

# Adopted East London Waste Plan

# Monitoring Report

**Version: 2.0 Submission**

**December 2025**

**Barking &  
Dagenham**

 **Havering**  
LONDON BOROUGH

 **Newham London**

London Borough of  
**Redbridge** 

# East London Waste Plan – Monitoring Report

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## Abbreviations

AD	Anaerobic Digestion
LB	London Borough
C&D	Construction & Demolition (waste)
C,D&E / CDE	Construction, Demolition & Excavation (waste)
CDEW	Construction, Demolition & Excavation Waste
CE	Circular Economy
CEMP	Construction Environmental Management Plan
CHP	Combined Heat and Power
DEFRA	Department for Environment, Food & Rural Affairs
DESNZ	Department for Energy Security & Net Zero
EA	Environment Agency
EfW	Energy from Waste
EHO	Environmental Health Officer
ELJWP	East London Joint Waste Plan
ELWA	East London Waste Authority
ELWP	East London Waste Plan (adopted 2012)
GLA	Greater London Authority
HGV	Heavy Goods Vehicle
HIC (waste)	Household and Industrial & Commercial (waste)
IVC	In-Vessel Composting
LACW	Local Authority Collected Waste
LP	London Plan
LSIP	London Sustainable Industries Park
MBT	Mechanical Biological Treatment
NI191 / NI192	National Indicators (Residual household waste per household / % household waste reused, recycled & composted)
RAG	Red/Amber/Green
RDF	Refuse Derived Fuel
RRC	Reuse & Recycling Centre
SPG	Sludge Powered Generator
STW / WWTW	(Sewage) Treatment Works / Wastewater Treatment Works
SuDS	Sustainable Drainage Systems
WDI	Waste Data Interrogator (EA)
WDF	WasteDataFlow (Defra)

## Executive Summary

This executive summary provides a high-level overview of the key findings and monitoring outcomes from the East London Waste Plan (ELWP) adopted in 2012. It draws on quantitative and qualitative data from various sources to evaluate the effectiveness of the ELWP policies in achieving its strategic objectives and targets.

### Key Findings

#### ***Waste Management Capacity***

Sufficient permissions to meet the identified capacity requirements have been granted.

**Overall RAG status: Green**

#### ***Waste Recycling***

##### *Evaluation of municipal waste recycling and composting rates*

Recycling/composting performance for LACW (formerly referred to as municipal waste) remains low by comparison to Plan targets. Low household waste recycling rates are not due to a lack of built recycling/composting capacity being available in the Plan area but largely due to nature of housing and demography of East London which in densely developed areas restricts opportunities for separation and collection of separated materials. Overall recovery targets (essentially the rate at which waste is diverted from landfill) have been achieved or exceeded.

##### *Trends in construction and demolition waste management.*

In 2023 it is estimated that 2.2 million tonnes of C, D & E waste was generated in East London<sup>1</sup>. Of this, 36% arose from construction and demolition activity while 64% arose from excavation. This difference is significant because the London Plan sets separate targets for the management of excavation waste, from those applied to construction and demolition waste. At least 74% of the excavation waste arising was managed through recovery routes while at least 72% of C&D waste was managed through recovery. In both cases the remainder was managed through transfer stations from where it would be transferred on to an unknown final fate, hence it is not possible to state with certainty if the 95% recycling and reuse target for 2020 was met.

**Overall RAG status: Amber**

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<sup>1</sup> *Baseline & Forecast for Construction, Demolition & Excavation Waste Arising in East London to 2042*  
Update BPP Consulting January 2025

### ***Compliance and Status***

Approximately 41 planning consents for waste related activity were issued during the period 2020-2024. Conditions consistent with requirements in ELWP Policy W5 (e.g. controls on noise, odour, dust, hours of operation, drainage/SuDS, contamination, HGV routing/servicing and construction environmental management) were applied.

No permissions were granted contrary to Environment Agency advice on flood risk or water quality, and none contrary to Environmental Health/EA advice on air quality.

Circular economy and operational waste statements were required with applications with the London Borough of Redbridge using a standard condition requiring a Circular Economy Statement and Operational Waste Management Strategy.

Non waste development occurred at one of the waste sites safeguarded in Schedule 1 of the ELWP (Mayer Parry, Bidder Street) with compensatory capacity provided.

**Overall RAG status: Amber/Green**

### ***Renewable Energy Generation***

Land at Dagenham Dock/Sustainable Industries Park is allocated in the ELWP to accommodate 2 medium scale and 1 small scale IVC/AD/Recovery facility. There are two anaerobic digestion (AD) plants located there, one operated by ReFood UK Limited (Hitch Street) and one operated by East London Biogas Limited (Halyard Street).

The ReFood UK Limited facility is designed to process c.220,000 tonnes of biomass per annum, creating biogas. The biogas produced at the plant is treated to meet the requirements of the national gas grid specification and injected directly into the grid, producing 2,000m<sup>3</sup>/hr of biomethane. This is a large-scale facility. The East London Biogas Facility processes up to 75,000 tonnes of waste per annum, creating biogas. The biogas produced at the plant is burnt in a combined heat and power (CHP) to generate power supplied to the National Grid. It has a reported electricity generation capacity of 3.56Mwe. This is considered to be a medium/large scale facility.

In addition to the above there is a Sludge Powered Generator (SPG) at Beckton with the capability to convert up to 90,500 tonnes per annum of sewage sludge (as dry solids) into heat and power. The plant generates 11.5 MWe which supplies the needs of the SPG, with a surplus being exported to Beckton STW and/or the National Grid. Waste heat is further reused to preheat combustion air and for plume reheat.

All three plants came on stream since adoption of the ELWP and continue to operate and supply renewable energy throughout the monitoring period.

