Representator ID	Title	First Name	Last Name	What is your organisation? (where relevant)	Which part of the East London Joint Waste Plan does this representation relate to? (Please be as specific as possible). - Policy number	Which part of the East London Joint Waste Plan does this representation relate to? (Please be as specific as possible). - Implementation Text / Paragraph / Table / Figure / Policies Map	Do you consider the East London Joint Waste Plan to be legally compliant? - legally compliant	Do you consider the East London Joint Waste Plan to be sound? - select yes or no	Do you consider the East London Joint Waste Plan complies with Duty to Cooperate? - select yes or no	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 Cooperate. - please type your comments in the text box below	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 above. - please type your comments in the text box below	If your representation is seeking a modification, do you consider it necessary to participate in examination hearing session(s)? - (please select as appropriate). - yes / no	If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. - please type your comments in the text box below	Do you wish to be notified about the submission of the Joint Waste Plan for independent examination?	Do you wish to be notified about the publication of the Inspector's report?	Do you wish to be notified about the adoption of the Joint Waste Plan?
24	Ms.	Ann-Marie	Ashton	BornEverywhereRoadentsNewham			Yes	Yes	Yes			No, I do not wish to participate in hearing session(s)		Yes	Yes	Yes
2	Mr.	Barbara	Holland-Davies	N/A			Yes	Yes	Yes	It seems to me that the only certain way to stop flytippers & those wishing to avoid paying to dispose of rubble etc at no cost, is to make getting rid of unusable or non-recyclable items is to secure funding to make it cost free for all. The unscrupulous dealers, builders or waste removal companies do not then have a scam to build on or lie about. Wherever waste requires removal, its retention should be allocated into specific places by a government or council-run department, ensuring there is no likelihood of fumes or leaks, and health & safety measures are observed. There should be a standard provision for this type of cleaning up after renovations, refurbishments and new builds, which are classified as regular conditions in a society. The huge extra benefit of unsavoury characters losing their chance of taking a payment for removal of such waste, as it is dealt with free of charge by a proper department, will save police time, council enforcement officers' involvement, threats to honest workmen and fly tipping. It would no longer exist. Please consider the sense on so many levels, of this idea. Thank you.	Compliance to the new idea is the only thing required.	No, I do not wish to participate in hearing session(s)		No	Yes	Yes
43	Mr	Ian	Macdonald				Yes	Yes	Yes			No, I do not wish to participate in hearing session(s)		Yes	Yes	Not Answered
25	Mr	Elliott	Day				Yes	Yes	Yes	While I agree the East London Joint Waste Plan has followed the required process and statutory consultation duties, I am concerned that its effectiveness may be undermined in practice. In my local area, persistent fly-tipping and limited enforcement activity suggest that current waste infrastructure and operational strategies are insufficient. If the Plan does not include realistic measures to address these on-the-ground issues or lacks adequate mechanisms for monitoring and enforcement, it may not be effective in delivering its objectives.	To ensure the East London Joint Waste Plan is both sound and effective, I recommend a clear and measurable policy commitment to proactive local enforcement and infrastructure delivery to tackle fly-tipping and unauthorised waste disposal. Specifically, the Plan should be amended to include: "Each borough shall set out and publish an annual enforcement strategy aligned to the objectives of the Joint Waste Plan, including performance metrics on fly-tipping response times, prosecutions or penalties issued, and public awareness campaigns." This addition would enhance the effectiveness of the Plan (per NPPF para. 16c(c)) and provide transparency and accountability at borough level, where implementation gaps currently risk undermining the Plan's delivery. While the Joint Waste Plan sets strategic direction, real-world impact will depend on local execution—an area currently under-addressed in the submission draft. Without a measurable mechanism for addressing visible waste and fly-tipping in public spaces, the Plan risks being disconnected from the on-the-ground reality for residents and failing to secure public confidence.	Yes, I wish to participate in hearing session(s)	I wish to participate in the examination hearing session(s) to provide further detail on why the Plan's effectiveness may be undermined in practice without explicit commitments to local enforcement and infrastructure to reduce fly-tipping and unauthorised waste. I believe the Inspector would benefit from hearing direct resident evidence about gaps in implementation and public confidence, which are not fully addressed in the written Plan but are essential for its deliverability and soundness under NPPF paragraph 35. My contribution would be constructive and focused on ensuring the Plan is realistically enforceable and publicly credible.	Yes	Yes	Yes
3	Mr	Eddie	Dee				Yes	Yes	Yes			No, I do not wish to participate in hearing session(s)		No	No	No
