ELJWP

East London Joint Waste Plan

Regulation 19 Submission Plan

Final

19.02.25

Barking & Dagenham

Havering LONDON BOROUGH

Newham London

London Borough of Redbridge

Table of Contents

Abbreviations

AMR	Annual Monitoring Report
BAP	Biodiversity Action Plans
CCC	Climate Change Committee
CCS	Carbon Capture and Storage
CE	Circular Economy
C, D & E	Construction, Demolition and Excavation
C&I	Commercial and Industrial
ELJWP	East London Joint Waste Plan
HIC	Household, Industrial and Commercial waste
HRA	Habitats Regulation Assessment
LACW	Local Authority Collected Waste
LLDC	London Legacy Development Corporation
LNR	Local Nature Reserve
MBT	Mechanical Biological Treatment
NPPF	National Planning Policy Framework
OS	Ordnance Survey
PAN	Planning Advisory Note
RBMP	River Basin Management Plan
RDF	Refuse Derived Fuel
RWS	Resources and Waste Strategy
SIL	Strategic Industrial Location
SRF	Secondary Recovered Fuel
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SPA	Special Protection Area
tpa	Tonnes per annum
WDI	Waste Data Interrogator
WPA	Waste Planning Authority

Executive Summary

The efficient and effective management of waste (including wastewater) is an important aspect of a well- functioning modern society. Whilst essential, waste management has the potential to cause impacts on the environment and communities, including those related to climate change, if it is not undertaken in the right place and in the right way. Without proper consideration, built development may result in the production of excessive quantities of waste.

The future management of waste therefore needs to be carefully planned for, and it is a statutory requirement for each area to have a 'waste local plan' that sets out how and where waste will be managed. In East London, the predecessor waste local plan, known as the 'East London Waste Plan', was adopted in 2012 and planned for the management of waste over the period until 2021 within the following East London boroughs: Barking and Dagenham; Havering; Newham; and Redbridge. This Plan, the East London Joint Waste Plan (ELJWP), updates and replaces the East London Waste Plan.

The ELJWP deals with all waste but focusses on Local Authority Collected Waste (LACW), Commercial and Industrial (C&I) waste, Construction, Demolition and Excavation (C, D&E) waste, Hazardous waste and wastewater. The ELJWP takes account of the East London Waste Authority's strategy for managing Local Authority Collected Waste to 2057.

This document is the version of the Plan that the Boroughs intended to submit for examination and is published for representations on soundness and legality. The Plan includes a Vision and eight Strategic Objectives. Seven planning policies are included for use in determining the suitability of development proposals submitted to the Boroughs for planning permission. Implementation of the policies will ensure waste management facilities are well located and do not result in significant adverse impacts on local communities and the natural environment. They also ensure that the right types of waste management capacity are developed to facilitate the achievement of targets such as those related to increasing recycling and diverting waste away from landfill.

The most recent waste management capacity assessment demonstrates that, other than for landfill, there is a surplus of capacity necessary for the management of current and forecast future waste arisings. Therefore, there is no need for development of additional capacity to meet the London Plan 2021 apportionments within the Plan area. The Plan safeguards most existing sites and allows additional waste development in exceptional circumstances. On this basis no land is allocated specifically for the development of additional waste management capacity. This is a

significant change to the adopted East London Waste Plan that identified land for new waste management facilities.

Policy JWP1 is intended to ensure that all types of development, and not just those relating to the management of waste, come forward in a manner that minimises the production of waste and ensures that any waste that is produced can be managed sustainably. The overarching approach of the ELJWP can be summarised as follows:

1. Ensuring that waste produced from development, including during its occupation, is minimised and then reused or recycled;
2. existing waste management capacity is safeguarded;
3. allowing the development of new waste management capacity at existing sites if it will result in waste being managed more sustainably;
4. not allowing the development of new waste management sites except in exceptional circumstances including the site being in a sustainable location; and,
5. Any new capacity should be designed in a way that protects and enhances communities and the natural and historic environment.

1 Introduction and background

What is the East London Joint Waste Plan?

1.1. The efficient and effective management of waste and treatment of wastewater is an important aspect of a well-functioning modern society. While essential, waste management and wastewater treatment have the potential to cause impacts on the environment and communities if it is not undertaken in the right place and in the right way. Without careful consideration, built development may result in the production of excessive quantities of waste.

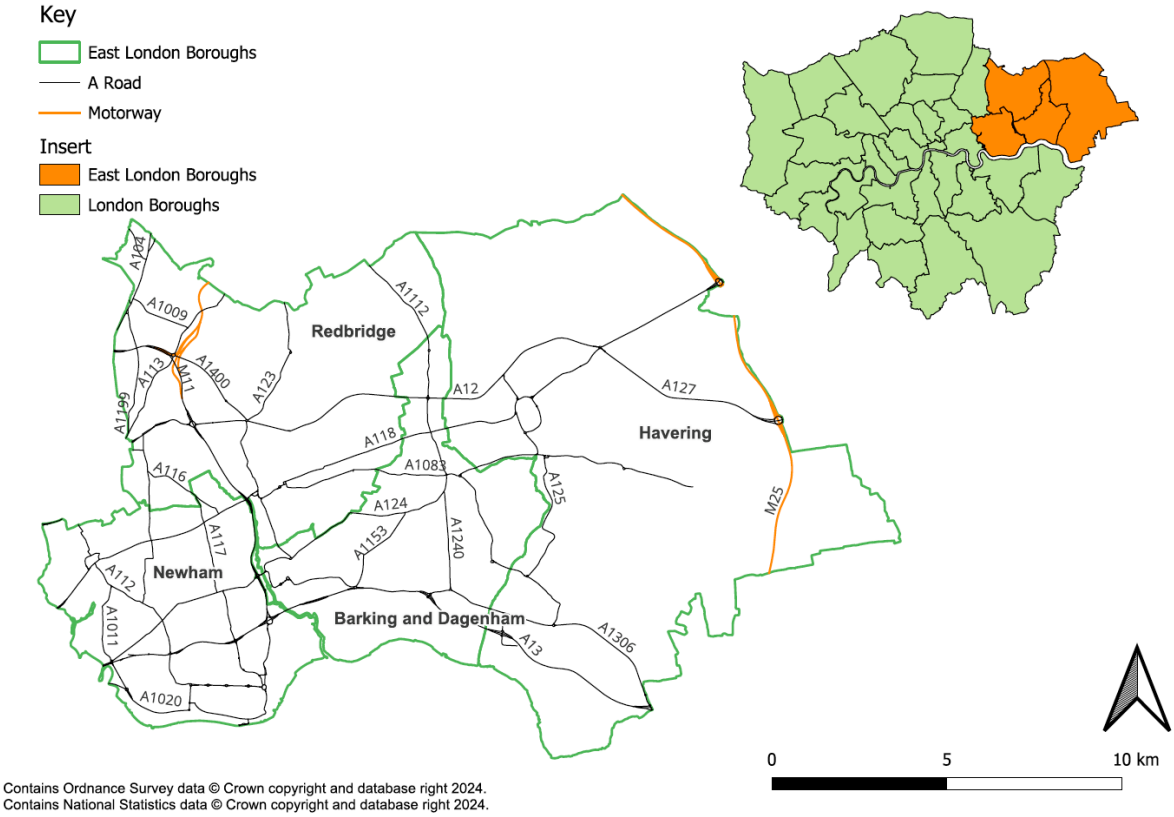
1.2. It is a statutory requirement for each area to have a 'waste local plan' that sets out how and where waste will be managed. Policies in waste local plans are used to determine planning applications affecting the management of waste.

1.3. In East London, the predecessor waste local plan, known as the 'East London Waste Plan', was adopted in 2012 and planned for the management of waste over the period until 2021 within the following East London boroughs ('the Boroughs'):

- London Borough of Barking and Dagenham
- London Borough of Havering
- London Borough of Newham
- London Borough of Redbridge

1.4. The East London Joint Waste Plan (ELJWP), updates and replaces the adopted 2012 East London Waste Plan. A map of the area to be covered by the Plan ('the Plan area') is provided in Figure 1.

Figure 1: The area covered by the East London Joint Waste Plan



1.5. The Plan area is bordered within London by the London Borough of Waltham Forest, London Borough of Hackney and the London Borough of Tower Hamlets to the west, and the London Borough of Greenwich and the London Borough Bexley to the south of the river Thames. To the north and east, outside of the Greater London area, are the Districts of Epping Forest and Brentwood (within the county of Essex) and the unitary area of Thurrock.

1.6. The ELJWP area is consistent with the geography for the East London Waste Authority[1]. The ELJWP also includes the area covered by the London Legacy Development Corporation (LLDC) within the London Borough of Newham though the planning powers of the LLDC returned to the Borough of Newham on 1 December 2024.

1.7. These planning applications concern proposals for new facilities, changes to existing facilities and proposals which might otherwise affect how waste is

1 East London Waste Authority (2022) Joint Strategy [online]. Available at: https://eastlondonwaste.gov.uk/east-london-waste-authority/jointstrategy

managed, for example proposals to redevelop existing waste management facilities for other non-waste uses or to change how a facility operates. The Plan is also concerned with how proposals for new development consider how waste will be managed during demolition and construction and operational phases of the development.

1.8. Once adopted, the East London Joint Waste Plan will form part of the Development Plan for the East London Boroughs. Each Borough has a separate 'Local Plan' that is concerned with other forms of development such as housing and employment. It is important to note that all the policies of the Development Plan will be taken into account when decisions of development proposals are made. Furthermore, Supplementary Planning Documents may also exist which provide further guidance on the acceptability of certain aspects of development (e.g. design).

The need to replace the current waste plan

1.9. As the Boroughs have regard to the waste local plan when making decisions on development proposals, it is essential that the plan provides an up to date and robust policy framework to support the sustainable management of waste. Since the current plan was adopted in 2012, a number of changes have occurred which include the following:

- Changes in the policy landscape, in particular a new London Plan was adopted in 2021, there have been several updates to national planning policy and the Boroughs have adopted new Local Plans.
- Evolution of waste management technologies and approaches.
- Current and emerging local conditions including pressure to release existing safeguarded waste sites to alternative development, in particular that relating to alleviating the pressures in London for more housing.
- Changes in patterns of waste production.
- Emergence of the 'Circular Economy' as a concept

1.10. The new plan, known as the 'East London Joint Waste Local Plan' (ELJWP) ('the Plan') updates the East London Waste Plan, by taking account of the changes listed above and covering the period to 2041.

1.11. The new ELJWP ensures that new waste management capacity is provided on the basis of the most up to date evidence and forecasts of waste arisings. The new ELJWP helps make sure that there continues to be sufficient capacity to manage waste in East London in the most sustainable way.

The process of preparing the East London Joint Waste Plan

1.12. There are several stages in preparing a Local Plan which are prescribed in legislation[2] and policy[3]. The way in which these stages are being applied to the preparation of the ELJWP is outlined in Table 1. Many of the stages offer opportunities for residents, businesses and other key stakeholders to comment and be involved in determining the content of the Plan.

Table 1- Anticipated Timetable for Development of the East London Joint Waste Plan

Key Stage	**When**
Draft ELJWP – 6-week public consultation ('Reg 18')	July-September 2024 (complete)
'Final' Submission ELJWP published for representations ('Reg 19')	Mid 2025
ELJWP submitted for independent examination	Late 2025/early 2026
Examination hearings (if needed)	Early-mid 2026
Main modifications (if needed) published for representations	Mid 2026
Inspector's Report	Mid-late 2026
Adoption	Late 2026

Key elements of the East London Joint Waste Plan

1.13. The key elements of the East London Joint Waste Plan are:

- Vision
- Strategic Objectives
- Policies
- Policies Map
- Monitoring Framework

1.14. Together these elements confirm how and where the Boroughs expect the waste management of waste to take place in East London.

2 Planning and Compulsory Purchase Act 2004 and the Town and Country (Local Planning) (England) Regulations 2012
3 National Planning Policy Framework, December 2024

1.15. The Vision and Strategic Objectives set out how it is proposed that waste be managed to ensure it benefits, protects and enhances communities and the environment of East London. The Policies and Policies Map are intended to ensure the Vision is realised and the Strategic Objectives are achieved.

1.16. To establish how the objectives of the Plan are being met, certain indicators will be monitored on a regular basis as detailed in Appendix 1.

1.17. The National Planning Policy Framework (NPPF) and National Planning Policy for Waste (NPPW) expect local planning authorities to focus on determining if a proposed development is a suitable use of land, and the consequences of the use, rather than managing any related processes or emissions, which are regulated under separate pollution control regimes. Local Planning Authorities (LPAs) should assume that these regimes will be applied effectively by pollution control authorities e.g. the Environment Agency. Similarly, once a planning decision has been reached for a specific development, the planning concerns should not be re-evaluated through the permitting regimes managed by pollution control authorities.

1.18. It is important that developers contact the pollution control authorities at the earliest design stages to ensure that proposals put forward take account of pollution control requirements.

This stage of preparing the ELJWP

1.19. This ‘Regulation 19’ Submission Version of the ELJWP has been prepared taking account of comments received on an earlier draft ELWJP (Regulation 18 version) that was consulted on from July to September 2024.

1.20. Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires the Waste Planning Authority (WPA) to publish the version of the Plan that is intends to submit to Secretary of State for examination on its legal compliance and soundness for a period of six weeks. During this period representations can be made on the soundness and legal compliance of the Plan. A representation form and guidance note is available and should be used and referenced by anyone wishing to make a representation.

1.21. The Plan has been evaluated through a Sustainability Appraisal which is incorporated into an ‘Integrated Impact Assessment’ (IIA) published with this Plan. In addition, a Habitat Regulations Assessment (HRA) has been undertaken to assess any potential adverse impacts on statutory nature conservation sites. The IIA serves as framework for assessing and communicating the impacts of a plan, and its reasonable alternatives, with a focus on key sustainability issues. The main objective of the IIA is to inform and influence the plan with a view to avoiding and mitigating negative

impacts. By adopting this method, the IIA aims to maximise the plan's contribution to sustainable development. The IIA and the HRA have been published as part of the consultation documents.

1.22. Other evidence base documents have been published which inform the approaches taken in the Plan.

1.23. Following the six week period for representations the Boroughs will submit the Plan for examination, along with the evidence base and all the representations received. The Plan can only be adopted by the Boroughs if, following the examination, the Inspector finds that the Plan is sound and legally compliant.

Supporting documents

1.24. This submission draft ELJWP is supported by evidence base documents including:

- Updated Waste Capacity Assessment and Arisings Estimates
- Strategic Waste Flows Report
- Safeguarded Sites for Release – Assessment Report
- Integrated Impact Assessment comprising:
  - Sustainability Appraisal
  - Habitats Regulation Assessment
- Climate Change Topic Paper
- Circular Economy Topic Paper
- Waste Management in East London Topic Paper

1.25. The submission draft ELJWP and all evidence base documents can be found on the following website: ELJWP project website.

How to comment on the Submission Draft ELJWP

1.26. You can submit representations on the soundness and legality of the ELJWP via the ELJWP project website until the deadline specified on the website.

1.27. Guidance on how to respond is included in the Consultation Protocol. The Consultation Protocol and representation forms are available online and at the Borough's main offices as listed below:

- London Borough of Barking & Dagenham: Barking Town Hall, 1 Town Square, Barking, IG11 7LU
- London Borough of Havering: Town Hall, Main Road, Romford, RM1 3BB
- London Borough of Newham: Newham Dockside, 1000 Dockside Road, London, E16 2QU
- London Borough of Redbridge::Lynton House, 255 - 259 High Road, Ilford, IG1 1NY

2 The Context

Geographical Context

Population

2.1 The population of the ELJWP Area has grown from 772,900 in the 2011 Census to 1,142,300 in the 2021 Census. The London Plan predicts that the population of London will increase by 70,000 every year, reaching 10.8 million in 2041, and East London will make a large contribution to this growth[4].

Table 2 – Population in East London

Borough	2021 census population total	2030 expected total population	Population increase since 2011 census	Projected population increase By 2030
Barking and Dagenham	218,900	238,044	17.7%	9%
Havering	262,100	299,000	10.4%	14%
Newham	351,000	465,035	14.0%	32%
Redbridge	310,300	362,000	11.2%	17%

Housing

2.2 The London Plan 2021 sets out the ten-year housing targets for each London borough as net housing completions for 2019/20 - 2028/29. The table below sets out the targets for East London boroughs.

Table 3 – Housing in East London

Borough	Total housing stock in 2017	Ten-year target for net housing completions (2028/29)	Projected total	Percentage increase from 2017 housing stock total
Barking and Dagenham	71,079	19,440	90,519	27%

4 https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

Havering	99,184	12,850	112,034	13%
Newham	100,062	47,600[5]	132,862	33%
Redbridge	101,348	14,090	115,438	14%
Authority Average	-	*16,340*	-	-

Economy[6]

2.3 The spatial make-up of London's economy shows that different sectors are important to different boroughs. In Newham, the largest employment sector is banking, finance and insurance, employing 29.8% of the workforce. In Havering, Barking and Dagenham and Redbridge, the largest percentage of residents aged 16 and over (27.8%, 23% and 26.7% respectively) are employed in the public administration, education and health sector. In Barking and Dagenham, the production industries account for 21.2% of total output.

2.4 Across London in the year ending June 2023, 75.1% of people aged 16 to 64 years were employed. This means that Barking and Dagenham and Redbridge are below the London average. Across London in quarter one of 2024, 5.1% of people aged 16 to 64 years were unemployed. This means that Barking and Dagenham and Redbridge have a higher unemployment rate than the London average. Barking and Dagenham has the highest unemployment rate out of all London boroughs.

Table 4 – Employment in East London

Borough	**Employment rate for 16–64 year olds**	**Unemployment rate for 16-64 year olds[7]**
Barking and Dagenham	73.1%	7.0%
Havering	82.6%	4.2%
Newham	75.5%	4.9%
Redbridge	72.5%	5.3%
Authority average	75.9%	4.7%

5 This reflects an element of the London Legacy Development Corporation target that Newham will be responsible for planning for.
6 Source: Greater London Authority (2016) Economic Evidence Base for London [online] Available at: https://www.london.gov.uk/sites/default/files/economic_evidence_base_2016.compressed.pdf
7 Source: Trust for London

2.5 Strategic Industrial Locations (SIL) are protected through Policy E5 of the London Plan which ensures that SILs are given strategic protection because they are critical to the effective functioning of London's economy. A map of SIL in East London is included in Figure 2 below.

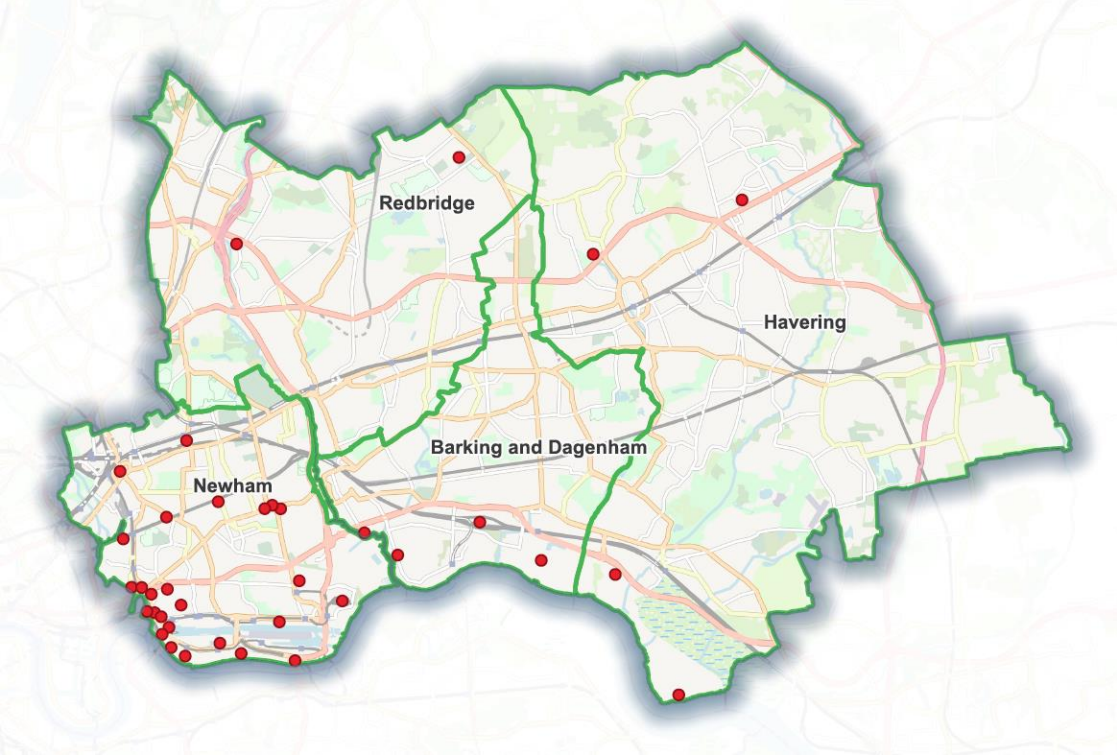


Figure 2 Strategic Industrial Locations in East London

2.6 SIL can accommodate activities which - by virtue of their scale, noise, odours, dust, emissions, hours of operation and/or vehicular movements - can raise tensions with other land uses, particularly residential development. The London Plan notes the importance of these locations in East London, and the role the Thames Gateway will play in a *'strategically co-ordinated plan-led consolidation of SILs in order to manage down overall vacancy rates, particularly in the boroughs of Newham and Barking & Dagenham'*. The East London Boroughs have, and will, explore the release of SIL for other land uses (such as housing) through the preparation of their Local Plans.

Transport infrastructure

2.7 Several of the ELJWP road links are inadequate, with several roads (e.g. A12 and A13) and junctions noted as being at or near to capacity, and many experiencing congestion at peak times. Adverse traffic conditions on these routes often have knock-on effects on local roads, leading to localised gridlock on occasion and impacting negatively on economic productivity. In addition, with planned developments and increased housing and job provision, more pressure may be placed on the road networks.

2.8 The London Infrastructure Plan 2050: Transport Supporting Paper notes that across London, trip rates are expected to remain constant on a per person basis, but that expected growth in population will require significant additional capacity across London's transport networks by 2050

Wharves and railheads

2.9 The London Plan reflects the NPPF in seeking to maximise recycling and reuse of construction, demolition, and excavation (C, D & E) wastes and the Boroughs should support the development of aggregate recycling facilities in their local plans. Moreover, in recognition of the heavy dependence of London on imports of crushed rock and marine (dredged) aggregates, the London Plan requires the Boroughs' local plans to safeguard wharves and railheads for aggregate distribution. The safeguarded wharves in East London are listed in table 4b and their location is shown in Figure 3 below.