**Overall RAG status: Green.**

### ***Site-Specific Progress***

No waste management facilities were actually built out on land allocated in the ELWP during the period 2020–2024. Ferry Lane North (small-scale IVC/AD), Gerpins Lane (medium composting), Hall Farm (large composting) and Beckton Riverside (medium/large IVC/AD/MBT/thermal) were not subject to planning applications or developed. At Dagenham Dock/Sustainable Industries Park, the required capacity was consented and came on stream in the form of two AD plants providing c.295,000tpa combined capacity, with permission also being granted for an EfW plant with up to 200,000tpa capacity.

**Overall RAG status: Amber/Red.**

### ***Household Waste Indicators***

This indicator concerns residual waste per household and proportion of waste sent for reuse, recycling, and composting.

While this indicator is specified in the ELWP monitoring framework no apparent target has been set against which actual performance is to be measured (historic data presented). In any event this metric does not measure the development of waste management capacity nor its suitability, which are key concerns of the Plan.

**Overall RAG status: n/a**

### ***Data Gaps and Challenges***

In some cases, data for certain indicators intended to give a sense of how well waste is being managed was not readily available, however 'proxy' data was used in its place to provide an indication of how well the objectives of the ELWP were/are being met. An example of this is landfill diversion for LACW (formerly 'municipal solid waste') as a measure of recovery rate, as it essentially measures the same metric, just from the opposite point of view.

Application of the ELWP monitoring framework has revealed that, while some indicators in the ELWP provide a sense of the direction of travel of how waste is being managed in East London, some indicators are not directly applicable to assessing the effectiveness of the Plan itself. For example, the inclusion of indicators relating to residual waste per household or proportion sent for recycling is not directly related to availability (or suitability) of local capacity for the management of this waste stream. Rather it is dictated by the collection methods applied and contract arrangements entered into for the collection and management of waste. These in turn are heavily influenced by the demographic and housing configuration in East London as a whole which determine what is actually possible/affordable.

## **Response and Next Steps**

The East London Waste Plan was adopted over ten years ago and so the East London Boroughs are preparing a replacement waste local plan based on an up to date evidence base (ELJWP) which, in particular, shows that the sites allocated in the adopted ELWP are no longer required for the development of additional waste management capacity. This updated Plan also takes account of relevant updated local, regional and national policy, in particular the Boroughs' Local Plans, the London Plan, National Planning Policy for Waste and the National Planning Policy Framework.

## **Conclusions**

Monitoring of the adopted East London Waste Plan essentially shows that the Plan's Vision and Objectives have been achieved in that sufficient, and appropriate, waste management capacity has been developed and continues to be available in East London.

# 1. Introduction

- 1.1 This monitoring report provides data and information which allows conclusions to be reached on the success of the implementation of the currently adopted East London Waste Plan (ELWP), adopted in 2012. It reports against the indicators and targets listed in the adopted ELWP using where available data for the period 2020 to 2024 in particular.
- 1.2 This report is structured in line with the adopted Plan's monitoring framework set out in Section 6 of the Plan, which in turn were aligned with national and regional planning policy and guidance in place at the time of preparation/adoption. For ease of reference, the wording of the strategic objectives and policies of the Plan are included in Appendices 1 and 2.
- 1.3 This report has been prepared jointly by the four East London boroughs (Barking & Dagenham, Havering, Newham, and Redbridge) taking account of evidence base documents prepared to inform submission of the updated waste plan for East London (the East London Joint Waste Plan (ELJWP)) to the Secretary of State for examination.
- 1.4 Separately each Borough has prepared its own Authority Monitoring Reports covering the implementation of each Borough's Local Plan with a focus on matters other than waste.



## 2. Methodology

The adopted ELWP includes 20 monitoring indicators comprising 4 core, 14 local output indicators and 2 national indicators. All indicators have been considered except the two national indicators (because these relate to the management of household waste subject to contractual control of ELWA and do not reflect the performance of the ELWP itself). Data and information have been obtained from the following sources:

- Reports prepared as part of the evidence base of the new East London Joint Waste Plan
- Borough Planning Registers, and relevant waste authority returns submitted to DEFRA via WasteDataFlow.
- EA permitting and annual throughput (WDI) data

2.1 A Red/Amber/Green rating has been applied to each monitoring indicator as a means of indicating how well targets within the East London Waste Plan have been met. An explanation of each rating is set out below:

- Red = Target not met
- Amber = Target partially met and/or likely to be met
- Green = Target clearly met

2.2 In some cases a rating has been provided which falls between the Red, Amber, Green categories ('Red/Amber' and 'Amber/Green') to provide a further, more nuanced indication of performance.

2.3 Where there is insufficient data to establish with any certainty whether a target has been met or not, a 'Grey' rating has been applied indicating 'uncertain'.

2.4 Monitoring has primarily been undertaken accessing data relating to the period in which the ELWP has been in effect. For some indicators, data for the most recent five year period 2020 to 2024 inclusive has been relied upon. This provides the most up to date information regarding the effectiveness of the ELWP policies in achieving the Plan objectives.

### ***Data Gaps and Reliability***

2.5 As indicated above, the monitoring data is derived from publicly accessible sources, but several limitations affect completeness and comparability.

2.6 For certain indicators, the data required to monitor certain indicators (at the time the ELWP was prepared) was not publicly available. In such cases, where possible other datasets have been accessed as a proxy to assess how progress towards meeting a particular target, or at least the intention behind it, was being achieved, thus giving an indication of direction of travel.

### 3. Monitoring Findings

The tables below set out the results of monitoring against the indicators in the ELWP monitoring framework.