12	Mrs	Karla	Ndomahina		Policy JWP6: Deposit of Waste on Land	Risk associated with extraction of Landfilled waste would have to be weighed against the risks of leaving such wastes where they are. [EIA6A]	No	No	No	There is a 'Growth Area' under development stretching from the West Bounday of Abbing just Wouth of A13 stretching alongside the River Thames to Rainham station. There are new ten thousands of units planned. There are two landfill sites close to those sites. The emissions of the landfill side will add to the existing emissions. New landfill sides should be planned closer to where the rubbish is produced. If that is not possible new facilities should be located away from new planned developments. The area of the site could be rather be used for the much needed social infrastructure for the new development which is not developed prior or parallel to the developments.	The landfill site should be located further away from ambitious planned new Growth Areas.	No, I do not wish to participate in hearing session(s)		Yes	Yes	Yes
4	Mr	Gary	Fair				Not Answered	Not Answered	Not Answered		Does this plan make it easier for residents to dispose of unwanted house hold and garden waste ? Since the Gerpins lane site has implemented the van and trailer once a month booking scheme, it means more trips to dispose of garden waste, This is evident by the amount of waste dumped in the surrounding lanes / area.	No, I do not wish to participate in hearing session(s)		Yes	Yes	Yes
42	Mr	Trevor	Pugh	Western Riverside Waste Authority		Sites identified for release	Yes	No	Yes	Current waste sites should not be released as there is an overall shortage of capacity across London. recent and proposed reform to government waste policies and the commitment to promoting a circular economy will require more land use for a wider variety of waste management services eg re-use hubs. This can not be readily provided by increasing the intensity of existing sites many of which are constrained by adjacent more modern mixed use development.	Remove the list of sites proposed to be released.	No, I do not wish to participate in hearing session(s)		No	Yes	No
13	Ms	Victoria	Bullock	Stantec	Policy JWP1: Circular Economy – Supporting text para 6.24, Policy JWP2: Prevention of Encroachment, Policy JWP6: Energy from Waste, Section 8: Glossary		Yes	No	Yes	The New Outline Planning Application (NOPA) for Barking Riverside is supported by an Environment Statement ('ES'), which considers all operational sites as part of the baseline for the Environmental Impact Assessment. The ES also assesses the suitability of the Site against existing noise sources, and provides a qualitative assessment of effects to future residents, confirming that these can be mitigated through design. In short, the NOPA is not anticipated to place constraints on existing safeguarded sites. We reiterate our previous representations to the Regulation 18 version that the Agent of Change principle should also apply to new waste sites or those where intensification or changes to waste operations are proposed, to ensure no adverse impacts on the occupants of Barking Riverside or other existing / consented development in proximity to such waste sites. Policy JWP3 should be amended to make clear that new or expanded operations should have regard to impacts on existing and future residential occupiers (where consent has been secured, or allocated as such through the LBBD Local Plan) and be designed and mitigated accordingly. The Agent of Change definition in the Glossary (Section 8) should be updated to reflect this. Policy JWP6: Energy from Waste should make clear that the restrictions set out, including the waste used as fuel will be waste that cannot be reused, recycled, or composted, and the use will be consistent with the proximity principle and not result in long distance vehicle movements, would apply only to new EfW facilities, and not to existing permissions or operations. Supporting text at para 6.24 makes specific reference to the Enviac system at Barking Riverside, including the types of waste it deals with and the number of inlets. We note that this description is based on current material's collected (i.e. it does not reference the potential collection of food waste via Enviac). This is based on the original masterplan for Barking Riverside which has been subject to various amendments, and we therefore restate our request that reference to specific figures is removed as these are no longer accurate.	Policy JWP3 should be amended to make clear that new or expanded operations should have regard to impacts on existing and future residential occupiers (where consent has been secured, or allocated as such through the LBBD Local Plan) and be designed and mitigated accordingly. Policy JWP6: Energy from Waste should make clear that the restrictions set out would apply only to new EfW facilities, and not to existing permissions or operations. We would recommend that the Agent of Change definition in the Glossary is amended as follows (additions underlined): 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 (including residential development where consent has been secured, or allocated as such through the LBBD Local Plan). Reference to specific figures at para 6.24 should be removed as these are no longer accurate.	No, I do not wish to participate in hearing session(s)	n/a	Yes	Yes	Yes
