



East London Joint Waste Plan

# Regulation 22 Consultation Statement

## Submission

Date: 17.12.25

**Barking &  
Dagenham**

 **Havering**  
LONDON BOROUGH

 **Newham London**

London Borough of  
**Redbridge** 

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## Abbreviations

<b>AD</b>	Anaerobic Digestion	<b>GLA</b>	Greater London Authority	<b>PLA</b>	Port of London Authority
<b>AMP</b>	Asset Management Plan	<b>HGV</b>	Heavy Goods Vehicle	<b>PPG</b>	Planning Practice Guidance
<b>BAT</b>	Best Available Techniques	<b>HIC</b>	Household, Commercial and Industrial waste	<b>RBMP</b>	River Basin Management Plan
<b>BNG</b>	Biodiversity Net Gain	<b>IIA</b>	Integrated Impact Assessment	<b>RDF</b>	Refuse Derived Fuel
<b>BREEAM</b>	British Research Establishment Environmental Assessment Method	<b>LACW</b>	Local Authority Collected Waste	<b>RRF</b>	Rainham Recycling Facility
<b>CDE</b>	Excavation	<b>LBBD</b>	London Borough of Barking and Dagenham	<b>SA</b>	Sustainability Appraisal
<b>CEEQUAL</b>	Civil Engineering Environmental Quality Assessment and Award Scheme	<b>LBN</b>	London Borough of Newham	<b>SAC</b>	Special Area of Conservation
<b>CHP</b>	combined heat and power	<b>LBTH</b>	London Borough of Tower Hamlets	<b>SIL</b>	Strategic Industrial Location
<b>CLEUD</b>	Certificate of Lawful Existing Use Development	<b>LIL</b>	Local Industrial Location	<b>SPZ</b>	Source Protection Zone
<b>CLOCS</b>	Construction Logistics and Community Safety	<b>LLDC</b>	London Legacy Development Corporation	<b>SRN</b>	Strategic Road Network
<b>DPD</b>	Development Plan Document	<b>LP2021</b>	London Plan 2021	<b>SSSI</b>	Site of Special Scientific Interest
<b>DVS</b>	Direct Vision Standard	<b>MBT</b>	Mechanical Biological Treatment	<b>STW</b>	sewage treatment works
<b>EIA</b>	Environmental Impact Assessment	<b>MHCLG</b>	Ministry of Communities, Housing and Local Government	<b>SoCG</b>	Statement of Common Ground
<b>ELJWP</b>	East London Joint Waste Plan	<b>MMO</b>	Marine Management Organisation	<b>SuDS</b>	Sustainable Drainage Systems
<b>ELJWPG</b>	East London Joint Waste Planning Group	<b>MPS</b>	Marine Policy Statement	<b>WDI</b>	Waste Data Interrogator
<b>ELWA</b>	East London Waste Authority	<b>NGET</b>	National Gas and Energy Transmission	<b>WFD</b>	Waste Framework Directive
<b>ELWP</b>	East London Waste Plan	<b>NPPF</b>	National Planning Policy Framework	<b>WLWP</b>	West London Waste Plan
<b>EWG</b>	European Waste Code	<b>NPPG</b>	National Planning Practice Guidance	<b>WRC</b>	water recycling centre

# 1 Introduction

## Purpose

- 1.1 This Consultation Statement has been prepared to support the submission of the East London Joint Waste Plan (ELJWP) 2025–2041, in accordance with Regulation 22(1)(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012. It sets out how the four East London Boroughs of Barking & Dagenham, Havering, Newham and Redbridge have involved the community, residents, and stakeholders in preparing the ELJWP, and how this engagement meets the requirements of the relevant legislation and the East London Joint Waste Plan Consultation Protocol.
- 1.2 This Statement provides an overview of the consultation activities at each stage of plan preparation, including which bodies and persons were invited to make representations under Regulation 18 and Regulation 19, how they were invited, a summary of the main issues raised, and how those issues have been addressed in the plan.
- 1.3 By documenting the consultation process and responses, this Statement demonstrates that the ELJWP has been prepared in accordance with the Boroughs' ELJWP Consultation Protocol and statutory requirements. This statement will accompany the ELJWP Submission Plan as evidence of the consultation undertaken and demonstrate that the Plan's preparation was transparent and legally compliant.

## Background

- 1.4 The ELJWP is a joint Development Plan Document setting the planning strategy and policies for sustainable waste management across the four boroughs up to 2041. It is a statutory requirement to maintain an up-to-date waste plan and once adopted the new ELJWP will replace the previous East London Joint Waste Plan (adopted in 2012) which covered the period up to 2021. This will ensure the boroughs continue to have an up-to-date policy framework for meeting their waste planning obligations in line with national policy and the London Plan.
- 1.5 Public consultation on the emerging ELJWP has been carried out in two main stages. The Regulation 18 Draft Plan was subject to public consultation from 29 July to 16 September 2024. Comments received during this first stage were carefully considered and incorporated into the Regulation 19 Submission ELJWP. The Submission Plan was then published for representations on the Plan's soundness and legal compliance over six weeks between 19 May and 30 June 2025.

- 1.6 A jointly agreed ELJWP Consultation Protocol was prepared setting out the Boroughs' approach to consultation on the ELJWP. This Consultation Protocol was informed by, and aligned with, each Borough's Statement of Community Involvement. An updated Consultation Protocol was updated to accompany the publication of the Submission Draft ELJWP.