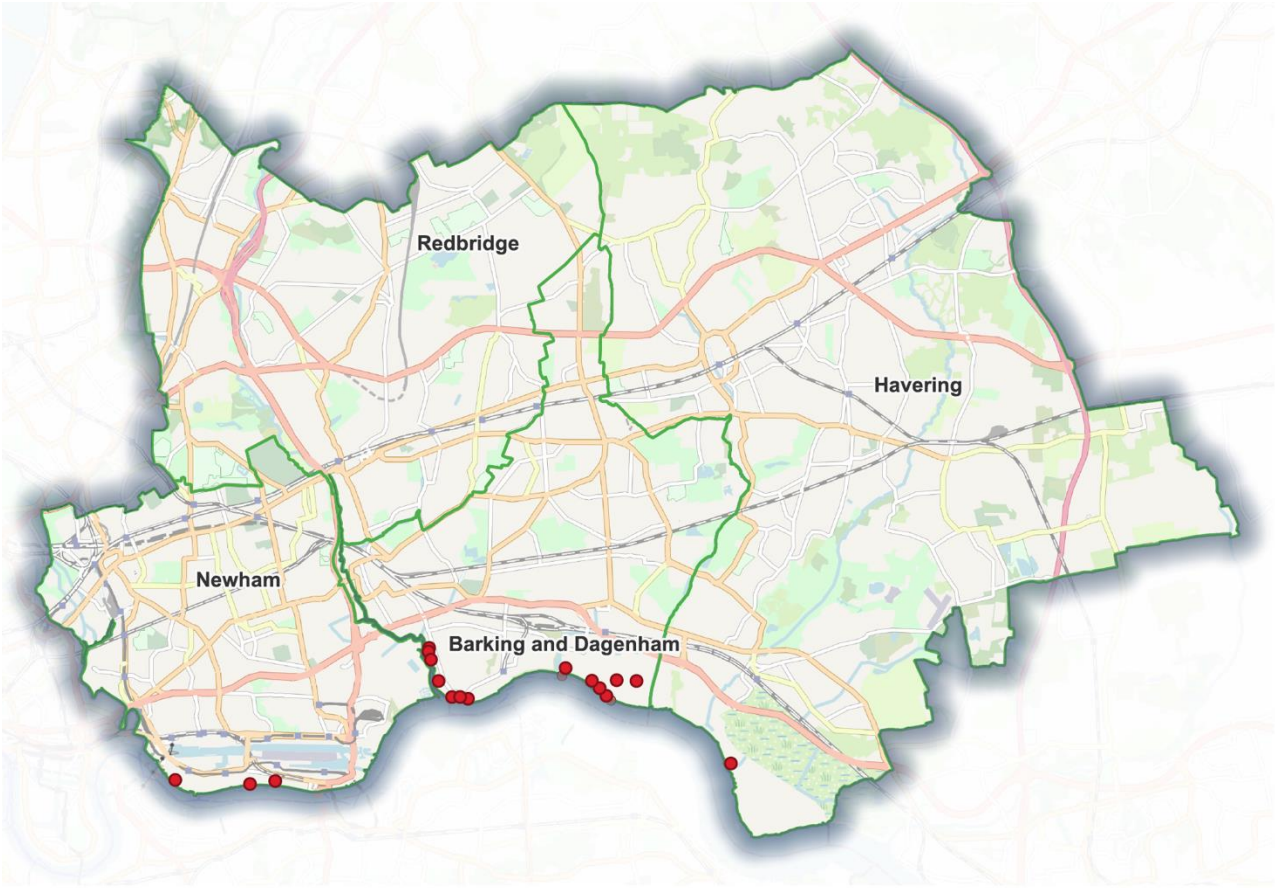


Figure 3 Location of Safeguarded Wharves in East London

Table 4b – Safeguarded Wharves in East London[8]

Barking and Dagenham
Alexander Wharf
Dagenham Wharf
De Pass Wharf
Docklands Wharf
East Jetty
Ford Dagenham Terminal
No.1 Western Extension
No.4 Jetty
Pinnacle Terminal
Pinns Wharf
Rippleway Wharf
Kierbeck and Steel Wharves
Victoria Stone Wharf
Havering
Halfway Wharf
Newham
Plaistow Wharf (Peruvian Wharf)
Royal Primrose Wharf
Thames Refinery

Nature conservation and biodiversity

2.10 The Plan area contains many areas of high ecological value ranging from European designated sites such as the Epping Forest SAC in Redbridge, to nationally designated Sites of Special Scientific Interest, Sites of Metropolitan Nature Conservation Importance and Sites of Importance for Nature Conservation (also known as Local Wildlife Sites) among local green spaces and networks that provide ecological connectivity and greater biodiversity, and there is proximity to sites of national importance. There is a need for continued preservation and long-term management of these areas within the Plan area, as well as consideration of potential effects on sites outside the Plan area boundary.

8 Source: https://www.london.gov.uk/programmes-strategies/planning/planning-applications-and-decisions/safeguarded-wharves-directions

2.11 Sites of Importance for Nature Conservation in each borough can be negatively impacted by actions such as inappropriate management, traffic pollution and recreational activities. If this continues, it could affect their wildlife value and contribution they make to biodiversity, landscapes and the natural environment.

2.12 A Local Nature Recovery Strategy (LNRS) for London is being prepared by the GLA. The LNRS will include a statement of London's strategic biodiversity priorities and propose actions in the locations where it would make a particular contribution to achieving those priorities. The LNRS will include an up to date spatial habitat map showing London's strategic Nature Recovery Network.

Landscape

2.13 The National Character Map defines the Plan area as lying within National Character Areas (NCA) 111 - Northern Thames Basin and Area 112 – Inner London. The Northern Thames Basin area is more diverse mix of urban and rural landscapes. The rural and dispersed landscape adjacent to Essex becomes increasingly urban towards the centre of London. There is a mix of historic settlement patterns, with remnants of historical orchards and other communal green and farmed spaces. Urban areas have low levels of tranquillity with pockets of perceived tranquillity, as with the Inner London area. Moving eastwards in the ELJWP area, tranquillity increases as green space and Green Belt areas increase.

2.14 Within the Inner London area, there is a strong sense of place along the Thames and particularly in the wharfs and creeks of East London as well as the parks and gardens, green spaces, rivers and other natural habitats. There are strong settlement patterns, and industrial features, with good public access to heritage assets. The whole NCA scores negatively for tranquillity, but there are good pockets of perceived tranquillity in public parks and other small spaces.

Open spaces and Green Belt

2.15 Barking and Dagenham has ambitions to be the 'Green Capital of the Capital'. One third of the Borough is green open space (463 hectares) and the Borough is in close proximity to Epping Forest.

2.16 More than 50% of Havering is classed as Metropolitan Green Belt, and the Borough has some of the most green space in London. Romford town centre has a lack of green space although it is within walking distance of number of local parks. This mirrors other areas of the Borough where, if there is a lack of one type of open space it is often met by another type of open space. There is generally a good coverage of parks, gardens, natural and semi natural spaces and amenity greenspaces across the Borough.

2.17 Newham has an existing network of natural spaces; not just nature reserves, parks, and rivers but also playgrounds, playing pitches, allotments, gardens, hedges, green walls, green/ brown roofs, cycle and footpaths, street trees, docks, lakes, and ponds. Specifically, Newham has a total of 926 hectares of open space, which includes the borough's 308 hectares of water spaces. The Borough has 16% tree cover, which is the second lowest in London. Green space is unevenly distributed across the borough and residents can have very different experiences when trying to access open space where they live.

2.18 Redbridge is one of London's greenest boroughs and comprises extensive Green Belt land (37% of total area) to the north-east. About 48% of the Borough comprises open spaces, including notable locations like Hainault Forest Country Park, Roding Valley Park, Fairlop Waters Country Park, Valentines Park, and around 120 hectares of countryside. These open spaces, including country parks and formal parks, contribute to the Borough's character, biodiversity, and climate change mitigation efforts.

Heritage and archaeology

2.19 The importance of protecting, conserving and enhancing both designated heritage assets and those more informally recognised, together with their setting, is generally recognised in the Borough Local Plans. The former includes those buildings, monuments, structures, parks, etc., that are subject to national listing/scheduling; the latter includes Locally Listed buildings and buildings that are yet not on the local register but the development management processes uncover their heritage value.

2.20 At local level, new developments, infrastructure and environmental pressures, such as extreme weather and flooding, present the greatest risk to cultural heritage assets.

2.21 Historic England has a Heritage at Risk Register which includes historic buildings, listed buildings, sites and Conservation Areas at risk of being lost through neglect, deterioration or decay. The register aims to highlight those places and buildings in greatest need of repair. As of 2023, there are eighty-one heritage assets registered as at risk within wider London. There are six heritage assets registered at risk within Barking and Dagenham, twelve within Havering, thirteen within Newham and ten within Redbridge.

Water environment

2.22 For each of the major catchments in the UK a river basin management plan (RBMP) has been prepared, which provides information about the current status of the different aspects of the water environment and sets targets for their improvement by 2027. The Boroughs contain waterbodies and catchments that lie within the areas covered by the Thames RBMP and the South East RBMP.

2.23 Several water bodies across the four Boroughs do not meet the required ‘good' status, and a number of water bodies and watercourses are protected sites and sensitive to changes in water quality. In Newham, the Thames, Lea and Roding rivers have not improved in water quality over the past few years, whilst the River Beam (from Ravensbourne to the Thames) is classified as ‘Bad’ and the Lower Roding, Mayesbrook River and the Goresbrook in Barking and Dagenham all fail against chemical quality targets.

2.24 There are a number of groundwater Source Protection Zones (SPZs) in East London. A map of these zones and how they are defined is publicly available[9]. Areas in Source Protection Zone 1 (SPZ1) are the catchment areas for sources of potable, high quality water supplies usable for human consumption. Groundwater at this location is therefore particularly vulnerable to polluting uses on the surface. All development proposals, including waste sites, are carefully monitored within SPZ1.

2.25 A number of sensitive aquifers span the study area, which can be viewed online[10]. A large amount of the superficial geological deposits within East London are classed as ‘Secondary A’, which comprise permeable layers that can support local water supplies and may form an important source of base flow to rivers. These shallow aquifers are most at immediate risk from any spills, leakages and leaching of contaminants from waste materials not stored on impermeable ground, and so protection against this is crucial.

2.26 The majority of the bedrock aquifer within East London is classed as ‘Unproductive London Clay’, however there is Secondary A Lambeth Group and Principal Chalk present to the south. Principal aquifers provide significant quantities of water and can support water supply and/or baseflow to rivers, lakes and wetlands on a strategic scale. They typically have a high intergranular and/or fracture permeability meaning they usually provide a high level of water storage.

9 Groundwater source protection zones (SPZs) - GOV.UK (www.gov.uk)
10 Magic Map Application (defra.gov.uk)

2.27 Under predicted climate change scenarios, more frequent drought conditions are expected in London and the South East of England, along with increased demands on water resources. Future developments will create additional demand for water abstraction from surface and groundwater sources in London. At a high level, it is broadly assumed that the quality of water bodies will improve in line with national objectives. However, water quality is influenced by a wide range of internal and external factors, including climate change, geology and soils, human consumption and population change, and pollution from human activities such as industry, agriculture, contaminated runoff from roads and other built surfaces, combined sewer overflows, and nutrient enrichment from treated wastewater. Future development, particularly in areas close to water bodies, may therefore hamper efforts to improve water quality.

Climate change

2.28 Climate change presents a global risk, with a range of different social, economic and environmental impacts that are likely to be felt within the Plan area across numerous receptors. A key challenge in protecting the environment will be to tackle the causes and consequences of climate change: warmer, drier summers and wetter winters with more severe weather events all year, higher sea levels and increased river flooding.

2.29 There has been a general trend towards warmer average temperatures in recent years with the most recent decade (2012–2021) being on average 0.2°C warmer than the 1991–2020 average and 1.0°C warmer than 1961–1990. All the top ten warmest years for the UK in the series from 1884 have occurred this century.

2.30 Given the trends in carbon emissions and energy consumption at both national and local level, carbon emissions in London, and each of the four London Boroughs within the ELJWP area, are likely to continue declining.

Flood risk

2.31 Heavy rainfall and flooding events have been demonstrated to have increased potential to occur in the UK as the climate has generally become wetter. For example, for the most recent decade (2012–2021) UK summers have been on average 6% wetter than 1991–2020 and 15% wetter than 1961–1990.

2.32 The effects of climate change in the ELJWP area are likely to result in extreme weather events becoming more common and more intense. Flood risk is of particular significance in this regard, alongside heatwaves and drought. Fluvial and surface water flooding poses the most significant risk to the plan area, particularly in areas in close proximity to the River Thames.

Existing waste management

2.33 The legal definition of waste, set out in section 75(2) of the Environmental Protection Act 1990, is “any substance or object which the holder discards, or intends or is required to, discard”. The key concept relates to the producer or holder's intention regardless of whether the waste may have a value to the recipient.

2.34 The main types of waste produced are:

- Local Authority Collected Waste (mainly household waste) (LACW);
- Commercial and Industrial Waste (waste from businesses and industry) (C&I waste);
- Construction, Demolition and Excavation Waste (C, D & E waste);
- Hazardous Waste from various sources; and,
- Wastewater and Sewage Sludge

2.35 Planning Practice Guidance also expects Waste Planning Authorities to plan for the management of Agricultural Waste and Low Level Radioactive Waste.

2.36 There are a range of waste management facilities that handle waste both from within and beyond East London. 65 sites are safeguarded by this Plan for waste management uses and their location is shown in Figure 4 below.

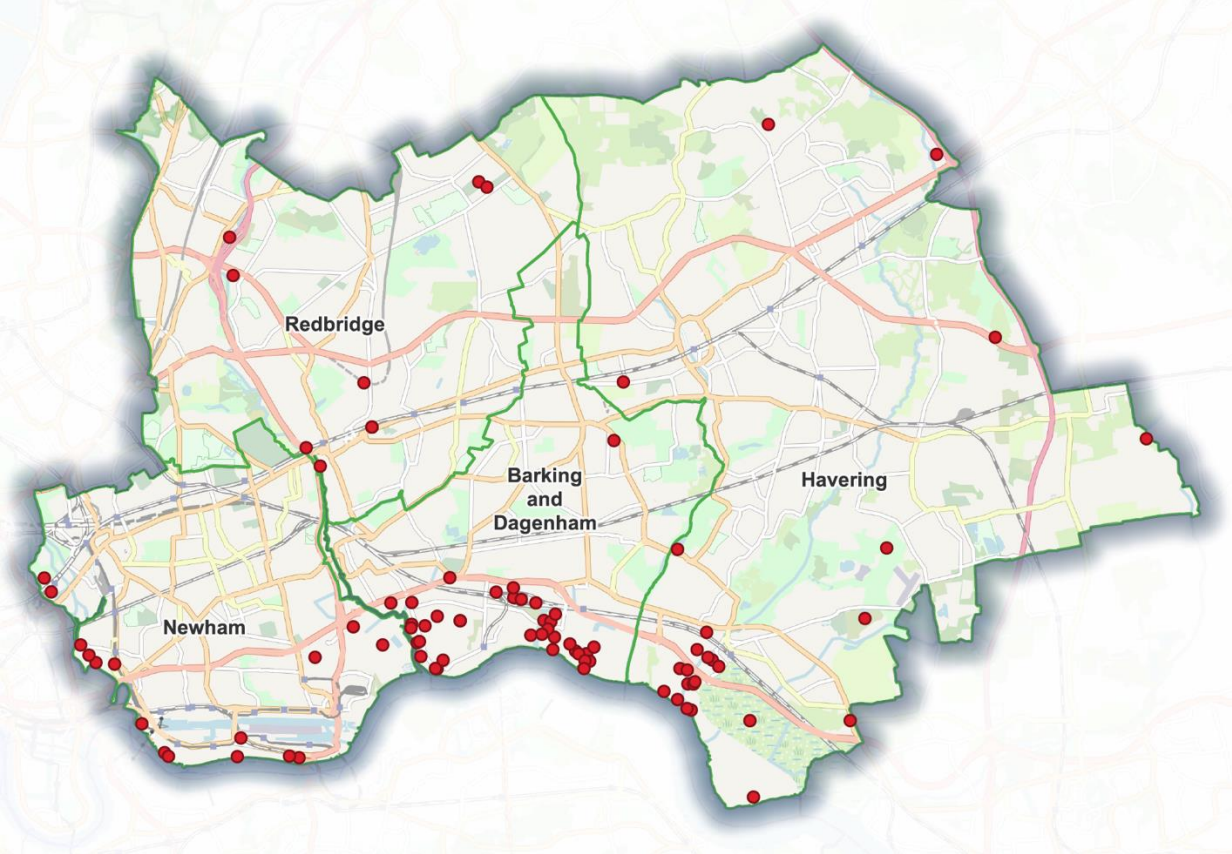


Figure 4: Map of Existing Waste Sites in East London

Local Authority Collected Waste

2.37 Local Authority Collected Waste (LACW) waste consists of waste which comes into the possession of, or under the control of, the local authority and includes waste collected from households (household waste). LACW collected by the Boroughs can include household waste (residual, dry mixed recycling and food waste), street sweepings, green waste from maintenance of open spaces, and a small quantity of clinical waste[11]. Depending upon the local arrangements, LACW can include commercial waste collected by trade waste operations.

2.38 In 2022/23 0.42 million tonnes of LACW was generated in East London, with 0.19 million tonnes managed through incineration with Energy from Waste (EfW) (at facilities outside of East London), 0.13 million tonnes recycled or composted, and only 117 tonnes managed through disposal to landfill.

Construction, Demolition and Excavation Waste

2.39 C, D & E waste comprises waste arising from the construction and demolition industries, including excavation during construction activities, and is made up of mainly inert materials such as soils, stone, concrete, brick and tile. However, there are also non-inert elements in this waste stream such as wood, metals, plastics, cardboard, and residual household-like wastes. Hazardous waste are also present particularly when development takes place on brownfield sites that have been affected by historical contamination. Due to their weight, the inert elements make up the majority of the total tonnage.

2.40 Different types of C, D & E waste require different forms of management. For example, hard inert[12] materials (such as concrete, brick and road planings arising from demolition and road maintenance) can be recycled for use as an aggregate, while soft materials such as soils and sub-soils can be deposited on land for beneficial purposes such as the restoration of minerals workings and in other engineering projects. The non-inert component includes timber, plasterboard and plastics may be recycled if separated. Ultimately there is very little C, D & E waste that cannot be recycled or recovered in some other way.

2.41 Soft inert excavation material may be deposited on land for beneficial purposes which may be consented as non-waste development and, either subject to an Environmental Permit as a recovery to land operation or managed under the CL:AIRE definition of waste protocol. If the latter case applies, the material managed through this route is not classed as waste.

2.42 The London Plan does not apportion quantities of C, D & E waste for management, but boroughs are still required to plan for this waste stream.

2.43 The production of C, D & E waste is influenced by large-scale infrastructure projects, as well as commercial and residential developments, which means that peaks and troughs in its production are often observed with arisings not following a regular pattern. Given it is a bulky and heavy waste type it does not tend to travel significant distances from source for management.

11 Household clinical waste is not deemed hazardous unless a particular risk has been identified (based on medical diagnosis).
12 Inert waste is defined as “waste that does not undergo any significant physical, chemical or biological transformations”.

Table 5: Non-hazardous C, D & E Waste arisings from East London 2023 (tonnes)

Category	Type	Tonnes	
C&D waste	Inert	345,495	795,002
	Non-inert	449,507	
Excavation waste	Inert	1,397,953	1,408,589
	Non-inert	10,627	
Total Non hazardous C, D & E waste:		2,203,591	

2.44 The management routes for Non-hazardous C, D & E waste (including inert waste) arising in East London in 2023 is set out in Table 6 below.

Table 6: Non-hazardous C, D & E Waste in East London Waste Management Profile 2023 (% of Total Arisings)

Category	Waste Type	Recycling	Recovery	Landfill	Transfer	Mobile Plant
C&D Waste	Inert	41%	1%	<1%	4%	0%
	Non-inert	28%	2%	<1%[13]	23%	0%
	Subtotal C&D	**69%**	**3%**	**1%**	**27%**	**0%**
Excavation Waste	Inert	30%	44%	0%	25%	1%
	Non-inert	<1%	0%	<1%	0%	0%
	Subtotal Excavation	**30%**	**44%**	**<1%**	**25%**	**1%**

2.45 The management profile for Non-hazardous C&D waste is as set out below:

- 69% was managed at recycling facilities;
- 3% was recovered (either through incineration or recovery to land);
- 1% was managed at permitted landfills;
- 27% was managed at intermediate sites and transferred on for recovery or disposal; and

- 0% was managed via mobile plant (normally for recycling or reuse).

2.46 The management profile for Non-hazardous excavation waste is as follows:

- 30% was managed at recycling facilities;
- 44% was recovered (through recovery to land including use in restoration or operational needs on permitted landfills);
- <1% was managed at permitted landfills (dredging spoil);
- 25% was managed at intermediate sites and transferred on for recovery or disposal; and
- 1% was managed via mobile plant (normally for recycling or reuse).

2.47 This compares with the following targets in the London Plan for C, D & E waste management in Policy SI 7 *Reducing waste and supporting the circular economy*:

> *meet or exceed the targets for each of the following waste and material streams:*
>
> - *construction and demolition – 95 per cent reuse/recycling/recovery*
> - *excavation – 95 per cent beneficial use overall and 100% of inert excavation beneficial used.*[14]

Table 6b: Non-hazardous C, D & E Waste attributed to East London plus reattributed Non-hazardous C, D & E Waste from London as whole Combined Waste Management Profile 2022

Category	Activity	Recycling	Recovery	Landfill	Transfer	Mobile Plant	Total
C&D	Recovery inc recycling	69%	3%	-	27%	0%	**>99%**
	Other	-	-	<1%		-	**<27%**
Inert Excavation	Recovery inc recycling	30%	44%[15]	0%	25%	1%	**>99%**
	Other	-	-	-		-	**<30%**
All Excavation	Recovery inc. recycling	30%	44%	0%	25%	1%	**>99%**
	Other	-	-	<1%		0%	**<25%**

14 London Plan Footnote 164

[15] Taken to be used for restoration or operational purposes which is classed as recovery.

2.48 To summarise the management profile for non-hazardous C& D waste managed at permitted facilities reporting through the WDI is as set out below:

- At least 72% was managed through recycling or recovery;
- With less than 1% disposed at permitted landfills; and
- 27% transferred on for recovery or disposal.

2.49 It should be noted that waste going for reuse may not be managed through permitted sites, plus a substantial amount of the fraction of C&D waste that constitutes hardcore may be managed on the site of production and converted into recycled aggregate either used on site or sold offsite[16]. Hence the recycled value should be taken to be a minimum 'at least' value.

2.50 The management profile for non-hazardous excavation waste is as set out below:

- At least 74% was managed through recycling or recovery (inc mobile plant);
- With <1% disposed at permitted landfills; and
- 25% transferred on for recovery or disposal. Given that disposal would only be to landfill, and backfilling of mineral workings and other uses would be classed as recovery, it is considered highly unlikely that the inert fraction of this stream would actually end up being disposed of.

Hazardous Waste

2.51 Hazardous wastes are categorised as those that are harmful to human health, or the environment, either immediately or over an extended period of time. In East London, hazardous waste arises mainly from: construction and demolition activity, vehicle maintenance and/or dismantling activity and healthcare.

2.52 It is estimated that around 71,000 tonnes of hazardous waste was produced in East London in 2023. Hazardous waste covers a wide range of waste types which each may require management at a range of specialist facilities for treatment and disposal, and given they generally arise in relatively small amounts, such facilities are developed to manage quantities greater than that arising in a single Plan area. Therefore, this waste may often travel further than non-hazardous wastes for management.

16 Data provided by the National Federation of Demolition Contractors.

Wastewater and Sewage Sludge

2.53 Wastewater generally comprises surface water runoff and effluent discharged to the foul sewer system from homes and industrial and commercial premises from where it is channelled to wastewater treatment works for treatment[17]. Output of this treatment is sewage sludge that may, if it meets certain parameters, be applied to land as a fertiliser or soil improver in accordance with the Sludge (Use in Agriculture) Regulations 1989 and associated best practice guidance. Sewage sludge (biosolids) applied in this manner falls outside the normal regulatory regime for waste. Alternatively, the sludge can be treated either through anaerobic digestion or incineration. The cleaner effluent may be discharged to a watercourse in accordance with a discharge consent granted by the Environment Agency.

2.54 In East London wastewater and sewage sludge are managed by Thames Water and Anglian Water (in Havering only). Wastewater treatment capacity is delivered through 'Asset Management Plans'. Thames Water use information in the public domain to forecast when upgrades to wastewater treatment facilities will be required.

2.55 Beckton Sewage Treatment Works is the key facility serving East London, being Thames Water's and the UK's largest sewage treatment works. It is located in the London Borough of Newham. To address changing need, a major upgrade is underway so it can receive wastewater from the new Thames Tideway Tunnel and provide for growth, resilience and consent compliance to a design horizon of 2036.

Agricultural Waste

2.56 Given the relatively small amount of agricultural land in East London arisings of agricultural waste are small, with quantities being so low as to not require specific provision of management capacity.

17 These works can provide a valuable function in managing wastes, other than wastewater, that arise in liquid and sludge form such as septic tank emptyings.

Low level radioactive waste

2.57 Radioactive waste is any material that is either radioactive itself or is contaminated by radioactivity and for which no further use is envisaged. Radioactive waste is not included in the definition of hazardous waste and therefore needs to be accounted for separately. Most radioactive waste is produced from nuclear power stations and the manufacture of fuel for these power stations. This is referred to as “nuclear waste.” Radioactive waste also arises from nuclear research and development sites and Ministry of Defence sites. No such sites exist within East London.

2.58 Radioactive waste also arises from nuclear research and development sites. Some also arises from Ministry of Defence sites and medical, industrial and educational establishments, such as hospitals and universities. This is sometimes referred to as “non-nuclear waste”. Being of a low level of radioactivity this may be referred to as low level radioactive waste, or even very low level radioactive waste.

2.59 Low level radioactive waste (LLW) does not normally require shielding during handling or transport. LLW consists largely of paper, plastics and scrap metal items that have been used in hospitals, research establishments and the nuclear industry.

2.60 According to the EA public register, there are two organisations holding four permits to keep and use radioactive materials in East London, mainly in Havering. LLW is not managed within East London and it is likely that very little LLW is produced in East London and that which is produced will likely continue to be managed via existing specialist arrangements.

