

Waste and Utilities Comments

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	11. WASTE MANAGEMENT a. W1: Waste Management Capacity - Would you keep, change or add something to this policy No comment.					W1 Waste management capacity	Waste and Utilities	Reg18-E-070/103	Aston Mansfield	Reg18-E-070
	Support noted.	Ballymore recognises the importance of ensuring sufficient waste capacity across London and ensuring existing waste management sites are safeguarded.		3			W1 Waste management capacity	Waste and Utilities	Reg18-E-077/051	Ballymore Group	Reg18-E-077

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	This wording change has not been made. We did not consider this change to be necessary as policy W1 allows for the loss of existing waste management sites where appropriate compensatory capacity is made within London at or above the same level of the waste hierarchy and the compensatory capacity at least meets, and should exceed, the maximum achievable throughput of the site proposed to be lost. This policy clause reflects the wording of London Plan policy SI 9 (Safeguarded waste sites).	However, Part 3 of the draft policy states 'Existing waste management sites within Newham will be safeguarded and should be retained in waste management use', we suggest including ' <u>unless allocated for strategic redevelopment</u> '. The Connaught Riverside site allocation contains an existing metal recycling facility which isn't compatible with residential development required by the draft site allocation, therefore facility must be relocated to ensure the successful redevelopment of the site. As long as this relocation is carried out in accordance with London Plan Policy SI9 in regard to compensatory capacity, there should be no objection to the relocation of this facility in policy terms, however, this would conflict with the current drafting of policy W1. We therefore suggest the policy is updated to reflect the requirements of the London Plan in this regard.		3			W1 Waste management capacity	Waste and Utilities	Reg18-E-077/052	Ballymore Group	Reg18-E-077

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	A change to this policy approach has not been made. We did not consider this change to be appropriate as the capacity of sites identified in the Joint Waste Plan evidence base will be confirmed through the forthcoming update to the East London Joint Waste Plan. In the interim, any planning application for proposals containing sites identified in the evidence base will be assessed in accordance with the requirements of draft Local Plan policy W1 and the London Plan.	Waste Use Some clarification is needed on the existing waste use on the southern part of the site (PMC Soil Solutions). Our research indicates that there has never been an approved planning application for this use on site and the Environment Agency do not have a record of a waste permit. Furthermore, we think it is unlikely that a planning application would ever be approved for a waste use, as the site is clearly allocated for employment and residential uses. This is evidenced as far back as 1999 where an application was refused for waste processing on this basis. Given this context, we do not believe the site qualifies as an existing waste site under SI 9 of the London Plan as there is no planning permission for waste processing or an extant permit from the EA. We would appreciate it if further clarification on this point is provided.		3			W1 Waste management capacity	Waste and Utilities	Reg18-E-121/032	Barratt London	Reg18-E-121

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				3			W1 Waste management capacity	Waste and Utilities	Reg18-E-121/044	Barratt London	Reg18-E-121
	A change to this policy approach has not been made. We did not consider this change to be appropriate as the capacity of sites identified in the Joint Waste Plan evidence base will be confirmed through the forthcoming update to the East London Joint Waste Plan. In the interim, any planning application for proposals containing sites identified in the evidence base will be assessed in accordance with the requirements of draft Local Plan policy W1 and the London Plan.										
				3			W1 Waste management capacity	Waste and Utilities	Reg18-E-108/028	Bellway Homes Limited	Reg18-E-108
	A change to this policy approach has not been made. We did not consider this change to be appropriate as the capacity of sites identified in the Joint Waste Plan evidence base will be confirmed through the forthcoming update to the East London Joint Waste Plan. In the interim, any planning application for proposals containing sites identified in the evidence base will be assessed in accordance with the requirements of draft Local Plan policy W1 and the London Plan. Waste uses ceasing to operate on a site will not negate the need for sites to demonstrate the re-provision of waste capacity within London, in line with the policy requirements of the London Plan.										

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				1			W1 Waste management capacity	Waste and Utilities	Reg18-E-133/178	Climate You Change	Reg18-E-133
	The Local Plan addresses this topic through waste policies. However, it cannot deliver the change you have requested. Our colleagues in the Highways and Skip permitting departments are able to help. We have also provided them with your comments.	General comments on waste: Can the council collect extra funds from residents taking on home building projects through charging higher fees for skip permits and using the extra money for sorting this waste for recycling? Alternatively, could the Council make it mandatory that residents only use approved skip hire companies, who can prove that they sort and recycle everything that they can?					W1 Waste management capacity	Waste and Utilities	Reg18-E-133/213	Climate You Change	Reg18-E-133
	The Local Plan addresses this topic through waste policies. However, it cannot deliver the change you have requested. Our colleagues in the Waste department are able to help, and host a Repair Café in the borough in collaboration with the East London Waste Authority. These types of events are also hosted by local community groups who operate across the borough, separate to the Council.	Up-cycling workshops - Climate You Change would really like to offer these.					W1 Waste management capacity	Waste and Utilities			

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				1			W1 Waste management capacity	Waste and Utilities	Reg18-E-133/215	Climate You Change	Reg18-E-133
	The Local Plan addresses this topic through waste policies. However, it cannot deliver the change you have requested. Our colleagues in the Waste department are able to help, and host a Repair Café in the borough in collaboration with the East London Waste Authority. These types of events are also hosted by local community groups who operate across the borough, separate to the Council.	Swap events – hosted in markets during occasional/regularly scheduled events, in creative & wellbeing or affordable workspaces. Ideally these would not incur entry fees, to enable entrance for all. Staff costs (unless staffed just by volunteers) could potentially be covered by modest charges paid only if people find suitable swaps. (Lower than prices for buying second hand, owing to swap element.) Items can include clothes, footwear, toys etc.									
	The Local Plan addresses this topic through waste policies. However, it cannot deliver the change you have requested. Our colleagues in the Waste department are able to help, and host a Repair Café in the borough in collaboration with the East London Waste Authority. These types of events are also hosted by local community groups who operate across the borough, separate to the Council.	Second hand sales events – as above, except without the swap element.		1			W1 Waste management capacity	Waste and Utilities	Reg18-E-133/216	Climate You Change	Reg18-E-133

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Reg18-E-065	DB Cargo (UK) Ltd	Reg18-E-065/009	Waste and Utilities	W1 Waste management capacity			3			In terms of how the Bow East Goods Yard site is identified and referenced in the the Emerging Newham Local Plan (Reg 18) Consultation this is as follows: (i) Policies Map The Draft Policies Map identifies the Bow East Goods Yard as follows: • Waste site identified in the Evidence Base for the East London Joint Waste Plan [W1] [• Strategic Industrial Location – Bow Goods Yard [J1]] Both the ‘waste’ and ‘SIL’ allocations are fully supported.	Support noted.
Reg18-E-145	Environment Agency	Reg18-E-145/183a	Waste and Utilities	W1 Waste management capacity						We are pleased to see the inclusion of Waste and Utilities under their own policy chapter [and note that the importance of water supply and provisions for wastewater have been recognised.]	Support noted
Reg18-E-145	Environment Agency	Reg18-E-145/184	Waste and Utilities	W1 Waste management capacity			1		W1.1.	We are pleased to see the strategic policy incorporates the principles of the circular economy and requires the submission of a circular economy statement	Support noted
Reg18-E-145	Environment Agency	Reg18-E-145/185	Waste and Utilities	W1 Waste management capacity			1			It is also positive to see the promotion of the waste hierarchy for the management of waste.	Support noted

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Reg18-E-145	Environment Agency	Reg18-E-145/186	Waste and Utilities	W1 Waste management capacity			2			It is noted that Newham will deliver an updated Joint East Waste Plan in collaboration with the East London boroughs of Havering, Barking and Dagenham, and Redbridge	Comment noted
Reg18-E-145	Environment Agency	Reg18-E-145/187	Waste and Utilities	W1 Waste management capacity			2			We encourage the alignment of policies within the Waste Plan with the Local Plan policies promoting approaches that support the transition to a more circular economy and the waste hierarchy.	Support noted
Reg18-E-145	Environment Agency	Reg18-E-145/188	Waste and Utilities	W1 Waste management capacity			2.1.e			We are pleased to see point W2.1.e. picks up the 'Agent of Change' principle well, and it is positive to see commitments to minimise the impacts of development on the surrounding area in terms of noise, odour and air pollution.	Support noted
Reg18-E-145	Environment Agency	Reg18-E-145/189	Waste and Utilities	W1 Waste management capacity			1.e			We also support the requirement for full 'enclosure' of waster operations, or equivalents environment protection.	Support noted
Reg18-E-145	Environment Agency	Reg18-E-145/190	Waste and Utilities	W1 Waste management capacity				3.294		It is noted that reference is given to the Environment Agency permits for waste management facilities in justification paragraph 3.294.	Comment noted

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	Support noted.	The Mayor welcomes the intention of the draft policy to follow the principles of circular economy and safeguard existing waste sites to meet its identified apportionment target within the London Plan (Table 9.2 of the London Plan sets out Newham's waste apportionment targets for 383,000 tonnes up to 2021 and 407,000 tonnes up to 2041).		2			W1 Waste management capacity	Waste and Utilities	Reg18-E-093/019	Greater London Authority	Reg18-E-093
	A change to this policy approach has not been made. We did not consider this change to be necessary as the East London boroughs entered into an Inter Authority Agreement in September 2023. We have appointed consultants to prepare a regulation 18 draft of the Joint Waste Plan and an associated Integrated Impact Assessment. Given the live nature of the production of the Joint Waste Plan, and the commitment of all boroughs to collaborative partnership working, we considered adding a timetable to the draft policy wording would not be appropriate, as this may be subject to change as the east London boroughs jointly progress this piece of work.	The Mayor also welcomes that work is underway on a new East London Waste Plan (ELWP). In this context, the draft Plan could provide a clear commitment to delivering the strategy by setting out a clear timetable for its adoption and through establishing a wider commitment to delivering the waste plan via an agreed Statement of Common Ground signed by the East London Waste Boroughs.		2			W1 Waste management capacity	Waste and Utilities	Reg18-E-093/020	Greater London Authority	Reg18-E-093

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	A change to this policy approach has not been made. We did not consider this change to be appropriate as the Evidence Base for the East London Joint Waste Plan shows there is sufficient capacity for east London to manage waste arising in its area without the need for the provision of new waste sites. Furthermore, the London Boroughs of Redbridge, Havering and Barking and Denham have not objected to the approach taken to proposing release of the Schedule 2 Beckton Riverside site in the draft Local Plan. We will be formally pursuing the release of this site through the update of the Joint Waste Plan, the preparation of which is currently being undertaken in parallel with the update of the London Borough of Newham's draft Local Plan. The removal of this safeguarding from the draft Local Plan also assists us in undertaking a design-led capacity testing of the site allocation at Beckton Riverside, helping us to optimise housing delivery to help meet the borough's housing requirement figure set out in the London Plan.	W1.3		2			W1 Waste management capacity	Waste and Utilities	Reg18-E-093/021a	Greater London Authority	Reg18-E-093
	Comment noted. This will be addressed through the production of the Joint Waste Plan.	W1.3		2			W1 Waste management capacity	Waste and Utilities	Reg18-E-093/021b	Greater London Authority	Reg18-E-093

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Reg18-E-027	Resident	Reg18-E-027/047a	Waste and Utilities	W1 Waste management capacity			1			I strongly support the hierarchy of reduce, reuse, recycle – with dispose without recycling being only the last resort.	Support noted.
Reg18-E-027	Resident	Reg18-E-027/048	Waste and Utilities	W1 Waste management capacity			2			I appreciate that Newham has recently improved what can be recycled, and I appreciate that it is dependant to some extent on the East London Waste Authority and the neighbouring partnership boroughs. But I am a bit concerned to see so little about recycling facilities, and the assertion that there are surplus waste management facilities in the borough. I don't know what the plan means by that – I certainly don't think there are surplus recycling facilities. I think there are some things that are really hard to recycle, eg. electrical waste, hard plastics, and can only be taken to Jenkins Lane recycling centre but that is really hard to get to and to use – please see my comments on 15 minute neighbourhoods in transport.	The Local Plan addresses this topic through waste policies. However, it cannot deliver the change you have requested. Our colleagues in the Waste department are able to help. We have also provided them with your comments. If you are unable to travel to Jenkins Lane, you can book a bulky waste collection is for large unwanted items including hard plastics and bulky goods such as furniture, fridges, freezers or TVs. TRAID provides a free clothing collection service to residents and businesses in the London Borough of Newham. As part of your main clothing donation, you can also include a bag of small Waste Electrical and Electronic Equipment (WEEE) items.