#### General Indicators

<b>ELWP Indicator:</b>	<b>Capacity of new waste management facilities by type (recycling and composting)</b>				
ELWP Target:	Progressive year on year cumulative increase toward 450,000 tpa capacity for municipal <sup>2</sup> , commercial, and industrial recycling and composting.				
Links to ELWP Policy and Objectives:	Policies: W1; W2; W3				
Performance v Target:	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
	457,000tpa	457,000tpa	457,000tpa	457,000tpa	457,000tpa
Data Source:	ELJWP evidence base Capacity Assessment Update (Table 4) based on EA permits issued / planning decisions for waste development.				
Commentary:	In addition to the combined capacity of the two AD plants consented prior to 2020 of 297,000tpa, additional recycling/composting capacity totalling 160,000 tpa has been consented post-2020 giving a total of 457,000tpa of capacity having been provided by 2020. This capacity continues to operate.				
<b>Overall RAG Rating:</b>	<b>Green</b>				

<sup>2</sup> The term 'municipal' is taken to relate to local authority collected waste which is predominately household waste.

<b>ELWP Indicator:</b>	<b>Capacity of new waste management facilities by type (recovery, treatment i.e. other recovery)</b>				
ELWP Target:	Progressive year on year cumulative increase toward 300,000 tpa capacity for recovery <sup>3</sup> and treatment				
Links to ELWP Policy and Objectives:					
Performance v Target:	<b>2020</b> >200,000tpa	<b>2021</b> >200,000tpa	<b>2022</b> >200,000tpa	<b>2023</b> >200,000tpa	<b>2024</b> >200,000tpa
Data Source:	ELJWP evidence base Capacity Assessment Update <sup>4</sup> (Table 4) based on EA permits issued / planning decisions for waste development				
Commentary:	<p>Permission granted for an EfW plant at London Sustainable Industries Park North, Dagenham offering up to 200,000tpa capacity<sup>5</sup> alongside AD plants referred to previously. The fact that the EfW permission may not now be implemented, suggests that the need identified previously no longer exists. Notably additional EfW capacity is under construction in LB Bexley (Cory Riverside) that is now contracted to take residual LACW managed by ELWA.</p> <p>It should also be noted that the ELWP monitoring framework expectation that this would be a 'cumulative increase' on a year by year basis assumes annual growth in arisings of the source waste stream such that management needs will also rise progressively. Both of these assumptions do not reflect the actuality in East London, e.g. arisings of LACW over the monitoring period have fluctuated as have the amounts of residual waste. Additional 'other recovery' capacity is unlikely to be developed in the Plan area without a reliable upward trajectory in LACW residual waste.</p>				
<b>Overall RAG Rating:</b>	<b>Amber/Green</b>				

<sup>3</sup> Taken to be 'other recovery' i.e. Energy from Waste as while a % target is provided for 'other recovery' (in Table 3 of the Plan) the term 'recovery and treatment' is used in relation to a policy concerning Energy Recovery Capacity (Policy W3).

<sup>4</sup> *ELJWP Assessment of Existing Waste Management Capacity* BPP Consulting (February 2025)

<sup>5</sup> Thames Gateway EfW plant (ATT)

<b>ELWP Indicator:</b>	<b>Type of waste managed (%) at each new facility (MSW<sup>6</sup>, C&amp;I, hazardous, etc.)</b>				
ELWP Target:	n/a				
Links to ELWP Policy and Objectives:	Policies: W2; W3 Objectives: B, C, D, E, G				
Performance v Target: Additional capacity provided	<b>HIC</b>	<b>CDEW</b>			
	180,000tpa	500,000tpa			
Data Source:	ELJWP evidence base Capacity Assessment Update (Table 4) based on EA permits issued / planning decisions for waste development.				
Commentary:	<p>Table 4 of the ELJWP Capacity Assessment shows an additional recycling/composting capacity totalling 160,000 tpa has been consented post-2020. It also demonstrates that the Plan area has more than sufficient management capacity to manage total HIC waste arisings (Tables 6 &amp; 7), and C,D &amp; E waste arisings (Table 8).</p> <p>A shortfall for hazardous waste management capacity is identified (Table 11) but Plan area provision for this stream is not an objective in itself.</p>				
<b>Overall RAG Rating:</b>	<b>Green</b>				

<sup>6</sup> The definition of MSW or municipal waste in the ELWP is: "Waste collected by local authorities. Mainly composed of household waste but also includes street cleaning waste, waste from reuse and recycling centres and commercial and industrial waste collected by local authority" – as this waste is now referred to as Local Authority Collected Waste (LACW), LACW data has been used to monitor performance for this waste stream.

<b>ELWP Indicator</b>	<b>Amount of municipal waste arising, and managed by management type (recycling and composting, recovery, treatment)</b>				
ELWP Target:	Average amount of municipal waste recycled and composted meets targets of 40% (2010); 45% (2015); 50% (2020)				
Links to ELWP Policy and Objectives:	Policies: W1; W2 Objectives: A, B, C, D, E, G				
Performance v Target:	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
LACW Recycling Target	50%	50% <sup>7</sup>	50%	50%	50%
LACW Recycling Achieved	25%	25%	27%	28%	28%
LACW Recovery Target (landfill diversion)	75%	75%	75%	75%	75%
LACW Recovery Achieved (landfill diversion)	99.7%	99.9%	99.9%	99.9%	99.9%
Data Source:	Defra data for ELWA based on WDF returns. N.B. MSW now taken to be LACW as definition of municipal waste has been extended to include a significant proportion of commercial waste & LP apportionment covers HIC waste.				
Commentary:	Recycling/composting performance for LACW remains poor by comparison to Plan targets. ELWA has gained a dispensation from the Mayor regarding achievement of these via Environment Strategy scrutiny of the LACW contract. Poor household waste recycling rates are largely due to nature of housing/demographic of East London restricting opportunity for setting out of separate materials. It is not due to a lack of built recycling/composting capacity being available in the Plan area. Overall recovery targets (essentially landfill diversion) have been achieved/exceeded.				
<b>Overall RAG Rating:</b>	<b>Red (recycling)</b>				
	<b>Green (recovery)</b>				

<sup>7</sup> Italicised entries assume 2020 target carried forward through to 2024.