The Policy Context

2.61 The main policy context within which the ELJWP is prepared is illustrated in Figure 5 below.

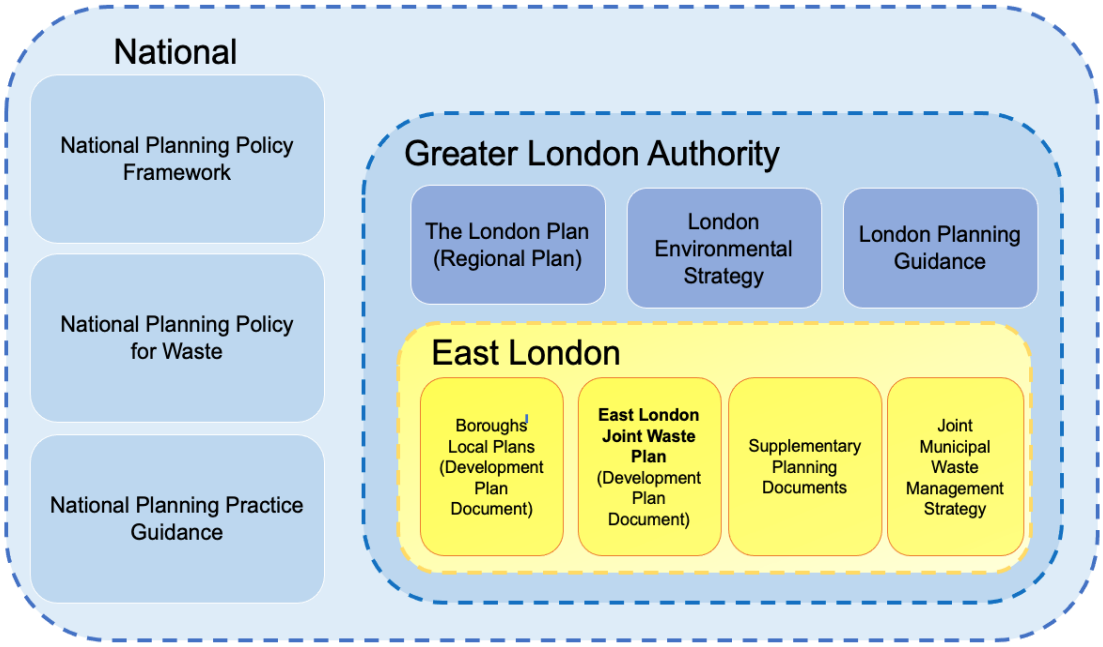


Figure 5 – The ELJWP Within the Wider Policy Context

2.62 To be found sound the ELJWP will need to be in general conformity with the London Plan and consistent with national policy.

2.63 The ELJWP is also aligned with the policies of the adopted Local Plans in East London. This is intended to ensure there are no policy tensions (i.e. contradictions) within the Development Plan. Having said that, the ELJWP may update the Development Plan and where any conflict between policies exists the latest policy to have been adopted generally takes precedent in decision making. One adopted, the policies in the ELJWP supersede the policies in the ELWP and Appendix 5 shows how the ELWP policies are replaced by the ELJWP.

National Policy

2.64 The key objective of national policy for managing waste[18] is to protect the environment and human health by:

- Preventing or reducing the generation of waste;
- where its production is unavoidable, reducing the adverse impacts of its generation and management; and
- reducing the overall impacts of the use of resources from which waste may arise and improving the efficiency of such use.

2.65 The National Planning Policy for Waste 2014 (NPPW))[19], associated Planning Practice Guidance and the Resources and Waste Strategy for England 2018 (RWS)[20] currently set the planning policy context for waste management in England. Whilst the NPPF does not contain policies specific to waste, its principles remain relevant. The Waste Management Plan for England[21] was updated in 2021 and signposts policies concerning waste management in England in particular those included in the RWS.

2.66 Both NPPW and RWS require application of the Waste Hierarchy in priority order as one of the key principles of sustainable waste management. The 'Waste Hierarchy' identifies different ways of dealing with waste as set out in Figure 6 below. This shows that 'Prevention' is the most preferred option with 'Disposal' at the bottom being the option of last resort.

18 See The Waste (England and Wales) Regulations 2011 and the Waste (Circular Economy) (Amendment) Regulations 2020

19 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf

20 https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england

21 https://www.gov.uk/government/publications/waste-management-plan-for-england-2021

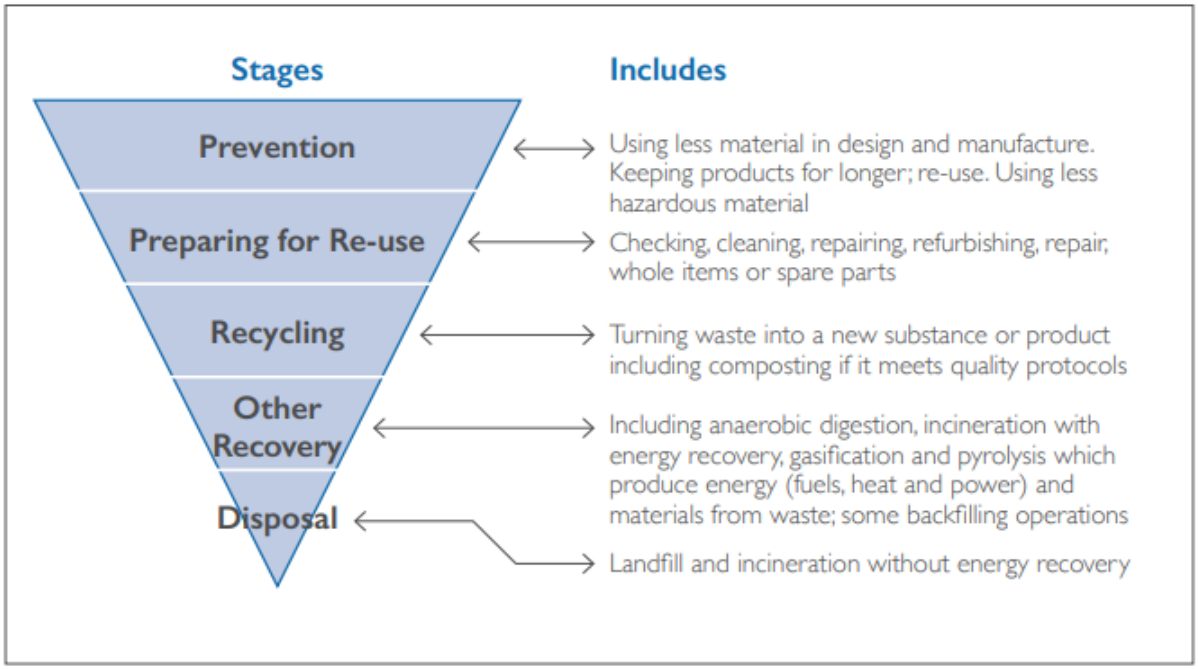


Figure 6 The Waste Hierarchy

2.67 The RWS sets out Government thinking on waste management in England, including how the country is to minimise waste and manage it more effectively through maximising opportunities to generate value from material that is both prevented from entering, and extracted from, the waste stream.

2.68 The RWS identifies five strategic ambitions:

- To work towards all plastic packaging placed on the market being recyclable, reusable or compostable by 2025;
- To work towards eliminating food waste to landfill by 2030;
- To eliminate avoidable plastic waste over the lifetime of the 25 Year Environment Plan;
- To double resource productivity by 2050; and
- To eliminate avoidable waste of all kinds by 2050.

2.69 The RWS is also concerned with ensuring that society's approach to waste aligns with the following circular economy principles:

- Design out waste and pollution;
- keep products and materials in use; and
- regenerate natural systems.

2.70 The role waste management plays in the material cycle that is central to creating a more circular economy is illustrated in Figure 7 below.

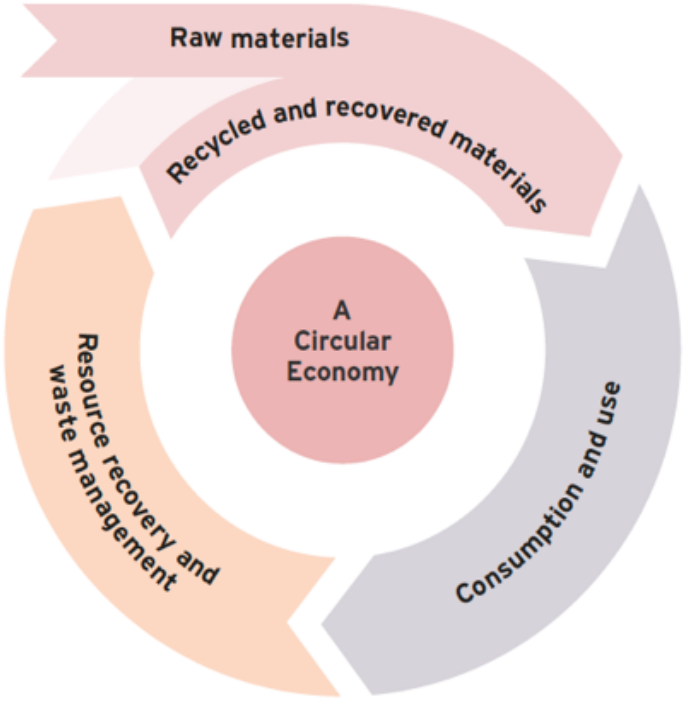


Figure 7 Circular Economy[22]

2.71 The Circular Economy is another key tool for tackling the climate emergency. When applied to the built environment, circular economy principles significantly reduce greenhouse gas emissions by avoiding extraction of raw materials, reducing production of construction materials, retaining embodied carbon and eliminating waste.

2.72 The Environment Act 2021 requires Government to set long-term, legally-binding environmental targets[23], including those for resource efficiency and waste reduction. In response to this requirement the Government set the following targets in the Environmental Improvement Plan 2023, which build on existing recycling and landfill diversion targets:

- Eliminate avoidable waste by 2050 and double resource productivity by 2050;
- explore options for the near elimination of biodegradable municipal waste to landfill from 2028;
- eliminate avoidable plastic waste by 2042;
- seek to eliminate waste crime by 2042; and,

22 Source: Resources and Waste Strategy, DEFRA, 2018
23 https://www.gov.uk/government/publications/environment-bill-2020/august-2020-environment-bill-environmental-targets

- halve ‘residual’ waste (excluding major mineral waste) produced per person by 2042. For the purposes of this target, ‘residual’ waste is defined as waste that is sent to landfill, put through incineration or used in energy recovery in the UK, or that is sent overseas to be used in energy recovery.

2.73 The EIP states that the targets will be achieved by the following actions:

- Implementation of packaging extended producer responsibility from 2024 (delayed to October 2025) ;
- introduction of a deposit return scheme for plastic and metal drinks containers from October 2025 (to be implemented in October 2027);
- implementation of consistent recycling collections between different councils (to be implemented by 31 March 2026);
- mandate recycling labelling for packaged products by 31 March 2026 except for plastic films which will be mandated by 31 March 2027;
- banning the supply of single-use plastics (e.g. plastic plates and cutlery) from October 2023;
- introduction of a mandatory digital waste tracking service to modernise existing waste record keeping;
- implementation of reforms to the waste carriers, brokers and dealers regime and bringing forward legislation to tackle abuse of certain types of waste exemptions; and,
- launching a call for evidence to support development of a plan to achieve the near elimination of biodegradable municipal waste going to landfill from 2028.

2.74 The target for the reduction in residual waste is enshrined in The Environmental Targets (Residual Waste) (England) Regulations 2023 which came into force on 30 January 2023. The waste target is for the reduction of residual waste (excluding major mineral wastes) on a kg per capita[24] basis by 50% by 2042 from 2019 levels (574 kg per capita). Accordingly, the residual waste long-term target is that by the end of 31 December 2042 the total mass of residual waste for the calendar year 2042 does not exceed 287 kg per capita. Waste routes which will count as residual are:

- Sent to landfill in the United Kingdom;
- put through incineration in the United Kingdom;
- used in energy recovery in the United Kingdom; or
- sent outside the United Kingdom for energy recovery.

24 Per head of population in England

2.75 In July 2023 the Government published a national waste prevention plan titled 'Waste prevention programme for England: Maximising Resources, Minimising Waste'. This document sets out how strategic principle 2 of the Resources and Waste Strategy – *to prevent waste from occurring in the first place and manage it better when it does* – will be achieved.

2.76 The Plan also notes that:

- the Government intends to prepare a 'Waste Sector Decarbonisation Plan' that will set out how the waste sector will; contribute to the targets in the 6th Carbon Budget (see below);
- the National Model Design Code published in 2021[25] provides tools and guidance for planning authorities to embed circular economy principles in new development;
- NPPW expects planning authorities to ensure that new development includes proposals for handling waste arising from the construction and operation of development maximise reuse and recovery opportunities, and minimises off-site disposal; and,
- Chapter 2 of the NPPF recognises the need for the planning system to consider the prudent use of natural resources and waste minimisation in the pursuit of sustainable development.

25 https://www.gov.uk/government/publications/national-modeldesign-code

2.77 In addition to the above, in 2024, the Government announced its ambition for the country to achieve a ‘zero waste economy’ by 2050.

2.78 In December 2024, The Government published a ‘Residual waste infrastructure capacity note’ indicating that, following the implementation of policies mentioned above, there would ‘be sufficient residual waste infrastructure capacity to treat forecast municipal residual waste arisings at a national level’.

Climate change

2.79 To achieve ‘net zero’ in carbon emissions by 2050, in 2021 the Government acknowledged that, overall, CO2 emissions need to fall by around two thirds by 2035[26].

2.80 The RWS includes plans to:

- Reduce the generation of greenhouse gas (GHG) emissions associated with breakdown of biodegradable waste by diverting it from landfill (with a focus on food waste); and
- to increase recycling, which typically results in lower carbon emissions in comparison to manufacturing products from virgin materials.

26 UK Industrial Decarbonisation Strategy, April 2021

2.81 In December 2020, the Climate Change Committee (CCC) published its Sixth Carbon Budget[27] that considered measures required to achieve the UK Government target net zero carbon emissions by 2050. The UK Government accepted the report's key recommendation of a 78% reduction in UK territorial emissions between 1990 and 2035 which essentially brought the UK's previous target of 80% reduction by 2050 forward by 15 years[28]. At COP29 the UK Government announced a new target to reduce greenhouse gas emissions by 81% (on 1990 levels) by 2035.

2.82 The Committee's Sixth Carbon Budget noted that emissions associated with waste management accounted for 6% of UK GHG emissions in 2018. While they have fallen to 63% of 1990 levels, due to a reduction in biodegradable waste being landfilled, in recent years emissions have stopped falling due to a plateau in recycling and significant growth in carbon emissions from the fossil sourced component (i.e. oil based plastics) of Energy from Waste plant feedstock.

2.83 Broadly, the Committee's Budget concludes that the management of waste in accordance with the waste hierarchy is consistent with the achievement of reductions in carbon emissions and includes the following specific recommendations:

- A ban on landfilling biodegradable waste by 2025;
- recycling increasing to 70% by 2030;
- additional focus through the chain from manufacturing to the consumer to reduce the amount of waste; and,
- All energy from waste facilities plants to be fitted with Carbon Capture and Storage (CCS) by 2040.

2.84 In 2021 the Environmental Services Association[29] published a Net Zero Strategy[30] that includes the following targets:

- Start fitting Carbon Capture, Utilisation and Storage (CCUS) technologies to EfW facilities from 2025, with all plants fitted with CCUS where feasible by 2040.

27 The Sixth Carbon Budget The UK's path to Net Zero Committee on Climate Change December 2020 Presented to the Secretary of State pursuant to section 34 of the Climate Change Act 2008
28 UK enshrines new target in law to slash emissions by 78% by 2035, Government Press Release, April 2021
29 The Environmental Services Association (ESA) is the trade association for the waste management industry in the UK.
30 http://www.esauk.org/application/files/7316/2496/7294/ESA-Net-Zero-Exec-Summary.pdf

- Ensure that all new plants are built with CCUS fitted or are CCUS-ready from 2025 onwards.

2.85 In March 2023, the Government consulted on updates to its '2009 Carbon Capture Readiness' requirements. The consultation considered the need for carbon capture relating to Energy from Waste facilities and noted that:

- 'Whilst the EfW sector is relatively small, we expect that it will represent a significant proportion of residual emissions from the power sector in the 2030s, as other forms of generation are rapidly decarbonised. It is therefore important that it is targeted with emissions reduction policies'

2.86 As part of this consultation, the Government proposed that Energy from Waste plants, which are of a size which require a Development Consent Order, should be included in 'decarbonisation ready' requirements and that this would be administered by the Environment Agency as part of the Environmental Permitting, rather than the planning consent, process.

2.87 In its June 2023 report, 'Progress in reducing emissions 2023 Report to Parliament', the CCC summarised its findings in regard to the progress made within the waste management sector to reducing emissions as follows:

- 'Greater strategic coordination of plans to decarbonise the waste sector is needed including: much greater emphasis on waste prevention, clarity on future residual waste capacity needs, and the suitability of incentives and interactions with other sectors such as waste as a feedstock for Sustainable Aviation Fuels. Energy from Waste (EfW) emissions are already higher than the Government's CBDP[31] anticipates and EfW capacity is set to increase in the coming years. A comprehensive systems-approach to control and reduce EfW emissions is urgently needed, including clarity on carbon pricing. We recommend a moratorium on additional EfW capacity until a review of capacity requirements has been completed and an updated assessment of residual waste treatment capacity requirements published.'

2.88 At the time of publishing its note of the need for residual waste infrastructure (as mentioned above), the Government announced that energy recovery developments *'must be able to demonstrate that making use of the heat they produce is viable and that they can be built carbon capture ready'.*

31 CBDP = Carbon Budget Delivery Plan

Waste movement and net self sufficiency

2.89 The 'proximity principle' is set out in paragraph 4 of Part 1 of Schedule 1 to the Waste (England and Wales) Regulations 2011. This is within the context of the requirement for mixed municipal waste collected from private households to be disposed of, or recovered, in one of the nearest appropriate installations, by means of the most appropriate methods and technologies, in order to ensure a high level of protection for the environment and public health.

2.90 This is to be achieved by establishing an integrated and adequate network of installations for disposal and recovery of mixed municipal waste collected from private households. The requirement also extends to where the collection includes similar types of waste collected from non-household sources (e.g. waste from offices and retail).

2.91 The network is to be designed in such a way as to enable movement towards the aim of self-sufficiency in the disposal and recovery of waste at a national[32] level, while giving consideration to geographical circumstances and/or the need for specialised installations for certain types of waste.

2.92 This principle is to be applied when decisions are taken on the location of facilities for the management of mixed municipal waste collected from private households and similar waste (see above) by disposal or recovery. This is recognised in NPPW that expects waste planning authorities to:

> *'plan for the disposal of waste and the recovery of mixed municipal waste in line with the proximity principle, recognising that new facilities will need to serve catchment areas large enough to secure the economic viability of the plant;'.*

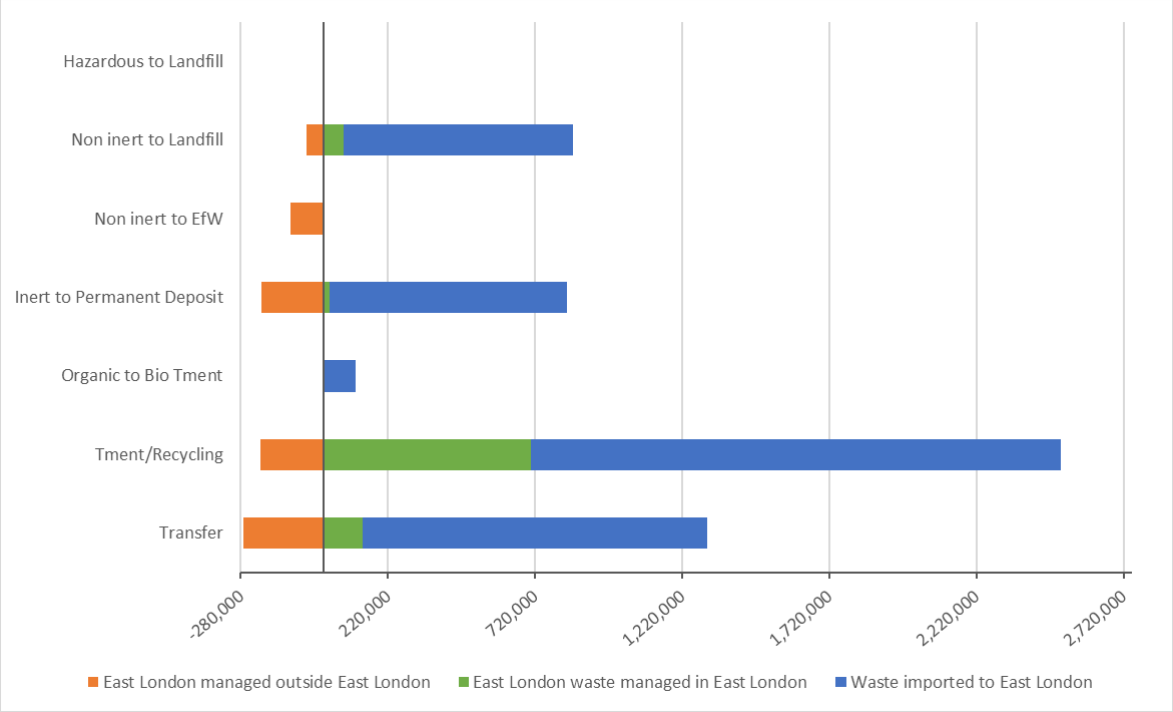
32 England and Wales

2.93 The NPPW requires local planning authorities, with responsibility as Waste Planning Authority for their area, to include policies in their development plans which set out an overall strategy for the pattern and scale of waste development, ensuring sufficient provision is made for infrastructure for waste management, and energy that may be produced (including heat).

2.94 Data shows that varying quantities of waste are routinely transported between East London and other Waste Planning Authority (WPA) areas[33]. This cross-boundary movement is typical of the way in which waste is managed in general, as it has little regard for administrative boundaries. Certain, strategic, flows of waste from East London have been identified which may be important to the management of waste arising in East London over the Plan period and the WPAs hosting facilities to which their flows relate have been contacted to confirm that such flows may continue over the plan period.

2.95 Figure 8[34] displays the balance between imports and exports by waste management method and waste type to and from East London in 2022.

Figure 8: Waste import and export balance in East London 2022 by management method and waste type where known (tonnes)



33 See 'Identification of Strategically Significant Cross Boundary Waste Movements', BPP Consulting, February 2025

34 Note that Figure 8 only includes waste managed at permitted sites in England and does not include any waste exported to Wales, Scotland or further afield as this is not reported in the WDI.

2.96 When planning for waste the NPPW expects WPA areas to assess whether the unmet needs of other areas could be met within their own areas.

Regional Policy – The London Plan

2.97 The administrative geography of London is overseen at a regional level by the Greater London Authority (GLA). There are thirty-three-administrative areas within London: twelve inner boroughs, twenty outer boroughs, and the City of London. Newham is the only inner borough within the ELJWP area.

2.98 The London Plan provides strategic planning policy for the whole of London and sets out how certain matters, including waste, should be addressed in borough Local Plans including waste local plans.

2.99 The London Plan states that London should manage as much of its waste within its boundaries as practicable, aiming to achieve waste net self-sufficiency by 2026 in all waste streams except for excavation waste. To meet this aim, the London Plan 2021 forecasts arisings of Local Authority Collected Waste (referred to as household waste) plus Commercial and Industrial waste (C&I waste) for London by borough to 2041 (collectively referred to as household, industrial and commercial waste (HIC)). These forecasts are used as a basis to apportion quantities of this waste for management to each borough so that the overall goal of managing the equivalent of 100 per cent of London's waste should be managed within London (i.e. net self-sufficiency) by 2026 (Policy SI 8) is achieved. Excavation waste is excluded from the London Plan net self-sufficiency target as it is difficult to recycle and it is more difficult for London to provide sites for management or beneficial use.

2.100 The borough apportionments were derived through an assessment process that included assessment of existing capacity in each borough along with a number of other factors that are considered to determine the ability of a particular borough to provide additional management capacity. The quantities arrived at are referred to as the London Plan apportionments (LP apportionments for short). The types of capacity considered to count towards the management of apportioned waste (hereinafter referred to as 'qualifying capacity') is defined in paragraph 9.8.4 of the London Plan as follows:

- Energy recovery in London;
- production of solid recovered fuel (SRF) and refuse derived fuel (RDF) in London;
- sorting or bulking for re-use or recycling including anaerobic digestion. The reuse or recycling may take place within or outside London providing the sorting and bulking capacity is located within London; and

- reuse or recycling including anaerobic digestion within London.