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Reg18-E-027	Resident	Reg18-E-027/049a	Waste and Utilities	W1 Waste management capacity			1			There are two common things that are hard to recycle in the borough, but easy for people living in other boroughs. These are Tetrapaks/juice cartons and food waste. Neighbouring Hackney and Walthamstow have juice carton recycling banks all over the place in the streets, so they must have somewhere they can recycle them. I appreciate they are with a different Waste authority but it can't be beyond the realms of possibility for Newham to have this too.	The Local Plan addresses this topic through waste policies. However, it cannot deliver the change you have requested. Our colleagues in the Waste department are able to help, and are more broadly looking at scope for improved recycling as part of the development of Newham's Public Realm Waste and Cleansing Strategy. We have also provided them with your comments. You are able to recycle Tetrapaks at Jenkins Lane. As part of national changes, cartons will be added to the recycling collection from April 2026
Reg18-E-027	Resident	Reg18-E-027/049d	Waste and Utilities	W1 Waste management capacity						The other problem is how to safely dispose of hazardous waste, by which I mean ordinary things such as varnish, aerosols. I don't use these things much and have moved over to more environmentally friendly substances – but honestly it is a nightmare to dispose of safely. Most people just probably just chuck it in the bin. I tried to do it online on City of London's hazardous waste collection – but it was really difficult and required virtually a degree in chemistry! I know you collect empty aerosol cans but what about half-full ones of stuff you're not going to use anymore?	The Local Plan addresses this topic through Waste policies. However, it cannot deliver the change you have requested. Our colleagues in Waste department are able to help, and the following link provides further information on how to dispose of hazardous waste: Hazardous waste collection – Newham Council https://www.newham.gov.uk/homepage/75/hazardous-waste-collection We have also provided them with your comments.

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	The Local Plan addresses this topic through Waste policies. However, it cannot deliver the change you have requested. The Council does not control where waste is transported for disposal as we are only a waste collection authority. Once the waste has been collected by the Council, it is sent for disposal by the East London Waste Authority (ELWA). ELWA are a separate organisation to the Council, and their website provides further information on what happens to waste once it is disposed of.			3			W1 Waste management capacity	Waste and Utilities	Reg18-E-027/050	Resident	Reg18-E-027
	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy W1 supports the waste hierarchy, which is an important component of meeting the London Plan target to deliver net-waste self-sufficiency. The waste hierarchy gives top priority to preventing waste in the first place. When waste is created, it gives priority to preparing it for reuse, then recycling, then recovery, and last of all disposal (e.g. landfill). Energy recovery from waste is part of the waste hierarchy, albeit at a lower priority, being the last element of the waste hierarchy before final disposal of waste.			1			W1 Waste management capacity	Waste and Utilities	Reg18-E-027/051	Resident	Reg18-E-027

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	The Local Plan addresses this topic through waste policies. However, it cannot deliver the change you have requested. Skip collections are run privately in the borough. Our colleagues in the Highways and Skip permitting departments are able to help with obtaining permits for skips. We have also provided them with your comments.	Distributed waste proposals - skip, collections, across borough. Better than Beckton					W1 Waste management capacity	Waste and Utilities	Reg18-D-001/148	Local Plan Drop-In	Reg18-D-001
	A change to this policy approach has not been made. We did not consider this change to be necessary as Policy W1 supports the principles of the circular economy and waste hierarchy, which seek to prioritise reduction, reuse, recycling, and energy recovery before final disposal of waste, aiming to keep materials in use at their highest value for as long as possible.	Can increase value of things if caught early on and recycled		1			W1 Waste management capacity	Waste and Utilities	Reg18-D-001/171	Local Plan Drop-In	Reg18-D-001

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	The Local Plan addresses this topic through our policy on public realm net gain (policy D2), which seeks for major developments to make a proportionate contribution towards public realm enhancement and maintenance beyond the site. However, it cannot deliver the change you have requested. Our colleagues in Waste department are able to help if you have concerns related to a particular site. Please see the following links for reporting issues: - Recycling, waste and bin collections – Newham Council https://www.newham.gov.uk/rubbish-recycling-waste - Report fly-tippers – Fly-tipping: Reporting and removal – Newham Council https://www.newham.gov.uk/public-health-safety/fly-tipping-reporting-removal Further information about fines for people who litter can be found here: Street Litter – Newham Council https://www.newham.gov.uk/transport-streets/street-litter We have also provided the Waste team with your comments.	Please implement regular cleaning of the residential streets,					W1 Waste management capacity	Waste and Utilities	Reg18-T-118/002	Resident	Reg18-T-118

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	The Local Plan addresses this topic through our policy on public realm net gain (policy D2), which seeks for major developments to make a proportionate contribution towards public realm enhancement and maintenance beyond the site. However, it cannot deliver the change you have requested. Our colleagues in Waste department are able to help if you have concerns related to a particular site. Please see the following links for reporting issues: - Recycling, waste and bin collections – Newham Council https://www.newham.gov.uk/rubbish-recycling-waste - Report fly-tippers – Fly-tipping: Reporting and removal – Newham Council https://www.newham.gov.uk/public-health-safety/fly-tipping-reporting-removal Further information about fines for people who litter can be found here: Street Litter – Newham Council https://www.newham.gov.uk/transport-streets/street-litter We have also provided the Waste team with your comments.	discourage littering and fly tipping.					W1 Waste management capacity	Waste and Utilities	Reg18-T-118/003	Resident	Reg18-T-118
	Support noted.	[Keep it]					W1 Waste management capacity	Waste and Utilities	Reg18-T-126/030	Resident	Reg18-T-126

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	Support noted.	Policy W1: Waste Management Capacity Bow Goods Yard is proposed to be designated as a waste site which is identified in the evidence base for the East London Joint Waste. Draft Policy W1 (Waste Management Capacity) outlines that the management of waste and development of waste management facilities in Newham should follow the principles of the circular economy and waste hierarchy, prioritising reduction, reuse, recycling, and energy recovery before final disposal. The policy further states that Newham will meet its identified apportionment target set out within the London Plan (2021) through the delivery of an updated East London Waste Plan in collaboration with the East London Waste Authority boroughs. Whilst this policy and subsequent designation of Bow Goods Yard as a waste site is supported in principle, [this needs to be considered alongside other policy aims such as intensification of industrial uses].		3			W1 Waste management capacity	Waste and Utilities	Reg18-E-019/015a	Network Rail - Bow Goods Yard	Reg18-E-019

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				3			W1 Waste management capacity	Waste and Utilities	Reg18-E-019/015b	Network Rail - Bow Goods Yard	Reg18-E-019
	A change to this policy approach has not been made. We did not consider this change to be appropriate as any loss of existing safeguarded waste management capacity will need to be considered either in accordance with Policy SI 9 of the London Plan or through the update to the East London Joint Waste Plan.										
				3			W1 Waste management capacity	Waste and Utilities	Reg18-E-019/015c	Network Rail - Bow Goods Yard	Reg18-E-019
	A change to this policy approach has not been made. We did not consider this change to be appropriate as any loss of existing safeguarded waste management capacity will need to be considered either in accordance with Policy SI 9 of the London Plan or through the update to the East London Joint Waste Plan.										
				3			W1 Waste management capacity	Waste and Utilities	Reg18-E-019/015d	Network Rail - Bow Goods Yard	Reg18-E-019
	A change to this policy approach has not been made. We did not consider this change to be appropriate as any loss of existing safeguarded waste management capacity will need to be considered either in accordance with Policy SI 9 of the London Plan or through the update to the East London Joint Waste Plan.										
							W1 Waste management capacity	Waste and Utilities	Reg18-T-011/026	Resident	Reg18-T-011
	Support noted.										

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Reg18-T-018	Resident	Reg18-T-018/014	Waste and Utilities	W1 Waste management capacity						[Add to it] More bins	The Local Plan addresses this topic through waste policies. However, it cannot deliver the change you have requested. Our colleagues in the Waste department are able to help, and if you have feedback on a specific location for the team you can use the following link: Complain, compliment or suggest – Newham Council <u>We have also provided them with your comments.</u>
Reg18-T-019	Resident	Reg18-T-019/025	Waste and Utilities	W1 Waste management capacity						[Add to it] Unclear need more information	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.
Reg18-T-038	Resident	Reg18-T-038/012	Waste and Utilities	W1 Waste management capacity						[Add to it] EVERYONE is acutely aware of the need to recycle and manage waste. We need to get EVERYONE involved to generate new ideas and to get involved with waste management. The council is supposed to help cultivate new ideas and not just impose ideas of their own, as innovation is key to ensuring we do not keep adding to the spiralling destruction ALL AROUND US.	The Local Plan addresses this topic through waste policies. However, it cannot deliver the change you have requested. Our colleagues in the Waste department are able to help, and are more broadly looking at scope for improved recycling as part of the development of Newham's Public Realm Waste and Cleansing Strategy. We have also provided them with your comments.
Reg18-T-045	Resident	Reg18-T-045/012	Waste and Utilities	W1 Waste management capacity			1			[Keep it] It's recycling that needs reform	The Local Plan addresses this topic through waste policies. However, it cannot deliver the change you have requested. Our colleagues in the Waste department are able to help, and are more broadly looking at scope for improved recycling as part of the development of Newham's Public Realm Waste and Cleansing Strategy. We

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	have also provided them with your comments.										
	Support noted.	[Keep it] NO					W1 Waste management capacity	Waste and Utilities	Reg18-T-057/041	Resident	Reg18-T-057
	The Local Plan addresses this topic through our policy on public realm net gain (policy D2), which seeks for major developments to make a proportionate contribution towards public realm enhancement and maintenance beyond the site. However, it cannot deliver the change you have requested. Our colleagues in Waste department are able to help if you have concerns related to a particular site. Please see the following links for reporting issues: - Recycling, waste and bin collections – Newham Council https://www.newham.gov.uk/rubbish-recycling-waste - Report fly-tippers – Fly-tipping: Reporting and removal – Newham Council https://www.newham.gov.uk/public-health-safety/fly-tipping-reporting-removal Further information about fines for people who litter can be found here: Street Litter – Newham Council	[Add to it] Please keep the streets, residential areas and recycling hubs clean and empty the bins frequently. Please clear up rubbish and fly-tipping everywhere.					W1 Waste management capacity	Waste and Utilities	Reg18-T-072/026	Resident	Reg18-T-072

Comment Response		https://www.newham.gov.uk/transport-streets/street-litter We have also provided the Waste team with your comments.
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	This Policy approach has now changed to ensure better alignment with London Plan Policy S6. We did not consider a change to the Policy clauses to be necessary as Policy CF2.6(k) already requires the provision of free, publically available toilets. This requirement is further expanded in the Reg 18 Implementation text for this Policy. However, for clarity, and to show alignment with London Plan Policy S6, we have amended the implementation text to include details on who public toilets should be designed for, reference to the British Standard for 'Changing Spaces' and information on opening hours. We have also included reference to London Plan Policy S6 in the Policy links for CF2.	[Add to it] Clean WCs public use needed in parks and shopping malls. [Originally submitted in response to W1]					W1 Waste management capacity	Waste and Utilities	Reg18-T-072/027	Resident	Reg18-T-072
	The Local Plan addresses this topic through waste policies. However, it cannot deliver the change you have requested. Our colleagues in the Waste department are able to help and have recently consulted on a new Public Realm Waste and Cleansing Strategy. We have also provided them with your comments.	[Add to it] Please invest in upgrading all waste [and utilities] facilities and services.					W1 Waste management capacity	Waste and Utilities	Reg18-T-072/030	Resident	Reg18-T-072
	The Local Plan addresses this topic through Waste policies. However, it cannot deliver the change you have requested. We now have bins with orange lids, which replaced orange recycling bags so the Council can help reduce the use of single use plastics. However, if you do not have space for a recycling bin, then we will deliver orange bags for you to use.	[Add to it] In the past Newham started to give orange recycle bags which is stopped now, which is bad. This service should start again.		1			W1 Waste management capacity	Waste and Utilities	Reg18-T-088/027	Resident	Reg18-T-088