## Structure of the Consultation Statement

- 1.7 This Consultation Statement comprises four sections as follows:

- Section 1 – Introduction (this section), providing background on the ELJWP, an overview of the consultation approach and outlining the purpose of this document.
- Section 2 – Plan preparation timeline, summarising the key stages and milestones in the production of the ELJWP, in accordance with the Boroughs' Local Development Schemes.
- Section 3 – Summary of the consultation process, describing the methods of engagement and consultation activities undertaken at each stage (Regulation 18 and Regulation 19).
- Section 4 – Summary of the main issues raised by consultees during the Regulation 18 and Regulation 19 consultations, and how those comments have been considered by the Boroughs. Section 4 is supported by appendices providing detailed schedules of the representations received and the Boroughs' responses for each consultation stage.

## 2 Plan Production Timeline

2.1 The preparation of the ELJWP has followed a number of key stages, from initial evidence gathering through public consultations to submission. Figure 1 below outlines the main stages of plan production, in line with each Borough's Local Development Scheme.

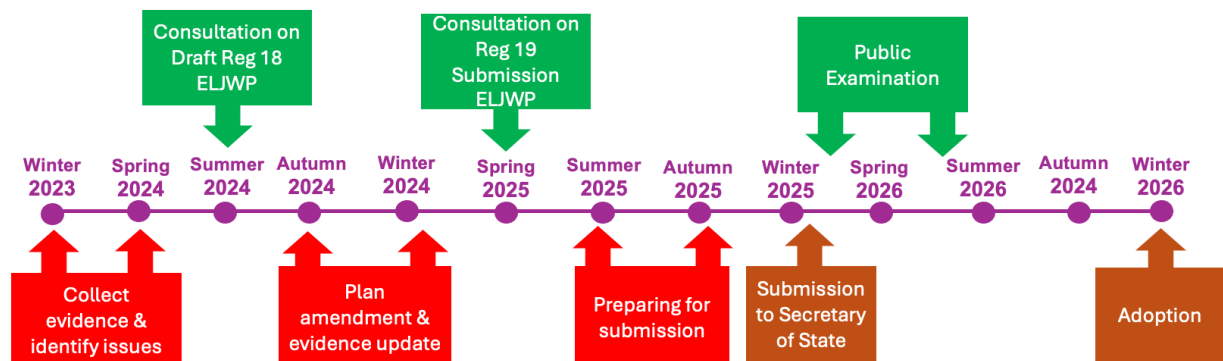


Figure 1: Plan Making Process Timeline

### Key Plan Production Stages

#### Stage 1: Identify issues and collect evidence (Late 2023 – Spring 2024)

- 2.2 In 2023, the four East London boroughs agreed to jointly update the adopted 2012 East London Waste Plan. Preparatory work for the new plan involved reviewing the adopted East London Waste Plan policies and relevant policies in each Borough's Local Plan, as well as reviewing national and regional policy (including the National Planning Policy Framework, the National Planning Policy for Waste, and the London Plan 2021).
- 2.3 A comprehensive Waste Needs Assessment was undertaken to determine how much existing waste management capacity meets projected requirements over the plan period (including London Plan waste apportionment targets). From this evidence, the Boroughs identified the key issues to address in the new ELJWP and developed a draft vision, strategic objectives, and planning policies to guide waste management to 2041. Draft supporting text was also prepared to justify the policies and explain how they will be implemented in practice.
- 2.4 An Integrated Impact Assessment Scoping Report was prepared and the following bodies were consulted on its contents including the Sustainability Objectives:
- Environment Agency
  - Natural England
  - Historic England

## **Stage 2: Draft Local Plan consultation – July-September 2024**

- 2.5 Following initial meetings with key stakeholders (GLA and ELWA) to discuss the content and scope of the ELJWP, the Boroughs published the first full draft of the ELJWP for public consultation under Regulation 18 for a seven-week period from Monday 29 July to Monday 16 September 2024.
- 2.6 An evidence base was published alongside the draft ELJWP. A full list of the documents published is included below:
- Draft East London Joint Waste Plan (July 2024)
  - Draft East London Joint Waste Plan (July 2024) - Appendix 2 (Site Maps)
  - Integrated Impact Assessment for the ELJWP
  - Habitats Regulations Assessment for the ELJWP
  - Circular Economy Topic Paper
  - Climate Change Topic Paper
  - Waste Management Topic Paper
  - Assessment of Existing Waste Management Capacity Report
  - Hazardous Waste Baseline and Arisings Report
  - Construction, Demolition, & Excavation Waste Baseline and Arisings Report
  - Strategic Waste Flows Report
  - Release of Safeguarded Waste Sites Report
  - ELJWP Consultation Protocol
- 2.7 This evidence base provided the justification for the draft policies. The public and other stakeholders were invited to comment on any aspect of the draft ELJWP during this period. (The consultation methods for this stage are detailed in Section 3 below).

## **Stage 3: Plan amendments and evidence update – October 2024 to January 2025**

- 2.8 Following the Regulation 18 consultation on the draft ELJWP, the Boroughs reviewed and considered all comments received. To reflect new information and address issues raised, the evidence base studies were updated as necessary and this included revisions to the Integrated Impact Assessment, the waste capacity assessment and the assessment of sites proposed for release from safeguarding.
- 2.9 The Draft ELJWP was then updated to take account of the consultation feedback and to ensure the next version would be sound i.e. positively prepared, justified, effective, and consistent with national policy. This stage resulted in the preparation of the Regulation 19 Submission ELJWP.