2.101 London Plan arisings and forecasts for the East London Boroughs are set out below in Table 7 below.

Table 7 London Plan Forecast Waste Arisings and Apportionments for the East London Boroughs

	Waste Arising		**Waste Management Apportionments**	
	2021	**2041**	**2021**	**2041**
Barking and Dagenham	214,000	230,000	505,000	537,000
Havering	229,000	249,000	370,000	393,000
Newham	244,000	260,000	383,000	407,000
Redbridge	196,000	216,000	151,000	160,000
Total	***883,000***	***955,000***	***1,409,000***	***1,497,000***

2.102 The apportionment targets for East London are significantly higher than the area's projected arisings which demonstrates how East London is expected make a major contribution to the London Plan 2026 net self-sufficiency target.

2.103 The London Plan also sets out management targets for waste generated in London in Policy SI 7 Reducing waste and supporting the circular economy. These targets reflect those in the London Environment Strategy (LES) as follows:

- ensure that there is zero biodegradable or recyclable waste to landfill by 2026
- meet or exceed the municipal waste recycling target of 65 per cent by 2030
- meet or exceed the targets for each of the following waste and material streams:
    - construction and demolition – 95 per cent reuse/recycling/recovery
    - excavation – 95 per cent beneficial use (with 100% inert put to use)

2.104 In addition, in connection with hazardous waste management capacity, paragraph 9.8.18 of the London Plan identifies *'..a need to continue to identify hazardous waste capacity for London.'*

2.105 The London Plan requires boroughs to allocate sufficient land and identify waste management facilities to provide capacity to manage the tonnages of waste apportioned in the plan and to plan for those waste streams not apportioned by the London Plan.

2.106 The London Plan includes a requirement for 'referable applications'[35] to be submitted with a "Circular Economy Statement" that demonstrates how the development will come forward in a manner which is consistent with achieving a circular economy. This includes how much waste the proposed development is expected to generate and where it will be managed. The GLA has published further guidance on the content of Circular Economy Statements[36].

2.107 The London Plan requires boroughs to "allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste". This is in line with the NPPW which requires waste planning authorities to "identify sites and/or areas for new or enhanced waste management facilities". The London Plan identifies existing facilities, Strategic Industrial Locations, Locally Significant Industrial Sites and safeguarded wharves as suitable for new waste facilities.

2.108 The London Plan makes clear that all existing waste sites should be safeguarded and retained in waste use. Paragraph 9.9.1 of the London Plan defines existing waste sites as those with planning permission for waste use or those with an Environment Agency permit.

2.109 The London Plan requires compensatory capacity elsewhere in London if a waste site is redeveloped for another use. Compensatory capacity must be at or above the same level of the waste hierarchy of that which is lost, and that any loss of hazardous waste capacity must be replaced with hazardous waste capacity. Existing waste sites can only be released without re-providing capacity if it can be demonstrated that there is sufficient capacity elsewhere in London and the target of achieving net self-sufficiency is not compromised.

2.110 The London Plan supporting text indicates that boroughs with surplus capacity share this with boroughs facing a shortfall before considering release of sites from safeguarding protection. The London Plan also acknowledges that it may not always be possible for boroughs to meet their apportionment within their boundaries and in these circumstances boroughs will need to agree the *'transfer of apportioned waste'*.

2.111 Furthermore, the London Plan includes policy (Part G of Policy D4 Housing quality and standards) that requires housing to be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) food waste as well as residual waste.

2.112 In December 2018, the London Assembly declared a climate emergency and called on the Mayor of London to do likewise and put in place specific emergency plans for London to achieve carbon neutrality by 2030. The Mayor declared a climate emergency shortly after the Assembly and set a target for London to be net zero-carbon by 2030.

Local Policy

Borough Local Plans and Related Plans and Guidance

2.113 Each Borough has prepared its own Local Plan that includes a Vision, Objectives and planning policies relating to all forms of development in its area. Policies in this Plan are to be considered alongside relevant policies in the Local Plans.

Barking and Dagenham

2.114 Barking and Dagenham's Local Plan was adopted in September 2024. Policy SP2 expects Circular Economy principles to be adopted in the design of new development. Policy SP7 contains strategic-level sustainable waste management principles. Policy DMSI8 addresses demolition, construction and operational waste associated with all forms of new development.

2.115 Other Plans and guidance relating to the management of waste in Barking and Dagenham are as follows:

- Barking and Dagenham Planning Advice Note (PAN3) – Waste and Recycling Provisions
- Barking and Dagenham Reduction and Recycling Plan April 2023 to March 2025

35 Referable applications include those for developments providing 150 residential units, other types of development of 20,000sq.m in central London or 15,000sq.m outside Central London, developments 25m high adjacent to the Thames or 30m high elsewhere in London.
36 https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance

Havering

2.116 Havering's Local Plan was adopted in 2021. The Local Plan relies on the ELWP for the determination of applications for waste management and includes Policy 35: On-site waste management which concerns the provision of suitable arrangements for the separate storage and collection of waste in new development.

2.117 The Havering Reduction and Recycling Plan April 2023 to March 2025 sets out initiatives in Havering intended to reduce waste production and increase recycling.

Newham

2.118 Newham's Local Plan was adopted in 2018. Policy INF3: Waste and Recycling includes sustainable waste management principles, repeats key strategy points from the ELWP pertinent to the Borough, and includes design criteria. The Local Plan is currently being reviewed and a 'Regulation 19' draft submission Plan was published for consultation in July 2024. The draft similarly contains policy relating to waste management which reflects the requirements of the 2021 London Plan policies. See below regarding the application of the London Legacy Development Corporation Local Plan within Newham.

2.119 Other Plans and guidance relating to the management of waste in Newham are as follows:

- Newham Recycling and Waste Collection Policy
- The Newham Recycling, Waste and Street Cleansing Strategy
- Newham Waste Management Guidelines for Architects and Property Developers
- Newham Reduction and Recycling Plan April 2023 to March 2025

Redbridge

2.120 Redbridge's Local Plan 2015-2030 was adopted in 2018. Policy LP17: Delivering Community Infrastructure includes safeguarding of existing waste sites and delivering the "ELWA Joint Waste Development Plan".

2.121 Other Plans and guidance relating to the management of waste in Redbridge are as follows:

- Redbridge Housing Design Supplementary Planning Document
- Redbridge Waste Reduction Strategy 2019
- Redbridge Reduction and Recycling Plan 2023-2025

London Legacy Development Corporation

2.122 The London Legacy Development Corporation (LLDC) is a Mayoral Development Corporation, which covers parts of four London Boroughs including Newham (see Figure 5 below). The LLDC Planning Policy & Decisions Team ceased its function as local planning authority for the LLDC area from midnight on the 30th November 2024, and returned planning powers to the local London Boroughs. The LLDC was both a local planning authority and a waste planning authority for part of Newham, however it was not given a separate apportionment target in the London Plan.

2.123 The LLDC Local Plan was adopted in 2020 and will continue to be implemented as part of the Development Plan for the part of the London Borough of Newham to which it relates until the replacement Newham Local Plan is adopted. It contains Policy S.7 which commits the LLDC to working with its constituent boroughs on matters of strategic waste management and planning, and taking account of their adopted local waste plans.

East London Waste Authority

2.124 The East London Waste Authority (ELWA) is a statutory joint 'waste disposal authority' (WDA) that was established on 1 January 1986 with responsibility for the management of household and commercial waste collected by the East London Boroughs. ELWA is also responsible for providing the public Reuse and Recycling Centres to serve local residents.

2.125 In 1996, ELWA developed its Integrated Waste Management Strategy (IWMS), aimed at dramatically increasing recycling and composting and reducing the amount of waste sent to landfill. In 2002, ELWA signed a 25-year contract with Shanks PLC (now Renewi), to deliver the IWMS. This involved investment of over £100 million in new and improved facilities, new ways to treat and transport waste.

2.126 ELWA worked with the East London Boroughs to develop the 'Joint Strategy for East London's Resources and Waste (2027-57)' (the Joint Strategy), which was formally adopted by all five authorities in early 2022. The Joint Strategy sets out the aims, objectives, priorities and actions for the partner authorities on preventing and reducing waste, increasing reuse and recycling, supporting improvements with infrastructure, and monitoring performance. The Joint Strategy covers a 30-year period from 2027 to 2057 to reflect the timing of the end of ELWA's long-term Integrated Waste Management Services contract, but work is already underway to meet the targets and ambitions set out in the document.

2.127 The ELWA Joint Strategy proposes a joint minimum recycling performance for local authority collected waste of 35% by 2030, with aspirations to reach 50% recycling of household waste. A reduced level of future recycling performance (when compared to its 50% target for London as a whole) was accepted by the GLA in recognition of the issues associated with achieving high recycling rates in flatted development and the fact that 90% of new housing in East London in future will be in the form of flats.

2.128 The Joint Strategy was produced at a time of rapidly evolving national policy changes affecting the waste and resources sector, including proposals for a Deposit Return Scheme for drinks containers, extended producer responsibility for packaging, and the Simpler Recycling agenda that seeks to establish consistent recycling collections across the country. Separate food waste collections for households and businesses will be required to be introduced in East London under these proposals.

2.129 ELWA has begun the procurement of new contracts to replace its long-term IWMS contract from late 2027. A 'disaggregated' approach is being taken, meaning that separate contracts will be let for different types of services rather than one fully-integrated contract. The procurement process will be making sites available for bidders to use and will maintain the four existing Reuse and Recycling Centres. However, the future use of the facilities at Jenkins Lane and Frog Island, which manufacture refuse-derived fuel (RDF) from residual household and commercial waste through mechanical-biological treatment (MBT), will be determined through the procurement process.

2.130 ELWA also maintains a Waste Prevention Programme, working with the East London Boroughs and other partners to deliver a range of projects and services aimed at reducing waste and increasing reuse. The latest Waste Prevention Action Plan is for 202/25 and includes various objectives relating to the reduction of the following waste streams:

- Bulky waste
- Textiles and nappies
- Food waste
- Electronics
- Mixed Organic Waste
- Other waste

Local Climate Change Strategies

2.131 London Borough Barking and Dagenham declared a climate emergency in 2019. London Borough of Havering declared a climate and ecological emergency in 2023. London Borough of Newham declared a climate emergency in 2019. London Borough of Redbridge has an action plan to be carbon neutral by 2030 and carbon zero by 2050.

3 Vision and Objectives

The Vision

3.1 The Vision below describes how the Boroughs envisage how waste, including wastewater[37], will be managed in East London by 2041. The 'Strategic Objectives' explain what needs to be achieved if the vision is to be realised.

3.2 The Vision and Strategic Objectives have drawn on Local Plans and strategies in East London as well as the London Plan and national policies and strategies. Planning policies are linked to the Vision and Strategic Objectives to ensure that development, that affects the way waste is managed and produced, will occur in a manner that helps achieve the Vision and Strategic Objectives.

East London Joint Waste Plan Vision

By 2041, the principles of the circular economy will be fully integrated into all forms of development within East London, resulting in reduced waste production and increased emphasis on repair, refurbishment and reuse including that associated with built structures.

A network of accessible service providers for reuse, repair, and recycling will be in place. Remaining waste will be viewed and managed as a resource, with hazardous properties virtually eliminated in construction and demolition waste. Priority will be given to using recycled materials in construction, and development projects will prioritise waste minimisation.

Sustainable waste management in East London will contribute to the area's regeneration, positioning it as a key part of London's industrial engine and a thriving economic centre. Waste management facilities will be located to protect and enhance communities and the natural environment, and be resilient to climate change. Waste will be managed efficiently by maximising existing capacity of facilities, releasing underutilised or poorly located sites, minimising transportation and using infrastructure established for alternative means of waste movement, in particular via the River Thames.

Net zero in waste management will have been achieved in East London through an understanding, and reduction, of lifecycle carbon impacts and incorporating renewable energy in waste management and transportation.

Sending waste to landfill will be a last resort, occurring only in exceptional circumstances, and any landfill in East London will be considered a strategic resource with carefully managed capacity.

37 Within the Vision and Strategic Objectives the term 'waste management' is taken to include wastewater treatment

Strategic Objectives

East London Joint Waste Plan Strategic Objectives

Strategic Objective 1: Significantly Reduce Waste Production Overall

- Encourage the integration of circular economy principles and the adoption of best practice design and construction approaches, to achieve a significant reduction in waste production by 2041.

Strategic Objective 2: All Built Development Will Contribute to the Achievement of a Fully Functioning Circular Economy by 2041

- Promote the use of circular economy principles in design, construction and development in the built environment, emphasising reduced waste production and increased reuse and repair practices.
- Encourage development to consider and minimise waste during construction and operation, following the waste hierarchy in priority order.
- Enable delivery of development which will help establish a viable and easily accessible network of re-use, repair, and recycling services.
- Foster a shift in perception such that waste materials are viewed as a valuable resource, ensuring sustainable waste management is integral to the development and use of all new development.
- Encourage development that prioritises the use of reused, reusable, recycled and recyclable materials and minimises the use hazardous materials which could result in the production of hazardous waste in construction projects in East London

Strategic Objective 3: Appropriately Locate Waste Management Capacity

- Locate, construct, and operate waste management facilities while protecting and enhancing communities, health, employment, and the natural and historic environment, and ensuring resilience to climate change.

Strategic Objective 4: Contribute to East London's Regeneration and Economic Growth

- Leverage sustainable waste management in a manner that contributes to East London's regeneration and economic growth.
- Ensure high quality restoration and aftercare of landfill sites which maximises benefits to the community and the environment.
- Ensure waste is managed using methods and in locations that contribute to measurable improvements in the natural environment, including biodiversity, of East London.

East London Joint Waste Plan Strategic Objectives *(continued)*

Strategic Objective 5: Achieve Net Zero Waste Management

- Attain net zero in waste management by 2041 by ensuring that whole lifecycle carbon impacts are taken into account in proposals for the management of waste.
- Provide waste management capacity that minimises greenhouse gas production and supports the development of a low carbon economy and decentralised energy.
- Promote development which allows for the exclusive use of renewable energy sources in waste management operations and transportation.

Strategic Objective 6: Optimise Existing Waste Management Capacity

- Realise the full potential of existing waste management capacity in East London, using only the minimum land necessary while ensuring the capability to manage at least the apportionment in the London Plan is maintained.
- Review and release land occupied by poorly located or under-utilised waste management facilities for other uses.

Strategic Objective 7: Minimise Transportation and Establish Alternative Infrastructure

- Minimise the transportation of waste by locating facilities as close as possible to its source
- Safeguard and establish alternative energy efficient transport infrastructure, including River Thames wharves, to allow movement without reliance on fossil fuel-powered HGVs.

Strategic Objective 8: Restrict Landfilling to Exceptional Circumstances

- Ensure the disposal of waste occurs only as a last resort and in exceptional circumstances.
- Ensure any landfill capacity is reserved solely for the disposal of waste which cannot be managed by any other means.

4 Future Requirements for Waste Management Capacity

4.1 In order to establish how much waste management capacity is needed over the Plan period a study[38] was completed that considered the requirements of the London Plan and how well the existing waste management capacity might meet those requirements. It is important to note that this study did not include existing capacity with temporary planning permission or very small sites and on this basis it may be considered to have underestimated existing capacity. The results of the study are set out below:

Management Capacity for Apportioned HIC[39] Waste

4.2 It is estimated that there is currently 2,619,508 tpa of qualifying waste management capacity in East London which is more than sufficient to manage the London Plan apportioned forecast arisings to 2041. This is shown in Table 8 below.

Table 8: Combined apportionment for East London boroughs compared to Estimated Apportionment Capacity in East London (after release of sites)

	2021	2041
Apportionment Forecast	1,409,000	1,497,000
Capacity	2,619,508	2,619,508
Difference	**+1,210,508**	**+1,122,508**

4.3 A sensitivity analysis was undertaken to account for the possible loss of MBT capacity after 2027 and this showed that this loss would not result in a capacity shortfall.

4.4 The surplus capacity for the management of apportioned waste at 2041 is estimated to range between c.0.68 Mtpa (without MBT) and c.1.2Mtpa.

38 East London Joint Waste Plan, Assessment of Existing Waste Management Capacity, BPP Consulting, 2025
39 Local Authority Collected Waste plus Commercial and Industrial waste

Management Capacity for C, D & E Waste

4.5 Based on an extrapolation of the forecast for C, D & E waste arisings included in an earlier report completed in 2022[40], a revised estimate of 2,203,591 tpa was derived for C, D & E waste arising in 2023 through to 2041. Comparing this to an estimate of existing C, D & E waste management capacity to be safeguarded of c.3,185,500 tpa reveals a capacity surplus estimated to be approximately 0.98 Mtpa in 2041.

Management Capacity for Hazardous Waste

4.6 An updated forecast for hazardous waste arisings to 2041 suggests that 72,400 tpa will be produced in 2041. This compares to existing hazardous waste management capacity of 54,000tpa which indicates there is a capacity deficit of approximately c.18,400tpa in 2041.

4.7 However, it should be noted that given the diverse nature of hazardous wastes, there is no policy expectation that individual Plan areas should be net self sufficient for the management of hazardous produced in the area. Instead, existing capacity should be safeguarded and additional capacity be sought in co-operation with other Plan areas. This is set out in the London Plan as follows:

"The main requirement is for sites for regional facilities to be identified. Boroughs will need to work with neighbouring authorities to consider the necessary facilities when planning for their hazardous waste." (paragraph 9.8.18)

4.8 Therefore, the estimated shortfall is not considered to be a barrier to release of other sites, or impose a requirement to provide for additional capacity through allocation in the ELJWP.

40 Evidence Base for the East London Joint Waste Plan, Anthesis, November 2022

Requirements for landfill

4.9 Non-hazardous waste will continue to be diverted from landfill due to the landfill tax escalator and other initiatives, slowing the depletion of available void space in existing sites. This helps to preserve remaining landfill capacity. When landfill operations at Rainham cease, the anticipated demand for non-inert landfill capacity in East London could potentially be met by landfills outside the Plan area.

4.10 Monitoring of landfill availability, and ongoing liaison with relevant WPAs will help ensure sufficient capacity is planned for while the Plan's focus remains on reducing the area's non-hazardous landfill requirement to an absolute minimum in line with the national residual waste reduction target.

Providing for Unmet Needs for Waste Capacity from Elsewhere within London

4.11 The London Plan[41] expects Boroughs with existing waste management capacity which exceeds their management needs (as prescribed by the London Plan), to offer to share the surplus with other London Boroughs that may be facing a shortfall when planning to meet the waste management needs of their Plan areas, before considering release of sites from waste use. In light of the identified surplus in C, D & E waste and apportioned HIC waste management capacity, the Boroughs invited other London boroughs to consider whether the surplus in East London might offer an opportunity for their unmet needs to be met. It should be noted that the most recent dataset for 2023 shows significant tonnages of waste that arise from outside the ELJWP area are managed at facilities located within the ELJWP area (hence the existence of the identified capacity surplus).

4.12 Any agreements on sharing capacity will be formalised in a Statement of Common Ground (or similar) to which all the East London Boroughs party to the ELJWP, and the Borough (or other Plan making entity) seeking to share East London capacity will be signatories. Such agreements would cover a specified period (which may be less than the period of this Plan) and be subject to review and renegotiation, including as part of future reviews of the ELJWP. Such agreements will be reported in the East London Boroughs' Authority Monitoring Reports.

41 Paragraph 9.8.6, London Plan 2021

5 Sites for Waste Management

5.1 As noted in section 4.0 above, there is sufficient waste management capacity in East London to meet requirements for C, D & E Waste and HIC over the plan period. In light of this the Plan:

1. Does not allocate specific areas of land for the development of additional waste management facilities;
2. does not expressly safeguard several existing waste management sites where such safeguarding protection would hinder the wider development aims of the Boroughs. For example, where existing waste facilities are situated on land that has been earmarked by the Boroughs for other forms of development in their adopted and emerging Local Plans; and,
3. safeguards all other existing waste sites with in accordance with Policy JWP2.

5.2 Safeguarded sites are listed in Appendix 2 with maps and further details included in Appendix 3. The safeguarding policy is included in section 6.0 below as Policy JWP2. JWP2 also sets out the circumstances when proposals for additional waste management capacity might be acceptable.

5.3 Existing sites identified for redevelopment in Borough Plans for non waste uses (and so not safeguarded) are listed in Table 9 below. The loss of these sites was considered in a separate report[42]. The assessment of existing waste management capacity, outlined in Section 4.0 above, factored in the loss of these sites.

Table 9: Existing Waste Sites Released from Safeguarding

Borough	Site	Permitted Use	Assessed Peak Waste Capacity (tpa)
Barking & Dagenham	Barking Eurohub, Box Lane, Barking (D B Cargo)	Transfer Station taking Non-Biodegradable Wastes	c313,500
Barking & Dagenham	Barking Eurohub, Box Lane, Annex to Shed A (Titan Waste)	Non Haz Waste Transfer / Treatment	c36,000

42 Safeguarded Sites for Release – Assessment Report, BPP Consulting, 2025

Borough	Site	Permitted Use	Assessed Peak Waste Capacity (tpa)
Barking & Dagenham	Old Bus Depot, Perry Road	Non Haz Waste Transfer / Treatment	c56,000 (CDEW) c22,000 (HIC)
Newham	Connolleys Yard, Unit 5c Thames Road, London, E16 2EZ	Metal Recycling Site	c35,000

5.4 The Plan also identifies additional existing waste management sites which might make good candidates for redevelopment for non-waste uses in future. These sites are listed in Appendix 4.The capacity assessment shows sufficient surplus to allow release of these sites, without the objectives of the Plan or that of the London Plan being compromised and on this basis the host boroughs may plan for the release of these sites through the allocation of sites in updated Local Plans. The assessed capacity of these sites is approximately 310,000 tpa in total (see Appendix 4 for capacity split) and so a surplus of at least this quantity will be safeguarded as compensatory capacity to facilitate their future release.

5.5 Available capacity will be monitored over the Plan period, taking account of any agreements reached with other boroughs and any future release of Appendix 4 sites. This assessment of capacity will be reported periodically through the joint AMR.

6 Policies

6.1 The policies set out below are applied when making decisions on the suitability of proposals for development in East London. All the policies apply to proposals relating to waste management and Policies JWP 1 and JWP 3 apply to all forms of development. Parts of Policy JWP 2 apply to proposals which involve the redevelopment of existing waste management facilities.

6.2 Relevant policies included in the adopted Local Plan of the Borough in which the proposal is located are also applied. Such policies may relate to wider issues concerning the protection and enhancement of communities and the natural environment. In some cases, there may be overlap between the policies of the Borough's Local Plans and the policies in this Plan, where this occurs the latest policy to have been adopted will take precedence.

6.3 Table 10 below shows how the Strategic Objectives of this plan are implemented by the policies.

Table 10: Relationship Between Strategic Objectives and Policies

Strategic Objective	Related Policies
Strategic Objective 1: Establish a Fully Functioning Circular Economy by 2040	Policy JWP1: Circular Economy
Strategic Objective 2: All Built Development Will Contribute to the Achievement of a Fully Functioning Circular Economy by 2041	Policy JWP1: Circular Economy Policy JWP4: Design of Waste Management Facilities
Strategic Objective 3: Appropriately Locate Waste Management Capacity	Policy JWP2: Safeguarding and Provision of Waste Capacity Policy JWP2B: Safeguarding and Provision of Wastewater Treatment Capacity Policy JWP 3 Prevention of Encroachment Policy JWP5: Energy from Waste Policy JWP6: Deposit of Waste on Land
Strategic Objective 4: Contribute to East London's Regeneration and Economic Growth	Policy JWP1: Circular Economy Policy JWP2: Safeguarding and Provision of Waste Capacity Policy JWP2B: Safeguarding and Provision of Wastewater Treatment Capacity Policy JWP4: Design of Waste Management Facilities Policy JWP5: Energy from Waste Policy JWP6: Deposit of Waste on Land

Strategic Objective	Related Policies
Strategic Objective 5: Achieve Net Zero Waste Management	Policy JWP1: Circular Economy Policy JWP4: Design of Waste Management Facilities Policy JWP5: Energy from Waste Policy JWP6: Deposit of Waste on Land
Strategic Objective 6: Optimise Existing Waste Management Capacity	Policy JWP2: Safeguarding and Provision of Waste Capacity Policy JWP2B: Safeguarding and Provision of Wastewater Treatment Capacity Policy JWP 3 Prevention of Encroachment
Strategic Objective 7: Minimise Transportation and Establish Alternative Infrastructure	Policy JWP4: Design of Waste Management Facilities Policy JWP5: Energy from Waste
Strategic Objective 8: Restrict Landfilling to Exceptional Circumstances	Policy JWP6: Deposit of Waste on Land

Policy JWP1: Circular Economy

Purpose of Policy

To encourage and support development that is consistent with the achievement of a circular economy by, amongst other things, requiring all forms of development (not just those concerned primarily with the management of waste) to demonstrate that it will not result in the production of waste that practically could have been prevented over its lifespan.