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								Waste and Utilities	Reg18-T-097/001	Resident	Reg18-T-097
	Unfortunately it was not clear what change you wanted to make to this part of the Plan.	[Change it] Make it more efficient					W1 Waste management capacity	Waste and Utilities	Reg18-T-103/028	Resident	Reg18-T-103
	The Local Plan addresses this topic through waste policies. However, it cannot deliver the change you have requested. Our colleagues in the Waste department are able to help and have recently consulted on a new Public Realm Waste and Cleansing Strategy. We have also provided them with your comments.	[Change it] Better quality facilities					W1 Waste management capacity	Waste and Utilities	Reg18-T-105/026	Resident	Reg18-T-105
	Support noted.	[Keep it]					W1 Waste management capacity	Waste and Utilities	Reg18-T-114/006	Resident	Reg18-T-114
	The Local Plan addresses this topic through waste policies. However, it cannot deliver the change you have requested. Our colleagues in the Waste department are able to help. We have also provided them with your comments. At the moment collections are once per week for rubbish, and once per fortnight for recycling. We will shortly be moving to collections once per week for recycling.	[Add to it] Something that will help with the number of collection days for recycling		1			W1 Waste management capacity	Waste and Utilities	Reg18-T-114/007	Resident	Reg18-T-114
	The Local Plan addresses this topic through waste policies. However, it cannot deliver the change you have requested. Our colleagues in the Waste department are able to help, and are more broadly looking at scope for improved recycling as part of the development of Newham's Public Realm Waste and Cleansing Strategy. We	[Add to it] Something that will help [with the number of collection days for recycling] and expanding on the recycling material		1			W1 Waste management capacity	Waste and Utilities			

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	have also provided them with your comments.										
	The Local Plan addresses this topic through waste policies. However, it cannot deliver the change you have requested. Our colleagues in the Waste department are able to help, and if you have feedback on a specific location for the team you can use the following link: Complain, compliment or suggest – Newham Council https://www.newham.gov.uk/contact-information/complain-comment-compliment We have also provided them with your comments.						W1 Waste management capacity	Waste and Utilities	Reg18-T-116/014	Resident	Reg18-T-116
	The Local Plan addresses this topic through waste policies. However, it cannot deliver the change you have requested. Our colleagues in the Waste department are able to help, and if you have feedback on a specific location for the team you can use the following link: Complain, compliment or suggest – Newham Council https://www.newham.gov.uk/contact-information/complain-comment-compliment						W1 Waste management capacity	Waste and Utilities	Reg18-T-116/015	Resident	Reg18-T-116

Comment Response		Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		We have also provided them with your comments.										
		The Local Plan addresses this topic through waste policies. However, it cannot deliver the change you have requested. Our colleagues in the Public Realm team run a programme of door knocking across the borough, and attend schools and local events to engage and educate residents on all elements of waste and recycling management.	[Add to it] and more education to get rid of our waste in bins and not in streets.					W1 Waste management capacity	Waste and Utilities	Reg18-T-116/016	Resident	Reg18-T-116

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-116	Resident	Reg18-T-116/017	Waste and Utilities	W1 Waste management capacity						[Add to it] Canning Town could become a much cleaner city if there were not so much rubbish around. The other day I saw three large bags with rubbish from some of the many fast food places in the area who had placed their rubbish in the street instead of bins and there was a big mouse enjoying its meal just behind one of the bags. That happened under the brindle between Morrisons and post office, so in a pretty central point. This is such a bad image for our city.	The Local Plan addresses this topic through our waste policies. However, it cannot deliver the change you have requested. Our colleagues in Waste department are able to help if you have concerns related to a particular site. Please see the following links for reporting issues: - Recycling, waste and bin collections – Newham Council https://www.newham.gov.uk/rubbish-recycling-waste - Report fly-tippers – Fly-tipping: Reporting and removal – Newham Council https://www.newham.gov.uk/public-health-safety/fly-tipping-reporting-removal Further information about fines for people who litter can be found here: Street Litter – Newham Council https://www.newham.gov.uk/transport-streets/street-litter We have also provided the Waste team with your comments.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The Local Plan addresses this topic through our policy on public realm net gain (policy D2), which seeks for major developments to make a proportionate contribution towards public realm enhancement and maintenance beyond the site. However, it cannot deliver the change you have requested. Our colleagues in Waste department are able to help if you have concerns related to a particular site. Please see the following links for reporting issues: - Recycling, waste and bin collections – Newham Council https://www.newham.gov.uk/rubbish-recycling-waste - Report fly-tippers – Fly-tipping: Reporting and removal – Newham Council https://www.newham.gov.uk/public-health-safety/fly-tipping-reporting-removal Further information about fines for people who litter can be found here: Street Litter – Newham Council https://www.newham.gov.uk/transport-streets/street-litter We have also provided the Waste team with your comments.						W1 Waste management capacity	Waste and Utilities	Reg18-T-122/001	Resident	Reg18-T-122

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-122	Resident	Reg18-T-122/002	Waste and Utilities	W1 Waste management capacity						[Change it] Some benches were built a long time ago but there also are piles of rubbish around them and all over the green areas. Whose ideas were to put there and they never thought that people would take breaks have some snacks or drinks and after there is no even single bin or that area as far as passing by never been cleaned. Now that it's toxic with alcohol waste and plenty of rats. It is so hazardous.	The Local Plan addresses this topic through our waste policies. However, it cannot deliver the change you have requested. Our colleagues in Waste department are able to help if you have concerns related to a particular site. Please see the following links for reporting issues: - Recycling, waste and bin collections – Newham Council https://www.newham.gov.uk/rubbish-recycling-waste - Report fly-tippers – Fly-tipping: Reporting and removal – Newham Council https://www.newham.gov.uk/public-health-safety/fly-tipping-reporting-removal Further information about fines for people who litter can be found here: Street Litter – Newham Council https://www.newham.gov.uk/transport-streets/street-litter We have also provided the Waste team with your comments.
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/022	Waste and Utilities	W1 Waste management capacity			3		W1.3	Furthermore, St William notes and welcomes the recommendation outlined within the evidence base for the East London Joint Waste Plan for the removal of the Schedule 2 Waste Allocation sites meaning Beckton Riverside is no longer identified as a potential waste site for strategic waste management	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-070	Aston Mansfield	Reg18-E-070/104	Waste and Utilities	W2 New or improved waste management facilities						b. W2: New or improved waste management facilities - Would you keep, change or add something to this policy? No comment.	Comment noted.
Reg18-T-006	Community Group Representative	Reg18-T-006/013	Waste and Utilities	W2 New or improved waste management facilities						[Keep it] Make it easier for community facilities to recycle- have community / charity collections.	The Local Plan addresses this topic through waste policies. However, it cannot deliver the change you have requested. Our colleagues in the Waste department are able to help, and are more broadly looking at scope for improved recycling as part of the development of Newham's Public Realm Waste and Cleansing Strategy. We have also provided them with your comments.
Reg18-T-006	Community Group Representative	Reg18-T-006/014	Waste and Utilities	W2 New or improved waste management facilities						[Keep it] Consider actions such as extra recycling & waste generated by foodbanks etc	The Local Plan addresses this topic through waste policies. However, it cannot deliver the change you have requested. Our colleagues in the Waste department are able to help, and are more broadly looking at scope for improved recycling as part of the development of Newham's Public Realm Waste and Cleansing Strategy. We have also provided them with your comments.
Reg18-T-071	Resident	Reg18-T-071/014	Waste and Utilities	W2 New or improved waste management facilities						[Change it] More educational programmes so that we can understand the changes being made	The Local Plan addresses this topic through waste policies. However, it cannot deliver the change you have requested. Our colleagues in the Public Realm team run a programme of door knocking across the borough, and attend schools and local events to engage and educate residents on

Comment Response	all elements of waste and recycling management.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The Local Plan addresses this topic through waste policies. However, it cannot deliver the change you have requested. Our colleagues in the Waste department are able to help. We have also provided them with your comments. If you are unable to travel to Jenkins Lane, you can book a bulky waste collection is for large unwanted items including hard plastics and bulky goods such as furniture, fridges, freezers or TVs.	Fifteen-minute neighbourhood s and recycling centre The only thing that I can't get to in 15 minutes walk, and that is actually really, really hard and awkward to get to without a car is the Jenkins Lane recycling Centre. Firstly, I've only been there once, because the journey by public transport was so difficult, awkward and stressful. There isn't an easy route via public transport. I usually go to the Chigwell Road centre in Redbridge now but they say it is fine for me as a Newham resident to go there. Secondly, the Jenkins Lane recycling centre isn't designed for pedestrians. It's all designed for car drivers – when I turned up as a pedestrian, they were shocked, and it was really dangerous. There is the same problem at the Chigwell Road Centre. Thirdly, it is really difficult to carry heavy or bulky items on public transport, and maybe a bit dangerous. It is the only time when I've considered asking someone to drive me somewhere in their car. Can Newham make recycling facilities a bit easier to use without a car please?					W2 New or improved waste management facilities	Waste and Utilities	Reg18-E-027/043	Resident	Reg18-E-027

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted.	[Keep it]					W2 New or improved waste management facilities	Waste and Utilities	Reg18-T-126/031	Resident	Reg18-T-126
	Unfortunately it was not clear what change you wanted to make to this part of the Plan.	[Change it] Be bolder					W2 New or improved waste management facilities	Waste and Utilities	Reg18-T-002/077	Resident	Reg18-T-002
	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.	[Add to it] Need more info					W2 New or improved waste management facilities	Waste and Utilities	Reg18-T-019/026	Resident	Reg18-T-019
	Unfortunately, it was not clear what change or addition you wanted to make to this part of the Plan. Policy W1 supports the principles of the circular economy and waste hierarchy, which seek to prioritise reduction, reuse, recycling, and energy recovery before final disposal of waste, aiming to keep materials in use at their highest value for as long as possible. Policy CE3 also requires developments to consider the circular economy and any embodied carbon in the planning of buildings. Developments should set out how a building could be deconstructed in future.	[Add to it] What happens when we keep going up and one day they all have to come down...					W2 New or improved waste management facilities	Waste and Utilities	Reg18-T-038/015	Resident	Reg18-T-038
	Support noted.	[Keep it] None					W2 New or improved waste management facilities	Waste and Utilities	Reg18-T-045/013	Resident	Reg18-T-045

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Unfortunately it was not clear what change you wanted to make to this part of the Plan.	[Add to it] N					W2 New or improved waste management facilities	Waste and Utilities	Reg18-T-057/042	Resident	Reg18-T-057
	The Local Plan addresses this topic through our policy on public realm net gain (policy D2), which seeks for major developments to make a proportionate contribution towards public realm enhancement and maintenance beyond the site. However, it cannot deliver the change you have requested. Our colleagues in Waste department are able to help if you have concerns related to a particular site. Please see the following links for reporting issues: - Recycling, waste and bin collections – Newham Council https://www.newham.gov.uk/rubbish-recycling-waste - Report fly-tippers – Fly-tipping: Reporting and removal – Newham Council https://www.newham.gov.uk/public-health-safety/fly-tipping-reporting-removal Further information about fines for people who litter can be found here: Street Litter – Newham Council https://www.newham.gov.uk/transport-streets/street-litter We have also provided the Waste team with your comments.	[Add to it] Please upgrade all public facilities and ensure they are properly maintained and clean.					W2 New or improved waste management facilities	Waste and Utilities	Reg18-T-072/028	Resident	Reg18-T-072

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-103	Resident	Reg18-T-103/029	Waste and Utilities	W2 New or improved waste management facilities						[Change it] Improved service	The Local Plan addresses this topic through waste policies. However, it cannot deliver the change you have requested. Our colleagues in the Waste department are able to help and have recently consulted on a new Public Realm Waste and Cleansing Strategy. We have also provided them with your comments.
Reg18-T-105	Resident	Reg18-T-105/027	Waste and Utilities	W2 New or improved waste management facilities						[Keep it]	Support noted.
Reg18-T-109	Resident	Reg18-T-109/063	Waste and Utilities	W2 New or improved waste management facilities						[Add to it] Again Newham is [overcrowded] and suffering from noise pollution,	A change to this policy approach has not been made. We did not consider this change to be necessary as policy D7 (Neighbourliness) requires developments to avoid unacceptable exposure to noise.