## **Stage 4: Publish the Plan for representations (Regulation 19) – May to June 2025**

- 2.10 In accordance with Regulation 19 of the plan making regulations, the East London Boroughs published the Submission Draft ELJWP for formal representations on its soundness and legal compliance. This publication stage consultation was a statutory, formal stage lasting a minimum of six weeks. The Regulation 19 consultation invited the public and other stakeholders to submit representations addressing whether the Plan meets the tests of soundness (positively prepared, justified, effective, and consistent with national policy) and legal plan making requirements. Details of this publication stage and how representations were invited are provided in Section 3. The comments received at this stage are often termed 'Regulation 20 representations' and are forwarded to the Planning Inspector as part of the submission material.

### **Stage 5: Submission to the Secretary of State: Late 2025/early 2026**

- 2.11 After the close of the Regulation 19 period for representations, the Boroughs reviewed the representations to confirm that no fundamental issues were raised that would undermine the Plan's soundness. The ELJWP is then submitted to the Secretary of State (via the Planning Inspectorate) for independent examination, along with this Consultation Statement and all supporting documents (including the evidence base).
- 2.12 The Boroughs have prepared a list of 'minor' modifications arising from the Regulation 19 stage, which are submitted as part of the examination documents for the Inspector's consideration (to be used if deemed necessary). Upon submission, an independent Planning Inspector is appointed to conduct the examination into the Plan's soundness and legality.

### **Stage 6: Examination: Early-mid 2026**

- 2.13 The Planning Inspector will examine the submitted ELJWP (which is the same as the version that was published in accordance with Regulation 19), the evidence base, and all representations to determine if the plan is sound and legally compliant. This stage may include public hearing sessions where the Inspector explores key issues with the Boroughs and representors. If invited to by the Boroughs, the Inspector can recommend Main Modifications to address any soundness or legal compliance problems identified. These Main Modifications would be subject to further consultation before the Inspector finalises their report.

### **Stage 7: Adoption – Late 2026 (anticipated)**

- 2.14 Subject to the Plan being found sound and legally compliant by the Inspector, the ELJWP will be adopted by each of the four East London Boroughs. Adoption will formally replace the previous 2012 East London Waste Plan with the new East London Joint Waste Plan, and the plan's policies will then form part of each Borough's development plan for making planning decisions on waste management proposals.

### 3 Summary of Consultation Process

- 3.1 Public and other stakeholder consultation has been an integral part of developing the ELJWP. The Boroughs have undertaken both informal engagement and formal consultations in line with the plan making regulations and their agreed joint Consultation Protocol. This section summarises the consultation process associated with the Regulation 18 draft plan stage and the Regulation 19 submission draft stage, including who was invited to comment and how the consultations were carried out.

#### Regulation 18 Consultation (Draft Plan Stage, 2024)

##### **Bodies and persons invited to make representations under Regulation 18**

- 3.2 In preparing the draft ELJWP, the Boroughs carried out a Regulation 18 consultation from 29 July to 16 September 2024. The consultation was publicised to statutory consultees, neighbouring authorities, local stakeholders and the general public. In total, approximately 2,665 organisations and individuals were directly notified of the Draft Plan consultation and invited to submit comments. These included:
- All 32 London Boroughs and the City of London;
  - all joint waste authorities in London;
  - 24 Waste Planning Authorities in counties surrounding London;
  - numerous companies in the waste management industry (owners/operators of 77 waste sites in the area); and,
  - a wide range of statutory and non-statutory consultation bodies.
- 3.3 Statutory consultees invited at this stage comprised relevant government agencies and infrastructure providers including the following:
- the Environment Agency,
  - Natural England,
  - Historic England
  - the Marine Management Organisation
  - National Highways
  - Network Rail
  - Office of Rail and Road
  - Transport for London
  - the Port of London Authority
  - UK Power Networks
  - Thames Water
  - Anglian Water
  - Essex and Suffolk Water
  - National Grid
  - Cadent Gas

- the Greater London Authority
- the London Local Nature Partnership
- Sport England
- Coal Authority
- Department for Education
- NHS
- Canal and River Trust
- Homes England

3.4 Community groups, businesses, and residents on the Boroughs' planning databases were also notified. This comprehensive list ensured that all Duty to Cooperate bodies and locally interested parties were aware of the draft Plan consultation.

### **How bodies and persons were invited to make representations**

- 3.5 The Regulation 18 consultation was carried out in accordance with the strategy set out in the Consultation Protocol, using a variety of communication methods to reach stakeholders. On 29 July 2024 (the start of the consultation), the Boroughs sent a formal notification email to all contacts on their planning policy databases, including the specific and general consultation bodies noted above, local community groups, and individuals who had asked to be kept informed. The email provided details of the consultation period, explained how to access the draft Plan documents, how to submit comments (online, email or post), and included an invitation to upcoming consultation events (drop-in sessions and an online webinar).
- 3.6 In addition to direct notifications, each Borough issued press notices in local newspapers and posted announcements on their official websites and social media channels to publicise the consultation.
- 3.7 A dedicated online consultation portal was used to facilitate this public consultation. The London Borough of Havering hosted the ELJWP Regulation 18 consultation on its Citizen Space website<sup>1</sup>. All Draft Plan documents and supporting evidence were available to download from this website throughout the consultation period.
- 3.8 To ensure accessibility, hard copies of the Draft ELJWP were also made available for public inspection at key locations in each borough from 29 July 2024 onwards. Printed copies could be viewed at the main council offices (Barking Town Hall, Havering Town Hall, Newham Dockside, and Redbridge Town Hall) and at designated libraries (such as Dagenham Library and local libraries in Newham) during normal opening hours. These measures met the

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<sup>1</sup> <https://consultation.havering.gov.uk/planning/east-london-joint-waste-plan/>  
 Project: East London Joint Waste Plan 2025-41  
 Document: Regulation 22 Consultation Statement  
 Version: v3.0  
 Date: 17.12.25

regulatory requirements for making the plan available for inspection and were consistent with the Boroughs' Statements of Community Involvement.

