

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-194	London Borough of Tower Hamlets		Reg19-E-194/002	Waste and Utilities	W1 Waste management capacity														The primary aim of submitting this representation is to seek further information specifically regarding the proposed release of safeguarded land for waste management at Beckton Riverside. There appears to be a discrepancy between Newham’s draft plan (Regulation 19) this aspect would be welcomed.		<p>Comment noted. This comment has been subject to further discussion with the London Borough of Tower Hamlets and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report.</p> <p>Both parties are satisfied that the plan remains sound without these changes.</p>

Waste and Utilities Comments

Reg19-E-194	London Borough of Tower Hamlets		Reg19-E-194/020	Waste and Utilities	W1 Waste management capacity			3											<p>3. Matters requiring clarification</p> <p>Policy W1 of Newham’s Regulation 19 Plan sets out the borough’s strategic approach to waste management, including safeguarding sites for waste management. Point 3 of the policy indicates that ‘existing waste sites within Newham will be safeguarded and should be retained in waste management use’. We welcome that safeguarding and note that the safeguarding of all waste sites in Newham is in accordance with the draft East London Joint Waste Plan (ELJWP), which does not identify any sites in Newham for release from waste safeguarding.</p> <p>However, it is noted that the clear protection in the wording of the policy itself, Implementation Point W1.3 explains that the land at Beckton Riverside that is safeguarded for waste management in the adopted 2012 East London Waste Plan is no longer being safeguarded. This appears to be at odds with both the adopted East London Waste Plan, and the emerging (Regulation 18) ELJWP, neither of which identify Beckton Riverside for release from safeguarding. It is unclear what evidence has been provided to justify such a release.</p> <p>London Plan Policy SI8 expects boroughs with a surplus of waste sites to offer to share these sites with those boroughs facing a shortfall in capacity before considering site release. Tower Hamlets is facing a shortfall in capacity and explained this to officers from LB Newham and the other members of the East London Joint Waste Planning Group in meetings in early 2023. We are keen to continue to work with Newham (alongside the other boroughs within the ELJWPG) to ensure that the approaches taken in our respective plans (as well as the East London Joint Waste Plan which is being progressed concurrently) remain in conformity with the adopted London Plan.</p> <p>As you will be aware, Tower Hamlets provided a detailed representation to the Regulation 18 consultation on the ELJWP (dated 16 September 2024), which sets out in detail the shortfall Tower Hamlets is facing and how much capacity should be allocated from the East London boroughs.</p> <p>We consider that the release of safeguarded waste sites – as a strategic matter - is best addressed through the ELJWP, particularly as it is currently going through the plan-making process.</p>	<p>Comment noted. This comment has been subject to further discussion with the London Borough of Tower Hamlets and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report.</p> <p>Both parties are satisfied that the plan remains sound without these changes.</p>
Reg19-E-194	London Borough of Tower Hamlets		Reg19-E-194/024	Waste and Utilities	W1 Waste management capacity														<p>We have noted where further clarification would be welcomed around the proposed release of safeguarded waste sites in Beckton Riverside on the basis that this appears to be in conflict with the emerging East London Joint Waste Plan.</p>	<p>Comment noted. This comment has been subject to further discussion with the London Borough of Tower Hamlets and a satisfactory resolution has been found. This is set out in more detail in a Statement of Common Ground, included in the updated Duty to Cooperate Report.</p> <p>Both parties are satisfied that the plan remains sound without these changes.</p>