Reg18-T-109	Resident	Reg18-T-109/064	Waste and Utilities	W2 New or improved waste management facilities							[Add to it] Again Newham is [overcrowded and] suffering from [noise pollution, overcrowding] and ASB The Local Plan addresses the topic of safety and security through a range of policies, such as requiring developments to have proactively design in safety and security measures (see Policies D1, D2, D6, GWS1), and have Secure by Design accreditation (Policy D1). Planning obligations will also be sought to support physical policing infrastructure (Policy D2) and to build capacity in local partnerships addressing high streets safety coordination (Policy HS5). However The Local Plan cannot deliver the change you have requested. The Council take all reports of noise and ASB seriously and will take appropriate steps to abate reported nuisances. There are also a number of different programs in place to reduce fly tipping on the Borough. Community Safety team work in partnership with Cleansing, Waste and Recycling, Housing, Private Rented Service, Greenspace, Neighbourhoods and Planning to tackle fly tipping and littering. Community Safety Enforcement Officers are authorised to investigate and enforce against all illegal waste dumping. Fixed penalty notices and prosecutions are used to address fly tipping and littering. The Community Safety Enforcement Officers can also, where appropriate, issue Community Protection Warning Notices/Notices and Fixed Penalty Notices to persistent beggars and buskers, or people displaying acts of antisocial behaviour. However, Officers are required to make necessary referrals to outreach services, such as, Change Grow Live (CGL) and Street Population, for individuals that
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												are vulnerable, rough sleeping or living with addiction. Our colleagues in Community Safety Enforcement department may be able to help. We have also provided them with your comments.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The Local Plan addresses this topic through our policy on public realm net gain (policy D2), which seeks for major developments to make a proportionate contribution towards public realm enhancement and maintenance beyond the site. However, it cannot deliver the change you have requested. Our colleagues in Waste department are able to help if you have concerns related to a particular site. Please see the following links for reporting issues: - Recycling, waste and bin collections – Newham Council https://www.newham.gov.uk/rubbish-recycling-waste - Report fly-tippers – Fly-tipping: Reporting and removal – Newham Council https://www.newham.gov.uk/public-health-safety/fly-tipping-reporting-removal Further information about fines for people who litter can be found here: Street Litter – Newham Council https://www.newham.gov.uk/transport-streets/street-litter We have also provided the Waste team with your comments.						W2 New or improved waste management facilities	Waste and Utilities	Reg18-T-109/065	Resident	Reg18-T-109

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The Local Plan addresses the topic of safety and security through a range of policies, such as requiring developments to have proactively design in safety and security measures (see Policies D1, D2, D6, GWS1), and have Secure by Design accreditation (Policy D1). Planning obligations will also be sought to support physical policing infrastructure (Policy D2) and to build capacity in local partnerships addressing high streets safety coordination (Policy HS5). The Metropolitan Police Service (run by the GLA), is also a consultee for the Local Plan and as part of decisions on major planning applications, and have dedicated designing-out-crime officers who are trained to conduct environmental visual audits to identify methods of making a place less attractive for criminal behaviour. Please also see responses we have provided to their comments on the draft Local Plan. However The Local Plan cannot deliver the change you have requested. These offences are investigated by the Police. However, Community Safety do work in partnership with the Police and other Council departments to tackle and reduce crime and ASB in the hotspot locations around the Borough. Whilst the Council are unable to task Police officers, we can through our partnership work request and recommend patrols in a particular location,						W2 New or improved waste management facilities	Waste and Utilities	Reg18-T-109/066	Resident	Reg18-T-109

Comment Response		should there be justifiable grounds. We have also provided the Community Safety Enforcement department with your comments.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted.	[Keep it]					W2 New or improved waste management facilities	Waste and Utilities	Reg18-T-114/008	Resident	Reg18-T-114
	The Local Plan addresses this topic through our policy on public realm net gain (policy D2), which seeks for major developments to make a proportionate contribution towards public realm enhancement and maintenance beyond the site. However, it cannot deliver the change you have requested. Our colleagues in Waste department are able to help if you have concerns related to a particular site. Please see the following links for reporting issues: - Recycling, waste and bin collections – Newham Council https://www.newham.gov.uk/rubbish-recycling-waste - Report fly-tippers – Fly-tipping: Reporting and removal – Newham Council https://www.newham.gov.uk/public-health-safety/fly-tipping-reporting-removal Further information about fines for people who litter can be found here: Street Litter – Newham Council https://www.newham.gov.uk/transport-streets/street-litter We have also provided the Waste team with your comments.	[Change it] More cleaners needed					W2 New or improved waste management facilities	Waste and Utilities	Reg18-T-122/003	Resident	Reg18-T-122

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-122	Resident	Reg18-T-122/004	Waste and Utilities	W2 New or improved waste management facilities						[Change it] and more CCTV cameras to check on illegal dumping	The Local Plan addresses this topic through our policy on public realm net gain (policy D2), which seeks for major developments to make a proportionate contribution towards public realm enhancement and maintenance beyond the site. However, it cannot deliver the change you have requested. Our colleagues in Waste department are able to help if you have concerns related to a particular site. Please see the following links for reporting issues: - Recycling, waste and bin collections – Newham Council https://www.newham.gov.uk/rubbish-recycling-waste - Report fly-tippers – Fly-tipping: Reporting and removal – Newham Council https://www.newham.gov.uk/public-health-safety/fly-tipping-reporting-removal Further information about fines for people who litter can be found here: Street Litter – Newham Council https://www.newham.gov.uk/transport-streets/street-litter We have also provided the Waste team with your comments.
Reg18-E-070	Aston Mansfield	Reg18-E-070/105	Waste and Utilities	W3 Waste management in developments						c. W3: Waste Management in Developments - Would you keep, change or add something to this policy? No comment.	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-133	Climate You Change	Reg18-E-133/001	Waste and Utilities	W3 Waste management in developments						We forgot to include a suggestion for making it mandatory for developers to include a community fridge for residents to take their unwanted food, to share with their neighbours, to cut down on the problem of food waste	A change to this policy approach has not been made. We did not consider this change to be appropriate as such provision will be disproportionate to manage, noting the potential health and safety implications of making sure food remains in date.
Reg18-E-133	Climate You Change	Reg18-E-133/002	Waste and Utilities	W3 Waste management in developments						We believe that this will complement the Local Draft Plan initiative for a mandatory space for sharing second hand items	Comment noted.
Reg18-E-133	Climate You Change	Reg18-E-133/153	Waste and Utilities	W3 Waste management in developments			3			P: 289 Waste and Utilities – W3: Waste management in developments 3. ‘Major housing developments on site allocations should provide a well-managed re-use and circular economy room, where residents can leave items for other residents to collect and reuse and/ or which residents can use as a space for tool sharing.’ Comment: We ask for this to be mandatory	A change to this policy approach has not been made. We did not consider this change to be necessary as the policy seeks to apply this requirement on site allocations, which is considered to be proportionate as these sites are of a larger scale and therefore more able to deliver this requirement.
Reg18-E-133	Climate You Change	Reg18-E-133/154	Waste and Utilities	W3 Waste management in developments			3			Additionally, We would like to suggest that it is mandatory for developers to include a community fridge for the use of residents in the proposed development. We suggest that this be included in the ‘circular economy room’ (or alternative space if preferable). A community fridge can really help the residents to cut back on food waste.	A change to this policy approach has not been made. We did not consider this change to be appropriate as such provision will be disproportionate to manage, noting the potential health and safety implications of making sure food remains in date.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be necessary as policy W3 requires new housing development to provide sufficient and accessible space to separate and store dry recyclables, organics and residual waste for collection. This will help futureproof developments to allow for the introduction of food waste collections in future years. Our colleagues in the Waste department are looking at scope for improved recycling as part of the development of Newham's Public Realm Waste and Cleansing Strategy. Newham residents can buy a subsidised composting bins; we are contributing to this cost to keep it affordable for residents. You can order online from Get Composting or call 0845 130 6090. We have also provided them with your comments.			1			W3 Waste management in developments	Waste and Utilities	Reg18-E-133/180	Climate You Change	Reg18-E-133

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be appropriate as the justification text for policy W3 sets out the East London Waste Authority's target for Newham to achieve a minimum 28 per cent recycling rate for Local Authority Collected Waste by 2030. The East London Waste Authority managed Local Authority waste collection for the boroughs of Newham, Havering, Barking and Dagenham and Redbridge. The challenges to setting more ambitious targets are set out in the 'Barriers to Recycling' section of A Joint Strategy for East London's Resources and Waste 2027 – 2057 (https://eastlondonwaste.gov.uk/wp-content/uploads/Joint-Strategy-for-East-Londons-Resources-and-Waste-2027-57.pdf). Despite the barriers identified to recycling, our colleagues in the Waste department are more broadly looking at scope for improved recycling as part of the development of Newham's Public Realm Waste and Cleansing Strategy. We have also provided them with your comments.	Monitoring	3.295				W3 Waste management in developments	Waste and Utilities	Reg18-K-016/001	Eco7	Reg18-K-013
	Support noted	W2.3		3			W3 Waste management in developments	Waste and Utilities	Reg18-E-145/191	Environment Agency	Reg18-E-145

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-145	Environment Agency	Reg18-E-145/192	Waste and Utilities	W3 Waste management in developments						We welcome Policy W3 and the requirement for consideration to be given to space and design of in-development waste management	Support noted
Reg18-E-145	Environment Agency	Reg18-E-145/193	Waste and Utilities	W3 Waste management in developments			2			In particular, we are pleased to see that major developments are required to submit acceptable waste management plans	Support noted
Reg18-E-145	Environment Agency	Reg18-E-145/195	Waste and Utilities	W3 Waste management in developments						[low recycling rate] We are pleased that Policy W3 addresses this issue with new housing needed accessible and sufficient waste facilities and storage.	Support noted.
Reg18-E-093	Greater London Authority	Reg18-E-093/022	Waste and Utilities	W3 Waste management in developments				3.29 5		The waste policy (W3, para 3.295) that sets out a target of 28 per cent waste recycling by 2030 does not align with London Plan Policy SI7 A4 that sets out to meet or exceed the municipal waste recycling target of 65 per cent by 2030. London Plan Policy SI7 A3 sets out further targets for waste planning authorities which are currently not included in the Newham draft plan. The Mayor suggests the borough commits to these targets in the local plan since the timeframe of the ELWP is uncertain.	A change to this policy approach has not been made. We did not consider this change to be appropriate for the reasons set out in the 'Barriers to Recycling' section of A Joint Strategy for East London's Resources and Waste 2027 – 2057 (https://eastlondonwaste.gov.uk/wp-content/uploads/Joint-Strategy-for-East-Londons-Resources-and-Waste-2027-57.pdf). It is well-understood that not all London boroughs will be able to meet the GLA's targets to meet a municipal waste recycling target of 65 per cent by 2030, particularly given the high density of flats delivered and planned in the borough. Despite the barriers identified to recycling, our colleagues in the Waste department are more broadly looking at scope for improved recycling as part of the

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	development of Newham's Public Realm Waste and Cleansing Strategy. We have also provided them with your comments.										
	The Local Plan addresses this topic through waste policies. However, it cannot deliver the change you have requested. Our colleagues in the Waste department are able to help and have recently consulted on a new Public Realm Waste and Cleansing Strategy. We have also provided them with your comments.	[Change it] Not enough seems to be happening to improve and develop the services					W3 Waste management in developments	Waste and Utilities	Reg18-T-071/015	Resident	Reg18-T-071
	Support noted.	I strongly support policy W3 about new developments having to have facilities that make it easy to separate your recycling and organic waste,		1			W3 Waste management in developments	Waste and Utilities	Reg18-E-027/047b	Resident	Reg18-E-027

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-027	Resident	Reg18-E-027/047c	Waste and Utilities	W3 Waste management in developments			2			I strongly support policy W3 about [new developments having to have facilities that make it easy to separate your recycling and organic waste, and] having composting opportunities.	Support noted.
Reg18-E-027	Resident	Reg18-E-027/049b	Waste and Utilities	W3 Waste management in developments			1			The other is food waste. I appreciate that reduction in wasting food must be the priority, but there will always be some food waste. A change to this policy approach has not been made. We did not consider this change to be necessary as policy W3 requires new housing development to provide sufficient and accessible space to separate and store dry recyclables, organics and residual waste for collection. This will help futureproof developments to allow for the introduction of food waste collections in future years. Our colleagues in the Waste department are looking at scope for improved recycling as part of the development of Newham's Public Realm Waste and Cleansing Strategy. Newham residents can buy a subsidised composting bins; we are contributing to this cost to keep it affordable for residents. You can order online from Get Composting or call 0845 130 6090. We have also provided them with your comments.	