6.4 Many forms of development are key to facilitating a Circular Economy in the ways they provide for goods and materials to be re-used, repaired and refurbished. Examples include the following:

- Repair/refurbishment workshops;
- other uses associated with repair of products e.g. tailors;
- shops selling second hand goods;
- lending libraries (e.g. 'Library of things');
- hire shops; and
- 'reuse hubs'.

6.5 While these types of development are considered 'everyday', they have a key role to play in a circular economy and it is important that their contribution is recognised. In many cases such development is covered by general land use classes, however where specific decisions are needed on proposals, support will be provided for development which incorporates such uses in suitable locations. Newham is currently exploring the concept of dedicated 'Circular Economy Construction Hubs' which may be developed to offer space for the storage, sorting, testing and redistribution of reclaimed construction materials; a centre for the repair, remanufacture and retail of reclaimed building components, and potentially consumer items (i.e. paint, timber etc); as well as related training and skills development (e.g. training in specific trades related to construction with emphasis on repair and use of reused, recycled and low carbon materials).

6.6 Goods and materials that have become waste will have been produced and transported usually using energy that was derived from fossil fuels and so resulting in carbon emissions. The carbon associated with this energy is known as ‘embodied carbon’ and when waste materials are disposed of, it is not only the materials that are wasted but also the energy and hence the associated embodied carbon cost. Vast amounts of energy have been used in the production of materials, e.g. steel, glass, concrete, used in buildings (including in their construction). Waste relating to development activity is therefore intrinsically linked to carbon emissions and associated climate change.

6.7 It is increasingly acknowledged that even though older structures might not be as energy efficient during their use phase, the carbon footprint of constructing a new, energy efficient building may exceed any savings achieved during its operational phase, particularly where retrofitting measures to improve energy efficiency is possible.

6.8 The quantity and the nature of waste resulting from built development relates directly to how a building is designed. It is expected that proposals will be accompanied by an assessment that shows why the service, e.g. housing, provided by the development is genuinely needed and cannot be met in a way that does not involve demolition of existing buildings and/or the construction of new ones. Consideration of whether existing development can be refurbished and/or put to the required use should occur at the earliest design concept stage.

6.9 The London Plan recognises that ‘London should move to a more circular economy’. Policy SI 7 expects proposals for development which are of such a size and nature that they are referrable to the Mayor, to be ‘net zero waste’. To demonstrate consistency with Policy SI 7, ‘Circular Economy Statements’ are required to be submitted with referrable applications. The London Plan supports boroughs who adopt lower thresholds for requiring Circular Economy Statements in their Local Plans. Lower thresholds are included in this Plan such that all proposals for major development should be accompanied by a Circular Economy Statement.

6.10 A shift in mindset is needed to ensure that circular economy principles are integral to thinking around the provision of built development that is needed to meet society’s needs. To that end, where it is practicable to do so and the health and safety of visitors can be safeguarded, major waste proposals are expected to provide opportunities to educate their employees and the local communities that they serve about the importance of moving towards a circular economy and how this can be achieved.

Policy JWP1: Circular Economy

A. Development that constitutes or incorporates activities compatible with the circular economy will be encouraged.

B. All development should follow the principles of a circular economy during construction and operation phases, which includes:

1. **Preserving and repurposing existing structures where practical and appropriate; or**
2. **demonstrating that repurposing existing built development is not practicable and/or consistent with Development Plan objectives and/or the best environmental option; and**
3. **reducing the generation of construction, demolition, and excavation waste and managing any such waste that arises from the development in accordance with the waste hierarchy and on the site of production where practicable; and**
4. **designing for flexibility and longevity, recyclability, repurposing and refurbishment; and,**
5. **using sustainable construction methods, including maximising the use of reused, recycled and recyclable materials and techniques that reduce waste and facilitate the deconstruction and reuse of building components.**

For major developments, this should be demonstrated through the submission of a Circular Economy Statement. All proposals should set out how waste arising from demolition (if applicable) and construction will be managed in a Site Waste Management Plan which, as appropriate, should incorporate a Pre-demolition Audit.

C. New development (not including minor householder applications) should include detailed consideration of waste arising from its occupation and/or use including how waste will be stored, collected and managed through a Recycling and Waste Management Strategy that demonstrates:

1. **Sufficient storage space will be provided to accommodate source separation and separate storage of recyclable materials; and,**
2. **Waste will be stored in accordance with 'Secure by Design' principles; and,**
3. **in flatted development and houses in multiple occupation, sufficient temporary on site storage, including for separated recyclables (including food waste) until it is collected; and,**
4. **storage and collection systems (such as dedicated spaces, storage areas, chutes, or underground waste collection systems) will ensure adequate and convenient access for all users and waste collection operatives, ease of maintenance and separation collection of recyclable materials and reusable items; and,**
5. **systems and infrastructure will be monitored and maintained including contingency arrangements for system/infrastructure failures; and,**
6. **for applications referable to the Mayor of London, temporary storage space for items for reuse.**

D. Where practical, major waste sites should incorporate facilities for visitors to allow educational opportunities relating to the circular economy.

Implementation

6.12 Where it is demonstrated that new development is necessary, issues needing consideration to ensure that the development is compatible with the circular economy, include:

- the efficient use of land – how well development is designed to ensure the use of the land where it is located is optimised;
- the resilience of development i.e. will it last. This not only concerns sound construction but also relates to how easily a building can be adapted to meet different requirements over time;
- how a building will be dismantled at the end of its life and whether components and materials can be easily reused and recycled;
- consumption of materials, not just in construction but also in its use, and how renewable those materials are;
- reduction of waste, through modular construction, project and materials management and procurement;
- the management of waste arising from demolition and construction as high on the waste hierarchy as possible. This also relates to the materials used in construction, for example how easily surplus material can be re-used;
- the design of the development to provide for waste which arises during its use and occupation to be managed in accordance with the waste hierarchy.

6.13 Major development proposals (including waste management) should include a Circular Economy Statement showing how the matters set out in Policy JWP1 have been taken into account. This statement should be prepared in accordance with the related GLA guidance[43] (and any update) and, amongst other things, include a waste management audit outlining plans for waste handling throughout construction, including any demolition and refurbishment, as well as during the development's occupation and use. Where required, it is recommended that Circular Economy Statements be prepared alongside Whole Lifecycle Carbon Assessments.

43 Circular Economy Statement Guidance, GLA, 2022

6.14 Non major development proposals should be submitted with a Site Waste Management Plan which details how waste arising from construction, demolition and excavation will be minimised and then how any waste which does arise will be managed in accordance with the waste hierarchy. Site Waste Management Plans must include targets for retaining, reusing, or recycling materials arising for the development. Ideally these should link to online databases of reclaimed materials (e.g. the Excess Material Exchange[44]) where developers list materials on web-based platforms and network locally to salvage and reuse materials.

6.15 Development proposals involving demolition are required to be supported by a 'Pre-demolition Audit'. The 'Pre-demolition Audit' is a survey conducted on existing buildings, structures, and hard-standing surfaces before demolition or major redevelopment that identifies the type and volume of materials that will arise as a result of deconstruction. The audit will support preparation of Circular Economy Statements, Site Waste Management Plans and Whole Lifecycle Carbon Assessments.

6.16 Waste Management Strategies are required to be submitted with non major development that considers the types of waste that will be produced during the occupation and use of the development and how this will be managed. A template of a Waste Management Strategy is included with the Tower Hamlets Reuse and Recycling Supplementary Planning Document. While this document was prepared by a different London Borough, it was prepared with the support of the London-wide waste advisory organisation 'ReLondon' and is currently considered to represent best practice. This document also includes information on best practice approaches to maximising recycling (e.g. provision of signage) and specifies the space that should be provided for storage of waste in development pending its collection for off site management. Similar related guidance prepared by the East London Boroughs should be referred to such as the Newham Waste Management Guidelines for Architects and Property Developers (2024). Thresholds for sizes of development requiring certain arrangements for waste management included in Local Plans should be followed. Flatted development above shops is known to present particular challenges and it is important that proper provision of the storage and collection of waste is considered at the earliest stage of design.

6.17 The documentation provided with planning applications should demonstrate how the development is designed to achieve:

1. The following rates of recycling:

Type of development	Dry Mixed Recyclables	Food Waste	Other wastes (non-household waste)	Overall recycling rate
Houses	50%[45]	50%	-	50%
Flats	50%	50%	-	50%
Shops	-	-	65%	65%
Offices	-	-	65%	65%
Light industrial	-	-	65%	65%
Heavy industrial	-	-	65%	65%

2. Zero biodegradable or recyclable waste to landfill by 2026: and,
3. 95% recycling of Construction, Demolition and Excavation waste

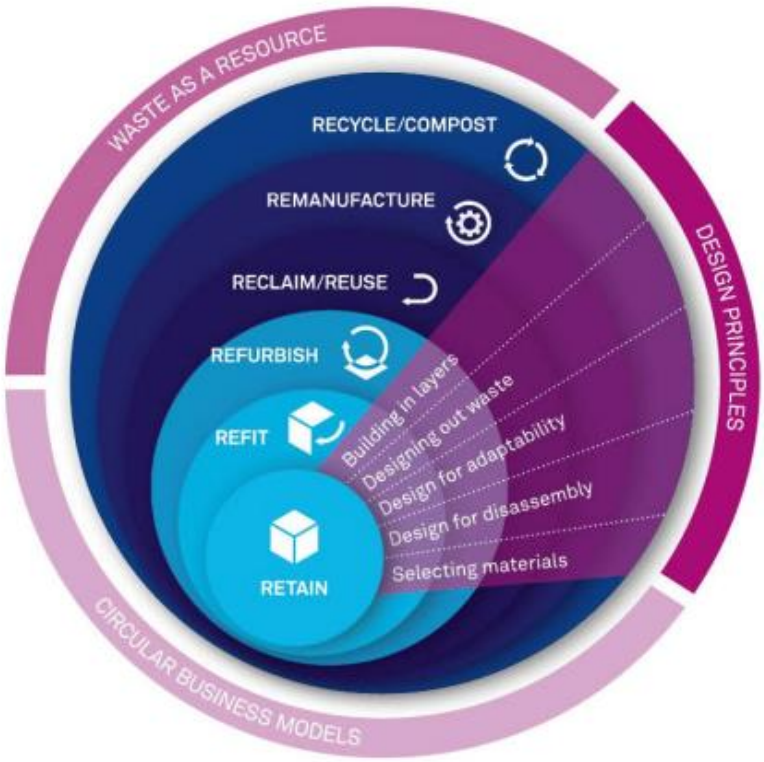
6.18 In order to maximise the opportunities for residents to reuse and recycle their household waste, planning applications involving additional residential development[46] should include the following details:

- Measures to be taken to show compliance with this policy and potential future collection arrangements e.g. food waste; and
- the details of the nature and quantity of any construction, demolition and excavation waste which will arise from the development and its subsequent management.

6.19 Figure 9 below illustrates approaches related to the circular economy and the built environment.

44 Excess Materials Exchange, London Borough of Enfield
45 ELWA Strategy Borough / LES Household Recycling Aspiration
46 Excluding householder applications; reserved matters applications; minor extensions; and non-material amendments to current planning permissions

Figure 9 Circular Economy hierarchy for building approaches (from London Plan Policy D3 Figure 3.2)[47]



6.20 The optimal use of land is particularly important in the more built-up areas of East London and policies in the Boroughs' Local Plans seek to address this as appropriate.

6.21 Efficient modular off-site construction methods are now commonly used as a means of minimising the wastage of materials used in construction.

6.22 In 2023, the UK Government announced it's 'Simpler Recycling' initiative which is a plan to standardise recycling across England which includes the following:

1. Consistent Collection of Materials: Both local authorities and businesses in England are required to collect a consistent set of materials for recycling. These include dry recyclables such as glass, metal, plastic (including plastic film), paper and card, and organics like food waste and garden waste.
2. Flexibility in Collection Methods: Local authorities have the flexibility in the method of collection for dry recyclables in terms of level of separation and

47 Source: Building Revolutions (2016), David Cheshire, RIBA publishing©

number/type of container. An exemption would allow authorities to collect dry recyclables co-mingled.

3. Weekly Food Waste Collection: Collection authorities will be required to collect food waste weekly. The preference is for food waste to be treated by anaerobic digestion.
4. Fortnightly Residual Waste Collection: A The government is proposal to ing the requirement for residual waste to be collected at least fortnightly.
5. Designing Business Premises for Waste Storage: Business premises must be designed with sufficient space for the storage of materials to be separately collected.

6.23 Where these requirements are not already in place, they will be brought in by March 2026 and this confirms the need for all buildings to be designed with sufficient space to allow for the separate collection and storage of these materials. All Boroughs provide separate collection of recyclable materials and the ELWA strategy anticipates 'separate food waste collections for street level properties and blocks of flats, in line with anticipated regulations and Government guidance'.

6.24 Different storage and collection systems are needed for different types of development, for example, the Barking Riverside mixed use development incorporates a vacuum system for collecting waste from apartments. The system processes three fractions: residual, cardboard and dry recyclables and reduces the need for storage facilities (460 collection inlets replace 19,000 traditional bins) and vehicle movements.

6.25 Proposals should be consistent with the police 'Secured By Design' initiative which demonstrates, for example, how the need for security (e.g. gating, doorsets/windows, access control/counter terrorism measures, lighting and CCTV etc.) measures has been considered for development proposals where bin stores are incorporated.

6.26 Proposals for 'Circular Economy Construction Hubs' which provide dedicated space and facilities for the storage and repair of waste materials, as well as opportunities for the development of skills needed to achieve a circular economy e.g. repair workshops, are encouraged.

Policy JWP2: Safeguarding and Provision of Waste Capacity

Purpose of Policy

To ensure that:

- Existing consented waste management sites are appropriately safeguarded from loss to non waste uses;
- additional waste management capacity is consented on a limited basis, to meet specific needs in certain circumstances such that unnecessary capacity is not developed;
- existing waste management sites fulfil their potential to maximise the management of waste in accordance with the waste hierarchy and other relevant objectives; and,
- waste management facilities are only developed in locations where the environment and communities will be protected and enhanced.

Safeguarding of existing waste management capacity

6.27 This policy (and supporting text) concerns the management of solid and liquid waste. Policy JWP2B concerns the management of wastewater.

6.28 The purpose of safeguarding waste management sites is to maintain waste management capacity that contributes to meeting the objectives and targets for waste management set out in the Plan.

6.29 The 2021 London Plan allows existing waste management sites to be redeveloped for non-waste uses if an equivalent amount of management capacity is established and/or if there is already sufficient capacity to allow London Plan objectives to be met elsewhere in London[48]. Compensatory capacity should be based on the highest throughput achieved by the site in question over the past five years, or, if such data is unavailable, an appropriate assessment of potential capacity. The Environment Agency's Waste Data Interrogator tool is recommended for this assessment for sites that have been operational.

48 London Plan Policy SI9 and paragraph 9.9.3

6.30 Existing waste sites are defined by the London Plan as sites that benefit from permanent planning permission that expressly consents the management of waste, and sites subject to an Environmental Permit that permit a waste management activity. The London Plan definition does not include sites with a use that is lawful by virtue of time where a particular area of land has been continuously used for a specific waste related activity and is therefore immune from enforcement action. The lawful status of such sites can be confirmed by issue of a Certificate of Lawful Existing Use or Development (CLEUD). This Plan safeguards such sites along with sites with planning permission for a waste use.

6.31 In the case of sites for which a CLEUD has not been granted, evidence of the activity taking place continuously for 10 years or more, for example an Environmental Permit covering the same area and activity issued over 10 years ago, has been taken to establish a waste use deemed to be lawful over time for the purpose of application of this policy. In addition, in order to avoid the safeguarding of sites that make a minor contribution to capacity in East London that may inhibit redevelopment schemes, sites that consistently managed less than 500 tonnes a year and were not providing specialist waste management capacity have been excluded.

6.32 Under the London Plan definition of an existing waste use, sites which do not have planning permission specifically for a waste use but are subject to an Environmental Permit would be safeguarded. Sites safeguarded by virtue of an Environmental Permit alone would lose their safeguarded status if/when the Permit ceases to exist. This may be by the permit holder choosing to surrender the permit or where the permit holder ceases to exist, such as a company becoming insolvent. Since 2012 the grant of an Environmental Permit by the Environment Agency can occur independently of the land-use planning system. This means, an Environmental Permit may be granted for an activity that is unlawful under the planning system, for example on land for which planning permission for a waste use has been refused or is subject to enforcement action against a waste use. Therefore, this Plan does not safeguard such sites, although they remain safeguarded under the London Plan until the relevant permit ceases to exist, or until such time as the London Plan definition changes.

6.33 Some sites may have a time limited planning permission for a waste management use and the temporary nature of the permission means that it has been determined that it is not desirable for the use permitted to continue beyond a certain date. For this reason, sites with time limited planning permission are only safeguarded by the ELJWP up to the date on which the permission expires. This is regardless of the status of any related Environmental Permit for the site e.g. if it has been surrendered. In addition, in cases where land on which the waste use is lawful under the land use planning system and land covered by an Environmental Permit don't align, the area to which the lawful use under planning applies is taken as that to be safeguarded. Finally, where a site is subject to planning enforcement action against the continued use, safeguarding will not take effect/is held in abeyance until the matter has been resolved regardless of permitted status.

6.34 As noted in Section 5.0, a small number of existing waste sites have not been safeguarded on the basis that their re-development will achieve wider planning objectives and will not significantly impact the achievement of the London Plan strategic objective of net self sufficiency and this Plan's objectives for the management of waste. These sites are identified in Table 9.

6.35 Sites that are not safeguarded by this Plan but are subject to Environmental Permits are still safeguarded by virtue of the existing Policy SI9 of the current London Plan and so the policy applies to proposals for redevelopment of such sites until such time as the Environmental Permit is surrendered/ceases to exist. Any relevant changes to the London Plan approach to safeguarding would then apply to sites not expressly safeguarded by this Plan.

6.36 An assessment of the capacity for each safeguarded site in East London was undertaken and included in a separate Waste Management Capacity Assessment[49].

6.37 Applicants seeking permission to redevelop an existing safeguarded waste site for a non-waste use in East London will need to demonstrate that other existing waste sites already provide sufficient capacity to meet both the apportionment targets for the Plan area and the net self-sufficiency target for the city as a whole or that they have secured appropriate compensatory, replacement capacity before the change in use will be permitted. Replacement capacity can be achieved either by enhancing an existing safeguarded waste site or through securing a compensatory site capable of managing at least the assessed peak annual throughput, as per Policy JWP2 requirements.

6.38 Replacement capacity must be at least equivalent in terms of: Type of waste managed (HIC (LACW & C&I), C, D & E, Hazardous); throughput (lower throughput for management further up the hierarchy than that being lost may be acceptable); and position on the waste hierarchy.

6.39 There must also be no existing, or proposed developments that could constrain the operation of the replacement capacity such that the required capacity might not be realistically achieved.

6.40 Boroughs will enforce this through conditions or legal agreements to ensure that compensatory capacity is confirmed and delivered before a permission that results in a change of a safeguarded waste site to a different use is implemented. In accordance with Policy SI 9 of the 2021 London Plan, this additional capacity should be located in London (unless the nature of the facility to be lost is such that it serves a larger than regional catchment) and ideally within the Plan area.

6.41 The provision of compensatory capacity in East London for the loss of waste capacity outside the Plan area will not typically be permitted unless there is clear justification. Such justification should include the following:

- the compensatory provision is necessary for London to manage its waste sustainably and achieve net self-sufficiency;
- the capacity lost cannot be provided through adapting or intensifying existing facilities within that Plan area;
- no suitable alternative sites are available for the development of additional waste capacity within the host Plan area (in which the waste site is proposed for redevelopment); and,
- the proposed compensatory provision would manage waste as high up the waste hierarchy as practically feasible.

6.42 Development of new and/or re-purposing of an existing waste management facility that reduces overall throughput of an existing site may be acceptable where this enables management of the waste further up the waste hierarchy. This should be demonstrated through supporting evidence including:

- A list of the types of waste that would be managed at the facility;
- The type of management that will be undertaken and its place on the hierarchy;
- How the waste being managed will be managed as high up the hierarchy as practicable; and,

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49 See East London Waste Capacity Assessment, 2025, BPP Consulting

- Ongoing management arrangements to ensure that the waste hierarchy continues to be applied.

Need for additional capacity and waste hierarchy

6.43 'Waste management capacity' is the amount of waste that can be managed at a site or facility (generally measured in tonnes per annum throughput, or, for permanent deposit to land e.g. landfill, may be overall volume in cubic metres).

6.44 The most recent waste management capacity assessments[50] demonstrate that there is a surplus of capacity needed for the management of current and forecast future waste arisings in East London. Therefore, there is no need for development of additional capacity to meet the London Plan apportionments within the Plan area. The capacity of sites that are safeguarded for waste use[51] exceeds that required over the Plan period. This provides a degree of flexibility should waste management requirements change.

6.45 However, there may be scope for development of additional capacity, including through intensification of existing sites, to provide for management further up the waste hierarchy, for example waste managed through MBT to RDF, might otherwise be managed through a MRF and recycled. The potential loss of MBT capacity (as contracts end) may also require provision of replacement or new capacity.

50 See East London Waste Capacity Assessment, 2025, BPP Consulting
51 See Appendices 2 and 3.

Location

6.46 The London Plan (Policy SI8 B4) identifies suitable locations for waste management as existing waste sites, especially transfer facilities, where capacity can be maximized, Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs), and safeguarded wharves with existing or potential for waste management.

6.47 While existing capacity is adequate to meet management needs over the Plan period, development of new capacity, for example to move waste management up the waste hierarchy or to provide compensatory capacity, might be acceptable where it is located on existing waste sites, or on industrial land identified as suitable in Borough Local plans, where these are consistent with other policies of the development plan including those protecting the environment, health and amenity.

6.48 Impacts on ease of transport and air quality caused by congestion and HGV movements are key areas of concern for local communities. Preferred locations are therefore those close to railheads and wharves and/ or close to the strategic road network (motorways and trunk and principal roads). It is also important that the full potential of locations which allow for non-road modes of transport I.e. by rail and waste, are utilised and transport of waste by road is minimised.

Policy JWP2: Safeguarding and Provision of Waste Capacity

Safeguarding existing capacity

A. Existing waste sites safeguarded from non-waste development are listed in Appendix 2 and detailed in Appendix 3 (hereinafter referred to as "safeguarded waste sites"). If a waste site does not have express planning permission for a waste management use, benefit from a CLEUD or have become lawful over time and is safeguarded under London Plan policy only by virtue of it having an Environmental Permit for a waste activity, the site will cease to be safeguarded if/when the Environmental Permit is surrendered/ceases to exist. Where a site benefits from a time limited planning permission, the site will cease to be safeguarded on the date when the planning permission expires, regardless of its permitted status.