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Reg19-E-194	London Borough of Tower Hamlets		Reg19-E-194/025	Waste and Utilities	W1 Waste management capacity														We consider that releasing safeguarded waste sites is best addressed through the ELJWP and we welcome further discussion of waste management as part of that process.		Comment noted.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/003b		W1 Waste management capacity														1.21 Furthermore, St William notes and welcomes the recommendation outlined within the evidence base for the East London Joint Waste Plan for the removal of the Schedule 2 Waste Allocation sites meaning Beckton Riverside is no longer identified as a potential waste site for strategic waste management.		Support noted.
Reg19-E-218	IXDS	RPS	Reg19-E-218/042	Waste and Utilities	W1 Waste management capacity			2.b			Yes	No						Yes	<p>Mayer Parry Recycling Ltd (29 Bidder Street, London, E16 4SZ) is identified on the policies map as a site which was identified in the Evidence Base for the East London Joint Waste Plan and which therefore warrants continued protection as a waste site under Policy W1.</p> <p>Whilst the Mayer Parry site has previously been identified as a safeguarded waste site, the evidence base for the East London Joint Waste Plan (including the ‘Assessment of Existing Waste Management Capacity’) (July 2024) does not identify the Mayer Parry site as a site which needs to be protected to safeguard East London’s waste processing capacity. In confirming this status, the site is also not identified in the Regulation 18 Consultation Draft East London Joint Waste Plan (July 2024).</p> <p>The same applies to the neighbouring waste site of P M C Soil Solutions Ltd.</p> <p>As such, the protected status of the Mayer Parry Recycling Ltd and P M C Soil Solutions Ltd sites pursuant to Policy W1, as shown on the policies map, does not align with the emerging East London Joint Waste Plan and this protected status should be removed from both sites.</p>	<p>Policies Map changes:</p> <p>Remove ‘Mayer Parry Recycling Ltd 29 Bidder Street Canning Town London E16 4SZ’ from the Policy W1 designation within the policies map.</p>	<p>The Council notes the proposed modification. This is not considered necessary for soundness, as Policy W1 contains caveats around the list of existing waste sites being updated as the Joint Waste Plan refresh is progressed. However, the Council understands the reasons for the proposal and considers an update to the list of safeguarded waste sites, reflecting the safeguarded sites list in the draft East London Joint Waste Plan, could improve the clarity of policy W1 and the site allocations.</p> <p>Therefore, if the Inspector considers the draft Joint Waste Plan has sufficiently progressed to update the site allocation and policies map, the Council would be supportive of these modifications being made.</p>
Reg19-E-218	IXDS	RPS	Reg19-E-218/043	Waste and Utilities	W1 Waste management capacity			2.b			Yes	No						Yes	<p>[The same applies to the neighbouring waste site of P M C Soil Solutions Ltd. As such, the protected status of the Mayer Parry Recycling Ltd and P M C Soil Solutions Ltd sites pursuant to Policy W1, as shown on the policies map, does not align with the emerging East London Joint Waste Plan and this protected status should be removed from both sites.]</p>	<p>[Policies Map changes:</p> <p>Remove ‘Mayer Parry Recycling Ltd 29 Bidder Street Canning Town London E16 4SZ’ from the Policy W1 designation within the policies map.]</p> <p>Remove ‘P M C Soil Solutions Soil Management Facility’ from the Policy W1 designation within the policies map.</p>	<p>The Council notes the proposed modification. This is not considered necessary for soundness, as Policy W1 contains caveats around the list of existing waste sites being updated as the Joint Waste Plan refresh is progressed. However, the Council understands the reasons for the proposal and considers an update to the list of safeguarded waste sites, reflecting the safeguarded sites list in the draft East London Joint Waste Plan, could improve the clarity of policy W1 and the site allocations.</p> <p>Therefore, if the Inspector considers the draft Joint Waste Plan has sufficiently progressed to update the site allocation and policies map, the Council would be supportive of these modifications being made.</p>