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	A change to this policy approach has not been made. We did not consider this change to be necessary as policy W3 requires new housing development to provide sufficient and accessible space to separate and store dry recyclables, organics and residual waste for collection. This will help futureproof developments to allow for the introduction of food waste collections in future years. Our colleagues in the Waste department are looking at scope for improved recycling as part of the development of Newham's Public Realm Waste and Cleansing Strategy. We have also provided them with your comments. Separately, Newham residents can buy a subsidised composting bins; we are contributing to this cost to keep it affordable for residents. You can order online from Get Composting or call 0845 130 6090.			2			W3 Waste management in developments	Waste and Utilities	Reg18-E-027/049c	Resident	Reg18-E-027
	The Local Plan addresses this topic through waste policies. However, it cannot deliver the change you have requested. We have provided our colleagues in the Waste department with your comments. Our colleagues in the Waste department are more broadly looking at scope for improved recycling as part of the			2			W3 Waste management in developments	Waste and Utilities	Reg18-D-001/173	Local Plan Drop-In	Reg18-D-001

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	development of Newham's Public Realm Waste and Cleansing Strategy.										
	The Local Plan addresses this topic through waste policies. However, it cannot deliver the change you have requested. We have provided our colleagues in the Waste department with your comments. Our colleagues in the Waste department are more broadly looking at scope for improved recycling as part of the development of Newham's Public Realm Waste and Cleansing Strategy.	Need centralised skips to reduce collection - 2 person carry - would help reduce (flytipping). Need to fix up and recyle white goods as example		2			W3 Waste management in developments	Waste and Utilities	Reg18-D-001/174	Local Plan Drop-In	Reg18-D-001
	Support noted.	[Keep it]					W3 Waste management in developments	Waste and Utilities	Reg18-T-126/032	Resident	Reg18-T-126
	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. No additions have been made.	[Add to it] Need more imfo					W3 Waste management in developments	Waste and Utilities	Reg18-T-019/027	Resident	Reg18-T-019
	Unfortunately, it was not clear what change or addition you wanted to make to this part of the Plan.	[Keep it] As above.					W3 Waste management in developments	Waste and Utilities	Reg18-T-038/016	Resident	Reg18-T-038

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-045	Resident	Reg18-T-045/014	Waste and Utilities	W3 Waste management in developments						[Keep it] None	Support noted.
Reg18-T-057	Resident	Reg18-T-057/043	Waste and Utilities	W3 Waste management in developments						[Add to it] En	Unfortunately it was not clear what change you wanted to make to this part of the Plan.
Reg18-T-072	Resident	Reg18-T-072/029	Waste and Utilities	W3 Waste management in developments						[Add to it] Please ensure all are properly maintained, working well and kept clean at all times, esp in rail and bus stations with many people using these facilities.	The Local Plan addresses this topic through our policy on public realm net gain (policy D2), which seeks for major developments to make a proportionate contribution towards public realm enhancement and maintenance beyond the site. However, it cannot deliver the change you have requested. Our colleagues in Waste department are able to help if you have concerns related to a particular site. Please see the following links for reporting issues: - Recycling, waste and bin collections – Newham Council https://www.newham.gov.uk/rubbish-recycling-waste - Report fly-tippers – Fly-tipping: Reporting and removal – Newham Council https://www.newham.gov.uk/public-health-safety/fly-tipping-reporting-removal Further information about fines for people who litter can be found here: Street Litter – Newham Council https://www.newham.gov.uk/transport-streets/street-litter

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	We have also provided the Waste team with your comments.										
	Support noted.	[Keep it]					W3 Waste management in developments	Waste and Utilities	Reg18-T-105/028	Resident	Reg18-T-105
	A change to this policy approach has not been made. We did not consider this change to be necessary as the Local Plan's policies requiring the delivery of affordable and family-sized homes, including 5% four bedroom homes on site allocations, will	[Add to it] Again Newham is overcrowded and suffering from... overcrowding					W3 Waste management in developments	Waste and Utilities	Reg18-T-109/067	Resident	Reg18-T-109

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	help to address issues of overcrowding in the borough.										
	A change to this policy approach has not been made. We did not consider this change to be necessary as policy D7 (Neighbourliness) requires developments to avoid unacceptable exposure to noise.	[Add to it] Again Newham is [overcrowded] and suffering from noise pollution,					W3 Waste management in developments	Waste and Utilities	Reg18-T-109/068	Resident	Reg18-T-109

Reg18-T-109	Resident	Reg18-T-109/069	Waste and Utilities	W3 Waste management in developments							[Add to it] Again Newham is [overcrowded and] suffering from [noise pollution, overcrowding] and ASB The Local Plan addresses the topic of safety and security through a range of policies, such as requiring developments to have proactively design in safety and security measures (see Policies D1, D2, D6, GWS1), and have Secure by Design accreditation (Policy D1). Planning obligations will also be sought to support physical policing infrastructure (Policy D2) and to build capacity in local partnerships addressing high streets safety coordination (Policy HS5). However The Local Plan cannot deliver the change you have requested. The Council take all reports of noise and ASB seriously and will take appropriate steps to abate reported nuisances. There are also a number of different programs in place to reduce fly tipping on the Borough. Community Safety team work in partnership with Cleansing, Waste and Recycling, Housing, Private Rented Service, Greenspace, Neighbourhoods and Planning to tackle fly tipping and littering. Community Safety Enforcement Officers are authorised to investigate and enforce against all illegal waste dumping. Fixed penalty notices and prosecutions are used to address fly tipping and littering. The Community Safety Enforcement Officers can also, where appropriate, issue Community Protection Warning Notices/Notices and Fixed Penalty Notices to persistent beggars and buskers, or people displaying acts of antisocial behaviour. However, Officers are required to make necessary referrals to outreach services, such as, Change Grow Live (CGL) and Street Population, for individuals that
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												are vulnerable, rough sleeping or living with addiction. Our colleagues in Community Safety Enforcement department may be able to help. We have also provided them with your comments.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	The Local Plan addresses this topic through our policy on public realm net gain (policy D2), which seeks for major developments to make a proportionate contribution towards public realm enhancement and maintenance beyond the site. However, it cannot deliver the change you have requested. Our colleagues in Waste department are able to help if you have concerns related to a particular site. Please see the following links for reporting issues: - Recycling, waste and bin collections – Newham Council https://www.newham.gov.uk/rubbish-recycling-waste - Report fly-tippers – Fly-tipping: Reporting and removal – Newham Council https://www.newham.gov.uk/public-health-safety/fly-tipping-reporting-removal Further information about fines for people who litter can be found here: Street Litter – Newham Council https://www.newham.gov.uk/transport-streets/street-litter We have also provided the Waste team with your comments.						W3 Waste management in developments	Waste and Utilities	Reg18-T-109/070	Resident	Reg18-T-109

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-116	Resident	Reg18-T-116/010	Waste and Utilities	W3 Waste management in developments			1			[Add to it] I liked the idea of having bins for general waste, recycling and food waste in blocks. Because we currently do not have food waste bins but I am a little concerned that there will be no control of how residents will use them. [Originally submitted in response to CE2]	A change to this policy approach has not been made. We did not consider this change to be necessary as policy W3 requires the submission of a waste management plan, which should include communications with residents on waste management within the development. Our colleagues in the Public Realm team also run a programme of door knocking across the borough, and attend schools and local events to engage and educate residents on all elements of waste and recycling management.
Reg18-T-116	Resident	Reg18-T-116/013	Waste and Utilities	W3 Waste management in developments			3			[Add to it] I also liked the idea of having spaces to meet and exchange tools and resell or recycle products. At the moment I can only recycle my clothes at primark at Westfield the closest. We should have more places in the area to recycle clothes or electrical appliances that can't be used again. [Originally submitted in response to CE2]	The Local Plan addresses this topic through waste policies. However, it cannot deliver the change you have requested. Our colleagues in the Waste department are able to help, and are more broadly looking at scope for improved recycling as part of the development of Newham's Public Realm Waste and Cleansing Strategy. We have also provided them with your comments. TRAID provides a free clothing collection service to residents and businesses in the London Borough of Newham. As part of your main clothing donation, you can also include a bag of small Waste Electrical and Electronic Equipment (WEEE) items.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-122	Resident	Reg18-T-122/005	Waste and Utilities	W3 Waste management in developments						[Change it] More and better access to waste disposal	The Local Plan addresses this topic through waste policies. However, it cannot deliver the change you have requested. Our colleagues in the Waste department are able to help and have recently consulted on a new Public Realm Waste and Cleansing Strategy. We have also provided them with your comments.
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/167a	Waste and Utilities	W3 Waste management in developments			1			The Berkeley Group supports the requirements outlined in points 1 [and 2] which require new housing developments to provide sufficient and accessible space to separate and store dry recyclables, organics and residual waste for collection, both within individual units and for the building as a whole [and for major residential development proposals to be accompanied by a Waste Management Plan.]	Support noted
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/167b	Waste and Utilities	W3 Waste management in developments			2			The Berkeley Group supports the requirements outlined in [points 1 and] 2 which require [new housing developments to provide sufficient and accessible space to separate and store dry recyclables, organics and residual waste for collection, both within individual units] and for the building as a whole and for major residential development proposals to be accompanied by a Waste Management Plan.	Support noted

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	A change to this policy approach has not been made. We did not consider this change to be necessary as it is considered that there should be sufficient space available on site allocations to deliver these requirements, recognising they are the largest sites available in the borough. The addition of 'where feasible' would dilute this requirement, which will be considered as part of the planning balance on individual planning applications.	Point 3 requires major housing developments on site allocations to provide a well-managed re-use and circular economy room, where residents can leave items for other residents to collect and reuse and/or which residents can use as a space for tool sharing. Whilst the principle of such a facility is supported its provision will be down to whether there is sufficient space to accommodate such a use. This is particularly heightened by the new fire regulation requirements for a second stair core which is placing further pressure on floorplates and the various requirements of residential development. The Berkeley Group therefore request that the wording of this requirement includes 'where possible or feasible'. Proposed policy wording change: 3. Major housing developments on site allocations should provide a well-managed re-use and circular economy room, where residents can leave items for other residents to collect and reuse and/ or which residents can use as a space for tool sharing, <u>where feasible</u> .		3			W3 Waste management in developments	Waste and Utilities	Reg18-E-136/168	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/169	Waste and Utilities	W3 Waste management in developments			4			Point 4 notes that developments should provide only one waste management solution or technology on site. The Berkeley Group would request that this statement is removed so as not to preclude more than one waste management solution being used on a site. There may be instances where more than one waste management solution is needed and is the most effective solution for a site, particularly large scale sites. Proposed policy wording change: 4. Developments should provide only one waste management solution or technology on site.	A change to this policy approach has not been made. We did not consider this change to be necessary as this is considered best practice in Newham's most up-to-date Waste Management development guidelines. Where alternatives to this arrangement are proposed these will be assessed on a case-by-case basis at application stage by the Waste department.
Reg18-E-070	Aston Mansfield	Reg18-E-070/106	Waste and Utilities	W4 Utilities and digital infrastructure						d. W4: Utilities and Digital Infrastructure - Would you keep, change or add something to this policy? No comment	Comment noted.
Reg18-E-145	Environment Agency	Reg18-E-145/183b	Waste and Utilities	W4 Utilities and digital infrastructure			Part 1		W4.1	[We are pleased to see the inclusion of Waste and Utilities under their own policy chapter and] note that the importance of water supply and provisions for wastewater have been recognised.	Support noted.
Reg18-E-145	Environment Agency	Reg18-E-145/196	Waste and Utilities	W4 Utilities and digital infrastructure						We strongly support this policy and the encouragement for developers to give sufficient consideration to utilities and infrastructure from the design stage through to completion and operation.	Support noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-145	Environment Agency	Reg18-E-145/197	Waste and Utilities	W4 Utilities and digital infrastructure			Part 1a		W4.1	In reference to W4.1.a., we are pleased to see early and effective engagement with utilities providers is encouraged to ensure utilities networks and connections can serve the development. This is particularly important for the provision of wastewater infrastructure.	Support noted.
Reg18-E-145	Environment Agency	Reg18-E-145/198	Waste and Utilities	W4 Utilities and digital infrastructure			Part 1		W4.1	There are number of misconnections within the borough which contribute to diffuse pollution in our waterbodies. We recommend the inclusion of a retrospective recognition of this in your policies, ensuring new developments aim to clean up misconnections in their proposal of works and ensure new ones are not created.	This wording change has been made. Please see the new wording in Local Plan Policy W4.
Reg18-E-145	Environment Agency	Reg18-E-145/199	Waste and Utilities	W4 Utilities and digital infrastructure			Part 1b		W4.1	We are pleased to see that Policy W4 requires enhanced wastewater management for new developments and that where deficit in utilities capacity is identified, developer contributions will be sought to ensure the needs of the development can be met.	Support noted.
Reg18-E-145	Environment Agency	Reg18-E-145/200	Waste and Utilities	W4 Utilities and digital infrastructure						There is an opportunity here to draw the link more clearly between the impact of new developments on surface water network, particularly at locations that are vulnerable to sewer flooding.	This wording change has not been made. We did not consider this change to be necessary as surface water drainage and flood risk are covered in Local Plan Policy CE7.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted.	We welcome the support for new “digital infrastructure and data as part of inclusive growth, including projects set out as part of the Newham Sparks programme and detailed in the neighbourhoods policies” in draft Policy W4 (Utilities and Digital Infrastructure) and are supportive of the Newham Sparks initiative.		Part 7c			W4 Utilities and digital infrastructure	Waste and Utilities	Reg18-E-113/012	GLP (Land at Central Thameside West and Former Allnex site)	Reg18-E-113
	Comment noted. The Local Plan does consider the provision of Wi-Fi as a basic commodity, given its importance to modern life and the relatively high rates of digital exclusion in Newham. As such we require developments in Town and Local Centres or those providing community facilities, green spaces, and recreational facilities to consider the provision of free Wi-Fi under Local Plan Policies HS2, CF2, GWS1 and GWS5. Improvements to digital connectivity infrastructure is also addressed under Local Plan Policy W4.	Question if the provision of WiFi is considered a basic amenity.		Part 7			W4 Utilities and digital infrastructure	Waste and Utilities	Reg18-S-002/008	Homelessness forum	Reg18-S-002

