



## East London Joint Waste Plan

### Publication Stage Representation Form

East London Joint Waste Plan

**Please return to Havering Town Hall, RM1 3BD by 30 June 2025.**

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<https://consultation.havering.gov.uk/planning/east-london-joint-waste-plan-regulation-19>

#### **Part A – Contact Details**

	<b>Personal details*</b> <small>*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in the second column.</small>	<b>Agent details (if applicable)</b>
<b>Title</b>		
<b>First Name</b>	Ngaire	
<b>Last Name</b>	Thomson	
<b>Job Title</b> (where relevant)		
<b>Organisation</b> (where relevant)	Port of London Authority	
<b>Address</b> Please include post code	London River House	
<b>Telephone Number</b>		
<b>Email address</b>		

<b>In which local authority do you live?</b>	<input type="checkbox"/> Barking and Dagenham <input type="checkbox"/> Havering <input type="checkbox"/> Newham <input type="checkbox"/> Redbridge <input type="checkbox"/> Other Local authority <input checked="" type="checkbox"/> I am responding on behalf of an organisation
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**Part B - Your representation (please use a separate sheet for each representation you wish to make)**

**Name or Organisation: Port of London Authority (PLA)**\_\_\_\_\_

**1. Which part of the East London Joint Waste Plan does this representation relate to? (Please be as specific as possible)**

Policy	Vision and Objectives	Implementation Text / Paragraph / Table / Figure / Policies Map	

**2. Do you consider the East London Joint Waste Plan: (please tick as appropriate)**

a. Legally compliant	Yes	✓	No	
b. Sound	Yes	✓	No	
c. Complies with Duty to Cooperate	Yes	✓	No	

**3. Please give details of why you consider the Waste Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.**

The PLA continues to support the following statement in the Vision '*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.*'

The PLA continues to strongly support the Strategic Objective 7:

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.

Reason: the PLA supports both the Vision and Objective 7 as they recognise the important role of River Thames and the safeguarded infrastructure in providing the opportunity for sustainable and safe methods of transport. They are also in line with London Plan policy SI15 which encourages the use of the River to transport freight of all kinds.

**Part B - Your representation (please use a separate sheet for each representation you wish to make)**

**Name or Organisation: Port of London Authority (PLA)**

**1. Which part of the East London Joint Waste Plan does this representation relate to? (Please be as specific as possible)**

Policy	JWP 2 and supporting text	Implementation Text / Paragraph / Table / Figure / Policies Map	

**2. Do you consider the East London Joint Waste Plan: (please tick as appropriate)**

a. Legally compliant	Yes	✓	No	
b. Sound	Yes	✓	No	
c. Complies with Duty to Cooperate	Yes	✓	No	

**3. Please give details of why you consider the Waste Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.** If you wish to support the legal compliance or soundness of the Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The PLA agrees with the statements made in Paragraphs 6.46 and 6.48, which support Policy JWP2, that recognise London Plan Policy SI 8 B 4(c ) that requires Development Plans to identify safeguarded wharves with an existing or future potential for waste and secondary material management as suitable locations to manage borough waste apportionments.

This is not mentioned in the Policy itself, and we strongly recommend that safeguarded wharves should be mentioned in Section D 5 of Policy JWP2 (Safeguarding and Provision of Waste Capacity), as set out in the proposed wording below:

D5 ii where it is demonstrated that the use could not be located on an existing safeguarded waste site, in a Strategic Industrial Location (SIL), including a safeguarded wharf; or ...

Amending the wording in this manner will also tie Policy JWP2 in with the Vision and Objectives of the Waste Plan.

