



East London Joint Waste Plan

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Submission

Schedule of Proposed Minor Modifications

Version: 4.0

Date: 14.01.26

Project: East London Joint Waste Plan

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Minor modifications are proposed to the text of the Submission Draft of the East London Joint Waste Plan. The proposed minor modifications are non-material changes to the plan which do not affect its overall soundness or the way policies are interpreted/applied in practice. The proposed minor modifications are set out the schedule (and Appendix) below and proposed for several reasons including the following:

- Improve clarity of meaning
- Making sure terminology is consistent
- Factual updates
- Updating maps or diagrams where they contain small drafting errors or omissions.
- Cross-referencing or formatting changes
- Corrections to spelling and grammar

The minor modifications below are expressed either in the conventional form of ~~strikethrough~~ for deletions and underlining for additions of text, or by specifying the modification in words in italics.

Proposed changes to hyperlinks and footnotes are expressed with the use of square brackets – []

Abbreviations:

EA – Environment Agency

PLA – Port of London Authority

Ref	Page	Policy/Para	Proposed Minor Modification	Reason
	Throughout	Throughout	Where not included add '(2021)' after "London Plan"	Clarification. All references to the London Plan relate to the London Plan 2021.

Ref	Page	Policy/Para	Proposed Minor Modification	Reason
	Throughout	Throughout	Where paragraphs are proposed for insertion/deletion, updates to paragraph reference numbers are proposed to ensure sequential numbering.	To ensure sequential paragraph numbering.
	7	Addition of a new paragraph 1.7 (between paragraph 1.6 and the current 1.7)	<p>New paragraph:</p> <p><u>Whilst the ELJWP guides how and where waste may be managed in East London, the actual management of waste (including Local Authority Collected Waste) is often undertaken by private sector waste management companies, sometimes under contract to a local authority and sometimes as purely commercial operations. In deciding how to manage waste, these companies take account of other regulatory and market influences, as well as customer requirements, such as the need for flexibility and resilience, value for money, service quality, social value and environmental impacts including greenhouse gas emissions.</u></p>	Clarification. Waste industry responds to a number of signals (including market) when developing new capacity. (in response to ELWA)
	18	Table 4b	Plaistow Wharf (<u>included in the Peruvian Wharf safeguarding direction</u>)	Clarification. Peruvian Wharf is included in the GLA Safeguarding Direction (in response to the PLA)
	18	2.10	<p>Add new paragraph to follow paragraph 2.10:</p> <p><u>As well as green spaces, river systems run through each borough and function as crucial networks for ecological connectivity and biodiversity. Many waterbodies across the catchment are designated Sites of Importance for Nature Conservation, Sites of Metropolitan Importance for Nature Conservation, and SSSIs. As rivers provide</u></p>	Clarification to Plan's context regarding aquatic systems and river corridors as ecological networks (in response to EA)

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			<u>critical habitat and migration paths for multiple species, these aquatic systems are crucial to support. There is a need for continued preservation and long-term management of both green and blue areas within the Plan area, as well as consideration of potential effects on sites outside the Plan area boundary.</u>	
	21	2.24	<p>Add new sentence at the end of paragraph 2.24:</p> <p><u>The Environment Agency has prepared guidance setting out the types of development that it would object to in areas of groundwater sensitivity (e.g. Source Protection Zones).</u></p> <p>Add footnote: See Environment Agency's Position Statements E1 and F1 on the Environment Agency's Approach to Groundwater Protection.</p>	Clarification on groundwater protection (in response to the EA)
	21	2.24	<p>New paragraph to be inserted as para. 2.24:</p> <p><u>Under regulation 33 of the Water Framework Directive (WFD), the Boroughs have a legal responsibility to have regard for the Thames River Basin Management Plan, which in turn has a legal responsibility to ensure that there is no deterioration in the ecological status of any RBMP water body or of its associated elements. The Boroughs therefore have a legal responsibility to avoid the deterioration of RBMP water bodies and their associated elements, and to support their enhancement objectives and measures. These Borough responsibilities are reinforced by the London Plan (2021) Policy SI 5 D1 (page 356).</u></p>	Clarification on groundwater protection (in response to the EA)

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	23	2.32	<p>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. <u>There is also risk of tidal flooding within the Thames Estuary 2100 (TE2100) Barking and Dagenham and Royal Docks Policy Unit Boundaries, the objectives of the TE2100 Plan and Joint Thames Strategy (Thames Strategy East) and riverside strategy approaches will be a consideration when assessing planning applications.</u></p>	Clarification regarding the Thames Estuary 2100 Plan concerning tidal flooding (in response to the EA)
	24	2.36	<p><u>665</u> sites are safeguarded by this Plan for waste management uses and their location is shown in Figure 4 below.</p>	Factual update (In response to GLA)
	50	2.129	<p>Deletion of paragraph 2.129: 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.</p>	Factual update. (in response to ELWA)

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	59	Between 6.1 and 6.2 - new paragraph	<u>All policies within the East London Joint Waste Plan are identified as Strategic Policies, noting their importance in delivering cross-boundary waste management infrastructure.</u>	To comply with paragraph 21 of the NPPF
	68	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.	Factual update (In response to Stantec obo Barking Riverside)
	70	6.32	Additional sentence to be added to Paragraph 6.32: <u>Any revised London Plan definition of 'waste site' will be taken into account through a subsequent review of the ELJWP.</u>	Minor clarification in response to GLA representation
	75	JWP2 Clause 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:.....2. result in <u>an increase in the throughput of an existing waste management facility</u> and 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;	Clarification. (in response to ELWA)