<b>ELWP Indicator</b>	<b>Number of planning permissions for waste facilities granted contrary to Environment Agency advice on flooding and water quality grounds</b>
ELWP Target:	Target = 0
Links to ELWP Policy and Objectives:	Policies: W5(iii); W5(v); W5(vi) Objectives: E, F
Performance v Target:	No planning permissions for waste facilities granted contrary to Environment Agency advice on flooding and water quality grounds
Data Source:	Planning applications and decision reports
Commentary:	Policy ensuring that waste management capacity is developed in a manner that avoids increasing the risk of flooding and adverse impacts on waste quality has been implemented effectively.
<b>Overall RAG Rating:</b>	<b>Green</b>

<b>ELWP Indicator:</b>	<b>Number of planning permissions for waste facilities granted contrary to local EHO/EA advice on air quality grounds</b>				
ELWP Target:	Target = 0				
Links to ELWP Policy and Objectives:	Policies: W5(i); W5(xi) Objectives: E, F				
Performance v Target:	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
	0 (target met)	0 (target met)	0 (target met)	0 (target met)	0 (target met)
Data Source:	Planning applications and decision reports; EA permits issued post 2012;				
Commentary:	Policy ensuring that waste management capacity is developed in a manner that avoids adverse impacts on air quality has been implemented effectively.				
<b>Overall RAG Rating:</b>	<b>Green</b>				

<b>ELWP Indicator:</b>	<b>Renewable energy generated from waste</b>
ELWP Target:	Year-on-year increase
Links to ELWP Policy and Objectives:	Policies: W3 Objectives: E, F
Performance v Target:	The DESNZ Renewable Energy Planning Database shows 5 facilities with installed capacity to generate a total of 29.5MWe (2 x Anaerobic digestion, 2 x landfill gas at Rainham (plus Beckton) and a further two facilities which have been approved but are awaiting construction offering c.29MWe.
Data Source:	Renewable Energy Planning Database DESNZ <a href="https://www.gov.uk/government/publications/renewable-energy-planning-database-monthly-extract">https://www.gov.uk/government/publications/renewable-energy-planning-database-monthly-extract</a>
Commentary:	There has been an increase in renewable energy generated from waste in East London since the ELWP was adopted in 2012.
<b>Overall RAG Rating:</b>	<b>Green</b>

<b>ELWP Indicator:</b>	<b>Proportion of waste developments with sustainable design and construction features</b>
ELWP Target:	Target = 75%
Links to ELWP Policy and Objectives:	Policies: W1; W5(x) Objectives: A, F, H
Performance v Target:	Havering – 50% Newham - 80% Redbridge – no proposals for waste development received 2020-2024 Barking and Dagenham – data not recorded
Data Source:	Planning applications and decision reports
Commentary:	Performance against this indicator is unclear as in some cases data has not been strictly recorded, however development management teams report that generally proposals for waste management development have been required to consider sustainable design and construction features. Since 2021 proposals for development which are referable to the mayor are required to be submitted with Circular Economy Statements and Whole Life Carbon Assessments which address many of the matters anticipated by this indicator.
<b>Overall RAG Rating:</b>	<b>Green</b>

<b>ELWP Indicator:</b>	<b>Proportion of waste developments with provision for transport by rail or water</b>
ELWP Target:	Progressive year on year increase;
Links to ELWP Policy and Objectives:	Policies: W1; W5(xii) Objectives: A, E
Performance v Target:	<b>2020-2024</b> 2 proposals.
Data Source:	Planning applications and decision reports/WDI
Commentary:	Established rail freight sites were responsible for the export of c250,000 tonnes of inert waste from East London for management in 2022 and 2023. In addition, c50,000 tonnes of RDF was moved to a rail connected EfW facility in Wakefield in 2022 and 2023. Established River Road site with wharfage being redeveloped by new occupant Cory to provide river transport for ELWA residual LACW across to Belvedere Riverside EfW plant in LB Bexley.
<b>Overall RAG Rating:</b>	<b>Green</b>

<b>ELWP Indicator</b>	<b>Number of safeguarded waste sites (Schedule 1) developed for non-waste uses</b>
ELWP Target:	Target = 0
Links to ELWP Policy and Objectives:	Policies: W2 Objectives: C, D, F
Performance v Target:	<b>2020 – 2024</b> 1
Data Source:	Planning decisions for non-waste development on Sch 1 sites;
Commentary:	One Schedule 1 site (Mayer Parry, Bidder Street, Newham) was redeveloped for a non-waste use but compensatory capacity was provided.
<b>Overall RAG Rating:</b>	<b>Amber</b>



<b>ELWP Indicator:</b>	<b>Actual waste throughput of Schedule 1 sites (where data available)</b>
ELWP Target:	Compare annual throughput against permitted tonnage (licensed capacity)
Links to ELWP Policy and Objectives:	Policies: W2 Objectives: B, C, D, E, G, H
Commentary:	All but two of the Schedule 1 sites remained in operation during the monitoring period (albeit in changed guises in some cases). One site has been released, while the Frog Island Gasification plant was not developed (provision formed part of ELWA contract for management of MBT residues). The actual annual inputs to each site will vary from year to year and are a reflection of market conditions rather than the effectiveness of Plan policy. Inputs to all these sites plus additional sites has been assessed as part of the Capacity Assessment that has informed formulation of the updated ELJWP to be subject to examination.
<b>Overall RAG Rating:</b>	<b>Green</b>