14	Mr	Zara	Lalubeeli	Thames Gateway Waste to Energy	JWP2	Safeguarding and Provision of Waste Capacity	Yes	No	Yes		Our main objective is to continue the development of our energy from waste site - however due to financial obligations we need to consider alternative uses for the site. Our site has remained undeveloped for over 10 years and has never received waste. The LSP has changed its primary use to B2,B8 and has rebranded as an industrial park with the new partners SEGRO.	Yes, I wish to participate in hearing session(s)	We will be making a definitive decision on the direction of development in Q3 2025 on whether we can definitely deliver the project or whether we have to consider an alternative development for the site.	Yes	Yes	Yes
11	Ms	Laura	Treagus	Surrey County Council			Yes	Yes	Yes			Not Answered		Yes	Yes	Yes
8	Mrs	Angela	Steward	London Borough of Lewisham		General comment about the whole plan	Yes	Yes	Yes	Thank you for providing Lewisham Council an opportunity to comment on your East London Joint Waste Plan. Whilst Lewisham Council falls outside of the geographical area covered by this Plan, all London Boroughs, as Duty-to-Cooperate partners, have the responsibility to address strategic matters across London. Particularly, the matter of waste arising across London being accommodated in a sustainable manner. We note that your Joint Waste Plan (in paragraph 5.1) states that there is sufficient waste management capacity in East London to meet requirements for C, D & E Waste and HIC over the plan period and that the Plan: does not allocate specific areas of land for the development of additional waste management facilities; safeguards specific sites for waste uses (in Appendix 2) and contains Policy JWP2 that sets out the circumstances when proposals for additional waste management capacity might be acceptable; identifies existing waste sites for redevelopment (in Table 9) in Borough Plans for non-waste uses; and identifies additional existing waste management sites which might make good candidates for redevelopment for non-waste uses in the future (in Appendix 4), as 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. On the basis that the East London Joint Waste Plan is not asking other waste groups across London to accommodate their waste arisings and that they can accommodate their apportionment within the confines of London Boroughs of Barking and Dagenham, Havering, Newham and Redbridge, we support the approach taken in the East London Joint Waste Plan. For clarity, the London Borough of Lewisham does not have spare capacity within its waste facilities to take on additional waste arisings, beyond that already accommodated within the South East London Joint Waste Planning Group. Best wishes for your emerging East London Joint Waste Plan as you progress towards submission.	n/a	No, I do not wish to participate in hearing session(s)	n/a	Yes	Yes	Yes
6	Ms.	Hannah	Booker	Be First	JWP2	Paragraphs 1.124 - 2.110 (Pages 49 and 50), Paragraph 6.33 (Page 71);	Yes	No	Yes	Please refer to the PDF version of the Regulation 19 representation for ELWA, referenced as representation 6 in the full schedule of representations.	Please refer to the PDF version of the Regulation 19 representation for ELWA, referenced as representation 6 in the full schedule of representations.	Yes, I wish to participate in hearing session(s)	ELWA would be happy to participate in the examination hearing so as to enable full consideration of the importance of public authorities being able to discharge statutory duties cost-effectively, and how planning policy can and should provide a local framework that supports and acknowledges this requirement.	Yes	Yes	Yes
7	Ms	Tessa	Saunders	Anglian Water Services Ltd		2.54	Yes	Yes	Yes	We welcome the reference to Anglian Water in terms of wastewater treatment for our Upminster water recycling centre (WRC) in Havering. The paragraph could explain that each Water and Sewerage Company (WaSC) has to prepare a Drainage and Wastewater Management Plan (DWMP) which utilises robust future forecasts of both housing and population growth in their respective regions, using the best available planning information. Anglian Water's DWMP growth demand forecast model is designed to produce growth forecasts in alignment with our Water Resources Management Plan 2025-2050 and the Water Resources East regional plan water forecasting processes. We are currently working on producing the next DWMP for 2030-2055 which will be published in 2028.		No, I do not wish to participate in hearing session(s)		Yes	Yes	Yes
7	Ms	Tessa	Saunders	Anglian Water Services Ltd		Vision	Yes	Yes	Yes	Anglian Water is supportive of the ELWP vision. As a water and sewerage undertaker, our role is essentially linked to the water cycle and the circular economy is a fundamental element of how we can most efficiently and effectively treat and manage waste whilst delivering on our purpose to bring environmental and social prosperity to the region. We are committed to using renewable energies to minimise our carbon footprint to become a net zero business by 2030. We support the circular economy, as getting to net zero is highly reliant on a sustainable, low-carbon approach to treating and recycling our sludge through our bioresource activities. Anglian Water's Circular Economy Delivery team focuses on redefining our waste streams to view them as opportunities to recycle, sell, or reuse wherever possible.		No, I do not wish to participate in hearing session(s)		Yes	Yes	Yes