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Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/47	Waste and Utilities	W1 Waste management capacity														W1: Waste management capacity Ballymore recognises the importance of ensuring sufficient waste capacity across London and ensuring existing waste management sites are safeguarded. The Connaught Riverside site allocation contains an existing metal recycling facility which isn't compatible with residential development required by the draft site allocation, therefore facility must be relocated to ensure the successful redevelopment of the site. As long as this relocation is carried out in accordance with London Plan Policy SI9 in regard to compensatory capacity, there should be no objection to the relocation of this facility in policy terms, however, this would conflict with the current drafting of policy W1. We therefore suggest the policy is updated to reflect the requirements of the London Plan in this regard.	However, Part 3 of the draft policy states 'Existing waste management sites within Newham will be safeguarded and should be retained in waste management use', we suggest including ' unless allocated for strategic redevelopment '.	A change to this policy approach has not been made, as the policy is in conformity with the London Plan and effective. We did not consider this change to be necessary as the policy would not preclude the provision of compensatory capacity for the existing waste site on the site allocation. This is accounted for under policy W1.4, which states that developments that would reduce or undermine the continued or enhanced use of an existing waste site will only be supported where appropriate compensatory capacity is made within London, and the site allocation, which requires the maximum throughput of Connolly's Yard/Jighand Ltd. waste site needs to be re-provided, either within the site boundary or elsewhere within London. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-065	Stratford Original BID		Reg19-E-065/010	Waste and Utilities	W3 Waste management in developments						Blank	Blank						Blank	[Following our participation to two consultation events where we shared our feedback, I further submit a summary of points we discussed around the Local Plan. Most of the points do endorse Newham Local Plan Neighbourhoods/Inclusive Economy. There are some additional recommendations as expansion to existing points (i.e. Inclusive economy, J1 and active frontages). None of the following points challenge or question the soundness and legal ground of local plan review. These are as follows:] - Waste management plan		Comment noted.

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Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/079	Waste and Utilities	W3 Waste management in developments			W3.3				No							<p>Policy W3 Waste management in developments</p> <p>12.2 St William continues to support the overarching principle of Policy W3 which is to ensure new housing developments provide sufficient and accessible space to separate and store dry recyclables, organics and residual waste for collection and ensure there is sufficient waste management processes in place.</p> <p>12.3 As noted previously, St William has some concern with the requirements of Part 3 which requires major housing developments on site allocations to provide a well-managed re-use and circular economy room, where residents can leave items for other residents to collect and reuse and/or which residents can use as a space for tool sharing. The principle of such a facility is supported but its provision will be down to whether there is sufficient space to accommodate such a use. This is particularly heightened by the new fire regulation requirements for a second stair core which is placing further pressure on floorplates and the various requirements of residential development. St William therefore request that the wording of this part of the policy is updated to either include ‘where possible or feasible’ or ‘are strongly encouraged to provide’.</p>	<p>[Appendix 12: General Policies – Suggested amendments]</p> <p>3. Major residential developments on site allocations should provide a well-managed reuse and circular economy room, where residents can leave items for other residents to collect and reuse and/or which residents can use as a space for tool sharing, where feasible.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as it is considered that there should be sufficient space available on site allocations to deliver these requirements, recognising they are the largest sites available in the borough and subject to masterplanning requirements. The addition of 'where feasible' would dilute this requirement, which will be considered as part of the planning balance on individual planning applications. This change would undermine delivery of the Local Plan objective to deliver people-friendly neighbourhoods with green and clean streets council. The Council is satisfied that the plan remains sound without the proposed changes.</p>
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/080	Waste and Utilities	W3 Waste management in developments			W3.4				No							<p>12.4 Part 4 maintains its requirement for developments to provide only one waste management solution or technology on site [and Part 8 outlines the requirements for an automated vacuum waste collection system which is required from certain site allocations including Beckton Riverside and Bromley by Bow]. As currently drafted, St William consider these requirements to be onerous and unjustified. There is often instances where more than one waste management solution is needed and is the most effective solution for a site, particularly large scale sites or sites that have a mix of tenures. Constraining a site to one waste management solution and indeed prescribing that waste management solution does not enable site solutions to be considered on a site by site basis.</p>	<p>[Appendix 12: General Policies – Suggested amendments]</p> <p>4. Developments should provide only one waste management solution or technology on site.</p>	<p>The Council’s objective for this policy approach is to ensure efficient servicing of the largest site allocations in the borough. If managed inefficiently these sites could result in significantly worse air quality, as a result of excessive vehicle numbers associated with traditional or private waste collection methods, as well as poor waste management solutions for future residents.</p> <p>However, the Council recognises the importance of ensuring the Plan is effective and has therefore made the following wording change which is included in the modification table:</p> <p>Only one type of refuse vehicle should be needed to service a site. For example, if a development proposes an underground storage of waste, this should be the only waste management solution across a development to allow for efficient servicing by a suitable collection vehicle. If a development site is unable to deliver a single waste management solution on site, the Council’s waste and recycling team should be contacted as early as possible to discuss whether they agree with this assessment and the most suitable alternative waste solution for the site.</p>