<b>ELWP Indicator</b>	<b>Number of planning permissions with reuse or recycling of CDE waste on site</b>
ELWP Target:	Progressive year on year increase as policies are applied
Links to ELWP Policy and Objectives:	Policies: W1 Objectives: A, E, F, H
Performance v Target:	<b>2020-2024</b> Newham – 5 (waste sites); Redbridge - 17 (see 'other findings' below) Data not recorded for Havering and Barking and Dagenham
Other findings:	Redbridge Development Management Team are applying a condition requiring a 'Circular Economy Statement and Operational Waste Management Strategy in line with the GLA's Circular Economy Guidance' to be submitted to and approved by the LPA
Data Source:	Planning applications and decision reports
Commentary:	Performance against this indicator is unclear as in some cases data has not been recorded. Since 2021 proposals for development referable to the Mayor are required to be submitted with Circular Economy Statements which seek to reduce the production of DCE waste and ensure that which is produced is managed sustainably. ELJWP evidence base (CDEW Forecast report) indicates that in total at least 74% of excavation waste and 72% of C&D waste managed offsite was managed through recovery methods which provides an indication of how CDE waste is being managed.
<b>Overall RAG Rating:</b>	<b>Amber</b>

<b>ELWP Indicator:</b>	<b>Amount of construction, demolition and excavation (CDE) waste disposed of at inert landfill sites</b>				
ELWP Target:	Progressive year on year decrease in amount of waste landfilled				
Links to ELWP Policy and Objectives:	Policies: W4 Objectives: A, C, E, F				
Performance v Target:	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
	Unknown	Unknown	3,562t	2,295t	Unknown
Data Source:	ELJWP evidence base (CDEW Management Requirement report v1.1 (Table 16) and v2.1 (Table 17))				
Commentary:	Deposit of inert waste at inert landfill is normally for the purposes of restoration of mineral workings and is generally considered 'other recovery' – not 'disposal'. Table 18 of the CDEW Management Requirement report shows that <1% of total C,D & E waste was landfilled in 2023. This was also the case in 2022 (Regulation 18 version).				
<b>Overall RAG Rating:</b>	<b>Green</b>				

<b>ELWP Indicator:</b>	<b>Percentage of household waste sent for reuse, recycling and composting (NI192)</b>				
ELWP Target:	<ul style="list-style-type: none"> <li>MSW targets: 40% (2010); 45% (2015); 50% (2020).</li> </ul>				
Links to ELWP Policy and Objectives:	Policies: W1 Objectives: A, B, H				
Performance v Target:	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
	26.8%	29.5%	31%	31.8%	n/a
Data Source:	Waste Topic Paper; National Defra data				
Commentary:	Recycling/composting performance for LACW remains low by comparison to Plan targets. ELWA has gained a dispensation from the Mayor regarding achievement of these targets via Environment Strategy scrutiny of the LACW contract. Low household waste recycling rates are largely due to nature of housing/demographic of East London restricting opportunity for setting out of separate materials It is not due to a lack of built recycling/composting capacity being available in the Plan area. Overall recovery targets (essentially landfill diversion) have been achieved/exceeded.				
<b>Overall RAG Rating:</b>	<b>Red</b>				

<b>ELWP Indicator:</b>	<b>Percentage of household waste recycled and composted at ELWA RRC sites</b>
ELWP Target:	Local output indicator (no numeric target)
Links to ELWP Policy and Objectives:	Policies: W2 Objectives:
Commentary:	In the absence of any numeric target being set this indicator has not been reported against.
<b>Overall RAG Rating:</b>	<b>Grey</b>

<b>ELWP Indicator:</b>	<b>Residual household waste generated per household (NI191)</b>
ELWP Target:	National indicator (no numeric target)
Links to ELWP Policy and Objectives:	Policies: W1 Objectives: A, B, H
Data Source:	National data
Commentary:	In the absence of any numeric target being set this indicator has not been reported against.
<b>Overall RAG Rating</b>	<b>Grey</b>

## Site Specific Indicators

<b>ELWP Indicator:</b>	<b>Provision of 2 small-scale IVC/AD facilities – Ferry Lane North, Havering</b>
ELWP Target	Delivery within 2015–2020
Links to ELWP Policy and Objectives:	Policies: W2 Objectives: B, C, D, E, G, H
Data Source:	London Borough of Havering planning applications and decision reports
Commentary:	<p>No planning applications were submitted to develop an organic waste facility at this particular location during the monitoring period.</p> <p>The ELJWP evidence base confirms existing facility capacity exceeds that required to provide sufficient qualifying capacity to manage the equivalent amount of HIC waste as set out in the London Plan apportionment envisaged by this indicator. It should be noted that the London Plan apportionment for the East London Boroughs for 2021 was 1,574,000 tonnes when the Plan was adopted and has been 1,409,000 tonnes since 2021 when the current London Plan was adopted (a reduction of 165,000 tonnes). Paragraph 4.11 of the ELWP anticipates the impact when monitoring shows that a surplus of capacity exists as follows: <i>‘Where it is apparent that surplus capacity has been identified it may be necessary to put back the delivery of a waste management facility to a later five year period, or review its allocation in the DPD and seek an alternative use.’</i></p>
<b>Overall RAG Rating:</b>	<b>Amber</b>

<b>ELWP Indicator:</b>	<b>Provision of 2 medium and 1 small-scale facility for IVC/AD/Recovery – Dagenham Dock, Sustainable Industries Park (LB Barking &amp; Dagenham)</b>
ELWP Target:	Delivery by 2020
Links to ELWP Policy and Objectives:	Policies: W2 Objectives: B, C, D, E, G, H
Data Source:	London Borough of Barking & Dagenham planning applications and decision reports
Commentary:	Two major facilities, the ReFood AD plant (c220k tpa) and the one operated by East London Biogas Limited (75ktpa), satisfying this target and the overall management requirement for the Plan area. The London Plan apportionment for the East London Boroughs for 2021 was 1,574,000 tonnes when the Plan was adopted and has reduced to 1,409,000 tonnes since 2021 when the 2021 London Plan was adopted (a reduction of 165,000 tonnes). Paragraph 4.11 of the ELWP anticipates the impact when monitoring shows that a surplus of capacity exists as follows: " <i>Where it is apparent that surplus capacity has been identified it may be necessary to put back the delivery of a waste management facility to a later five year period, or review its allocation in the DPD and seek an alternative use.</i> "
<b>Overall RAG Rating:</b>	<b>Green</b>