7	Ms	Tessa	Saunders	Anglian Water Services Ltd	Policy JWP2B: Safeguarding and Provision of Wastewater Capacity		Yes	Yes	Yes	Anglian Water supports this specific policy that clearly safeguards existing wastewater treatment works as a specific waste infrastructure typology, and provides the criteria for new capacity. We are also pleased to note that the list of safeguarded sites now extend to wastewater treatment works (water recycling centres) as identified in Appendices 2 and 3. This new policy ensures that such facilities are recognised for the essential infrastructure services they provide to East London. Paragraph 6.62 is partly correct in that investments in wastewater treatment capacity are identified in the Business Plans for each five-year AMP period. However, the Drainage and Wastewater Management Plan (DWMP) will inform this process and provide medium and long term strategies for each wastewater treatment catchment over a 25 year period. The policy appears to provide the breadth of scope to allow a range of different wastewater treatment technologies and infrastructure to come forward, as there will also be environmental drivers for some infrastructure enhancements on site, not only additional capacity arising from growth in employment and housing in East London - for example through our Water Industry National Environment Programme (WINEP). In addition, there are a range of permitted development rights that apply to these sites, which means that planning consent will not always be required.	Correction: Criterion D should reference Policy JWP3 not Policy JWP4	No, I do not wish to participate in hearing session(s)		Yes	Yes	Yes
7	Ms	Tessa	Saunders	Anglian Water Services Ltd	Policy JWP 3 Prevention of Encroachment		Yes	Yes	Yes	Anglian Water agrees with the need to have some form of encroachment policy or waste consultation zone around specific waste sites, and now wastewater treatment facilities are included in the list of safeguarded sites, we are supportive of the policy. As identified in our Reg. 18 response, the encroachment buffer for our water recycling centres (WRCs) is generally risk assessed by us according the to the size of the works and the population it serves. As identified in paragraph 6.76, a 250m encroachment buffer would be considered appropriate for our Upminster WRC.		No, I do not wish to participate in hearing session(s)		Yes	Yes	Yes
7	Ms	Tessa	Saunders	Anglian Water Services Ltd	Policy JWP4: Design of Waste Management Facilities		Yes	No	Yes	Anglian Water notes that some of the aspects of providing new or upgraded wastewater capacity will be governed by other permitting regimes, such as the Environment Agency. In terms of the treated wastewater discharges from our WRCs, the parameters are set by the discharge permit and monitored to ensure compliance for water quality. Anglian Water aims to become net zero by 2030 for operational carbon and reduce our capital (embodied) carbon by 70% against a 2010 baseline by the same date. We recognise that process emissions are more challenging to address. Our Long Term Delivery Strategy identifies that as part of our Net Zero sub-strategy we will invest at 17 of our largest sites to reduce fugitive emissions and drive down overall process emissions by 2030, with larger targeted reductions in process emissions by 2035, and further reductions in subsequent asset management periods (AMPs) until 2050 through new treatment processes. This illustrates our commitment to playing our part to support the delivery of national net zero targets and ensure our treatment processes do not emit greenhouse gases such as methane and nitrous oxide. We support the requirement for the efficient use of water, and this helps to reduce the volume of wastewater treated at our WRCs - saving energy. We also support the requirement for climate adaptation measures to ensure developments are resilient and resistant to flood risk and the use of sustainable drainage systems to manage surface water flood risk appropriately and in accordance with the Lead Local Flood Authority guidance. Our water recycling centres are identified as less vulnerable development that may be located in flood zones 1, 2 and 3a. Our capital investments to upgrade and enhance wastewater treatment capacity at our sites are carried out by our Strategic Alliances which cover several civil engineering companies to deliver a wide range of our infrastructure schemes across our region. We are also actively recruiting apprentices to help deliver our ambitious AMP8 programme. This presents a wide range of employment opportunities across Anglian Water and our partner alliances, however, we are concerned that these opportunities may be constrained by clause B of the policy, that may hamper the timely delivery of critical infrastructure. This does not provide the flexibility required to align with our operating and delivery models which have been established over a number of years, and ensure that our £11 billion Business Plan for AMP8 can be delivered.	Anglian Water suggests that Clause B is worded more positively to encourage the use of local supply chains and local employment opportunities but without tying in our capital investment delivery into a model which might not necessarily align - even though there are a range of employment opportunities across our business and alliances. When reviewing Havering's Local Plan, the equivalent policy (Policy 22 Skills and Training) refers to commercial, residential or mixed use development. Therefore, we do not agree that Policy JWP2 should broaden the remit of this policy to cover the delivery of critical wastewater treatment infrastructure, particularly when we have one WRC within the ELWP area and its catchment extends wider into Brentwood and Thurrock. We suggest the clause is modified, as follows: B. Proposals for development will be favourably considered where they 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 of the development.	No, I do not wish to participate in hearing session(s)		Yes	Yes	Yes