- 3.9 The Boroughs also provided opportunities for face-to-face and interactive engagement during the Regulation 18 stage. Midway through the consultation all consultees (including the general public) were invited to an online public consultation event (webinar) which was held on 14 August 2024, midway through the consultation. This virtual session included a presentation explaining the Draft Plan and a Q&A segment. It was recorded and the video was published on the consultation website for anyone unable to attend live.
- 3.10 A set of Frequently Asked Questions (FAQ) was published on the website as well, addressing common queries about the plan and the consultation process. In addition, a standard feedback form was provided (both online and in paper form) to help respondents structure their comments; this could be submitted via the consultation portal, email, or by post.
- 3.11 To reach local communities directly, the Boroughs organised drop-in sessions in each of the four boroughs during the consultation period. Two drop-in events were held per borough (eight sessions in total), staffed by Borough planning officers who were available to explain the plan proposals and answer questions from attendees. These sessions were scheduled at accessible venues and times as set out in the table below.

Location	Date	Time
Redbridge Central Library (Studio 2), Clements Road, Ilford, IG1 1EA	5 August 2024	4pm - 6pm
Rainham Library, 6 Celtic Farm Road, Rainham RM13 9GP	6 August 2024	2:30pm – 4:30pm
East Ham Library (Café area), 328 Barking Rd, London E6 2RT	15 August 2024	5pm - 7pm
Barking Town Hall (Committee Room 2) 1 Clockhouse Ave, Barking IG11 7LU	21 August 2024	3pm – 5pm
Romford Library, St Edwards Way, Romford RM1 3AR	28 August 2024	9:30 – 11:30am
Dagenham Learning Centre, 1 Church Elm Ln, Dagenham RM10 9QS	4 September 2024	11am - 1pm
Keith Axon Community Centre, 160 Grove Road, Chadwell Heath, Redbridge RM6 4XB	10 September 2024	4pm - 6pm
Stratford Library, 3 The Grove, Stratford, London, E15 1EL	12 September 2024	10am-12noon

- 3.12 This in-person outreach enabled residents and stakeholders to learn about the draft ELJWP, ask questions and provide feedback in a more informal setting.
- 3.13 All of the above methods – emails, media notices, online portal, documents on deposit, an online event, FAQs, feedback forms, and local drop-ins – were used to ensure a broad and effective engagement at the Regulation 18 stage, in line with the Consultation Protocol commitments.

### **Other consultation activity (duty-to-cooperate and ongoing engagement)**

- 3.14 In addition to the public consultation efforts described above, the Boroughs undertook further engagement as part of the plan preparation process. Under the Duty to Cooperate, Borough officers presented and discussed the emerging ELJWP with relevant bodies prior to and during the Regulation 18 stage. Borough officers attended meetings of the London Waste Planning Forum (LWPF) (a group of London planning authorities), the Greater London Authority and the Environment Agency, to raise awareness of the emerging ELJWP and invite cooperation. The ELJWP was discussed at LWPF meetings during 2023, 2024 and 2025, ensuring key London-wide stakeholders were informed of the plan progress.
- 3.15 The Boroughs also held focused discussions with certain key stakeholders who have particular interests in waste planning. This included meetings or correspondence with the Greater London Authority (GLA) and the East London Waste Authority (ELWA) (to align the plan with London-wide waste strategies and the management of Local Authority Collected Waste), with Thames Water regarding wastewater infrastructure needs, with neighbouring planning authorities such as London Borough of Tower Hamlets (who were consulted due to waste facility proximity across boundaries), and with infrastructure provider Network Rail.
- 3.16 Engagement was also carried out with landowners and operators of major waste sites (for example, Legal & General regarding a significant site, as well as relevant contacts in authorities outside the area like Thurrock Council where cross-boundary waste movements occur). These activities ran in parallel to the public consultation and helped address strategic and technical matters early in the process.
- 3.17 The Boroughs' ongoing cooperation activities were documented in the Duty to Cooperate Statement of Compliance, which accompanied publication of the Submission Plan. An updated DtC Statement of Compliance has been prepared for submission that provides the latest position with regard to DtC engagement.

## **Regulation 19 Consultation (Publication Stage, 2025)**

## **Bodies and persons invited to make representations under Regulation 19**

- 3.18 After incorporating the changes from the draft stage, the Boroughs published the Regulation 19 Submission ELJWP for formal consultation. This stage commenced on 19 May 2025, and stakeholders were given until 30 June 2025 to submit representations (a statutory minimum six-week period). This process was more targeted with representations specifically invited on whether the Plan was sound and legally compliant, rather than on broad policy options. Consultees invited to submit representations reflected those contacted at the Regulation 18 stage.
- 3.19 In accordance with statutory requirements, a Statement of Representations Procedure (see Appendix 1) was published and sent to all consultees. This document set out the subject of the Plan, the consultation dates, how to view documents, and the procedure for making representations, explaining that comments must be made in writing (including via the online consultation form or by email/post to a specified address) by the deadline and that representations should indicate whether the respondent wished to be heard by the Inspector or notified of subsequent stages.
- 3.20 The Boroughs directly notified by email the same extensive list of contacts used at the Regulation 18 stage (updated as necessary), including all specific and general consultation bodies, neighbouring authorities, stakeholders, and every individual who had responded or expressed interest previously. Those who had made comments during the Regulation 18 consultation or had asked to be kept informed were specifically included in the notification mailing, to ensure continuity of engagement. The notification correspondence emphasised that this was the final opportunity to comment before the Plan's submission, and it provided guidance on submitting representations focused on tests of soundness.