B. Development that would lead to the loss of capacity and/or constrain current operations of a safeguarded waste site or future committed operations subject to an active planning permission[52A] will not be permitted unless:

1. **it can be demonstrated that equivalent, suitable, and appropriate compensatory capacity is provided within the Borough where the site is located, or if this is demonstrated not to be possible, elsewhere in East London, or finally, elsewhere in London; or**
2. **it has been demonstrated that the capacity of the facility to be lost would not compromise the ability of London to meet the London Plan objective of net self sufficiency for London as a whole.**

Overarching need for new capacity

C. Proposals for the management of HIC waste (LACW and C&I waste) which would result in waste management capacity exceeding that required to meet the London Plan apportionment for East London and any proposals for the management of other waste streams beyond those needed to meet Plan targets, will not be permitted unless they would:

1. **Provide appropriate compensation for the loss of existing capacity which is needed for London to be net self-sufficient in waste management capacity overall; or**
2. **result in waste being dealt with further up the hierarchy (unless a life cycle assessment demonstrates that the method of management proposed is appropriate); and,**
3. **subject to criterion C2 above, increase the throughput of an existing waste management facility; or**
4. **consolidate waste management activities taking place at more than one site in East London at a single location (subject to cumulative impacts being acceptable and compliance with other policies in the Development Plan).**

52A ‘Active planning permission’ refers to planning permission granted for waste management use which may or may not have been implemented or be operational, and the permission is still valid i.e. it is within the time limit for implementation

Waste hierarchy and location

D. Subject to criterion C above, proposals for waste management uses, including changes to the operation and layout of safeguarded waste sites, will be permitted where it is demonstrated that:

1. **The waste to be managed could not practically be avoided or managed by a means further up the waste hierarchy unless a life cycle assessment demonstrates that the method of management proposed is appropriate; and,**
2. **by-products and residues are minimised; and,**
3. **any proposed decrease in the throughput of safeguarded waste sites would result in waste being managed further up the waste hierarchy.**
4. **The proposal will:**
    - i. **Minimise transportation of waste by being well located in relation to the sources of waste to be managed; and,**
    - ii. **have good access to railheads and wharves and utilise non road modes of transportation or demonstrate why this would not be practicable; and,**
    - iii. **Subject to criteria i., have good access to the road network and will not cause unacceptable adverse effects on the road network; and,**
    - iv. **avoid creating an undue amenity impact on existing permitted non-waste uses, or land allocated, or land with permission for non-waste uses that could conflict with the proposed waste management use; and,**
    - v. **for energy from waste facilities, be close to current or future heat users or networks and locations where resultant carbon may be captured for use; and,**
    - vi. **for operations which generate bioaerosols (like composting), be situated at least 250m from sensitive receptors.**
5. **In the following priority order, the proposal is situated:**
    - i. **On a safeguarded existing waste site; or**
    - ii. **where it is demonstrated that the use could not be located on an existing safeguarded waste site, in a Strategic Industrial Location (SIL); or**
    - iii. **where it is demonstrated that the use could not be located in a SIL, in a Local Industrial Location (LIL) as appropriate.**

6. Where it is demonstrated that SIL and LIL is not available, and that the proposal is consistent with all other policies in the Development Plan, proposals may be permitted in the following locations:

- **i. In or near safeguarded waste sites especially where this enables synergistic relationships between facilities; or,**
- **ii. Local Plan allocations identified as suitable for industrial uses; or,**
- **iii. previously developed, contaminated, or brownfield land not allocated for other non-industrial uses; or,**
- **iv. redundant agricultural and forestry structures and their surroundings; and,**
- **v. where composting or anaerobic digestion is proposed, farm properties where the resulting compost/digestate will be utilised including on adjacent land.**

E. Proposals on greenfield land will not be permitted unless it can be demonstrated that special circumstances require that the proposed waste management development is particularly needed in that location.

F. Proposals must be in accordance with other policies of this Plan, in particular Policy JWP4 relating to the protection of residential amenity, together with other relevant policies of the appropriate borough's Development Plan.

Implementation

6.49 This policy applies to sites where the management of controlled waste takes place. Policy JWP2B below is concerned with the safeguarding and provision of capacity relating to the treatment of wastewater.

Safeguarding of existing capacity

6.50 At the time of the Plan's adoption, safeguarded existing waste sites are those listed in Appendix 2 and detailed in Appendix 3. During the plan period changes such as new sites being granted planning permission may occur, which will result in a change to the available management capacity in East London. Details of any changes in capacity, including provision of additional capacity, will be reported through the Boroughs' Authority Monitoring Reports. Compensatory capacity relied upon to justify release of any safeguarded waste site capacity will also be recorded. Appendices 2 and 3 of the Plan will be shown as updated in the Authority Monitoring Reports to reflect and consolidate these changes on an occasional basis.

6.51 Applicants for development that would result in loss or reduction in capacity of lawful existing waste management sites and facilities are required to demonstrate that either there is sufficient capacity remaining to meet both the apportionments for the Plan area and achieve net self-sufficiency for the city as a whole, or that compensatory capacity has been secured, preferably within the Borough, the Plan area, or, failing that, in London. This will be applied through condition(s) for retention, and provision, of on-site capacity and/or legal obligations securing off-site provision. Consideration of impacts of other development on existing sites extends to the potential impacts on future 'committed' operations and development at the site which includes development with an active planning permission which has not been implemented.

6.52 The determination of whether the loss of capacity will compromise the ability of London to achieve net self sufficiency as a whole will take account of any information published by the GLA concerning the achievement of the London Plan net self sufficiency target.

6.53 Through the plan-making process described in paragraphs 6.29 to 6.36 above, a number of existing waste sites have been omitted from the list of safeguarded sites in Appendix 2.

6.54 If it is demonstrated that the capacity proposed to be lost is not actually required to for the objectives of this Plan and the London Plan to be met, for example if up to date monitoring of the London Plan indicates that net self-sufficiency in London has been achieved, then a site may be released without compensatory provision being made.

6.55 Due to pressures for development on land in East London, some of the safeguarded existing waste management sites which may be more suitable for release in the longer term have been identified in Appendix 4.

Waste Hierarchy and Location

6.56 In most cases, management of waste in accordance with the waste hierarchy results in the least impact, on environment and communities. However, there may be circumstances where it is appropriate to deviate from the waste hierarchy. An example of this is the management of food waste by anaerobic digestion. Anaerobic digestion is currently categorized within the 'other recovery' tier of the waste hierarchy. LCA studies[52] have shown that management of food waste in this way is the best environmental option being more acceptable than composting. Policy JWP2 allows for other such instances where LCA demonstrates that waste is better managed at a lower level of the waste hierarchy.

6.57 Proposals will show how the use of non-road forms of transport has been considered and, if necessary, why this has been ruled out. Proposals will need to show how transport by road will be minimised and how the strategic road network has been utilised to help manage and mitigate impacts on road safety and congestion. Proposals should demonstrate that the highway network is able to accommodate the traffic flows that would be generated.

6.58 The term 'greenfield land' in Policy JWP 2 means land that has not been previously developed or built upon. Typically found in rural or semi-rural areas, greenfield sites are undeveloped agricultural or natural spaces that may be considered for development. These areas include Metropolitan Open Land (MOL) and other Borough green spaces and contrast with "brownfield land," which refers to previously developed sites that may be reused or redeveloped. Other development plan policies on development on such greenfield land including MOL and development within the Green Belt will also apply.

52 LCA is widely used to compare different waste management options, such as recycling, landfilling, composting, and incineration. LCA evaluates all aspects of the management option and compares the impacts on the environment of each aspect.

Policy JWP2B: Safeguarding and Provision of Wastewater Treatment Capacity

Purpose of Policy

To ensure that:

- Existing consented wastewater treatment (including sludge management) facilities are safeguarded from loss to non-wastewater treatment uses;
- additional wastewater treatment capacity is consented to meet specific needs in certain circumstances such that unnecessary capacity is not developed;
- existing wastewater treatment facilities fulfil their potential to maximise the treatment of wastewater in accordance with relevant objectives; and,
- wastewater treatment facilities are developed in a manner which ensures the environment and communities will be protected and enhanced.

Safeguarding of wastewater treatment capacity

6.59 The ability to treat wastewater is an essential element of all forms of development and so related capacity must be protected from redevelopment by other uses. The redevelopment of all wastewater treatment infrastructure is therefore not permitted other than in exceptional circumstances and only when alternative suitable compensatory capacity has been identified. Boroughs will enforce this through conditions or legal agreements to ensure that compensatory capacity is confirmed and delivered before releasing a safeguarded waste site for a different use.

6.60 The redevelopment of wastewater treatment facilities in East London is not anticipated during the plan period, however, there is a possibility that proposals for development proximate to existing infrastructure might come forward which would hinder the normal operation of that infrastructure. Policy JWP3, which applies to development adjacent to wastewater treatment facilities and waste management sites, is intended to address this issue.

Need for additional wastewater treatment capacity

6.61 Policy SI5 of the London Plan 2021 relates to wastewater infrastructure and supports the provision of such infrastructure to service development.

6.62 The need for additional wastewater treatment capacity is determined through the 'Asset Management Planning' (AMP) process. The AMP process identifies the need for new and enhanced wastewater treatment capacity over a five year period. The next AMP five year period is 'AMP8' that commences on April 1 2025 and will run until March 2030. The AMP process considers the strategic context and conducts a risk-based assessment of the catchment areas to identify potential risks and vulnerabilities associated with existing wastewater treatment infrastructure.

6.63 Demonstration of the need for additional capacity will need to be made by direct reference to an Asset Management Plan.

6.64 AMP8 (and AMP7) identified the need for the following in East London:

- Upgrades to the Riverside wastewater treatment facility in Havering;
- A major upgrade to the Beckton wastewater treatment facility in Newham so it can receive wastewater from the new Thames Tideway Tunnel
- A number of strategic pumping stations throughout the Plan area which serve the wastewater treatment facilities need to be maintained and may require upgrade to meet the needs of new and existing development.

Development relating to the Riverside and Beckton improvements is already underway.

Location

6.65 Paragraph 9.5.9 of the London Plan 2021 notes that additional land may be required for upgrades or improvements at some wastewater treatment plants during the London Plan period. However, it is not expected that new wastewater treatment facilities will be developed in East London before 2041 and so this Plan does not identify specific areas where such development could come forward. In any event it is important to recognise that wastewater treatment has different geographical and technical requirements to solid waste management.

6.66 In particular, wastewater treatment facilities are constrained by the location of the sewerage network and need to be located close to where the sewerage network terminates (which is generally low-lying ground to enable flows to gravitate and avoid high energy consumption associated with unnecessary pumping) and need to be located close to a suitable receiving watercourse into which the treated effluent can be discharged.

6.67 In relation to existing wastewater treatment plants, maintaining an existing discharge point can often be a critical issue as effluent discharges can form a significant proportion of river flows which are required to be maintained by the Environment Agency.

6.68 As development land in East London becomes scarcer it will be necessary for any proposals to ensure the efficient use of land is maximised and environmental impacts are compatible with closer neighbours. Policy JWP4 is intended to ensure that new or extended wastewater treatment infrastructure is designed in a way that ensure unacceptable adverse impact on communities and the environment do not occur. Other policies in the Development Plan for the area in which any development is located will also apply.

Policy JWP2B: Safeguarding and Provision of Wastewater Treatment Capacity

Safeguarding existing capacity

A. Existing wastewater treatment facilities safeguarded from non-waste development are detailed in Appendix 2 (hereinafter referred to as "safeguarded wastewater sites").

B. Development that would lead to the loss and/or constrain current and future committed operation and development of safeguarded wastewater sites will not be permitted unless:

1. **it can be demonstrated that equivalent, suitable, and appropriate compensatory capacity is provided; or**
2. **it has been demonstrated that the capacity of the facility to be lost is not required to meet policy objectives and legal requirements related to the treatment of wastewater.**

New capacity

C. Proposals for the development of infrastructure for the management, treatment and disposal of wastewater and sewage sludge, including upgrades to existing wastewater treatment works, will be permitted, provided that:

1. **it is demonstrated that there is an identified need for such a facility to meet local and national policy objectives and legal requirements related to the treatment of wastewater which cannot be met at an existing facility; and,**
2. **it demonstrated that the proposed location for the development is the best practicable option; and,**
3. **the effective recovery of solid and gaseous by-products for beneficial use occurs as part of the treatment processes using best practice techniques.**

D. Proposals must be in accordance with other policies of this Plan, in particular Policy JWP4 relating to the protection of residential amenity, together with other relevant policies of the appropriate borough's Development Plan.

Implementation

Safeguarding of existing capacity

6.69 Safeguarded existing wastewater treatment facilities in East London are those with planning permission for wastewater treatment and, at the time of writing, are those listed in Appendix 2 and detailed in Appendix 3. During the plan period, any changes which occur, such as new sites or spatial extensions being permitted, will be reported on an annual basis in the Boroughs' Authority Monitoring Reports.

6.70 The Boroughs require applicants for development that would result in loss or reduction in capacity of existing wastewater treatment facilities to demonstrate that compensatory capacity has been secured. This will be applied through condition and/or legal obligations securing off-site provision. Consideration of impacts of other development on existing sites extends to the potential impacts on future 'committed' operations and development at the site which includes operations which have not been implemented but have active planning permission or those included in Asset Management Plans.

6.71 In exceptional (and unlikely) cases it may be possible to demonstrate that the capacity proposed to be lost is not actually required to meet the objectives of this Plan and the London Plan.

Operations

6.72 The normal operation of a wastewater treatment facility results in an effluent which is fit for discharge into the water environment, however by-products also arise and it is important these are appropriately managed to avoid adverse impacts and that their value is maximised e.g. biogas resulting from any anaerobic digestion of sewage sludge is used as an energy source. Proposals should therefore provide details of all by-products and describe how they will be managed in accordance with best practice.

Policy JWP 3 Prevention of Encroachment

Purpose of Policy

To ensure that existing safeguarded waste management and wastewater treatment facilities are safeguarded from nearby development that may limit or hinder their normal operation.

6.73 Existing waste management and wastewater treatment facilities can be adversely affected by non-waste development (i.e. development other than that which is principally intended for the management of waste or treatment of wastewater and sewage sludge) in proximity to them, even where this does not involve direct loss of an existing site. Some non-waste land uses, such as residential, can be sensitive to the impacts arising from the normal operation of waste management and wastewater treatment, including noise, odour and transport and are unlikely to be compatible with a nearby existing waste management site or wastewater treatment facility. 'Normal operations' relate to the operations at a site associated with its day to day running and not that associated with breakdowns or unforeseen events which effect the effective operation of the site. This can lead to unacceptable living conditions and resultant complaints, which may lead to constraints being imposed, such as restriction of operating hours or vehicle movements, which can reduce their current and future operations, with associated effects on available capacity.

6.74 The 'agent of change' principle in national policy (NPPF paragraph 200) and the London Plan (Policy D13) reflects this and requires new development that may be sensitive to the impacts of existing businesses (particularly noise but also other nuisances) to mitigate this through design.

6.75 The distance from an existing waste site at which such issues may arise will depend on site specific circumstances, including the size and nature of the facility and existing mitigation measures employed by the operation. Waste uses are subject to Environmental Permitting which requires measures to reduce and mitigate the potential effects of operations on amenity and the environment. In general, a 250m radius around safeguarded waste management sites, and wastewater treatment facilities, is an appropriate distance for consideration of potential effects of new development on safeguarding, and the sensitivity and compatibility of non-waste development.

6.76 Planning applications for development within at least 250m of safeguarded waste management sites and wastewater treatment facilities (except Beckton Sewage Treatment Works for which a distance of 800m is applied) will need to demonstrate that impacts, e.g. noise, dust, odour, light and air emissions, that may reasonably arise from the normal activities[53] taking place at a safeguarded site, including from transport, would not be experienced at a level which was unacceptable to the occupants of the proposed development and that vehicle access to and from the facility would not be constrained by the development proposed. Measures to mitigate potential adverse effects should be incorporated into the design and layout. Development proximate to a wastewater treatment facility may, in particular, be affected by odour arising from their operations.

Policy JWP 3 Prevention of Encroachment

Proposals for non-waste development in proximity to safeguarded waste management sites and wastewater treatment facilities must demonstrate that they would not prejudice the current or future committed operation of the safeguarded site, including through incorporation of measures to mitigate and reduce their sensitivity to operation of the safeguarded site through applying the 'Agent of Change' principle.

Implementation

6.77 The Boroughs will automatically scrutinise applications within 250m of existing waste management sites and 250m[54] of wastewater treatment facilities to assess their potential effect on safeguarding of those sites and their capacity. The Boroughs will consider applications at a greater distance depending on the nature of the proximate facility. For Beckton Sewage Treatment Works a custom distance of 800m has been applied.

6.78 Applicants for non-waste development within 250m[55] of an existing waste management site or existing wastewater treatment facilities are required to demonstrate that sensitivity to existing uses has been assessed and measures have been incorporated to ensure any unacceptable adverse effects are mitigated. Non waste development that is beyond 250m[56] of an existing waste management site or a wastewater treatment facility but is of a nature that may make it especially sensitive to the operations of the waste site e.g. schools, hospitals, may also be required to demonstrate that they would be designed to avoid any unacceptable adverse impacts from the waste site.

6.79 Where development is proposed within 250m of an existing wastewater treatment facility, an Odour Impact Assessment should be submitted which assesses the likelihood that odour would have a significant adverse effect, and details measures that will be taken or incorporated into the design of the development to mitigate adverse effects and minimise the risk of such effects occurring. Advice should be sought from Environmental Health teams at the pre-application stage highlighting any key issues with proposals relating to odour. Proposals should have regard to the latest Institute of Air Quality Management Guidance on the assessment of odour for planning

6.80 In addition, it may be that development proximate to a waste/wastewater site will be unlikely to be affected by an existing operation, depending on the type of activity, the type of waste, and the characteristics of the facility e.g. if it is enclosed within a building.

53 Normal activities are those related to the day to day operation of a site and do not include breakdowns.
54 800m for Beckton Sewage Treatment Works
55 800m for Beckton Sewage Treatment Works
56 800m for Beckton Sewage Treatment Works

Policy JWP4: Design of Waste Management Facilities

Purpose of Policy

To ensure waste management (including wastewater treatment) facilities are designed in a manner that protects and enhances host communities and the local environment which includes having regard to the need for climate change mitigation and adaptation.

6.81 It is not anticipated that there will be a need for new waste management capacity to be developed over the Plan period. However, there will continue to be investment in existing waste sites and facilities, including upgrades to wastewater treatment facilities, and inevitable changes in requirements over time, including some re-configuration and re-development.

6.82 Where new waste and wastewater capacity is developed, it should be of high quality and contribute to the achievement of other national and development plan policies and objectives including reducing greenhouse emissions, efficient resource use, protection and enhancement of the environment (including the water environment) and protection of amenity and health. For solid waste such requirements are set out in the London Plan (Policy SI8). This applies not only to their operational impacts but also to the 'whole life-cycle' carbon emissions associated with construction materials.

6.83 The policies of this Plan focus any new development on existing waste sites, industrial and previously-developed land, and so adverse effects on soils and biodiversity are likely to be limited. Biodiversity gain (of at least 10%) is now a mandatory requirement and so applications are required to be supported by a biodiversity assessment quantifying the existing pre-development value (previously-developed sites may host habitat of value), and consideration of how a minimum of 10% gain may be achieved (to be included within a Biodiversity Gain Plan).

6.84 Development design is crucial in managing and reducing adverse impacts on the environment and amenity. Enclosure of operations within a building, where operationally feasible, will be required as the best means of reducing noise, dust and odour. In exceptional cases, if it is shown that this is not a practicable option, other mitigation such as acoustic screening and operational management measures will be required. The need to enclose operations may also prescribed by the Environmental Permitting process. Re-configuration and intensification of existing waste management sites and wastewater treatment facilities may present opportunities to improve the design and performance of the facility.

6.85 Environmental permitting provides the appropriate mechanism for control of operational impacts and should be assumed to operate efficiently though it is strongly recommended that applicants to consider these matters in tandem with the planning application[57] and seek early advice from the Environment Agency.

6.86 Where development requires road transport it is important that optimum routes for HGVs are utilised and access to the site is safe and appropriate to the scale and nature of movements associated with normal operations.

6.87 Some larger facilities may be regarded as critical infrastructure and so should, in particular, be protected from acts of vandalism. Applications for new and existing sites should take account of the police Secured by Design guidance and consider areas such as gating, doorsets/windows, access control/counter terrorism measures, lighting, CCTV, staffing levels and intruder alarms to ensure that facilities are adequately protected.

57 NPPF paragraph 201

Policy JWP4: Design of Waste Management and Wastewater Treatment Facilities

A. Proposals for waste management and wastewater treatment development will only be permitted which have been designed to address the following during their construction and operation (including associated vehicle movements):

1. **The emission of greenhouse gases is minimised by working towards net zero where practicable or, where this isn't practical, an appropriate contribution will be made to the relevant Borough's carbon offset fund; and,**
2. **measures to avoid unacceptable adverse impacts arising from noise, dust, litter, vermin, vibration, odour, bioaerosols, external lighting, visual intrusion, traffic or associated risks to the environment (including the water environment) and health and wellbeing of local communities; and,**
3. **storage and management of waste (other than by landfill) and wastewater within a building or an appropriate level of protection is provided with respect to impacts on the local environment and amenity; and,**
4. **efficient use of energy and water; and,**
5. **climate adaptation measures such as sustainable drainage systems, flood resistance and resilience, water storage and recycling, open space design, green roofs and drought-resistant landscaping; and,**
6. **contributions to green and blue infrastructure, community benefits (including Public Rights of Way), and biodiversity enhancement and net gain where required; and,**
7. **The need to protect the historic environment including by including measures to avoid and/or mitigate adverse impacts; and,**
8. **protecting the best and most versatile agricultural land and soil quality more generally; and,**
9. **achievement of a BREEAM 'Excellent' rating or its equivalent unless it is demonstrated that this isn't practical; and,**
10. **the need to ensure development is secure in accordance with 'Secure by Design' principles; and,**
11. **preference being given to non-road transport where practicable; and,**
12. **measures to control and reduce vehicle impacts including:**
    i. **emissions, through the use of low emission vehicles, installation of vehicle charging points and scheduling and management of vehicle routing; and,**
    ii. **impacts on the safety of other road users including pedestrians.**

B. Proposals for development must demonstrate that opportunities will be provided for residents of the Borough in which the proposal is located, to access employment in both the construction and operational stages in accordance with relevant Local Plan policy and related guidance.

C. Proposals that have an adverse effect on the integrity of sites designated as Special Areas of Conservation (SAC), Special Protection Areas (SPAs) or Ramsar sites will not be permitted, in line with The Conservation of Habitats and Species Regulations 2017 (as amended). Any mitigation required to avoid adverse effects on their integrity, for example due to pollution risk or disturbance, must be detailed in, and secured as part of the grant of planning permission.

Implementation

6.88 Applicants are required to demonstrate that the design and operation of development contributes to the achievement of policy objectives in this Plan, and the wider development plan, through preparation and submission of supporting evidence which may include a design and access statement.

6.89 Planning applications should be supported by appropriate evidence e.g. a Climate Change Assessment and a BREEAM assessment, setting out measures considered, and incorporated, to improve energy efficiency and incorporate renewable and low carbon energy into the development and operation (including vehicles and transport) and achieve net zero[58], to reduce water consumption, and to adapt to the likely effects of climate change including extreme rainfall, drought and heatwave events.

6.90 Whilst a BREEAM rating of excellent (or equivalent), is sought, it is recognised that certain circumstances such as constraints on site and applicability of technology may means it is not practicable for such a rating to be achieved. In such instances. the application should demonstrate exactly why such a rating is not practical and show how the highest rating practicable will be achieved.

6.91 As a minimum requirement, all major waste and wastewater proposals must achieve net-zero carbon standards in alignment with London Plan Policy SI2. This can be accomplished by following the Mayor's energy hierarchy:

- Be Lean: Optimize energy use and manage demand during operation.
- Be Clean: Utilise local energy resources efficiently and cleanly (including secondary heat).
- Be Green: Maximize opportunities for on-site renewable energy production, storage, and usage.
- Be Seen: Monitor, verify, and report on energy performance.

6.92 Additionally, major and minor proposals must achieve a minimum 35% reduction beyond Part L 2013 standards on-site.

6.93 Where requirements for net zero and other enhancements cannot be delivered on-site, applicants may be required to contribute to wider Borough schemes including for carbon and air quality offsetting.

58 Consistent with London Plan Policy SI2B requirement for energy strategy

6.94 The application should show how potential impacts on the amenity of the area caused by the operations of the site have been identified and appropriate mitigation included, for example those resulting from noise, lighting, dust and odour. In many cases such impacts will be addressed by enclosing operations within a building as required by the policy.

6.95 An assessment of the risk to the normal operation of facility caused by climate change should be undertaken, taking account, for example, of the likelihood of higher rainfall and hotter temperatures. The proposal should show how it has responded to this assessment by incorporating measures to reduce the risk as far as practicable. Proposals in areas prone to flooding, as shown by Strategic Flood Risk Assessments, are required to produce a site specific flood risk assessment.

6.96 While Biodiversity Gain Plans are required to be submitted and approved prior to commencement, it will often be sensible to prepare drafts of such plans beforehand for submission with the planning application.

6.97 Measures to enhance biodiversity should be integrated into new buildings, e.g. biodiverse roofs, swift bricks or boxes, green walls and contribute to the achievement of the Local Nature Recovery Strategy for London[59]. Depending on the location in relation to protected habitats, and the nature of the proposal, a Habitats Regulation Assessment will need to be submitted.

6.98 Transport assessments and Travel Plans need to be submitted with applications for sites with an area of 2,500m^2 (or greater) which detail the impacts of transport to and from a proposed facility (including an extension or reconfiguration of an existing facility). Transport Assessment should follow Transport for London's Healthy Streets Transport Assessment format, or the latest version if updated over the course of the Plan period.

6.99 The Transport Assessment should illustrate accessibility to the site by all modes, the likely modal split of journeys to and from the site, impacts to the transport network, proposed measures to improve access or mitigate transport impacts using public transport, walking and cycling, as well as demonstrate compliance with other transport policies, including the London Plan (2021) Healthy Streets Approach. Applicants are recommended to discuss the potential transport implications of the development with the Boroughs' planning and transport teams, as well with relevant infrastructure providers such as Transport for London.