<b>ELWP Indicator:</b>	<b>Provision of medium-scale composting facility – Gerpins Lane, Havering</b>
ELWP Target:	Delivery within 2015–2020
Links to ELWP Policy and Objectives:	Policies: W2 Objectives: B, C, D, E, G, H
Data Source:	London Borough of Havering planning applications and decision reports
Commentary:	<p>No planning applications were submitted to develop a composting facility at this particular location during the monitoring period.</p> <p>The ELJWP evidence base confirms existing facility capacity exceeds that required to provide sufficient qualifying capacity to manage the equivalent amount of HIC waste as set out in the London Plan apportionment envisaged by this indicator.</p> <p>It should be noted that the London Plan apportionment for the East London Boroughs for 2021 was 1,574,000 tonnes when the Plan was adopted and has been 1,409,000 tonnes since 2021 when the current London Plan was adopted (a reduction of 165,000 tonnes). Paragraph 4.11 of the ELWP anticipates the impact when monitoring shows that a surplus of capacity exists as follows: <i>‘Where it is apparent that surplus capacity has been identified it may be necessary to put back the delivery of a waste management facility to a later five year period, or review its allocation in the DPD and seek an alternative use.’</i></p>
<b>Overall RAG Rating:</b>	<b>Amber</b>

<b>ELWP Indicator:</b>	<b>Provision of large-scale composting facility – Hall Farm, Havering</b>
ELWP Target:	Delivery within 2015 to 2020
Links to ELWP Policy and Objectives:	Policies: W2 Objectives: B, C, D, E, G, H
Data Source:	London Borough of Havering planning applications and decision reports
Commentary:	<p>No planning applications were submitted to develop a composting facility at this particular location during the monitoring period.</p> <p>The ELJWP evidence base confirms existing facility capacity exceeds that required to provide sufficient qualifying capacity to manage the equivalent amount of HIC waste as set out in the London Plan apportionment envisaged by this indicator. It should be noted that the London Plan apportionment for the East London Boroughs for 2021 was 1,574,000 tonnes when the Plan was adopted and has been 1,409,000 tonnes since 2021 when the current London Plan was adopted (a reduction of 165,000 tonnes). Paragraph 4.11 of the ELWP anticipates the impact when monitoring shows that a surplus of capacity exists as follows: <i>'Where it is apparent that surplus capacity has been identified it may be necessary to put back the delivery of a waste management facility to a later five year period, or review its allocation in the DPD and seek an alternative use.'</i></p>
<b>Overall RAG Rating:</b>	<b>Amber</b>



<b>ELWP Indicator:</b>	<b>Provision of medium–large facility for IVC/AD/MBT/Thermal (excl. incineration) – Beckton Riverside, Newham</b>
<b>ELWP Target:</b>	Delivery within 2010–2015
<b>Links to ELWP Policy and Objectives:</b>	Policies: W2 Objectives: B, C, D, E, G, H
<b>Data Source:</b>	London Borough of Newham planning applications and decision reports
<b>Commentary:</b>	<p>This target at the start of the Plan period was met through provision of AD capacity at an alternative location (Dagenham Sustainable Industries Park).</p> <p>No planning applications were submitted to develop a waste facilities at this particular location during the monitoring period.</p> <p>The ELJWP evidence base confirms existing facility capacity exceeds that required to provide sufficient qualifying capacity to manage the equivalent amount of HIC waste as set out in the London Plan apportionment envisaged by this indicator. It should be noted that the London Plan apportionment for the East London Boroughs for 2021 was 1,574,000 tonnes when the Plan was adopted and has been 1,409,000 tonnes since 2021 when the current London Plan was adopted (a reduction of 165,000 tonnes). Paragraph 4.11 of the ELWP anticipates the impact when monitoring shows that a surplus of capacity exists as follows: <i>‘Where it is apparent that surplus capacity has been identified it may be necessary to put back the delivery of a waste management facility to a later five year period, or review its allocation in the DPD and seek an alternative use.’</i></p>
<b>Overall RAG Rating:</b>	<b>Amber</b>

## 4. Policy Monitoring – Key Messages

This section considers overall performance relating to the implementation of each policy.

### **Policy W1 - Sustainable Waste Management**

Implementation by Boroughs increasingly ‘designs-in’ sustainable waste management. Conditions commonly secure Operational Waste Management Strategies and (where relevant) Circular Economy Statements. Redbridge applies a standard condition requiring a Circular Economy Statement and Operational Waste Strategy.

Despite provision of sufficient built capacity, ELWA’s household recycling performance remains significantly below the ELWP targets, 25-30% vs 50% target.

### **Policy W2 - Waste Management Capacity, Apportionment & Site Allocation**

No applications were received to develop new facilities on ELWP allocated sites in 2020–2024 at Ferry Lane North, Gerpins Lane, Hall Farm, and Beckton Riverside. The Dagenham Dock/Sustainable Industries Park (LSIP) allocation has substantially delivered AD capacity commissioned pre-2020 (c.295ktpa). Monitoring indicates sufficient (surplus) operational capacity to meet London Plan apportionments, eliminating the need for the development of additional capacity on the undeveloped allocated sites.