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		Need for dedicated digital infrastructure and Newham Sparks policies 2.9 With the above context in mind, it is disappointing that the draft Local Plan makes only one reference to supporting digital infrastructure and the Newham Sparks initiative. Specifically, part 7c of draft policy W4 (Utilities and Digital Infrastructure) includes a small and perfunctory reference to digital infrastructure and data being supported as part of growth and that projects within Newham Sparks will also be supported.		Part 7c			W4 Utilities and digital infrastructure	Waste and Utilities	Reg18-E-126/009	IXDS Ltd	Reg18-E-126

Reg18-E-126	IXDS Ltd	Reg18-E-126/010	Waste and Utilities	W4 Utilities and digital infrastructure			Part 7c		2.10 The lack of further reference to the data economy conflicts with the corporate importance that has been identified by LBN in relation to it and the need for its growth to be accommodated and planned for at a spatial level. Given that there is no specific policy pertaining to the Newham Sparks initiative in the draft Local Plan, its deliverability is identified to be at serious risk, given that a number of the proposals forming the 'Future Blueprint for Newham', including the plan for Bidder Street to become a data corridor, require land to be designated (and/or safeguarded), strong planning policy support, and proper spatial planning methods to guide its delivery as part of Newham's Local Plan. 2.11 In light of the above, it will be essential for Newham's emerging Local Plan to include a dedicated policy that supports the provision of new digital infrastructure (including the provision of data centres), as well as a dedicated policy that sets out how the Newham Sparks initiative, as a Corporate Plan priority, will be delivered in spatial planning terms. A new digital infrastructure policy should incorporate a similar degree of support for digital infrastructure as is communicated within London Plan Policy SI 6, but should go even further to assign this policy even greater weight in the context of LBN's wider plan, given the Council's corporate aspirations for the borough to be a leading location within the digital economy in the wider region.	This wording change has not been made. We did not consider this change to be necessary as the delivery of data and digital growth is already covered in Local Plan Policy W4, the Inclusive Economy chapter and relevant Neighbourhood Policies. However, the policy has changed to aid clarity, policy W4 is now focussed on digital connectivity infrastructure and other projects under Newham Sparks area covered by the Inclusive Economy chapter and relevant Neighbourhood Policies. Our Data Economy Sector lead has reviewed the Plan and further suggestions to aid delivery of key Newham Sparks objectives and to clarify the difference between the data and digital economies have been made. Data centres are considered an employment use and proposals will be subject to requirements as set out in the Inclusive Economy chapter as well as any other relevant policies in the local plan.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This wording change has not been made. We did not consider this change to be necessary as the delivery of data and digital growth is covered in Local Plan Policy W4, the Inclusive Economy chapter and relevant Neighbourhood Policies. However, the policy has changed to aid clarity, policy W4 is now focussed on digital connectivity infrastructure and other projects under Newham Sparks area covered by the Inclusive Economy chapter and relevant Neighbourhood Policies.	2.12 Similarly, a new policy underpinning the Newham Sparks programme should incorporate a spatial focus that clearly stipulates allocations for data hubs and other projects forming part of the 'Future Blueprint for Newham'. Given the importance of Newham Sparks within the Corporate Plan and for the future of Newham and its residents, the policy should go as far as safeguarding sites around the borough for the delivery of digital infrastructure.		Part 7c			W4 Utilities and digital infrastructure	Waste and Utilities	Reg18-E-126/011	IXDS Ltd	Reg18-E-126
	Comment noted.	Heat networks 2.13 Draft policy W4 (Utilities and Digital Infrastructure) also makes reference to heat networks and the importance of ensuring clean heat sources. This is consistent with the aims of London Plan Policy SI 3 (Energy Infrastructure) which seeks for developments to connect to local existing or planned heat networks where possible.	W4.5	Part 5			W4 Utilities and digital infrastructure	Waste and Utilities	Reg18-E-126/012	IXDS Ltd	Reg18-E-126

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	Consultation 2.14 At Newham's Issues and Options Consultation Stage (Q4 2021), developers sought for as much employment land as possible to be safeguarded and to encourage its intensification, as well as for an increase in digital infrastructure, such as data centres, to be achieved, consistent with the aims of London Plan Policy SI 6. In addition, a collaborative workshop on the 20th November 2021 considered that Newham would need to be responsive to and enabling of fast growth sectors, including data and digital; and that Newham as a whole should benefit, using economic investment as a place-making tool. This further justifies the need for dedicated policies that address digital infrastructure and Newham Sparks to be incorporated within the emerging Local Plan.		Part 7c			W4 Utilities and digital infrastructure	Waste and Utilities	Reg18-E-126/014	IXDS Ltd	Reg18-E-126

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This wording change has not been made. We did not consider this change to be necessary as the delivery of data and digital growth is already covered in Local Plan Policy W4, the Inclusive Economy chapter and relevant Neighbourhood Policies. However, the policy has changed to aid clarity, policy W4 is now focussed on digital connectivity infrastructure and other projects under Newham Sparks area covered by the Inclusive Economy chapter and relevant Neighbourhood Policies. Our Data Economy Sector lead has reviewed the Plan and further suggestions to aid delivery of key Newham Sparks objectives and to clarify the difference between the data and digital economies have been made. Data centres are considered an employment use and proposals will be subject to requirements as set out in the Inclusive Economy chapter as well as any other relevant policies in the local plan.	Recommendations for a revision to the draft policies 2.15 The Newham Sparks First Chapter document (2021) identifies that “Newham is uniquely placed to seize the data opportunity”. In light of the comments made above, our recommendations for changes to the draft Local Plan are as follows: • In building on the content of draft Policy W4 (Utilities and Digital Infrastructure), and drawing from the Government’s National Data Strategy and London Plan Policy SI 6, digital infrastructure should benefit from its own policy within the Local Plan that places significant, overarching emphasis on the local, national and regional importance of such infrastructure (including data centres) to ensure that it is properly planned for and that their importance is afforded weight in the determination of planning applications.		Part 7			W4 Utilities and digital infrastructure	Waste and Utilities	Reg18-E-126/015	IXDS Ltd	Reg18-E-126

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This wording change has not been made. We did not consider this change to be necessary as the delivery of data and digital growth is covered in Local Plan Policy W4, the Inclusive Economy chapter and relevant Neighbourhood Policies. However, the policy has changed to aid clarity, policy W4 is now focussed on digital connectivity infrastructure and other projects under Newham Sparks area covered by the Inclusive Economy chapter and relevant Neighbourhood Policies.	[Recommendations for a revision to the draft policies] Linked to the digital infrastructure policy, the Local Plan should include a dedicated policy which sets out how LBN will deliver the Newham Sparks programme in line with its Corporate Plan 2022 priorities. Land for the projects within Newham Sparks (where relevant) should be identified (or safeguarded) through spatial designations within the Local Plan. As part of this, the Mayer Parry Wharf site should be explicitly safeguarded for digital and data economy uses and needs to benefit from appropriate policy requirements to guide this form of development which is seen as a catalyst and gateway development for realising the Newham Sparks blueprint.		Part 7c			W4 Utilities and digital infrastructure	Waste and Utilities	Reg18-E-126/016	IXDS Ltd	Reg18-E-126
	The Local Plan addresses this topic through Local Plan Policy W4. However, it cannot deliver the change you have requested. Watering metering is controlled through the water regulator and central government legislation. Homes with a water meter are only charged for the water they use and reductions in water use, through water saving devices, is therefore incentivised through a lower bill for fresh water.	[Keep it] Why are we charged for the same amount of waste used regardless of the water saving devices we use. I don't think that individual house use and waste are measured accurately.					W4 Utilities and digital infrastructure	Waste and Utilities	Reg18-T-071/016	Resident	Reg18-T-071

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-027	Resident	Reg18-E-027/012	Waste and Utilities	W4 Utilities and digital infrastructure					W4.5	'This policy has nothing to do with waste and should be in the climate change policy. The district heat network in Stratford is high-carbon and the decarbonisation policy does nothing to stop that. District heat networks are a major threat to Newham meeting its carbon emissions targets. It is completely unacceptable that this has been casually dropped into this Waste section. It's a major, major climate change issue that should be highly scrutinised and put in the climate change section. W4.5 does nothing to reduce my suspicion that the LLDC have leant heavily on the authors of the climate change evidence base to silence them. W4.5 does nothing to increase my trust in the council and in developers, that you say in the Vision is a key part of the vision and objectives.'	Comment noted. Local Plan Policy CE2 outlines that developments connecting to a heat network that will rely on the continued use of fossil fuels beyond the lifetime of the plan will not be supported. The policy has changed to clarify that development may connect to a heat network powered by gas but only where there is an agreed decarbonisation plan that will be implemented within the lifetime of the plan. Wording changes have also been made to Local Plan Policy W4 to cross reference to Local Plan Policy CE2. Please see the revised wording.
Reg18-E-027	Resident	Reg18-E-027/045	Waste and Utilities	W4 Utilities and digital infrastructure					W4.5	This policy has nothing to do with waste and should be in the climate change policy.	Comment noted. Decarbonised heat network connection is covered in Local Plan Policy CE2. Wording changes have also been made to Local Plan Policy W4 to cross reference to Local Plan Policy CE2. Please see the revised wording.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted. Local Plan Policy CE2 outlines that developments connecting to a heat network that will rely on the continued use of fossil fuels beyond the lifetime of the plan will not be supported. The policy has changed to clarify that development may connect to a heat network powered by gas but only where there is an agreed decarbonisation plan that will be implemented within the lifetime of the plan. Wording changes have also been made to Local Plan Policy W4 to cross reference to Local Plan Policy CE2. Please see the revised wording.	W4.5 The district heat network in Stratford is high-carbon and the decarbonisation policy does nothing to stop that. District heat networks are a major threat to Newham meeting its carbon emissions targets. It is completely unacceptable that this has been casually dropped into this Waste section. It's a major, major climate change issue that should be highly scrutinised and put in the climate change section. Please see my comments in the Climate change evidence base and climate change policy sections. W4.5 does nothing to reduce my suspicion that the LLDC have leant heavily on the authors of the climate change evidence base to silence them. W4.5 does nothing to increase my trust in the council and in developers, that you say in the Vision is a key part of the vision and objectives.					W4 Utilities and digital infrastructure	Waste and Utilities	Reg18-E-027/046	Resident	Reg18-E-027

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	W4.5 With district heat networks, there is also the issue of who owns and runs them, how are they accountable, and who monitors them. With individual buildings, there is a clear, accountable separation of powers and responsibilities – the developer must submit a planning application to Newham council and the council is responsible for scrutinising it and making sure it meets the required climate change policy standards. With district heat networks, what has happened with the LLDC is that the district heat network has been commissioned out to an external commercial company who seems to be responsible both for assessing its carbon emissions and actually choosing, implementing and running its operation. In other words, it is both the developer and the planning authority.		Part 5			W4 Utilities and digital infrastructure	Waste and Utilities	Reg18-E-027/010	Resident	Reg18-E-027

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-052	London Legacy Development Corporation	Reg18-E-052/128	Waste and Utilities	W4 Utilities and digital infrastructure			Part 5			Policy W4 - Bullet point 5 only allows connection to District Heat Networks where decarbonised and fuelled by renewable energy. The comments provided to Policy CE4 are relevant here. The bullet point should be amended to allow connection to existing heat networks where there is a decarbonisation plan in place, to ensure consistency with the London Plan and associated guidance published by the Mayor of London. The NPPF allows for low carbon energy supply systems in para 155 bullet point c) and therefore this should be reflected in the policy.	The wording change has not been made. We did not consider this change to be appropriate as any developments that ensures continued use of fossil fuels for a heat network beyond the lifetime of the plan will not be supported. However, the policy has changed as to clarify development may connect to a heat network powered by gas only where there is an agreed decarbonisation plan that will be implemented in the lifetime of the plan. Please see revised wording in Local Plan Policies CE2 and W4.
Reg18-T-126	Resident	Reg18-T-126/033	Waste and Utilities	W4 Utilities and digital infrastructure			Blank			[Keep it]	Support noted.
Reg18-E-011	Metropolitan Police Service - Designing Out Crime	Reg18-E-011/009	Waste and Utilities	W4 Utilities and digital infrastructure			Part 1a		W4.7	5) It is recommended that Policy W4: Utilities and Digital Infrastructure point 1a (page 293) also refers to review at the pre-application stage with the Counter Terrorism Security Advisors (CTSAs). This is to ensure that security mentioned in Implementation point W4.7 (page 295) is appropriately considered at the earliest opportunity. Where recommendations have been made by a CTSA, it is strongly advised that these are carried out.	This wording change has been made. Please see the new wording in Local Plan Policy W4.