6.100 Proposals should reference the use of Direct Vision Lorries for waste vehicles or the use freight operators who can demonstrate their commitment to TfL's Freight Operator Recognition Scheme (FORS) or similar.

6.101 Transport for London's (TfL) Direct Vision Standard (DVS) for HGVs should be applied and freight operators should demonstrate their commitment to TfL's Freight Operator Recognition Scheme (FORS) or similar. The DVS is intended to enhance road safety by ensuring that HGV drivers have better visibility, thereby reducing the risk of accidents involving vulnerable road users like pedestrians and cyclists.

59 https://www.london.gov.uk/programmes-strategies/environment-and-climate-change/parks-green-spaces-and-biodiversity/local-nature-recovery-strategy

Policy JWP5: Energy from Waste

Purpose of Policy

To ensure energy from waste facilities are developed appropriately including utilisation of the maximum amount of energy produced.

6.102 Energy from Waste (EfW) generally takes the form of plants that incinerate waste and capture the heat to generate electricity. 'Surplus' heat may also be captured and utilised in heating, or cooling, of other development sometimes via the use of district heating schemes. Other forms of energy from waste such a pyrolysis and gasification are sometimes classed as 'Advanced Thermal Treatment'.

6.103 In terms of the waste hierarchy, EfW is classed as 'Other Recovery' and so, as a means of managing waste is generally less preferred than recycling but more preferred than disposal. To qualify as 'recovery', energy from waste plants must achieve a minimum level of energy efficiency as defined by 'R1' status[60]. Without R1 status such plants are technically classed as disposal.

6.104 Although planning permission has been grated for such a facility in Barking and Dagenham[61], at present there are no plants in East London which incinerate waste, however some facilities manufacture refuse derived fuel from residual waste arising in East London for incineration in elsewhere. Indeed, the assessment of future waste management capacity requirements indicates that there is no clear need for EfW capacity to be developed in East London, and the Boroughs are currently unaware of any specific proposals for such capacity. However, this form of waste management has certain characteristics which need particular consideration and so Policy JWP 5 is included to address these matters in the event that an application for planning permission for such a facility was received.

60 The 'R1' value relates to the energy efficiency factor of an incinerator which determines the extent to which an incinerator uses waste as a fuel to generate energy. The minimum R1 value is 0.65 for municipal waste incinerators permitted and in operation after 31 December 2008. For further information see https://www.gov.uk/guidance/waste-incinerator-plant-apply-for-ri-status

61 London Sustainable Industries Park

6.105 The burning of waste leads to the release of carbon dioxide, therefore, the more energy that can be recovered, the less carbon dioxide is emitted per energy unit. Policy SI 10 (E) 3) of The London Plan expects EfW facilities to meet a minimum performance of 400g of CO2 equivalent per kilowatt hour of electricity produced (this is known as the 'Carbon Intensity Floor'). To maximise their efficiency, it's important for Energy from Waste facilities to be designed and located in such a way that excess heat can be fully exploited. This could be through district heating or by a nearby industry that can utilise the process heat. This kind of EfW is known as Combined Heat and Power (CHP). The Borough Local Plan include separate policies related to developments that deliver heat and cooling to buildings near a CHP facility.

6.106 The combustion of the biogenic elements of residual waste can generate low-carbon renewable energy, whereas burning non-biogenic waste, which includes materials like oil-based plastics, does not. The split of biogenic and non-biogenic materials in residual waste is currently thought to be roughly equal, but this is likely to shift during the Plan period as measures like separate food waste collection from households and businesses are put into place. However, non-biogenic waste generally has high calorific value and so may be required to ensure EfW plants are viable.

6.107 The Sixth Carbon Budget of the Government's Climate Change Committee suggests that all EfW facilities should implement carbon capture and storage by 2040 to meet the national goal of net-zero carbon emissions by 2050. Considering that EfW plants have a minimum lifespan of 30 years, any EfW development proposal must account for this, as retrofitting Carbon Capture, Utilization, and Storage (CCUS) may not be feasible once the plant is operational. The Committee's budget also indicates that the required carbon reduction in waste management is anticipated to result from increased recycling, which should not be undermined by the creation of extra EfW capacity.

6.108 EfW results in the production of solid ash residues. In the case of mass burn incineration two types of ash are produced: 'bottom ash' (heavy material that falls through the grate) and 'air pollution control (APC) residues' (ash collected by emission control systems). Bottom ash can easily be recycled into an aggregate and technologies are now being developed which utilise the APC residue in the manufacture of construction materials avoiding the need for landfill.

6.109 Incineration offers an environmentally-safe disposal option for certain hazardous wastes. Specialised high-temperature incineration facilities may not always able to achieve commercially viable scales for energy or heat recovery, but may become an essential part of waste management infrastructure especially if the need for management of persistent organic pollutants and other chemicals increases in future.

Policy JWP5: Energy from Waste

Proposals for waste sites that use waste as a fuel source to produce energy will only be permitted where it is demonstrated that:

1. **They qualify as recovery, rather than disposal, operations (except if intended solely for disposal of hazardous waste); and,**
2. **the waste used as fuel will be waste that cannot be viably reused, recycled, or composted (as detailed in a Waste Hierarchy Statement); and,**
3. **solid by-products (e.g. bottom ash) from the process will be recycled or used as raw materials; and,**
4. **the use will be consistent with the proximity principle and not result in long distance vehicle movements; and,**
5. **the facility will operate as a combined heat and energy plant such that the facility is as energy efficient as possible; and,**
6. **the release of non-biogenic gaseous carbon emissions will be minimised, with mechanisms to capture for use and/or storage if use is not viable.**

Implementation

6.110 Applicants are required to demonstrate how any proposed Energy from Waste plant will achieve the requirements of Policy JWP5 through preparation and submission of supporting evidence including that relating to the adoption of technology designed to generate power and utilise surplus heat.

6.111 To ensure that waste managed at EfW facilities is genuinely residual, proposals need to be submitted with a Waste Hierarchy Statement. Such a statement should include:

- A list of the types of waste that would be managed at the facility and the reason why they cannot be managed further up the hierarchy;
- Details of the information that will be collected and retained that includes the sources of the waste after waste, that would be managed at higher levels of the hierarchy, has been removed;

- the arrangements to be put in place to ensure that as much waste, that could be managed at higher levels of the hierarchy, as is reasonably possible is removed from the waste to be managed at the facility, including any contractual measures put in place to secure the removal of such waste and that such waste is actually subject to management further up the hierarchy;
- the arrangements to be put in place to ensure that suppliers of waste work to a written environmental management system which includes establishing a baseline for the removal of waste that could be managed at higher levels of the hierarchy and working to specific targets for continuously improving and reporting on the percentage of such waste removed;
- the arrangements to be put in place for suspending and/or discontinuing supply arrangements from suppliers who fail to work to and report on compliance with any environmental management systems relating to waste reporting;
- the provision of an annual waste composition analysis of the waste received at the facility, with the findings submitted within one month of sampling being undertaken; and,
- the form of records to be kept for the purpose of demonstrating compliance with the matters above and the arrangements in place for provision of data and inspection of such records by the authorities.

Policy JWP6: Deposit of Waste on Land

Purpose of Policy

To ensure that the landfill of non-inert waste is minimised (in accordance with the waste hierarchy) and that potential impacts of landfill, including any reworking and restoration and aftercare are properly managed.

Non-inert Waste Landfill

6.112 The deposit of non-inert waste on land for disposal may occur as backfilling of old mineral workings (landfill), or by deposit on land where the ground levels have not been artificially changed (landraise).

6.113 The disposal of waste is at the bottom of the waste hierarchy as the least preferred form of waste management, and non-inert waste should be sent to landfill only if it cannot be handled using methods higher up the Waste Hierarchy. In exceptional circumstances it may be demonstrated that there are certain types of waste (e.g. some hazardous wastes) which cannot practically be managed by any other means and so landfill[62] is the only option. These wastes are generated in comparatively limited amounts and are handled at specific landfill sites designated for hazardous waste or within specially constructed cells at non-inert landfill sites.

6.114 Non-inert landfill has been undertaken in East London at Rainham for some time, although it is anticipated that the current site will close during the Plan period. No specific provision for additional non-inert landfill is allocated in this Plan. In East London, there are currently no additional suitable voids created by mineral working which would be appropriate for non-inert waste landfilling. Therefore, any provision would involve the creation of new void space either by extracting material for other purposes like engineering, or by altering the land's natural contours, or a combination of these two methods. Policy JWP6 has been included in this Plan to help determine any proposals that might be received for new non-inert waste landfill capacity.

62 Landfill should also be taken to mean land raise.

6.115 Landfilled non-inert waste usually results in the production of landfill gas (including methane) and leachate, both of which need proper containment and management to ensure they do not cause pollution of the environment of harm to human health. In light of this, the provision of new capacity is largely reliant on the presence of certain geological and hydrogeological conditions needed to minimise the risk of groundwater pollution. While being a potential pollutant, landfill gas can be beneficial when captured and put to use as a fuel to produce energy.

6.116 In addition to generating more void space, the reworking (or 'mining') of current or historical and restored landfill sites could potentially free up land for development and/or result in the extraction of recyclable or recoverable materials that were previously discarded. Older landfills might also require reworking to remove waste causing pollution and/or to prevent the uncontrolled release of pollutants. However, there are significant risks associated with the reworking of landfill sites as materials may have been disposed of without being recorded. After the closure of landfills, other developments, such as housing, may have taken place nearby, which could be sensitive to any modification activity, and the need to avoid negative impacts must be considered. Generally, the modification of landfills containing hazardous waste is not recommended due to the potential impacts on communities and the natural environment. An Environmental Permit, intended to ensure there is no pollution of the environment or harm to human health will also likely be required for any such activity and advice from the Environment Agency should be sought.

6.117 The restoration of landfill sites will offer opportunities to enhance the environment for example by providing wildlife habitats and/or recreational opportunities e.g. country parks.

Deposit of Inert Waste on Land for Beneficial Purposes

6.118 Some inert waste (mainly excavation waste e.g. soils and subsoils) is of a nature that lends itself for use in engineering operations such as landscaping, flood defences and site restoration. To mitigate their impacts on landscape and visual amenity, voids created by mineral working frequently require restoration by backfilling.

6.119 In waste hierarchy terms, the beneficial use of inert waste on land is classed as 'other recovery'. Policy SI 7 of The London Plan expects that 100% of inert excavation waste will put to a beneficial use.

6.120 The availability of land in East London for the deposit of inert excavation waste is more constrained and so such waste is frequently transported to areas outside of London for management. This is recognised in paragraph 9.8.1 of the London Plan 2021 which observes that target net self-sufficiency by 2026 does not relate to this waste stream.

Policy JWP6: Deposit of Waste on Land

A. Proposals for the use of land for the disposal of non-inert waste to land will only be permitted where the following is demonstrated:

1. **The waste cannot be practically managed by other means further up the waste hierarchy; and**
2. **there is a management plan and end date for the operation, ensuring the timely completion and restoration of the site; and**
3. **fugitive emissions of landfill gas are minimised and energy recovery is maximised; and**
4. **a management system demonstrating how any leachate will be managed is provided; and,**
5. **restoration and aftercare of the site will be of a high quality that ensures demonstrable benefits to the environment and local communities.**

B. Proposals for the permanent deposit of inert waste on land will be permitted where it is demonstrated that:

1. **the waste will be deposited for a beneficial purpose, such as restoring landfill sites/mineral workings, rather than as part of a disposal operation; and**
2. **if the waste is intended for use in an engineering operation (other than landfill site restoration), it must be demonstrated that there is no local demand for its use in mineral working restoration; and,**
3. **the minimum amount of waste necessary will be used to achieve the intended benefit.**

C. Proposals for the reworking of old landfill sites will be permitted provided they meet the criteria in Part A above, and that:

1. **Hazardous waste was not disposed at the site; and,**
2. **any materials extracted will be managed as far up the waste hierarchy as practicable.**

Implementation

Non-inert waste

6.121 Proposals for non-inert landfill will need to demonstrate that the waste to be disposed is genuinely residual (following removal of all material that cannot be recycled or recovered) and cannot be managed by a means further up the waste hierarchy. This requires the submission of a Waste Hierarchy Statement as detailed under Policy JWP5 above.

6.122 The need for non-inert landfill capacity must be justified by showing that there will be enough residual waste for disposal to ensure the site's timely completion. Non-inert landfill sites should be filled in sections and progressively restored for beneficial uses such as agriculture, recreation, or biodiversity.

6.123 Proposals for non-inert landfill development must demonstrate how landfill gas would be managed, and its potential for energy generation maximised, during the operational and aftercare phases.

6.124 Any proposals for the reworking of old landfill sites will require a site investigation to identify and evaluate the presence of hazardous materials. Proposals would need to address the potential for negative impacts related to the release of leachate and landfill gas, the handling of hazardous materials, and potential impacts on existing restoration and aftercare arrangements.

6.125 Proposal for restoration should consider whether habitats can be protected and enhanced, and where possible contribute to delivery of Local Nature Recovery Strategies.

6.126 The provisions of this policy equally apply to proposals to extend existing non-inert landfill sites.

Inert Waste

6.127 Proposals involving the deposit of inert waste on land solely for disposal are not acceptable. Proposals will need to demonstrate how the inert waste will be used in a manner that results in a beneficial outcome. To qualify as recovery (rather than disposal), proposals need to demonstrate how the project will incorporate the least possible amount of inert waste material required to accomplish the intended result.

6.128 Proposals will need to demonstrate that the inert waste to be deposited consists of material that could not be recycled, for example it does not contain materials such as brick and concrete that could be used as a recycled aggregate. The deposit of hard inert construction waste e.g. brick and concrete for use in hardstandings and site roads is acceptable as material used in this way is considered to have been recycled for use as an aggregate.

6.129 In some cases, the need for the deposit of inert material may have been identified as part of a construction project and suitable material excavated as part of a different project may be used to fulfil that need. In such cases the “The Definition of Waste: Development Industry Code of Practice” (DoWCoP) may apply which would mean that the excavated material is not defined as waste and its deposit would therefore not be subject to Policy JWP6.

7 Policies Map

The Policies Map for the Plan comprises the maps shown in Appendix 3 of existing safeguarded waste sites.

8 Glossary

A	
Advanced Thermal Treatment (ATT)	Technologies that employ pyrolysis or gasification to process residual wastes. ATT facilities produce a gas (usually for energy recovery) and a solid residue which can often be recycled for secondary use.
Agent of change	A new development within an area that is of such a nature that it might be impacted by existing development or impact on that development (e.g. housing proposed within an industrial area). The 'agent of change principle' sets out a position that an applicant for planning permission (i.e. the 'agent of change') is responsible for managing any conflicts between the proposed development and existing development.
Aggregates and soils recycling	Rubble, hardcore and soil from construction and demolition projects can often be used on-site in place of primary aggregate. Alternatively, it can be taken to purpose-built facilities for crushing, screening and re-sale.
Agricultural waste	This mostly covers animal slurry/by products and organic waste,but also scrap metals, plastics, batteries, oils, tyres, etc. The regulations for this waste stream mean farmers cannot manage all of their own waste within the farm (historically the case). The agricultural waste regulations affect whether or not waste can be burnt, buried, stored, used on the farm or sent elsewhere.
Amenity	Amenity is a broad concept and is not specifically defined in Planning legislation. It is a matter of interpretation by the local planning authority and is usually understood to be the pleasant or normally satisfactory aspects of a location which contribute to its overall character and the enjoyment of residents, business users and visitors. Amenity can be adversely affected by development impacts such as noise, dust, odour and visual change.
Anaerobic Digestion (AD)	A process comprising the breakdown of organic material in the absence of air. It is carried out in an enclosed vessel and produces methane that powers an engine used to produce electricity. The useful outcomes of AD are electricity, heat, and the solid material left over called the digestate. Both the heat and the electricity can be used or sold if there is a market and the digestate can either be sold or used for agricultural purposes (land spread). AD can only be used for some biodegradable parts of the waste stream e.g. sewage sludge, agricultural waste and some organic municipal and industrial waste.

Annual Monitoring Report (AMR)	The AMR reports progress in meeting the milestones of the adopted Local Development Scheme and monitors the impact of policies when the plans are adopted. The AMR is formally known in legislation as the 'Authority Monitoring Report'.
B	
Best and most versatile agricultural land	Land categorised as being of grades 1, 2 or 3a under the Agricultural Land Classification system.
Bioaerosols	Airborne material containing biological material from animals, plants, insects or microorganisms. They are produced wherever biological material is being processed, milled, or chopped and are commonly associated with organic waste composting facilities. Bioaerosols can have impacts on health.
Biodegradable waste	Any waste that is capable of undergoing natural decomposition,such as food and garden waste, paper and cardboard.
Biodiversity	The variety of all life on earth (mammals, birds, fish, invertebrates, plants, etc). In planning, it is often used to refer to nature conservation.
C	
Catchment	The geographical area served by a particular waste management activity. This will vary according to the adequacy of transport links and the economics of transporting different types of waste
Circular Economy	A circular economy is an alternative to a traditional linear economy (make, use, dispose) in which resources are kept in use for as long as possible, the maximum value is extracted from goods and services whilst in use, and, finally, resources and products are recovered and regenerated at the end of each service life.
Climate change adaptation	Adjustments to natural or human systems in response to actual or expected climatic factors or their effects, including from changes in rainfall and rising temperatures, which mitigate harm or exploit beneficial opportunities
Climate change mitigation	Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.
Combined heat and power facilities (CHP)	CHP plants generate electricity as well as providing local heat, and sometimes even cooling, to various types of users.
Commercial and Industrial (C & I) Waste	Waste generated by business and industry, for example: wholesalers; catering establishments; shops and offices; factories and industrial plants. Generally, businesses are expected to make their own arrangements for the collection, treatment and disposal of waste generated by their actions. Waste from smaller businesses where local authority collection arrangements have been set up is considered as LACW.

Composting	The breaking down of organic matter aerobically into a stable material that can be used as a fertiliser or soil conditioner. This can be undertaken commercially in open air (in 'windrows') or inside containment ('in-vessel'), and at a smaller scale by households at home or collectively by communities.
Conservation Area	An area designated by the LPA because of its special architectural or historic interest, the character and appearance of which it is desirable to preserve or enhance.
Contaminated Land	Contaminated land is land that has been polluted or harmed in some way making it unfit for safe development and usage unless cleaned.
Construction, Demolition and Excavation (C, D & E) Waste	The combined waste produced from earth moving, demolition of buildings/structures and construction of new buildings/structures. It mostly comprises brick, concrete, hardcore, subsoil and topsoil, but can also include timber, metals and plastics.
D	
Decentralised Energy	Local renewable energy and local low-carbon energy usually but not always on a relatively small scale that may encompass a range of technologies.
Deposit of Waste on Land	The placement of waste on land for the purpose of its management. This may include landfill or landraise operations, or, in the case of inert waste may involve its use in engineering works such as landscaping mounds.
Development Plan	The development plan has statutory status as the starting point for decision making. Section 38(6) of the Planning & Compulsory Purchase Act 2004 and Section 70(2) of the TCPA 1990 require that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. For waste proposals within London the development plan comprises the London Plan, Borough Local Plans and DPDs, joint Waste Plans as well as neighbourhood plans.
Disposal	Disposal means any waste management operation which is not 'recovery' even where the operation has a secondary consequence, the reclamation of substances or energy
Dry Mixed Recyclables (DMR)	Typically composed of: Paper - e.g. dry paper waste, newspapers, office paper and magazines Cardboard – e.g. corrugated cardboard, cereal boxes and card Metal cans – e.g. clean, empty drinks cans and food tins Plastic – e.g. packaging films, rinsed out milk bottles, empty drinks bottles & clean salad trays, rinsed out margarine tubs & microwaveable meal trays
E	
Encroachment	Development which is sensitive to the normal operations of a waste/wastewater facility being built near to an existing such facility

	which may hinder its operation by requiring changes to its operating practices (e.g. reduced vehicle movements, operating hours)
Energy from Waste (EfW)	The process of managing waste to generate energy - usually in the form of electricity or heat usually by means of thermal treatment. Many wastes are combustible, with relatively high calorific values – this energy can be recovered through processes such as incineration with electricity generation, gasification or pyrolysis. EfW generally falls within the 'other recovery' category in the waste hierarchy.
Energy Recovery	Covers a number of technologies, though most energy recovery is through incineration. Many wastes are combustible, with relatively high calorific values – this energy can be recovered through processes such as incineration with electricity generation (and where possible heat recovery), gasification or pyrolysis.
European Site	Sites designated for their nature conservation importance (under the EC Birds Directive and EC Habitats and Species Directive) and protected by the Habitats Regulations. This includes Special Protection Areas (SPAs) for birds, and Special Areas of Conservation (SACs) under the Habitats Directive.
G	
Gasification	A technology that converts carbon-containing material (including waste) into gas (mostly methane) at high temperature. The gas (known as 'syngas') can either be used as a substitute for natural gas or used to power electricity generation.
Green Belt	A national planning designation, which aims to prevent urban sprawl by keeping land around certain cities and large built-up areas permanently open or largely undeveloped, defined more fully in the NPPF.
Greenfield land	Land that has not been developed. Not to be confused with Green Belt.
Greenhouse gas (GHG)	GHGs trap heat in the atmosphere. Many gases exhibit greenhouse properties, including carbon dioxide, methane, water vapour, and nitrous oxide.
Green and blue infrastructure	A network of multi-functional green space or wetlands and waterways, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.
H	
Habitats Regulation Assessment (HRA)	An assessment under the Habitats Regulations to test if a plan or project could significantly harm the designated features of a 'Habitat site'. Proposals affecting proposed SACs, potential SPAs, Ramsar Sites (wetlands of international importance) also require HRA.

Hazardous waste	Controlled waste that is dangerous or difficult to treat, keep, store or dispose of, so that special provision is required for dealing with it. Hazardous wastes are the more dangerous wastes and include toxic wastes, acids, alkaline solutions, asbestos, fluorescent tubes, batteries, oil, fly ash (flue ash), industrial solvents, oily sludges, pesticides, pharmaceutical compounds, photographic chemicals, waste oils, wood preservatives. If improperly handled, treated or disposed of, a waste that, by virtue of its composition, carries the risk of death, injury or impairment of health, to humans or animals, the pollution of waters, or could have an unacceptable environmental impact. It should be used only to describe wastes that contain sufficient of these materials to render the waste as a whole hazardous within the definition given above. Defined in the Hazardous Waste (England and Wales) Regulations 2005 (as amended).
Heritage assets	A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Designated Heritage assets are the most protected and include listed buildings, scheduled ancient monuments, registered parks and gardens, registered battlefields, and World Heritage Sites.
Household waste	This is waste from a domestic property, caravan, and residential home or from premises forming part of a university or school or other educational establishment and premises forming part of a hospital or nursing home.
I	
Incineration	This is the controlled burning of waste usually in purpose-built plant and is subject to stringent standards for emissions. Ash residues are often landfilled but bottom ash may also be used in building materials. Incineration that involves the capture of energy falls within the category ‘Energy from Waste’.
Inert waste	Inert waste means waste that does not undergo any significant physical, chemical or biological transformations when untreated. Inert waste will not dissolve, burn or otherwise physically or chemically react, biodegrade or adversely affect other matter with which it comes into contact in a way likely to give rise to environmental pollution or harm human health. The total leachability and pollutant content of the waste and the ecotoxicity of the leachate must be insignificant, and in particular not endanger the quality of surface water and/or groundwater. Non-inert (including non-hazardous) waste is all other waste other than as identified above.
L	

Landfill and landraise	The term landfill relates to waste disposal mainly below ground level (by filling a void) whereas landraise refers to waste disposal mainly above pre-existing ground levels. They are generally the least preferred method of waste management in the waste hierarchy.
Listed buildings	A building of special architectural or historic interest in a list compiled by the Secretary of State under the Planning (Listed Buildings & Conservation Areas) Act 1990, thereby having statutory protection. Listing of buildings includes the interior as well as the exterior of the building, and any nearby buildings or permanent structures within the curtilage (e.g. wells, outbuildings). Historic England is responsible for designating buildings for listing in England.
Local Authority Collected Waste (LACW)	All waste collected by a local authority. It includes household waste and business waste and construction and demolition waste where collected by the local authority. LACW is the definition that is used in statistical publications produced by Defra, which previously referred to 'municipal' waste.
Local Development Scheme	The timetable for the preparation of Local Plans.
Local Nature Reserves (LNRs)	An area designated by local authorities, in consultation with Natural England under the National Parks & Access to the Countryside Act 1949, to provide opportunities for educational use and public enjoyment, in addition to protecting wildlife or geological and physiographical features of special interest.
Local Planning Authorities (LPAs)	The public authority whose duty it is to carry out specific planning functions for a particular area.
Local Plan	A plan for the future development of a local area, drawn up by the LPA in consultation with the community. In law this is described as the development plan documents adopted under the Planning & Compulsory Purchase Act 2004. Current core strategies or other planning policies, which under law would be considered to be DPDs, form part of the Local Plan. The term includes old policies which have been saved under the 2004 Act.
Local roads	These are taken to include: A roads (not including trunk roads and primary routes). B roads – which are roads intended to connect different areas, and to feed traffic between A roads and smaller roads on the network. Classified unnumbered roads which are smaller roads intended to connect together unclassified roads with A and B roads, and often linking a housing estate or a village to the rest of the network. Similar to 'minor roads' on an Ordnance Survey map and sometimes known unofficially as C roads. Unclassified roads which are local roads intended for local traffic. The vast majority (60%) of roads in the UK fall within this category.