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Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/081	Waste and Utilities	W3 Waste management in developments			W3.8				No							<p>[Part 4 maintains its requirement for developments to provide only one waste management solution or technology on site] and Part 8 outlines the requirements for an automated vacuum waste collection system which is required from certain site allocations including Beckton Riverside and Bromley by Bow. [As currently drafted, St William consider these requirements to be onerous and unjustified. There is often instances where more than one waste management solution is needed and is the most effective solution for a site, particularly large scale sites or sites that have a mix of tenures. Constraining a site to one waste management solution and indeed prescribing that waste management solution does not enable site solutions to be considered on a site by site basis.]</p> <p>12.5 With regards to the requirement for an automated vacuum waste collection system on both the Twelvetrees Park and Bromley by Bow site allocation and the Beckton Riverside site allocation, the policy should make clear that this requirement should be subject to a feasibility study to ascertain whether it is possible. The provision of an automated vacuum waste collection system is typically only suitable for large scale masterplans i.e. once the entire site allocation has been built out and usually for developments in the region of c. 10,000 homes. The only known examples in London are at Wembley and Barking Riverside.</p> <p>12.6 As is acknowledged within the site allocations, these sites will come forward as phased development and in the case of Beckton Riverside for example the first phase of development only resembles a small portion of the wider Beckton Riverside area with huge uncertainty over the timescales for the rest of the wider allocation coming forward. There are significant upfront costs associated with bringing forward an automated vacuum waste collection system and in the context of the exceptional abnormal costs associated with gasworks sites and the significant constraints these sites have to contend with the additional cost associated with such a system would simply place an additional burden on the viability of these developments further delaying delivery of much needed new housing (particularly affordable housing).</p> <p>12.7 At this stage, the most appropriate waste collection system is one that can service the phase coming forward at the time hence St William’s request to remove this requirement or adjust the wording to only require an exploration of the feasibility of delivering such as system.</p>	<p>[Appendix 12: General Policies – Suggested amendments]</p> <p>8. Developments that propose alternative waste management technologies, including those site allocations that require the delivery of an automated vacuum waste collection system, should be discussed at an early stage of design with the waste and recycling team. Automated vacuum waste collection systems should be able to collect dry recyclables, organics and residual waste as separate streams.</p>	<p>This wording change is not supported. We did not consider this change to be necessary as the requirement to deliver automated vacuum waste collection systems is effective and justified. The Local Plan's objective to create a healthier Newham will be, in part, facilitated through policies that seek to minimise vehicle emissions, including those that result from inefficient waste management solutions on development sites. Schemes which have been permitted will still be able to be implemented and all future planning applications will be subject to case-by-case assessment during the development management process.</p> <p>The Council is satisfied that the plan is sound without the proposed changes.</p>
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/082	Waste and Utilities	W3 Waste management in developments							No							<p>12.8 As currently drafted, St William consider the requirements of Parts 3, 4 and 8 of this policy to be unjustified and therefore failing to meet the soundness tests set out in the NPPF.</p>		<p>Comments noted. Responses to the comments made on the respective clauses are provided above.</p>
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/074	Waste and Utilities	W3 Waste management in developments														<p>The waste management policy is supported as it requires an appropriate level of information to be submitted alongside applications.</p>		<p>Support noted.</p>

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Reg19-E-010	London Borough of Redbridge		Reg19-E-010/004	Waste and Utilities															We support the changes to the changes to Policies W1, W3 and W4, as it is considered that they do not affect the overall core waste policies in the Plan.		Support noted.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/117	Waste and Utilities															No comment.		Comment noted.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/078	Waste and Utilities															12 Waste and utilities 12.1 St William remains committed to helping to achieve sustainable development goals and recognises that as a business they have a very important role to play in the process. St William fully supports the need for local policies to help ensure waste is reduced and managed in a sustainable manner.		Support noted.