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	W4.1 National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses. National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use. National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.		Part 1a			W4 Utilities and digital infrastructure	Waste and Utilities	Reg18-E-140/001	National Grid	Reg18-E-140

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	W4.1 National Grid is happy to provide advice and guidance to the Council concerning their networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid's assets. National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.		Part 1a			W4 Utilities and digital infrastructure	Waste and Utilities	Reg18-E-140/012	National Grid	Reg18-E-140

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This wording change has been made. Please see the new wording in relevant site allocations and Local Plan Policy W4. Local Plan Policy W4 requires all major development to undertake engagement with utilities providers at pre-application stage to ensure their existing assets are not affected.	Electricity assets Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.		Part 1a			W4 Utilities and digital infrastructure	Waste and Utilities	Reg18-E-140/013	National Grid	Reg18-E-140
	This wording change has been made. Please see the new wording in relevant site allocations and Local Plan Policy W4. Local Plan Policy W4 requires all major development to undertake engagement with utilities providers at pre-application stage to ensure their existing assets are not affected.	National Grid's 'Guidelines for Development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: https://www.nationalgridet.com/document/130626/download		Part 1a			W4 Utilities and digital infrastructure	Waste and Utilities	Reg18-E-140/014	National Grid	Reg18-E-140

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	This wording change has been made. Please see the new wording in relevant site allocations and Local Plan Policy W4. Local Plan Policy W4 requires all major development to undertake engagement with utilities providers at pre-application stage to ensure their existing assets are not affected.	W4.1 The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. National Grid's statutory safety clearances are detailed in their 'Guidelines when working near National Grid Electricity Transmission assets', which can be downloaded here: www.nationalgridet.com/network-and-assets/working-near-our-assets		Part 1a			W4 Utilities and digital infrastructure	Waste and Utilities	Reg18-E-140/015	National Grid	Reg18-E-140

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-140	National Grid	Reg18-E-140/016	Waste and Utilities	W4 Utilities and digital infrastructure			Part 1a		W4.1	Gas assets High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines. National Grid's 'Guidelines when working near National Grid Gas assets' can be downloaded here: www.nationalgridgas.com/land-and-assets/working-near-our-assets	This wording change has been made. Please see the new wording in relevant site allocations and Local Plan Policy W4. Local Plan Policy W4 requires all major development to undertake engagement with utilities providers at pre-application stage to ensure their existing assets are not affected.
Reg18-E-140	National Grid	Reg18-E-140/017	Waste and Utilities	W4 Utilities and digital infrastructure			Part 1a		W4.1	National Grid have land rights for each asset which prevents the erection of permanent/temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.	This wording change has been made. Please see the new wording in relevant site allocations and Local Plan Policy W4. Local Plan Policy W4 requires all major development to undertake engagement with utilities providers at pre-application stage to ensure their existing assets are not affected.
Reg18-E-140	National Grid	Reg18-E-140/018	Waste and Utilities	W4 Utilities and digital infrastructure			Part 1a		W4.1	If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please visit the website: https://lsbud.co.uk/	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-019	Resident	Reg18-T-019/028	Waste and Utilities	W4 Utilities and digital infrastructure						[Add to it] Need more info	The wording change has been made to aid clarity. Please see the new wording in Local Plan Policy W4.
Reg18-T-038	Resident	Reg18-T-038/017	Waste and Utilities	W4 Utilities and digital infrastructure			Part 7			[Keep it] Digital growth is pretty good	Support noted.
Reg18-T-038	Resident	Reg18-T-038/018	Waste and Utilities	W4 Utilities and digital infrastructure			Part 7			[Keep it] but unfortunately the benefits have been mainly for service providers.	A change to this policy approach has not been made. We did not consider this change to be necessary as the policy objective of Local Plan Policy W4 aims to improve the digital connectivity network across the borough to meet the need of the end users.
Reg18-T-038	Resident	Reg18-T-038/019	Waste and Utilities	W4 Utilities and digital infrastructure			Part 7			[Keep it] But infrastructure needs to be in place to ensure EVERYONE can utilise the services.	Comment noted. Local Plan Policy W4 requires major developments to provide sufficient ducting space for full fibre connectivity and engage utilities providers in pre-application stage to ensure development can meet the utilities needs of the end users.
Reg18-T-045	Resident	Reg18-T-045/015	Waste and Utilities	W4 Utilities and digital infrastructure						[Keep it] Not sure what this is	The wording change has been made to aid clarity. Please see the new wording in Local Plan Policy W4.
Reg18-T-050	Resident	Reg18-T-050/006	Waste and Utilities	W4 Utilities and digital infrastructure			Blank			[Keep it]	Support noted.
Reg18-T-057	Resident	Reg18-T-057/044	Waste and Utilities	W4 Utilities and digital infrastructure			Blank			[Add to it]	Unfortunately, it was not clear what addition you wanted to make to this part of the Plan. The wording change has now been made to aid clarity. Please see the new wording in Local Plan Policy W4.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-T-072	Resident	Reg18-T-072/031	Waste and Utilities	W4 Utilities and digital infrastructure			Part 2			[Add to it] Please invest in upgrading all [waste and] utilities facilities and services.	This wording change has not been made. We did not consider this change to be appropriate as all major development will be expected to undertake engagement with utility providers at pre-application stage to ensure utilities networks and connections can serve the development ahead of occupation according to Local Plan Policy W4. The council already engages with utilities providers and the GLA to address utilities infrastructure requirements in the borough and region. However, the policy has changed as to address more comprehensive consideration on utility infrastructure capacity. Please see the new wording in Local Plan Policy W4.
Reg18-T-105	Resident	Reg18-T-105/029	Waste and Utilities	W4 Utilities and digital infrastructure			Blank			[Keep it]	Support noted.
Reg18-T-109	Resident	Reg18-T-109/061	Waste and Utilities	W4 Utilities and digital infrastructure			Part 1		W4.1	[originally submitted in W1 Waste management capacity] [Add to it] Sewers regularly blocked and rats, feces smells pervade Newham streets due to overcrowded HMOs	The Local Plan addresses this topic through Local Plan Policy W4. However, it cannot deliver the change you have requested. Our colleagues in Environmental and Public Health team are able to help. If you have a specific occurrence to report you can do so through the details online here: https://www.newham.gov.uk/public-health-safety/pollution-%E2%80%93-report-nuisance

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-116	SEGRO Plc	Reg18-E-116/060f	Waste and Utilities	W4 Utilities and digital infrastructure			Part 1b & Part 6		W4.1	8. Utilities a. Draft Policy W4 (Utilities and digital infrastructure) <u>SEGRO objects to part (1)(b) and (6) of the draft Policy</u> which would require major development proposals to demonstrate that there is sufficient utility infrastructure capacity to meet the demand of development during the construction and operational phases. This is a structural issue which should be resolved by the Government and utilities providers. The planning system should not be the arbiter of wider structural capacity.	This wording change has not been made. We did not consider this change to be appropriate as all major development will be expected to undertake engagement with utility providers at pre-application stage to ensure utilities networks and connections can serve the development ahead of occupation according to Local Plan Policy W4. The council already engages with utilities providers and the GLA to address utilities infrastructure requirements in the borough and region. However, the policy has changed as to address more comprehensive consideration on utility infrastructure capacity. Please see the new wording in Local Plan Policy W4.
Reg18-E-116	SEGRO Plc	Reg18-E-116/060g	Waste and Utilities	W4 Utilities and digital infrastructure			Part 7b & 7c		W4.7	More information is required to understand the implications and implementation of part (7)(b and c)	Comment noted. The wording change have been made to improve clarity. Please see the new wording in Local Plan Policy W4.

Reg18-E-128	Tate & Lyle Sugars	Reg18-E-128/038	Waste and Utilities	W4 Utilities and digital infrastructure			Part 5		W4.5	The current heat network text could be considered ambiguous in regards to industrial waste / excess heat and large scale heat networks. Industrial heat (including waste heat) is currently usually derived from fossil fuels (typically gas). Waste heat is currently typically emitted as just that (waste). The carbon has already been “spent” to produce the heat. It is inherently efficient and environmentally friendly for this heat to be utilised in heat homes locally rather than emitted as waste. Further the electrification of heat (e.g. via air source heat pumps) itself require electricity which by dint of UK’s overall energy mix is not 100% renewable currently. Further, just as over the medium term the UK’s power production will increasingly transition to renewable sources in future, energy/heat intensive industrial users will likely transition to renewable technologies as they mature (most likely hydrogen). Industrial users will still likely have waste/excess heat due to the nature of their specific processes. At a new development carbon accounting level, a heat network supplied with industrial waste heat will typically be recorded today as decarbonised as no additional carbon will have been “spent” to produce the heat for the development. The heat would have been produced anyway by industry but instead of becoming waste, it has been fed into a local heat network reducing the need for other energy to heat homes. It may be the intention of the draft local plan to treat such heat networks as decarbonised and TLS have misinterpreted. This is a complex area but the Local Plan unequivocally should not discourage the environmentally beneficial possibility of industrial waste heat in Newham being utilised to heat local homes. There may also be benefits in terms of end consumer pricing as	This wording change has been made to clarify waste heat is considered to be a carbonised heat source whilst applicants are required to demonstrate the waste heat production is minimised and meeting other requirements as set out in Local Plan Policy CE2. Please see revised wording in Local Plan Policies CE2 and W4.
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										well. TLS would suggest the following amends W4: Utilities and Digital Infrastructure (p293) 5. Major developments should prioritise connections to heat networks only where the source of the heat network is sufficiently decarbonised to be considered a renewable energy source, to support the transition to create zero emission solutions for clean and integrated energy systems. <u>Heat networks using waste heat from industrial processes are considered decarbonised and are encouraged.</u>	
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-128	Tate & Lyle Sugars	Reg18-E-128/039	Waste and Utilities	W4 Utilities and digital infrastructure					W4.5	TLS would suggest the following amends W4.5 Connections to decarbonised heat networks are an increasingly important driver for heat network deployment and objectives in the plan to transition to carbon free development. Proposals for new and extended networks will need to demonstrate that the energy source is a renewable source through the submission of an Energy Strategy. <u>Heat networks using waste heat from industrial processes are considered decarbonised and are encouraged.</u> (p295)	This wording change has been made to clarify waste heat is considered to be a carbonised heat source whilst applicants are required to demonstrate the waste heat production is minimised and meeting other requirements as set out in Local Plan Policy CE2. Please see revised wording in Local Plan Policies CE2 and W4.
Reg18-E-028	Thames Water	Reg18-E-028/002	Waste and Utilities	W4 Utilities and digital infrastructure						We support the policy W4 in principle	Support noted.
Reg18-E-028	Thames Water	Reg18-E-028/003	Waste and Utilities	W4 Utilities and digital infrastructure						but consider there should be a separate Policy covering Water Supply and Sewerage/Wastewater Infrastructure and not 'lost' within a general utilities policy.	A change to this policy approach has not been made. We did not consider this change to be necessary as consideration on water supply and sewerage/wastewater infrastructure capacity are covered in Local Plan Policy W4.