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	77	JWP2 Clause D	<p>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:....4. The proposal will:....iv. avoid creating an <u>unacceptable</u>due impact on the amenity associated with 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,.....vi. for operations which generate bioaerosols (like composting), be situated at least 250m from sensitive receptors <u>or be fully contained within a building.</u></p>	Clarification (in response to ELWA)
	77	JWP2 Clause D	<p>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:.....</p> <p>5. In the following priority order, the proposal is situated:</p> <p>i. On a safeguarded existing waste site; or</p> <p>ii. where it is demonstrated that the use could not be located on an existing safeguarded waste site, in a Strategic Industrial Location (SIL), <u>including a safeguarded wharf</u>; or</p>	Clarification on safeguarded wharves (in response to PLA).
	85	6.72	<p>Add new paragraph 6.72 to follow paragraph 6.71</p> <p><u>6.72 Applications resulting in the loss of wastewater treatment capacity will need to demonstrate they accord with relevant strategic objectives of the development plan and would not undermine the implementation of the AMP process.</u></p>	Clarification (in response to Thames Water)
	88	6.80	New paragraph to follow Para 6.80	

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			<p><u>When considering sensitive development, such as residential uses, close to the Sewage Treatment Works, a technical assessment should be undertaken by the developer. The technical assessment should be undertaken in consultation with the responsible water and sewerage undertaker. The technical assessment should confirm that either: (a) there is no unacceptable amenity impact on future occupiers of the proposed development or; (b) the development can be conditioned and mitigated to ensure that any potential for unacceptable amenity impact is avoided.</u></p>	Clarification on the implementation of JWP3 in response to Thames Water
	89	Policy JWP4 (Purpose)	To ensure waste management (including wastewater treatment) facilities are designed in a manner that protects and enhances host communities and the local environment <u>(including the water environment)</u> which includes having regard to the need for climate change mitigation and adaptation	Clarification in response to the EA
	91	Policy JWP4	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):.... <u>12. impacts to utility assets and infrastructure networks; and,</u> <u>132. measures to control and reduce vehicle impacts including:....</u>	To ensure new development does not adversely impact utility assets and infrastructure networks (in response to National Grid)
	93	6.95	Add new paragraph to follow paragraph 6.95: <u>The use of SuDS should take account of Environment Agency guidance, in particular Section G of the Environment Agency's</u>	Clarification on EA guidance, in response to the EA

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			<u>Approach to Groundwater Protection. Where infiltration SuDS are proposed in Source Protection Zone 1 (SPZ1) for anything other than clean roof drainage, a hydrogeological risk assessment must be undertaken to ensure no unacceptable risk to groundwater sources.</u>	
	93	6.99	<p>The Transport Assessment should illustrate <u>the following:</u></p> <p><u>i. accessibility to the site by all modes <u>for the waste being delivered to and/or exiting the site; including the opportunities for the waste to be transported by water and rail; and</u></u></p> <p><u>ii. accessibility for persons accessing the site, such as staff and visitors, proposed measures to improve access or mitigate transport impacts using public transport, walking and cycling; and,</u></p> <p><u>iii. for the site as a whole, 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.</u></p>	To clarify requirements associated with the submission of a Transport Assessment, emphasising consideration of rail and water transport (in response to PLA).
	93 and 94	6.100 and 6.101	<p>6.100 Proposals should reference the use of Direct Vision Lorries for waste vehicles or the use of freight operators who can demonstrate their commitment to TfL's Freight Operator Recognition Scheme (FORS) or similar.</p> <p>6.101 Transport for London's (TfL) Direct Vision Standard (DVS) for HGVs should be applied and freight operators should demonstrate their</p>	Clarification in response to London Cycling Campaign

Ref	Page	Policy/Para	Proposed Minor Modification	Reason								
			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. <u>All operators will be expected to achieve at least 4 out of 5 stars within the DVS standard.</u>									
	124	Appendix 4, totals row	<table border="1"> <tr> <td>Totals:</td> <td>176,276</td> <td>128,576</td> <td>4,320</td> </tr> <tr> <td></td> <td>154,148</td> <td>71,929</td> <td></td> </tr> </table>	Totals:	176,276	128,576	4,320		154,148	71,929		Mathematical error correction
Totals:	176,276	128,576	4,320									
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	3 (appendix 3)	Appendix 3 – Site ref. B&D 14	Change to the site area: 0.675 shown in the site particulars for 12-14 River Road (Alexander Wharf) See Appendix 1 of this schedule	Factual update to site area in response to PLA								

Appendix 1 – Proposed Changes to Maps in Appendix 3

Change to the area of 12-14 River Road (Alexander Wharf) (reference B&D 14):

Site name: Ref: B&D 14	12-14 River Road (Alexander Wharf)
Borough:	Barking and Dagenham
Site address:	12-14 River Road, Barking, Essex, IG11 0DG
OS grid reference:	TQ 45377 82670
Site size (ha):	0.675
Location map:	