One safeguarded Schedule 1 site (Mayer Parry, Bidder Street) was redeveloped for a non-waste use with compensatory capacity provided, consistent with the safeguarding approach.

### **Policy W3 - Energy Recovery Facilities**

Renewable/low-carbon generation from waste has increased since the ELWP was adopted. Two AD plants at Dagenham Dock export biomethane/electricity and Beckton’s sewage sludge management facility supplies heat/power to the Beckton WWTW and the national grid. An EfW facility at LSIP North (up to 200ktpa) has been consented but is still to be built out. The lack of development is consistent with evidence supporting the ELJWP that additional other recovery capacity is not required.

### **Policy W4 - Disposal of inert waste by landfilling**

Available evidence indicates very low inert landfill reliance, likely affected by classifying some deposit of inert waste for a beneficial use as ‘other recovery’. <1% of C,D&E waste was landfilled in 2022–2023. This is consistent with the ELWP aim to minimise disposal and prioritise beneficial use including via restoration.

**Policy W5 - General Considerations with regard to Waste Proposals**

Development management practice has been effective. Approximately 41 waste-related permissions were issued (2020–2024), with robust conditions covering drainage/SuDS, air quality and transport. No permissions were granted contrary to EA advice on flood risk/water quality or contrary to EA/EHO advice on air quality, indicating full implementation of the criteria in W5. Modal shift outcomes are mixed as while few new permissions provided rail/wharf infrastructure, established routes facilitated transport of c250,000t of inert waste by rail and c50,000t of RDF by rail in 2022–2023. River Road (Barking) is subject to redevelopment to move ELWA residual LACW by river to the EfW at Belvedere.

## 5. Conclusions

### Monitoring Outcomes

- Despite adequate built capacity, household waste recycling remained well below the historic 50% target, reflecting the housing and demography of the area, in particular flatted development, rather than a lack of processing capacity.
- Existing facilities provide sufficient qualifying capacity to meet London Plan apportionments without further new development on allocated sites.
- Renewable energy generation from waste in East London has occurred as a result of two AD facilities at Dagenham Dock and the Beckton sludge-to-energy plant. A consented EfW scheme at LSIP North has not proceeded, but this is consistent with evidence that additional 'other recovery' capacity is not currently required.
- With regard to transport of waste, while few new permissions delivered wharf or rail infrastructure, established routes handled significant inert and RDF movements by rail, and the River Road site is being developed for river transport of ELWA residual LACW to Belvedere.
- Monitoring confirms that while no applications came forward on four ELWP allocations (Ferry Lane North, Gerpins Lane, Hall Farm, Beckton Riverside) the Dagenham Dock allocation was substantially delivered to meet the identified need of the Plan area as a whole..
- There was non-waste development at one safeguarded Schedule 1 waste sites and compensatory capacity was agreed.
- Many of the outcomes reflect the updated evidence base which confirms capacity at existing facilities to be safeguarded is sufficient to meet London Plan apportionments for HIC waste and London Plan targets for the management of C,D&E waste without the need for the development of new facilities.

### Data Gaps and Challenges

- Data for certain indicators intended to give a sense of how well waste is being managed was not readily available, however in some cases 'proxy' data was used in its place to provide an indication of how well the objectives of the ELWP were/are being met. An example of this is the use of landfill diversion for LACW (formerly 'municipal solid waste') as a measure of recovery rate, as it essentially measures the same metric, just from the opposite point of view.

## **Identification of areas where monitoring indicators are not directly relevant to Plan effectiveness or data is insufficient**

- Application of the ELWP monitoring framework has revealed that while some indicators give an overall feel for the direction of travel of waste management in East London, some don't have direct applicability when assessing the effectiveness of the Plan itself. For example, the inclusion of indicators relation to residual waste per household or proportion sent for recycling is not directly related to availability of local capacity for management of this waste stream. Rather it is dictated by collection methods applied and contract arrangements entered into for collection and management of the resulting waste. These in turn are heavily influenced by the demographic and housing configuration in East London as a whole (these determine what is actually possible/affordable).

## **Response and Next Steps**

- The East London Waste Plan was adopted over ten years ago and so the East London Boroughs are preparing a replacement waste local plan (ELJWP) based on an up to date evidence base which, in particular, shows that the sites allocated in the adopted ELWP are no longer required for the provision of additional waste management capacity. This new Plan also takes account of relevant updated local, regional and national policy, in particular the Boroughs' Local Plans, the London Plan, National Planning Policy for Waste and the National Planning Policy Framework.

## **Overarching Conclusion**

- Monitoring of the adopted East London Waste Plan essentially shows that the Plan's Vision and Objectives has been achieved in that sufficient, and appropriate, waste management capacity has been developed and continues to be available in East London.

## 6. Appendices

### Appendix 1 – East London Waste Plan Strategic Objectives

- A) Deliver sustainable development by driving waste management up the waste hierarchy, addressing waste as a resource and looking to disposal as the last option, while recognising that disposal must be adequately catered for;
- B) Work towards meeting targets set out in the Waste Strategy for England 2007, and the London Plan;
- C) Enable the provision of a range of waste technologies;
- D) Enable the provision of facilities to allow for net self-sufficiency in the ELWA boroughs in accordance with the London Plan;
- E) Enable waste to be managed in one of the nearest appropriate installations without endangering health or harming the environment;
- F) Integrate waste planning with other spatial concerns, including regeneration plans;
- G) Reverse the historical trend of the ELWA area being the dumping ground for London's waste; and
- H) Encourage our communities to take more responsibility for their waste.