## **How the Regulation 19 consultation was undertaken**

- 3.21 The Regulation 19 Submission Plan and its supporting documents were made available for public inspection for six weeks from 19 May to 30 June 2025. All documents were accessible online via the same [Havering consultation portal](#) that was used at the draft stage.
- 3.22 Hard copies of the Submission Draft ELJWP, the Policies Map (safeguarded sites maps), and key supporting documents, including the Integrated Impact Assessment (February 2025), Habitats Regulations Assessment (February 2025), and the updated Consultation Protocol, were placed on deposit at the principal office of each Borough and other appropriate locations (e.g. Town Halls and central libraries) for public viewing during normal working hours in accordance with each Boroughs' Statement of Community Involvement. Hard copies of the Statement of Representations Procedure were also made available and posted on the online consultation portal.

- 3.23 Unlike the earlier informal consultation, at Regulation 19 the Boroughs did not organise interactive events or drop-in sessions, since this stage is a formal period for representations on soundness and legality. Explanatory videos were provided on the website which included a summary of how the plan had evolved and a reminder of the tests of soundness that representations should focus on. Officers from the Boroughs' planning policy teams were available to answer queries about the process by phone or email during the consultation period.
- 3.24 Anyone making a representation was able to use a standard representation form (available for download as a Word document, or via an online survey form) to structure their comments, ensuring that the legal compliance and soundness points were clearly addressed. By the end of the consultation on 30 June 2025, the Boroughs received representations from a range of sources including local residents, neighbouring authorities, statutory bodies and industry representatives. Each representation has been logged and its main issues identified for consideration. Section 4 of this Statement summarises the key issues raised by the representations.
- 3.25 It should be noted that, pursuant to Regulation 22, all representations made under Regulation 20 (i.e. during the Regulation 19 stage) have been compiled and are submitted alongside the Submission Draft ELJWP. Full copies of the original representations are available for the Inspector and public to view on the examination website.
- 3.26 In total, 43 organisations and individuals submitted representations during the Regulation 19 consultation. Many respondents commented on multiple policies or topics in the Plan, resulting in approximately 173 separate comments. The next section provides an overview of the main issues raised in those representations, as well as the main issues from the earlier Regulation 18 stage and outlines how the Boroughs have responded to each.

## 4 Outcome of Consultation - Summary of Main Issues Raised

### Main issues raised during Regulation 18 consultation and how they were addressed

4.1 53 responses were received in total with the following breakdown of respondents:

- London Borough Councils = 3
- Joint waste authorities in London = 2
- Waste Planning Authorities outside of London = 3
- The waste management industry = 11
- Statutory consultation bodies = 12
- Utilities companies = 4
- Individuals = 18

4.2 A table has been prepared which summarises all the issues raised the consultation, and how these issues have been addressed, as appropriate, in the Regulation 19 Submission Draft East London Joint Waste Plan. This table is included in Appendix 2 of this document.

4.3 A summary of the main issues raised and how these have been addressed is included below:

#### **Introduction and Background**

Broad support for the Plan's alignment with circular economy principles.

- Response: Noted.

Need for updates to context regarding the water environment and management of wastewater.

- Response: Relevant text updated and added.

Need for updates to context regarding the East London Waste Authority and the East London Joint Waste Strategy.

- Response: Relevant text updated and added.

Plan should include the London Borough of Tower Hamlets

- Response: The existing Waste Plan was adopted in 2012 and so it is important that a new Plan is prepared as soon as possible – adding Tower Hamlets would create excessive delay.

#### **Policy and Strategic Framework**

- Strong support for minimising waste from development and achieving net zero in waste management by 2041.

- Need to reference protection of historic environment
  - Response: Relevant updates made to Strategic Objective 3 and Policy JWP4.
- Need for specific policy and text addressing development associated with treatment of wastewater e.g. upgrades at Beckton and Riverside Sewage Treatment Works.
  - Response: Text of Plan amended with specific reference to wastewater (including changes to policies JWP3 and JWP4) and new Policy JWP2A included to address wastewater and sewage sludge management development. Specific consultation distances for development proposed proximate to waste water treatment works have been added,
- Concerns raised regarding location and environmental impacts of incineration facilities managing East London's waste.
  - Response: Such facilities require Environmental Permits issued by the EA intended to control pollution; policy is also included in the Plan to address environmental impacts associated. Policy JWP2 strengthened regarding the protection of residential amenity. Text in Section 2 updated to provide details of locations of potential facilities.
- Request that the Plan acknowledges 'secure by design' principles.
  - Response: Supporting text and Policy JWP 4 updated to reference 'secure by design'
- Concern that waste sites are often not suitable for educational visits
  - Response: Requirement for educational facilities at waste facilities has been deleted from Policy JWP1.

## **Transportation**

Support for alternative transportation modes, particularly utilising the River Thames, to reduce road congestion and emissions.

- Response: Support noted. Objective SO7 amended to emphasise need for energy efficiency in transport methods.
- Concerns about traffic impacts.
  - Response: Policies ensure any proposals account for traffic mitigation measures. Policy JWP4 has been strengthened to ensure applications consider the safety of road users. Text clarifying the need for, and content of, Travel Plans and Transport Assessments to be submitted with applications has been added.

