Response:**

- 2.1 Yes. The policy provides clear requirements in relation to applications relating to new waste sites. The requirements of parts 1 and 2 of the policy reflect the policy expectations set out through the national, regional and local policy frameworks. The National Planning Policy for Waste (NPPW) requires the delivery of sustainable development and resource efficiency by driving waste management up the waste hierarchy. The NPPW also requires waste management facilities to be well-designed, so that they contribute positively to the character and quality of the area in which they are located. The London Plan also seeks effective implementation of the waste hierarchy and minimisation of amenity impacts on surrounding areas (including but not limited to noise, odours, air quality and visual impact) through Policy SI 8 E.2 and E.4. The policy also seeks full enclosure of waste uses where these are likely to produce significant air quality, dust or noise impacts (EB001, Policy SI 8 E.2 and E.4, p.370). The adopted East London Joint Waste plan sets out that the boroughs will aim to drive waste management up the waste hierarchy and developments should include an assessment of any adverse effects on neighbouring amenity [Source: [Adopted Joint Waste DPD](#), Policy W1 and W5.xi). These policies will be delivered through the implementation of parts 1.d, 1.e and part 2 of Policy W2.
- 2.2 Parts 1.a, b and c of the policy help to ensure that waste uses in the borough will be located in suitable areas. Part 1.a accords with London Plan policy SI 8.B.4, reflecting those locations identified as suitable by the regional policy. Parts 1.b and 1.c of the policy support London Plan policy SI 8.E.5, which seek to assess the transport and environmental impacts of all vehicle movements related to waste proposals and supports the use of rail and waterway networks to transport waste. The use of the proximity principle is also supported through the National Planning Policy for Waste, which states that waste planning authorities should plan for the disposal of waste and the recovery of mixed municipal waste in line with the proximity principle.

2.3 Part 3 of the policy seeks to address some of the key challenges Newham has faced in relation to amenity impacts associated with operational waste sites, in particular operations and vehicles leading to mud being tracked onto the highway. This impact on the local highway presents risks for nearby homes, pedestrians and cyclists. To ensure the effectiveness of the policy, the management plan requirements primarily relate to matters around the design of waste management operations, to ensure such risks are minimised and best available techniques are secured at an early stage of design.

### **W3 Waste management in developments**

Q15.3 Is policy W3 justified, effective and consistent with national policy, the adopted Joint East London Waste Plan and the London Plan? In particular:

- a) The requirement in part 3 for all major developments on site allocations to provide a well-managed re-use and circular economy room.
- b) The requirement in part 4 for all developments to provide only one waste management solution or technology on site.

### **Council Response:**

3.1 a) Yes, it is considered that there should be sufficient space available within major developments on site allocations to deliver these requirements, recognising they are the largest sites available in the borough and subject to masterplanning requirements. These requirements not only support the delivery of the Local Plan objective to deliver people-friendly neighbourhoods with green and clean streets but also reflect commitments through the National Planning Policy Framework, London Plan and adopted Joint Waste Plan to support delivery of the waste hierarchy and circular economy (discussed in response to Q15.2). To improve the effectiveness of this policy, the implementation text references the Newham's Waste Management Guidelines for Architects and Property Developers, which provides further guidance from Newham's Waste and Recycling team on how these spaces can be effectively designed and managed [Source: [Waste Management Guidelines for Architects and Property Developers](#), Section 3.10].

3.2 b) The Council's objective for this policy approach is to ensure efficient servicing of the largest site allocations in the borough. The requirement for one waste management solution is based on advice from Newham's Waste and Recycling service. If managed inefficiently developments sites could result in unnecessary vehicle movements and negative amenity implications for residents and neighbours. Notwithstanding this, we have proposed a modification to the plan to ensure the effectiveness of this policy requirement and provide additional flexibility in circumstances where this is not feasible. The text of this modification is set out in the Schedule of proposed modifications to the Regulation 19 Draft Submission Local Plan under modification reference MO88 (SD004, p.63).

**M16. Other soundness legal compliance issues**

Q16.1 Are there any other soundness or legal compliance issues that have not been addressed under matters 1 to 15?
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**Council Response:**

The Council consider that there are no other soundness or legal compliance issues that have not been addressed under matters 1 to 15.