## **Appendix 2 – East London Waste Plan Policies**

### **Policy W1: Sustainable Waste Management**

The boroughs will aim to drive waste management up the waste hierarchy by promoting waste minimisation, materials reuse, recycling & recovery of resources and help the delivery of national and regional targets for recycling and composting set out in the Waste Strategy for England 2007 and the London Plan by:

- (i) working in partnership with the general public and the business community in the ELWA area to provide information and advice and raise awareness;
- (ii) working in partnership with local community and voluntary groups and social enterprises to encourage waste minimisation, materials reuse, recycling and recovery of resources;
- (iii) ensuring that developers and contractors design new housing, commercial and other developments to maximise opportunities for future occupiers to minimise, reuse, recycle and recover resources from waste, by providing adequate space and facilities for storage and handling of segregated waste; and
- (iv) require the reuse of construction, excavation and demolition waste during new developments, such as the Thames Gateway, with on-site recycling and use of recycled aggregate wherever possible and encourage use of sustainable transport modes where the movement of waste is necessary.

### **Policy W2: Waste Management Capacity, Apportionment & Site Allocation**

The London Plan identifies the amount of municipal and commercial waste to be managed by the ELWA boroughs as 1,228,000 tonnes at 2011; 1,395,000 tonnes at 2016 and 1,573,000 tonnes at 2021. The ELWA boroughs will meet this apportionment by:

- (v) Safeguarding the capacity of existing waste management facilities listed in Schedule 1 and encouraging increased processing of waste at these facilities, to run at a higher figure towards the licensed capacity; and
- (vi) Approving strategic waste management facilities where it will contribute to the ELWA boroughs meeting the London Plan apportionment on sites within the locations listed in Schedule 2.

Where the applicant can demonstrate there are no opportunities within these preferred areas for a waste management facility, sites within designated industrial areas as identified in borough Local Development Frameworks will be considered.

Planning permission will only be granted for new waste water and sewage treatment plant, extensions to existing works, or facilities for the co-disposal of sewage with other wastes, where development is either needed to treat waste arisings from within the East London Waste Authority area or in the case of arisings from elsewhere the need cannot practicably and reasonably be met at another site – subject to the relevant borough’s policy/guidance and Policy W5 of this Plan. Wherever practical and economical, renewable energy generation will be encouraged as part of such waste management facilities.

In all cases applications will be required to meet the relevant borough design guidance and Policy W5.

### **Policy W3: Energy recovery facilities**

Opportunities for the incorporation of waste recovery and treatment facilities, where the energy produced from biological or thermal treatment can be utilised in local schemes, should be considered for all major new developments.

Applications for advanced thermal treatment facilities<sup>8</sup> will be considered only where the waste to be treated cannot practicably and reasonably be reused, recycled or processed to recover materials and where there is provision for energy recovery and co-location with complementary activities.

In all cases applications will be required to meet relevant design guidance and Policy W5.

### **Policy W4: Disposal of inert waste by landfilling**

The ELWA boroughs will only grant planning permission for waste disposal by landfilling provided:

- (vii) the waste to be disposed of cannot practicably and reasonably be reused; and
- (viii) the proposed development is both essential for and involves the minimum quantity of waste necessary for:
  - a) the purposes of restoring current or former mineral workings sites; or
  - b) facilitating a substantial improvement in the quality of land; or
  - c) facilitating the establishment of an appropriate after-use; or
  - d) improving land damaged or degraded as a result of existing uses and where no other satisfactory means exist to secure the necessary improvement; and

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<sup>8</sup> Advanced Thermal Treatment technologies exclude conventional incineration



Where the above criteria are met, all proposals for landfilling should:

- (i) incorporate finished levels that are compatible with the surrounding landscape. The finished levels should be the minimum required to ensure satisfactory restoration of the land for an agreed after-use; and
- (ii) include proposals for high quality restoration and aftercare of the site, taking account of the opportunities for enhancing the overall quality of the environment and the wider benefits that the site may offer, including nature and geological conservation and increased public accessibility.

### **Policy W5: General Considerations with regard to Waste Proposals**

Planning permissions for a waste related development will only be granted where it can demonstrate that any impacts of the development can be controlled to achieve levels that will not significantly adversely affect people, land, infrastructure and resources.

Applications for new facilities that manage non-apportioned waste must demonstrate that there is not a more suitable site nearer the source of waste arising with regard to the factors listed below.

The information supporting the planning application must include, where relevant to a development proposal, assessment of the following matters and where necessary, appropriate mitigation should be identified so as to minimise or avoid any material adverse impact and compensate for any loss including:

- (i) the release of polluting substances to the atmosphere or land arising from facilities and transport;
- (ii) the amount of greenhouse gases produced;
- (iii) the development on sites that are likely to be at greater risk now, or over the lifetime of the development due to climate change;
- (iv) the likely increase in pressure on resources with climate change;
- (v) the contamination of ground and surface water;
- (vi) the drainage of the site and adjoining land and the risk of flooding;
- (vii) water consumption requirements and consideration of water management within operational plant;
- (viii) groundwater conditions and the hydrogeology of the locality;
- (ix) the visual and landscape impact of the development on the site and surrounding land, including townscape and agricultural land;
- (x) in the case of buildings, demonstration of high quality of design and sustainable construction and drainage techniques;
- (xi) adverse effects on neighbouring amenity including transport, noise, fumes, vibration, glare, dust, litter, odour and vermin;

- (xii) transport impact of all movements, including opportunities for use of sustainable transport modes, traffic generation, access and the suitability of the highway network in the vicinity, access to and from the primary route network;
- (xiii) adverse impacts of all movements including: traffic generation, an unsuitable highway network, inadequate accessibility to the site or the primary road network in the vicinity; and limited or no opportunities for the use of sustainable transport modes;
- (xiv) the loss or damage to significant biodiversity conservation interests;
- (xv) the loss or damage to the historic environment, archaeological and cultural resources of value and importance;
- (xvi) potential danger to aircraft from bird strike and structures;
- (xvii) scope for limiting the duration of use; and
- (xviii) the management arrangements for residues arising from any waste management facility.