## **Safeguarding**

- The Plan should set out a mechanism for sharing capacity with other Boroughs

- Response: The Plan notes that any agreements on sharing capacity should be formalised in a Statement of Common Ground
- Concern that Plan is not in general conformity with London Plan policy on the safeguarding of waste management sites, capacity should be shared with other boroughs before release, and that there is a need to retain strategic sites, including Eurohub and Renwick Road Rail Hub, as well as other sites serving neighbouring boroughs, for future waste management.
- Response: Proposed release of sites will not have a strategic impact on the ability of waste arising in East London (or elsewhere in London) to be managed in future. Release of some sites is necessary to facilitate other forms of development for which there is a critical shortage e.g. housing or the intensification of industrial land. Other Boroughs were invited to request surplus capacity as part of their plan making and no acceptable requests were received. Sites serving neighbouring boroughs are safeguarded. Clarification added to Policy JWP2 (and supporting text) regarding which category of sites will be safeguarded in relation to status in planning law.
- Specific request for transfer (sharing) of capacity with LBTH.
  - Response: LBTH has not adequately demonstrated that its need cannot be wholly met within its area.

Some support for site releases to facilitate housing development but the need to mitigate potential conflicts with adjacent industrial uses was highlighted.

- Response: Proposed release of sites will not have a strategic impact on the ability of waste arising in East London (or elsewhere in London) to be managed in future. Release of some sites is necessary to facilitate other forms of development for which there is a critical shortage e.g. housing or the intensification of industrial land. Clarification added to Policy JWP2 (and supporting text) regarding which category of sites will be safeguarded in relation to its status in planning law.
- Response: Agent of Change principles in the NPPF and specific policy JWP3 are intended to ensure redevelopment does not impact on ability of existing sites to manage waste.

## **Future Waste Management Capacity Requirements**

- Inconsistencies in data on waste between the Plan and supporting Waste Needs Assessments were noted.
  - Response: Waste data in Plan updated and cross-checked to ensure accuracy and alignment with evidence base reports.
- Concerns about grouping all Construction, Demolition, and Excavation (CDE) Waste CDE waste types into a single category.
  - Response: Supporting evidence base provides disaggregated data for CDE waste components.
- Concerns about the Plan's reliance on export of inert waste to other areas for landfill were raised

- Response: Text added to clarify that 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. **Integrated Impact Assessment (IIA)**
- IIA should assess an alternative where the ELJWP explicitly takes on apportioned waste from neighbouring boroughs
  - Response: The plan includes provisions to assess requests to share capacity

## Main issues raised during Regulation 19 consultation (Regulation 20 representations)

4.1 The Regulation 19 publication stage yielded representations from 44 respondents with the following breakdown of respondents:

- London Borough Councils = 4
- Joint waste authorities in London = 2
- Waste Planning Authorities outside of London = 5
- The waste management industry = 3
- Statutory consultation bodies = 11
- Utilities companies = 4
- Individuals = 8
- Other developers = 1
- Landowner = 3
- NGOs = 2

4.2 All the duly made representations have been analysed, and the summary of the main issues raised by these representations is presented in Appendix 3 of this Statement, alongside the Councils' responses to each issue. The Regulation 19 process is focussed on the Plan's soundness and legal compliance, the issues raised tend to be more targeted suggestions or objections regarding specific policies, sites, or evidence, rather than broad observations. The key themes arising from the representations at this stage are summarised below.

### Procedural and legal compliance matters

4.3 London Borough of Tower Hamlets (LBTH) concerns that:

- Earlier comments were not acknowledged or addressed as no reference to its response during the Regulation 18 consultation input in the published Regulation 19 Consultation Statement;

- the Plan's Integrated Impact Assessment (including Sustainability Appraisal) had not adequately considered reasonable alternatives.
- the East London boroughs had not met the Duty to Cooperate in light of how its request for unmet waste management capacity needs had not been explicitly accepted by the Plan.

**Response:** The Boroughs have engaged in ongoing discussions with LBTH through the Duty to Cooperate process (including preparing a Statement of Common Ground) as set out in the Duty to Cooperate Compliance Statement, to ensure the East London Boroughs' and Tower Hamlets' waste planning interests are addressed appropriately. The Boroughs met LBTH and have discussed comments made by them on the Reg 18 ELJWP and also provided comments on the Tower Hamlets Local Plan clearly setting out and explaining their position. The Boroughs' commitment to continued collaboration with Tower Hamlets is set out in the Statement of Common Ground and any necessary arrangements to share future waste capacity will be pursued outside the Plan via Duty to Cooperate requirements for ongoing and meaningful engagement or in future plan reviews. The consultation record (this document) has been updated to record Tower Hamlets' comments at Regulation 18. The Sustainability Appraisal's assessment of alternatives is considered proportionate and in line with requirements, and the consultation process (Regulation 18 and 19) was carried out properly,

## Safeguarding

- Clarification sought regarding the criteria for safeguarding, and under what circumstances a site could be released from safeguarding for other uses. In addition, whether certain sites identified in the Plan should remain safeguarded was questioned, and also whether the Plan is justified in proposing to release some existing waste sites from safeguarding. Queries about the definition of what constitutes an 'existing waste site' for the purposes of safeguarding, particularly where a facility has an Environmental Permit but does not have formal planning permission for waste use.
- Concern regarding the appropriateness of the Plan's criteria for choosing which sites to safeguard or release. Certain waste sites identified for release should remain safeguarded to ensure sufficient capacity.

**Response:** The Plan's strategy is to continue safeguarding all lawful and needed waste sites, and to release a few sites that were either not lawfully permitted in planning terms (even if they held an Environment Agency permit) or were low-performing and identified for redevelopment in Local Plans. The approach avoids conferring legal planning status on a site operating without planning permission and thus 'regularising' unlawful sites through the Plan. Minor modifications are proposed to retain two sites at

Box Lane that had originally been proposed for release. A Statement of Common Ground with the GLA that considers this matter is being prepared.