Reg18-E-028	Thames Water	Reg18-E-028/004	Waste and Utilities	W4 Utilities and digital infrastructure			Part 1a		W4.1	Water and wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure. A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans 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), 2021, states: <i>“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...”</i> Paragraph 11 states: <i>“Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that: a) All plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects”</i> Paragraph 28 relates to non-strategic policies and states: <i>“Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...”</i> Paragraph 26 of the revised NPPF goes on to state: <i>“Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively</i>	Comment noted. All major development will be expected to undertake engagement with utility providers at pre-application stage to ensure utilities networks and connections can serve the development ahead of occupation according to Local Plan Policy W4.
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										<i>prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....”</i> 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 <i>“Adequate water and wastewater infrastructure is needed to support sustainable development”</i> (Paragraph: 001, Reference ID: 34-001- 20140306). It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. The new Local Plan should therefore seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments.	
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
		W4.1		Part 1a			W4 Utilities and digital infrastructure	Waste and Utilities	Reg18-E-028/005	Thames Water	Reg18-E-028
	Comment noted. All major development will be expected to undertake engagement with utility providers at pre-application stage to ensure utilities networks and connections can serve the development ahead of occupation according to Local Plan Policy W4.	Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years.									

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	W4.1 The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water's asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling. As from 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The changes mean that more of Thames Water's charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us. The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges. Information on how off site network reinforcement is funded can be found here https://developers.thameswater.co.uk/New-connection-charging		Part 1a			W4 Utilities and digital infrastructure	Waste and Utilities	Reg18-E-028/006	Thames Water	Reg18-E-028

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-028	Thames Water	Reg18-E-028/007	Waste and Utilities	W4 Utilities and digital infrastructure			Part 1a		W4.1	Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following: • The developments demand for water supply and network infrastructure both on and off site; • The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and • The surface water drainage requirements and flood risk of the development both on and off site and can it be met.	This wording change has been made. Please see the new wording in Local Plan Policy W4. Surface water drainage and flood risk are covered in Local Plan Policies CE7 and CE8.
Reg18-E-028	Thames Water	Reg18-E-028/008	Waste and Utilities	W4 Utilities and digital infrastructure			Part 1a		W4.1	Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water's free pre planning service are available at: https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity	Comment noted. All major development will be expected to undertake engagement with utility providers at pre-application stage to ensure utilities networks and connections can serve the development ahead of occupation according to Local Plan Policy W4. Surface water drainage and flood risk are covered in Local Plan Policies CE7 and CE8.

Reg18-E-028	Thames Water	Reg18-E-028/009	Waste and Utilities	W4 Utilities and digital infrastructure							In light of the above comments and Government guidance we consider that the New Local Plan should include a specific policy on the key issue of the provision of water and sewerage/wastewater infrastructure to service development. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend the Local Plan include the following policy: PROPOSED WATER SUPPLY/WASTEWATER INFRASTRUCTURE POLICY TEXT: <u>“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”</u> <u>“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”</u>	A change to this policy approach has not been made. We did not consider this change to be necessary as consideration on water supply and sewerage/wastewater infrastructure capacity are already sufficiently covered in Local Planning Policy W4.
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Reg18-E-028	Thames Water	Reg18-E-028/010	Waste and Utilities	W4 Utilities and digital infrastructure						Local Authorities should also consider both the requirements of the utilities for land to enable them to meet the demands that will be placed upon them. This is necessary because it will not be possible to identify all the water and wastewater/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (AMPs). Thames Water are currently in AMP7 which covers the period from 1st April 2020 to 31st March 2025. AMP8 will cover the period from 1st April 2025 to 31st March 2030. The Price Review, whereby the water companies' AMP8 Business Plan will be agreed with Ofwat during 2024. Hence, a further text should be added to Policy as follows: <u>"The development or expansion of water supply or waste water facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised."</u>	This wording change has not been made. We did not consider this change to be necessary as any future infrastructure upgrades as listed in the Infrastructure Delivery Plan, will be supported, and this will be reviewed annually according to Local Plan Policy W4.
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Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Support noted.	We support part 4 of Policy W4. The new Local Plan should rightly continue to assess impact of any development within the vicinity of Beckton STW in line with the Agent of Change principle set out in the NPPF and Policy D13 of the London Plan 2021.		Part 4			W4 Utilities and digital infrastructure	Waste and Utilities	Reg18-E-028/011	Thames Water	Reg18-E-028

Reg18-E-028	Thames Water	Reg18-E-028/012	Waste and Utilities	W4 Utilities and digital infrastructure			Part 4		Where development is being proposed within 800m of a sewage treatment works, the developer or local authority should liaise with Thames Water to consider whether an odour impact assessment is required as part of the promotion of the site and potential planning application submission. The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a sewage treatment works. Paragraph 174 of the NPPF, February 2021, sets out that: "Planning policies and decisions should contribute to and enhance the natural and local environment by:e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans..." Paragraph 185 goes on to state: "Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development...." The online PPG states at Paragraph: 005 Reference ID: 34-005-20140306 that: "Plan-making may need to consider:whether new development is appropriate near to sites used (or proposed) for water and wastewater infrastructure (for example, odour may be a concern).."	Comment noted
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Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-028	Thames Water	Reg18-E-028/013	Waste and Utilities	W4 Utilities and digital infrastructure			Part 4			On this basis, text similar to the following should be incorporated into the Neighbourhood Plan: "When considering sensitive development, such as residential uses, close to the Sewage Treatment Works, a technical assessment should be undertaken by the developer or by the Council. The technical assessment should be undertaken in consultation with Thames Water. The technical assessment should confirm that either: (a) there is no adverse amenity impact on future occupiers of the proposed development or; (b) the development can be conditioned and mitigated to ensure that any potential for adverse amenity impact is avoided."	EKT amalgamated issue 7 - Beckton Riverside
Reg18-E-028	Thames Water	Reg18-E-028/014	Waste and Utilities	W4 Utilities and digital infrastructure			Part 2			Beckton Wastewater/Sewage Treatment Works (STW) is Thames Water's largest sewage treatment works and a vital component of London's infrastructure. We therefore consider it essential that there is an associated development management policy regarding Beckton STW which supports future upgrades as there has been in previous Local Plans, including Policy INF4 and supporting text of the current Local Plan.	EKT amalgamated issue 7 - Beckton Riverside

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-028	Thames Water	Reg18-E-028/015	Waste and Utilities	W4 Utilities and digital infrastructure			Part 2			In relation to wastewater capacity at Beckton STW, the works has been significantly upgraded with an extension just to the north of the RDBROAPF in AMP5 (2010-2015) and is currently undergoing a further upgrade to the extension and inlet works during AMP7 (2020-2025). The AMP 7 growth upgrade has a design horizon of 2036.	Comment noted.
Reg18-E-028	Thames Water	Reg18-E-028/016	Waste and Utilities	W4 Utilities and digital infrastructure			Part 2			We are also now preparing Drainage and Wastewater Management Plans (DWMPs) which are new long-term plans that will make sure we have a resilient and sustainable wastewater service for the next 25 years, and beyond. https://www.thameswater.co.uk/about-us/regulation/drainage-and-wastewater-management .	Comment noted.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-028	Thames Water	Reg18-E-028/017	Waste and Utilities	W4 Utilities and digital infrastructure			Part 2			We have prepared a long term adaptive plan for growth at Beckton up to 2100 as part of our DWMP. The DWMP is draft and open for public consultation until Thursday 22nd September. The details of the Adaptive Plan can be found in Technical Appendix G Adaptive Pathway Planning. https://www.thameswater.co.uk/media-library/home/about-us/regulation/drainage-and-wastewater/appendix-g-adaptive-pathway-planning.pdf	Comment noted.
Reg18-E-028	Thames Water	Reg18-E-028/018	Waste and Utilities	W4 Utilities and digital infrastructure			Part 2			Please see Section 3 for the specific Beckton STW example and fig 3.,2 (pg.29) for the adaptive pathway figure. We will update and revised this every 5 years as part of future iterations of DWMP.	Comment noted.
Reg18-E-028	Thames Water	Reg18-E-028/019	Waste and Utilities	W4 Utilities and digital infrastructure			Part 2			It should also be acknowledged that most of the remaining unused areas of land at Beckton STW are covered by the Landscape and Ecology Management Plan. It is likely that any future infrastructure upgrades on these areas are likely to require biodiversity replacement off site and this should be recognised in the new Local Plan.	EKT amalgamated issue 7 - Beckton Riverside

Comment Response	Comment	Implementation	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Representor	Representation Reference
	Comment noted.	In 2019/20, Thames Water pledged to reduce their net carbon emissions from their operations to zero by 2030. In 2018/19, Thames Water generated 22 per cent of their own electricity needs from renewable sources including sludge, wind and solar power. Most of the renewable electricity Thames Water self-generate comes from the treatment of sewage sludge via anaerobic digestion, but at Beckton there is also wind, solar and waste to energy. We are also exploring new opportunities such as heat recovery and these should be supported in accordance with the London Plan and NPPF 2021 which sets out at paragraph 148 that the planning system should support renewable and low carbon energy and associated infrastructure.		Part 2			W4 Utilities and digital infrastructure	Waste and Utilities	Reg18-E-028/020	Thames Water	Reg18-E-028

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-028	Thames Water	Reg18-E-028/046	Waste and Utilities	W4 Utilities and digital infrastructure			Part 2			The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure. The attached table provides Thames Water's site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.	These wording changes have been made. Please see the new wording in relevant site allocations and Local Plan Policy W4.
Reg18-E-028	Thames Water	Reg18-E-028/047	Waste and Utilities	W4 Utilities and digital infrastructure			Part 1a		W4.1	Early engagement between the developers and Thames Water would be beneficial to understand: • What drainage requirements are required on and off site • Clarity on what loading/flow from the development is anticipated • Water supply requirements on and off site	Comment noted. All major development will be expected to undertake engagement with utility providers at pre-application stage to ensure utilities networks and connections can serve the development ahead of occupation according to Local Plan Policy W4. The surface water drainage and flood risk is covered in Local Plan Policies CE7 and CE8.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-028	Thames Water	Reg18-E-028/048	Waste and Utilities	W4 Utilities and digital infrastructure			Part 1a		W4.1	The time to deliver water/wastewater infrastructure should not be underestimated. It can take 18 months – 3 years for local upgrades and 3 – 5 years plus for more strategic solutions to be delivered. It is therefore vital that the Council and Developers work alongside Thames Water so that we can build up a detailed picture what is being built where, get confidence of when that development is going to start and what the phasing of that development will be.	Comment noted. All major development will be expected to undertake engagement with utility providers at pre-application stage to ensure utilities networks and connections can serve the development ahead of occupation according to Local Plan Policy W4.
Reg18-E-028	Thames Water	Reg18-E-028/049	Waste and Utilities	W4 Utilities and digital infrastructure			Part 1a		W4.1	To support this Thames Water offers a Free pre planning service where developer can engage Thames water to understand what if any upgrades will be needed to serve the development where and when. Link here > https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity	Comment noted. All major development will be expected to undertake engagement with utility providers at pre-application stage to ensure utilities networks and connections can serve the development ahead of occupation according to Local Plan Policy W4.
Reg18-E-028	Thames Water	Reg18-E-028/050	Waste and Utilities	W4 Utilities and digital infrastructure			Part 1a		W4.1	We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed.	Comment noted. All major development will be expected to undertake engagement with utility providers at pre-application stage to ensure utilities networks and connections can serve the development ahead of occupation according to Local Plan Policy W4.

Representation Reference	Representor	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation	Comment	Comment Response
Reg18-E-145	Environment Agency	Reg18-E-145/194	Waste and Utilities						Integrated Impact Assessment	We note that the Integrated Impact Assessment (3.22.1) informs that that Newham has the lowest recycling rate in England, with 17% of the Council's waste being recycled in 2018/2019, compared to the 45.1% average for England.	Comment noted
Reg18-E-134	London Borough of Waltham Forest	Reg18-E-134/019	Waste and Utilities							Waste and Utilities W1 - W4 The London Borough of Waltham Forest are one of the seven London authorities that have collaborated as competent waste authorities to produce the North London Waste Plan. The NLWP sets out policies and guidelines for determining planning applications for waste developments. The aim is to identify suitable sites to manage the area's waste up to 2031. We are supportive of the London Borough of Newham's separate arrangement for managing waste in the borough over the Local Plan period.	Support noted.
Reg18-E-136	St William Homes LLP and Berkeley South East London Limited	Reg18-E-136/166	Waste and Utilities							The Berkeley Group is committed to helping to achieve sustainable development goals and recognises that as a business they have a very important role to play in the process. The Berkeley Group fully supports the need for local policies to help ensure waste is reduced and managed in a sustainable manner.	Support noted