**Part B - Your representation (please use a separate sheet for each representation you wish to make)**

**Name or Organisation: Port of London Authority**\_\_\_\_\_

**1. Which part of the East London Joint Waste Plan does this representation relate to? (Please be as specific as possible)**

<b>Policy</b>	<b>Policy JWP3 Prevention of Encroachment</b>	<b>Implementation Text / Paragraph / Table / Figure / Policies Map</b>	

**2. Do you consider the East London Joint Waste Plan: (please tick as appropriate)**

<b>a. Legally compliant</b>	<b>Yes</b>	✓	<b>No</b>	
<b>b. Sound</b>	<b>Yes</b>	✓	<b>No</b>	
<b>c. Complies with Duty to Cooperate</b>	<b>Yes</b>	✓	<b>No</b>	

**3. Please give details of why you consider the Waste Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.**

The PLA continue to support policy JWP3 Prevention of Encroachment, specifically the reference to the Agent of Change principle to ensure that existing safeguarded waste management facilities are safeguarded from nearby development that may limit or hinder their operation.

This is also consistent with Paragraph 200 of the NPPF and London Plan Policies D13 Agent of Change; Policy SI 9 Safeguarded Waste Sites; and SI 15 Water Transport.

**Part B - Your representation (please use a separate sheet for each representation you wish to make)**

**Name or Organisation: Port of London Authority (PLA)**\_\_\_\_\_

**1. Which part of the East London Joint Waste Plan does this representation relate to? (Please be as specific as possible)**

<b>Policy</b>	<b>Policy JWP4 Design of Waste Management Facilities</b>	<b>Implementation Text / Paragraph / Table / Figure / Policies Map</b>	

**2. Do you consider the East London Joint Waste Plan: (please tick as appropriate)**

<b>a. Legally compliant</b>	<b>Yes</b>	✓	<b>No</b>	
<b>b. Sound</b>	<b>Yes</b>	✓	<b>No</b>	
<b>c. Complies with Duty to Cooperate</b>	<b>Yes</b>	✓	<b>No</b>	

**3. Please give details of why you consider the Waste Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.**

The PLA in principle supports Policy JWP4 Design of Waste Management Facilities, including part A11 which states that proposals for waste management development will only be permitted where preference is given to non-road transport where practicable.

To strengthen this aspect of the Policy it is considered that a greater level of specificity be added in the supporting text to provide developers with better detail on what they should provide in a Transport Assessment and ensure that the use of non-road transportation has been considered as part of the design of waste management facilities within the ELJWP area. This would then ensure that an assessment of rail/river transportation opportunities are included in the Transport Assessment discussed in paragraphs 6.98 and 6.99, which would ensure that the Transport Assessment is consistent with the intent of Policy JWP4 and other aspects of the Waste Plan.

The wording for paragraph 6.99 is confusing, therefore a suggested reworking of the paragraph is provided in the next section to separate out the requirements of the Transport Assessment and ensure that the assessment of the waste transportation occurs separately from the assessment of persons accessing the site.

**Part B - Your representation (please use a separate sheet for each representation you wish to make)**

**Name or Organisation: Port of London Authority (PLA)\_\_\_\_\_**

**1. Which part of the East London Joint Waste Plan does this representation relate to? (Please be as specific as possible)**

Policy	Appendix 3	Implementation Text / Paragraph / Table / Figure / Policies Map	Maps

**2. Do you consider the East London Joint Waste Plan: (please tick as appropriate)**

a. Legally compliant	Yes		No	✓
b. Sound	Yes	✓	No	
c. Complies with Duty to Cooperate	Yes	✓	No	

**3. Please give details of why you consider the Waste Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.**

Several of the maps depicting Safeguarded Wharves are incorrect and therefore not legally compliant as the wharves are safeguarded under Town And Country Planning Act 1990 the Town and Country Planning (Development Management Procedure) (England) Order 2015 Direction Under Article 18(4).

The following matters need to be addressed (this is copied in Section 4 of this response).

Pinns Wharf 18 River Rd., Barking IG11 0DH in Barking and Dagenham has not been included in the Appendix, this was requested in the Regulation 18 response.