- Need for clarity on what the Plan defines as an ‘existing’ waste site for the purpose of establishing capacity.

**Response:** The Plan includes those facilities that have a valid Environmental Permit for waste use for establishing baseline capacity, even if they lack formal planning permission. No changes to the safeguarding approach in the Plan are proposed. A minor modification is proposed to address potential changes to the definition of ‘waste site’ if the new London Plan provides an updated definition. The East London boroughs will take that into account in any subsequent review of the Plan.

### **Release of safeguarded waste sites**

- Despite some support for release of sites from safeguarding, there was also some concern about how this might jeopardise the boroughs’ ability to meet their waste management targets and London Plan apportionments.

**Response:** This matter has been considered carefully. The evidence base includes a Waste Capacity Assessment and a specific ‘Sites Release Report’ to demonstrate that the loss of four sites identified for release would not harm the Plan area’s ability to meet its capacity requirements. In light of updated information from the related landowner, the Boroughs now propose to retain two sites in Barking & Dagenham on the safeguarded list. A Statement of Common Ground with the GLA that considers this matter further is being prepared.

### **Safeguarded wharves and transport of waste**

- Use of safeguarded wharves and the use of river (and rail) transport for moving waste is important and the Plan should make explicit reference to the safeguarded wharves in East London and include stronger support for using non-road transport modes in waste management.

**Response:** The London Plan already safeguards certain wharves (two of which are in the East London Plan area), and Policy JWP2 and Policy JWP4 encourage sustainable transport of waste. A minor modification is proposed to Policy JWP2 to explicitly acknowledge that safeguarded wharves are potentially suitable locations for waste management use. Changes to supporting text are proposed to emphasise that applicants should consider opportunities for waste to be transported by river or rail wherever feasible.

### **Capacity sharing with other London areas**

- Clarity sought on the approach to sharing waste management capacity.

**Response:** The East London Boroughs have emphasised their ongoing commitment to the Duty to Cooperate throughout the plan process. The East London Boroughs invited other London boroughs to request capacity to address any unmet waste needs through cooperative arrangements and in the absence of guidance from the GLA devised its own process (see the Duty to Cooperate Compliance Statement) for considering requests. Tower Hamlets made a specific request and the Boroughs have concluded that Tower Hamlets has not adequately demonstrated that its needs for capacity could not be wholly met within its own area. A Statement of Common Ground with Tower Hamlets is being prepared. The Plan commits the East London authorities to continue working with all relevant parties, including the Mayor of London, neighbouring boroughs like Tower Hamlets, and recipient waste planning authorities outside London, to ensure adequate waste management capacity is secured for the lifetime of the plan. Discussions will remain active as the Plan moves toward adoption and beyond. No changes to the Plan's targets or policies are proposed in direct response to these representations. A Statement of Common Ground with the GLA that considers this matter is being prepared.

### **Export of waste**

- The Plan aims for net self-sufficiency, but anticipates exporting some waste, particularly inert excavation waste, to facilities outside the East London area. The continued export of waste could impact other WPAs' own waste capacity and plans.

**Response:** The ELJWP strategy for certain waste streams, notably inert excavation waste, follows the approach of the London Plan in that it treats excavation waste as an exception to the self-sufficiency target because it is not feasible for the London boroughs to manage 100% of their excavation material within the area (the volumes are very large and outlets, including quarries requiring restoration are mainly outside London). The Plan area can meet the London Plan apportionment targets for the household, commercial, and industrial waste streams. WPAs in other areas receiving East London's waste have been engaged to ensure those arrangements are understood as documented in the Duty to Cooperate Compliance Statement. A Statement of Common Ground with Oxfordshire County Council that recognises and accepts the Plan's position with regards to waste exports is being prepared.

### **ELWA operational flexibility**

- The Plan should recognise ELWA's statutory role and the likelihood of multiple contract reviews/procurements over the plan period, with potential need for new, expanded or replacement municipal waste facilities (e.g. treatment, transfer and bulking). Clarify that proposals may need to come

forward in addition to safeguarded sites, and that the Plan provides a clear route for such proposals where a need is evidenced.

**Response:** Policies JWP2 and JWP5 already enable need-led proposals for waste infrastructure, subject to robust evidence of quantitative/market need, locational suitability (including preference for safeguarded sites/appropriate industrial locations) and environmental criteria. Minor modifications are proposed to remove detail relating to procurement (to ensure the Plan does not become out of date) and to Policy JWP2 to allow additional benefits of waste management to be taken into account when determining proposals. This matter is being addressed in detail in a Statement of Common Ground with ELWA.

### **Assessment of new waste sites**

- More detail sought on the criteria that would be used to determine the need and suitability of new waste facilities, in particular how proposals involving innovative technologies or unanticipated waste streams during the plan period would be determined.

**Response:** Policies JWP2, JWP4 and JWP5, set out robust criteria for assessing new proposals, intended to ensure any new facility demonstrates a clear need and meets strict locational and environmental criteria.

### **Allocation of mineral sites**

- The Plan should identify or safeguard local mineral sites where inert waste could be deposited, given the benefits (such as shorter transport distances, landscape restoration, and avoiding fly-tipping).

**Response:** The East London Joint Waste Plan is not a minerals plan. The Plan does not designate or safeguard mineral extraction sites for the disposal of inert excavated material but acknowledges the contribution that quarry restoration activities make toward managing excavation waste.