M	
Major development	For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m2 or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.
Mass burn incinerator	Large, complex facilities which are used to burn waste at very high temperatures.
N	
National Planning Policy Framework (NPPF)	The NPPF sets out the Government's planning policies for England and how these are expected to be applied.
National Planning Policy for Waste (NPPW)	Adopted in October 2014, this document sets out the Government's waste planning policies for England.
Net self-sufficiency	To provide enough waste management facilities to manage the equivalent amount of waste arising within the Plan area.
Non-inert waste	A waste that will biodegrade or decompose, releasing environmental pollutants. Examples include: wood and wood products, paper and cardboard, vegetation and vegetable matter, leather, rubber and food processing wastes.
O	
Open space	All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.
Other Recovery	Other recovery is not specifically defined in the revised Waste Framework Directive, although 'energy recovery' is referenced as an example. It can be assumed by their exclusion in the definition of recycling, that processing of wastes into materials to be used as fuels or for backfilling can be considered 'other recovery'.
P	

Plan area	The geographical area covered by the East London Joint Waste Plan i.e. the area covered by the London Boroughs of Barking and Dagenham, Havering, Newham, and Redbridge
Pollution	Anything that affects the quality of land, air, water or soils, which might lead to an adverse impact on human health, the natural environment or general amenity. Pollution can arise from a range of emissions, including smoke, fumes, gases, dust, steam, odour, noise and light.
Planning Practice Guidance (PPG)	Government guidance intended to assist practitioners in interpreting national planning policy.
Previously developed land	Land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed. Previously developed land excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.
Public Rights of Way (PRoW)	PRoW are paths that all members of the public can legally use: footpaths – for walking, running, in mobility scooters or powered wheelchairs; bridleways – for walking, horse riding, bicycles, mobility scooters or powered wheelchairs; restricted byways – for any transport without a motor and mobility scooters or powered wheelchairs; byways open to all traffic – for any kind of transport, including cars (but mainly used by walkers, cyclists and horse riders).
Pyrolysis	The combustion of waste in the absence of oxygen, resulting in the production of liquid, gas, char, whose after-use depends on the type of waste incinerated.
R	
Receptor	Existing land uses that could be affected by the proposed development at the site allocations. Some examples of receptors include: Residential dwellings; hospitals; commercial premises; and, footpaths.
Recovery	Recovery means any waste management operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy.

Recovery facilities	A facility that recovers value, such as resources and energy, from waste prior to disposal, includes energy from waste, biological treatment and physical treatment facilities.
Recovery to Land	This is considered to be the use of inert material for a genuine beneficial use such as landscape and/or amenity improvements.
Recycling	Recycling means any recovery operation by which waste materials are reprocessed into products, materials or substances whether for the original or other purposes. Includes the reprocessing of organic material but not energy recovery or the reprocessing into materials that are to be used as fuels or for backfilling operations.
Renewable and low carbon energy	Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass, ground and air, and geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).
Residual waste	The elements of the waste streams that remain following recovery operations. Residual waste usually needs to be managed by disposal e.g. landfill.
Restoration	Process of returning a site or area to a desirable condition following waste management use or mineral extraction.
Reuse	Re-using products and materials as part of the circular economy, avoiding generation of waste and the need for re-processing or disposal. The top priority on the waste hierarchy. The commercial sector can reuse products designed to be used a number of times, such as reusable packaging. Householders can buy refillable containers or reuse plastic bags. Reuse contributes to sustainable development and can save raw materials, energy and transport costs.
S	
Safeguarding	The process of protecting sites and areas that are used or have potential for waste development from other forms of development that may prevent or constrain such uses in the future
Sites of Special Scientific Interest (SSSI)	A site which is of special interest by reason of any of its flora, fauna, or geological or physiographical features and has been designated by Natural England under the Wildlife and Countryside Act 1981.
Special Areas of Conservation (SAC)	Areas defined by regulation 3 of the Conservation of Habitats and Species Regulations 2017 which have been given special protection as important conservation sites.
Special Protection Areas (SPAs)	Areas classified under regulation 15 of the Conservation of Habitats and Species Regulations 2017 which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds.

Strategic Industrial Locations	Sites identified (including in the London Plan, Policy E5) as critical to the economy and which can accommodate concentrations of industrial, logistics and related activities and land uses.
Sustainability Appraisal (SA)	A process of analysing and evaluating the environmental, social and economic impacts of the plan or programme, often in conjunction with an SEA.
Sustainable Waste Management	Waste management in line with the waste hierarchy in which waste generation is avoided as far as possible, materials and products are re-used, recycled or have as much value recovered from them as possible, before disposal is considered. This is delivered through product design, behaviour and choices, and through provision of sufficient waste management capacity of the required type, where possible proximate to where waste arises.
Supplementary planning documents	Planning documents which expand upon policy or provide further detail to policies in development plan documents, but do not have development plan status
T	
Thermal treatment	A waste management operation that involves the use of heat to process waste and generally involves the production of energy. Incineration is a thermal treatment but 'Energy from waste' is the term more generally used to describe waste management involving incineration.
Tonne	Metric Ton. 1000 kilos, equal to 2004 lbs.
tpa	Tonnes per annum
mtpa	Million tonnes per annum.
W	
Waste	Any substance or object that the holder or the possessor either discards or intends or is required to discard.
Waste arisings	This is the amount of waste produced in a given area during a given period of time, usually reported as tpa.
Waste Disposal Authority (WDA)	A local authority responsible for managing the waste collected by the collection authorities and the provision of household waste recovery centres.
Waste Hierarchy	A conceptual framework for management of waste, which ranks waste management options according to what is best for the environment. The most preferable option is preventing waste generation as far as possible, followed by preparing materials for re-use, recycling and composting, recovering as much value from them as possible including

	energy. Disposal to landfill or incineration without energy recovery is the least-preferred option.
Waste Planning Authority (WPA)	The local authority responsible for waste development planning and control. These are unitary authorities, including National Park Authorities, and county councils in non-unitary areas.
Waste streams	Waste produced by different sectors and with different composition such as ‘commercial and industrial’ or ‘hazardous’.
Waste transfer	Process where waste is taken from waste producers, and taken for treatment, recycling and/or disposal.
Wastewater	Water discharged to sewers and including waste in liquid form as well as surface water runoff. This raw wastewater is collected in sewers and transferred to wastewater treatment works where it is treated in such a way that produces largely reusable sewage sludge and effluent that is discharged to watercourses.
Water environment	The "water environment" encompasses all waterbodies and ecosystems that are influenced by water, including rivers, lakes, wetlands, groundwater, coastal waters, and seas. It also involves the complex interactions between water, land, and living organisms, as well as the human activities that affect these systems. The water environment therefore includes the broader ecological and environmental context in which water exists. This includes the quality, availability, and sustainability of water resources, as well as the impact of human activities on these water bodies.

9 Appendices

Appendix 1 – Monitoring Framework

Monitoring of the East London Joint Waste Plan will take place in accordance with the framework set out below. Results will be reported in a joint East London Joint Waste Plan Annual Monitoring Report.

Theme	Indicator	Targets / Milestones	Related Objective	Related Policy	Responsibility	Source	Frequency
Achieve Circular Economy	Quantity of household waste produced per head	50% reduction from 2019 levels	SO1	JWP1	East London Waste Authority (ELWA), East London Local Planning Authorities (LPAs)	Wastedataflow, WDI	Annual
	Percentage of LACW diverted from landfill	Divert 95% of LACW from landfill by 2030	SO2	JWP1; JWP2; JWP6	ELWA, LPAs, Waste Industry	Wastedataflow, WDI	Annual
	Recycling rates for C&I waste	Achieve 70% recycling rate for C&I waste by 2030	SO2	JWP1; JWP2	LPAs, Waste Industry	WDI, DEFRA	Annual
	Percentage reduction in C, D&E waste sent to landfill	100% of construction, demolition, and excavation waste to be diverted from landfill	SO2	JWP1; JWP6	LPAs, Waste and development industries	WDI, DEFRA	Annual

Theme	Indicator	Targets / Milestones	Related Objective	Related Policy	Responsibility	Source	Frequency
	Number of proposals considering circular economy strategies	100% of new major developments consider circular economy strategies by 2041	SO1	JWP1	LPAs	Planning Applications	Biannual
	Waste management capacity by waste category and position on the waste hierarchy (recycling / other recovery / disposal)	General trend observed of waste capacity positioned in accordance with the waste hierarchy	SO2, SO5, SO8	JWP2, JWP5, JWP6	LPAs, Waste Industry	Planning Applications	Biannual
Safeguard existing waste management capacity	Number of safeguarded sites lost to alternative development	No net loss of safeguarded waste management capacity	SO6	JWP2, JWP2B,	LPAs, Development Industry	Planning Applications	Annual
	Percentage of safeguarded sites operating at full capacity	95% of safeguarded sites operating at full capacity	SO6	JWP2, JWP2B, JWP3	LPAs, Waste Industry	Planning Applications, WDI	Biannual
	Waste management capacity by waste category and position on the waste hierarchy (recycling / other recovery / disposal)	Surplus capacity to be maintained equivalent to that of sites with potential for future release (Appendix 4)	SO2, SO5, SO6, SO8	JWP2, JWP5, JWP6	LPAs, Waste Industry	Planning Applications, WDI	Biannual
Protection of communities	Number of planning enforcement cases per	Trend of reducing annual planning	SO4	JWP2, JWP2B,	LPAs, Waste Industry	Environment Agency (EA)	Annual

Theme	Indicator	Targets / Milestones	Related Objective	Related Policy	Responsibility	Source	Frequency
and environment	annum related to operational impacts of waste facilities (e.g., noise, odour)	enforcement cases; zero by 2030 (ongoing)		JWP3, JWP4		& Borough Environmental Health Departments	
	Number of new waste developments with operations enclosed within buildings	100% new waste development within an enclosed building unless exceptional circumstances demonstrated	SO4	JWP2B, JWP4	LPAs, EA, Waste Industry	Planning Applications	Annual
Maximise energy recovery and minimise climate impacts	Percentage of Energy-from-Waste (EfW) proposals incorporating heat utilisation	100% of EfW capacity proposals to include heat utilisation	SO5	JWP5	LPAs, EA, Waste Industry	Facility Operation Reports	Annual
	EfW capacity incorporating Carbon Capture, Utilisation, and Storage (CCUS)	All new proposals for EfW capacity to include CCUS	SO5	Policy JWP5	LPAs, EA, Waste Industry	Facility Operation Reports	Annual
Sustainable landfill operations	New Non-inert landfill capacity permitted	Non-inert landfill capacity only permitted in exceptional circumstances.	SO5, SO8	Policy JWP6	LPAs, EA, Waste Industry	Planning Applications	Annual
	Quantity of landfill gas produced and amount of energy generated from landfill gas	100% landfill gas produced from landfill is utilised to generate energy.	SO5	Policy JWP6	LPAs, EA, Waste Industry	Facility Operation Reports	Annual

Theme	Indicator	Targets / Milestones	Related Objective	Related Policy	Responsibility	Source	Frequency
	Quantity of inert excavation waste deposited for beneficial use	0% of inert excavation waste is disposed of.	SO8	Policy JWP6	LPAs, EA, Waste Industry	Planning Applications, WDI, EA landfill records	Annual

Appendix 2 – List of Safeguarded Sites

Notes:

- Sites also safeguarded as wharves in the London Plan for water borne freight handling uses are marked with an asterisk
- Sites included in Appendix 4 as future development options are marked with a double asterisk.

Abbreviations

- CLEUD = Certificate of Lawful Existing Use or Development
- WTS = Waste Transfer Station
- MBT = Mechanical Biological Treatment Facility

London Borough of Barking and Dagenham

Location	Operator	Facility Type[63]	Grounds for safeguarding
2 Chequers Lane (B&D 02)	MMS Supplies Limited	Non-Haz Waste Transfer	Planning consent
2 Choats Road (B&D 03)	SUC Exc UK Ltd	Physical Treatment	CLEUD
12-14 River Road (Alexander Wharf)* (B&D 14)	ELG Metals UK Ltd	Metal Recycling	CLEUD
40 A&B River Road, Media Park (B&D 08)	SH & WS Company Limited	Non Haz Waste Transfer / Treatment	CLEUD
54-60 River Road (B&D 24)	Cory Barking Operations Ltd	Non-Haz Waste Transfer	Planning consent
72-76 River Road, Docklands Wharf Transfer Station (B&D 16 and B&D 40)*	S. Norton & Co. Ltd / Multi Services Kent Ltd	Metal Recycling / Haz Waste Transfer	Planning consent
75 - 77 Chequers Lane (B&D 25)	R White Waste Management Ltd	Haz Waste Transfer	Planning consent
Barking Transfer Station, 40 New Free Trade Wharf (B&D 27)	Suez Recycling & Recovery Ltd	Non-Haz Waste Transfer	Planning consent
Barking Waste Transfer and Recycling Facility, Maybell Farm (B&D 28)**	Biffa Waste Services Ltd	Non-Haz Waste Transfer	Planning consent

63 Site type based on Environment Agency permitting categories, and sites identified as waste transfer may be conducting treatment as well.

Location	Operator	Facility Type[63]	Grounds for safeguarding
Creek Road Waste Management Facility (B&D 06)	Workrate Ltd	Non-Haz Waste Transfer	Planning consent
Dagenham Dock Aggregate Recycling Facility (B&D 07)	Heidelberg Material UK	CDE Recycling Facility	Planning consent
Dagenham Plastics Recycling Facility (B&D 20)	Veolia E.S. (UK) Limited	Non Haz Waste Transfer / Treatment	Planning consent
Eastern Works, Alfred's Way (B&D 04)**	Creek Metals Limited	Metal Recycling	CLEUD
Frizlands Lane Reuse & Recycling Centre (B&D 31)	ELWA / Biffa	Non-Haz Waste Transfer	Planning consent
Halyard Street (B&D 21)	Cemex UK Material Ltd	Inert and Non Haz Waste Transfer / Treatment	Planning consent
Hindmans Way (Olleco) (B&D 36)	Stolthaven Dagenham Ltd	Treatment of non-hazardous waste	Planning consent
Hitch Street AD Plant (B&D 18)	ReFood UK Limited	Anaerobic Digestion	Planning consent
Hunts Wharf, Perry Road (B&D 17)*	HKS Dagenham Ltd	Metal Recycling	Planning consent
Kingsbridge Road (B&D 22)	G & S Tyre Services Limited	Non-Haz Waste Transfer	Planning consent
London Sustainable Industries Park North, Dagenham (B&D 32)	Thames Gateway Waste to Energy Ltd	Energy Recovery	Planning consent
Organic Waste Treatment Facility, Dagenham Dock, Choats Road (B&D 19)	East London Biogas Opco limited	Anaerobic Digestion	Planning consent
Perry Road Recycling Facility (B&D 11)	Recycled Material Supplies Ltd.	CDE Waste Physical Treatment Facility	Planning consent
Perry Road, off Chequers Lane (B&D 30)	Edwards Waste Paper Ltd.	Non-Haz Waste Transfer	Planning consent
Renwick Road Rail Hub, Barking (B&D 39)	Biffa	Non-Haz Waste Road to Rail Transfer only (N.B. no management capacity)	CLEUD
Thunderer Road (B&D 09 and 10)	Neptune Contract Services Ltd	CDE Waste Physical Treatment Facility	Planning consent

Location/Site Name	Operator	Facility Type	Grounds for safeguarding
5 Salamons Way (HV 30)	May Glass Recycling Ltd	Glass Recycling Facility	Planning consent
10 Salamons Way (HV 31)	Stokevale Ltd	Glass Recycling Facility	Planning consent
Albright Industrial Estate, Units 6A, 6B & 6 (HV 01)	Albright Transfer Station Ltd	Non-Haz Waste Transfer	Planning consent
B & P Scrap Co. Ltd New Road, Wennington (HV17)	City Metals Recycling Limited.	Non-Haz Waste Transfer	CLEUD
Car Breakers Yard, 2 Oaks, Broxhill Road (HV 07)	Randall, John t/a Randalls Car Dismantlers	Vehicle depollution facility	CLEUD
Centenary Works (HV 12)	F J Church & Sons Ltd	CDE Waste Physical Treatment Facility	Planning consent
Ferry Lane South WTF (HV 10)	Adler & Allan Limited	Non-Haz Waste Transfer	Planning consent
Frog Island MBT (HV 22) and WTS (HV 23)	ELWA/Biffa	Biological Treatment / Non-Haz Waste Transfer	Planning consent
Frog Lane, Off Marsh Way (HV 13)	Andrews Waste Management Ltd	CDE Waste Physical Treatment Facility	Planning consent
Gerpins Lane Reuse & Recycling Centre (HV 21)	ELWA / Biffa	CA Site	Planning consent
Grove Farm, Brook Street, Brentwood (HV 03 & HV34)	R J Skip Hire Ltd / South East Metals Ltd	Non-Haz Waste Transfer / Metal Recycling	Planning consent via Appeal against Enforcement Notice
Rainham Clinical Waste Treatment Centre (HV 14)	Sharpsmart Ltd	Clinical Waste Transfer	Planning consent
Rainham MRF Coldharbour Lane (HV 15 & 26)	Veolia ES Cleanaway (UK) Limited	Material Recycling Facility	Planning consent
Rainham Recycling Facility (HV 05)	Brett Aggregates Ltd.	CDE Waste Physical Treatment Facility	Planning consent
Riverside Sewage Treatment Works	Thames Water	Wastewater treatment facility	Planning consent
Silt Lagoons, Rainham and Wennington Marshes (HV 27)	Land & Water Remediation Limited	CDE Waste Physical Treatment Facility	Planning consent
Off Crow Lane (HV11)**	Crow Metals	Metal Recycling	Planning consent

Land At York Road, Rainham (HV 04)**	Kilnbridge Construction Services Ltd	Recycling and Waste Transfer Facility & Depot	Planning consent
Plot 22 Albright Industrial Estate (HV 28)	Excel Waste Management Ltd	Non-Haz Waste Transfer	Planning consent
Unit 7, Albright Industrial Estate, Ferry Lane (HV 09 & HV 20)	C T Wakefield & A Wakefield t/a Pier Metals / G&S Waste Management Ltd	Metal Recycling / Vehicle depollution facility / CDE Waste Physical Treatment Facility	Planning consent
Unit 13 Swift Business Park, Creek Waye (HV 19)	Citron Hygiene UK Ltd	Clinical Waste Transfer	Planning consent
Upminster Sewage Treatment Works	Anglian Water	Wastewater treatment facility	Planning consent

London Borough of Newham

Location/Site Name	Operator	Facility Type	Grounds for safeguarding
5, Eastbury Road Beckton (N14)	Terra Firma Pipeline Limited	Inert Waste Transfer	Lawful over time
Oasis Park, Stephenson Street (N 05)	Powerday Plc	Non-Haz Waste Transfer	Planning consent
Beckton Sewage Treatment Works (N 18)	Thames Water	Wastewater treatment facility	Planning consent
Bywaters Recycling & Recovery Centre, Unit J Prologis Park (N 11)	Bywaters (Leyton) Ltd	Material Recycling Facility	Planning consent
Canning Town Depot (N 01)	Pulse Environmental Limited	CDE Waste Physical Treatment Facility	Planning consent
9a Cody Business Centre, South Crescent Canning Town (N 08)	The Remet Company Limited	Metal Recycling	Lawful over time
EMR Silvertown, Unit 6, Standard Industrial Estate (N 09)	EMR	Metal Recycling	Planning consent
Jenkins Lane Reuse and Recycling Centre (N 15)	ELWA/Biffa	Household Waste Amenity Site	Planning consent
Jenkins Lane Waste Management Facility (N 16)	ELWA/Biffa	Biological Treatment	Planning consent
Knights Road, E16 2AT (N 02)*	JRL Environmental Limited	CDE Waste Physical Treatment Facility	Lawful over time
London Teleport Site Pier Road, Newham (N 17)	The Metal Recycling Company	Metal Recycling	Planning consent
Marshgate Sidings (N 03)	D B Schenker/D B Cargo	CDE Waste Physical Treatment Facility	Lawful over time

Marshgate Sidings (N 04)	S Walsh & Son Limited	Inert Waste Transfer	Lawful over time
Plaistow Wharf (N 06)*	Keltbray Environmental Ltd	Non-Haz Waste Transfer	Planning consent

London Borough of Redbridge

Location/Site Name	Operator	Facility Type	Grounds for safeguarding
45-47, Roebuck Road, Hainault Business Park (RB 04)	G & B Compressor Hire Ltd	Non-Haz Waste Transfer	Planning consent
Chigwell Road Reuse and Recycling Centre (RB 07)	ELWA / Biffa	Household Waste Amenity Site	Planning Consent
Ilford Recycling Centre (RB 08)**	ELWA / Biffa	Household Waste Amenity Site	Planning Consent
Ley Street Depot (RB 05)	Redbridge London Borough Council	Non-Haz Waste Transfer	Lawful over time
Unit U, Pegasus Works (RB 01)	N R M Metal Recycling Limited	Metal Recycling	Planning Consent

Appendix 3 – Maps of Safeguarded Sites (see Separate Document)

Included in separate document due to file size

Appendix 4 – Longer Term Development Options

Borough	Site Name	Reason	Assessed Capacity			Planning Status	Potential trigger for release
			Apportioned Waste	C, D & E Waste	Hazardous		
Barking & Dagenham	Barking Waste Transfer and Recycling Facility (Biffa) (B&D 28)	Located within Castle Green site allocation subject to masterplan	108,712	0	0	Permanent Permission for Waste Transfer Station (89/00279/TP)	Redevelopment of housing or other non waste uses proposed in accordance with Castle Green masterplan, which is expected to be developed in 2026/27
	Alfred's Way, Barking (Creek Metals) (B&D 04)	As above	0	27,091	0	Change of use including end of life vehicle scrapping (2013)	Redevelopment of housing or other non waste uses proposed in accordance with Castle Green masterplan, which is expected to be developed in 2026/27
Havering	Off Crow Lane, Romford (Crow Metals) (HV 11)	Potential for re-location for longer term regeneration aims of the area	25,436	245	4,320	Permanent Permission for recycling, processing, storage and distribution of scrap metal (P0962.11)	The future of this site will be considered as part of the New Havering Local Plan and future site allocations.
	Land At York Road, Rainham (Kilnbridge Construction Services Ltd) (HV04)	This site does not fall in a designated employment use area. Therefore there is potential for re-location for longer term	0	44,593	0	Permanent Permission as use as Recycling and Waste Transfer Facility & Depot (P1524.00)	The future of this site will be considered as part of the New Havering Local Plan and future site allocations.

		regeneration aims of the area.					
Redbridge	Ilford Recycling Centre (Renewi UK Services Ltd)	May not be required for ELWA contract	20,000	0	0	Permanent Permission (1847/94)	Redevelopment to be considered if site not required to service future ELWA waste management contract
		Totals:	**176,276**	**128,576**	**4,320**		

Appendix 5 – Replacement of Policies in the East London Waste Plan

The table below shows how the polices in the 2012 East London Waste Plan are replaced by those in the East London Joint Waste Plan

East London Waste Plan (2012) Policies		**Replacement Policies in the East London Joint Waste Plan**	
W1	Sustainable waste management	JWP1	Circular Economy
W2	Waste Management Capacity, Apportionment & Site Allocation	JWP2	Safeguarding and Provision of Waste Capacity
		JWP2B	Safeguarding and Provision of Wastewater Treatment Capacity
		JWP3	Prevention of Encroachment
W3	Energy recovery facilities	JWP5	Energy from Waste
W4	Disposal of inert waste by landfilling	JWP6	Deposit of Waste on Land
W5	General Considerations with regard to Waste Proposals	JWP4	Design of Waste Management Facilities