[safeguarding\\_direction\\_pinns\\_wharf.pdf](#)

It needs to be made clear throughout the document that Plaistow Wharf is included in the Peruvian Wharf Safeguarding Directions – the following amendments are suggested:

Table 4b of the main document– add underlined text:

Plaistow Wharf (included in the Peruvian Wharf safeguarding direction)

Appendix 3 - Plaistow Wharf is part of the Peruvian Wharf Safeguarding Direction please add the following text to the information provided regarding the wharf

Included in the Peruvian Wharf safeguarding direction

Also please check that the wharves identified as safeguarded sites in Appendix 3 match in area / extent to the GLA Safeguarding Directions.

Royal Primrose Wharf also in Newham which is 1.49ha is the Safeguarding Direction and 1.35ha in Appendix 3.

[safeguarding\\_direction\\_royal\\_primrose\\_wharf.pdf](#)

Rippleway Wharf in Barking and Dagenham which 4.13ha in the Safeguarding Direction and 4.08ha in Appendix 3.

[safeguarding\\_direction\\_rippleway\\_wharf.pdf](#)

Alexander Wharf which is 0.65ha in the Safeguarding Direction and 0.67 in Appendix 3.

[safeguarding\\_direction\\_alexander\\_wharf.pdf](#)

**4. Please set out the modification(s) you consider necessary to make the East London Joint Waste Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above.** (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Waste Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Proposed modification Table 4b – add underlined text:

Plaistow Wharf (included in the Peruvian Wharf safeguarding direction)

Proposed modification – add underlined text to Policy JWP 2 D5 (ii)

Policy JWP2: Safeguarding and Provision of Waste Capacity

D 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), including a safeguarded wharf; or
- iii. where it is demonstrated that the use could not be located in a SIL, in a Local Industrial Location (LIL) as appropriate.

- Proposed modification as mentioned in the previous section of the representation to provide greater clarity of what the Transport Assessment should include.
- Suggested re-wording/ reorganisation of Paragraph 6.99, supporting text for Policy JWP4 Design of Waste Management Facilities, additional text is underlined:

Paragraph 6.99

The Transport Assessment should illustrate the following:

- i. accessibility to the site by all modes for the waste being delivered to and/or exiting the site; including the opportunities for the waste to be transported by river and rail; and
- 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
- iii. for the site as whole; the likely modal split of journeys to and from the site, impacts to the transport network, 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.

### Proposed modifications - Appendix 3

The previous response to the Regulation 18 consultation by the PLA listed a number of wharves that should have been included in the then Appendix 2 now Appendix 3 while the Appendix has been updated the following matters need further modification:

- Pinns Wharf 18 River Rd., Barking IG11 0DH in Barking and Dagenham should be included in Appendix 3.

#### safeguarding\_direction\_peruvian\_wharf.pdf

- Plaistow Wharf is part of the Peruvian Wharf Safeguarding Direction please add the following text to the information provided regarding the wharf

Included in the Peruvian Wharf safeguarding direction

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Also please check that the wharves identified as safeguarded sites in Appendix 3 match in area / extent to the GLA Safeguarding Directions.

Discrepancies include:

- Royal Primrose Wharf also in Newham which is 1.49ha is the Safeguarding Direction and 1.35ha in Appendix 3.

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- Rippleway Wharf in Barking and Dagenham which 4.13ha in the Safeguarding Direction and 4.08ha in Appendix 3.

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- Alexander Wharf which is 0.65ha in the Safeguarding Direction and 0.67 in Appendix 3.

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**Please note** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make

submissions. **After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

**5. If your representation is seeking a modification, do you consider it necessary to participate in examination hearing session(s)? (please tick as appropriate)**

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

**Please note** that while this will provide an indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

**6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**7. Do you wish to be notified about:**

a. the submission of the Joint Waste Plan for independent examination

Yes  No

b. the publication of the Inspector's report

Yes  No

c. the adoption of the Joint Waste Plan

Yes  No

*If you have further questions about the consultation, please get in touch with the team at  
eljointwasteplan@havering.gov.uk*