### **Wastewater infrastructure**

- Future capacity and upgrades: The Plan should explicitly support necessary upgrades to wastewater treatment works and clarify how sewage sludge will be managed to ensure it adequately addresses future needs for wastewater capacity (especially given projected population growth)

**Response:** The importance of wastewater infrastructure is acknowledged by the Plan. Expected upgrades to facilities are covered by Asset Management Plans. A minor modification is proposed to strengthen the supporting text by linking the provision of new or improved wastewater infrastructure with the water industry's Asset Management Plan process.

- Development near sewage works (amenity impacts): Assurance sought that any new sensitive developments (e.g. housing) located close to existing wastewater treatment facilities would require robust assessment of odour, noise, and other amenity issues.

**Response:** Proposed modification to include a new provision requiring a technical assessment for proposals involving sensitive uses near wastewater treatment facilities.

### **Design of waste management and wastewater treatment facilities**

- The Plan should include strong design standards to ensure that modern waste facilities (and wastewater treatment works) are well-designed, energy-efficient, and compatible with their surroundings including the water environment.

4.4 **Response:** The Plan includes policy to ensure high quality design. Relevant policies of Local Plans will also be taken into account when determining applications. Minor modifications are proposed to ensure appropriate consideration of impacts on the water environment.

### **Transport assessments for waste facilities**

- Assurance sought that the Plan will require robust transport impact assessments for new or expanded waste facilities and will promote sustainable transport choices to reduce road traffic.

**Response:** The Plan's policies already address the need for thorough transport assessments and mitigation of transport impacts, in particular the Plan requires that waste developments do not cause unacceptable impacts on road congestion or safety. To provide additional clarity, a modification is proposed to supporting text to clarify certain expectations for Transport Assessments. Modifications are also proposed to supporting text concerning HGV safety standards.

### **General Protection of utilities**

- Utilities assets (such as gas or electricity networks) require protection

4.5 **Response:** Agree. Proposed minor modification to Policy JWP4 to explicitly require that waste management proposals consider potential impacts on utilities infrastructure as part of their design and mitigation measures.

### **Monitoring and implementation**

- Suggested that the proposed monitoring indicators should be strengthened to ensure the Plan's objectives are achieved e.g. more rigorously track progress on increasing recycling rates or reducing waste exports. In particular, the GLA recommended tightening the alignment of the Plan's targets with metrics from the Mayor's London Environment Strategy.

- 4.6 **Response:** Minor changes proposed to certain indicators to improve how Plan performance will be monitored. For example, indicators will more explicitly track the tonnages of waste diverted from landfill and progress toward net self-sufficiency targets.

#### General comments and clarifications

- A number of representations provided general comments or sought clarification on various parts of the Plan. For example, some residents raised broad concerns about how the Plan would be implemented and monitored in practice, without objecting to specific policies. Concerns were also raised about matters beyond the scope of the Plan such as flytipping. There were also minor wording suggestions to improve clarity, and requests for additional explanation in the supporting text.

**Response:** Minor factual updates and clarifications to the Plan's text are proposed. For example, extra supporting text is proposed to clarify certain environmental context and obligations (e.g. highlighting the importance of the water environment and referencing relevant flood risk management plans). These changes improve clarity and context but do not alter the Plan's policies or objectives.

- 4.7 All the above issues (and others raised in representations) are documented in detail in Appendix 3: Summary of Regulation 19 Representations and Borough Responses. For each main issue, Appendix 3 identifies the representors, summarises the points made, and provides the Boroughs' response, including any proposed actions (such as minor modifications to the plan and/or Statements of Common Ground). Where the Boroughs are proposing changes, they consider necessary to improve the Plan, these changes have all been capture in an accompanying Schedule of Proposed Minor Modifications.
- 4.8 The Boroughs do not consider that the representations necessitate significant alterations to the Plan's policies, as the plan was already sound when it was published. However, a number of minor amendments (e.g. clarifying wording and updates to supporting text) have been proposed in response to the representations which are intended to correct factual inaccuracies and improve the Plan's clarity of meaning.
- 4.9 In conclusion, the Boroughs are satisfied that all representations received through the Regulation 18 and Regulation 19 consultations have been properly considered and, where appropriate, have led to improvements in the ELJWP. Fundamentally no issues were raised that undermine the plan's strategy or compliance with legal requirements.

#### Next Steps

- 4.10 This Regulation 22 Consultation Statement, together with its appendices, is submitted as part of the ELJWP examination evidence. It demonstrates the

extensive consultation and engagement undertaken and how the Plan has evolved in response to the feedback. By fulfilling the requirements of Regulation 22(1)(c), this Statement provides transparency in the plan-making process and will assist the Planning Inspector in understanding the consultation history of the plan.

- 4.11 The East London Boroughs will continue to engage with stakeholders as needed throughout the examination. Upon adoption of the ELJWP, a final consultation notification will be issued to all who requested to be notified of the Plan's adoption.

## Appendix 1: Statement of Representations Procedure



land use tensions with the boroughs respective Local Plans. No new waste management sites have been allocated in the Plan.

- 3.3. The East London Joint Waste Plan Regulation 19 Submission Plan contains policies on circular economy, safeguarding and provision of waste and wastewater capacity, prevention of encroachment, design of waste management facilities, energy from waste and deposit of waste on land as well as a list of safeguarded waste sites across East London.
- 3.4. It covers the London Boroughs of Barking and Dagenham, Havering, Newham and Redbridge.

#### **4. Period for submission of representations**

- 4.1. The consultation period runs for 6 weeks from **Monday 19 May to Monday 30 June 2025**. You can make a representation anytime within this 6-week period provided we receive it by **23:59 pm on the 30 June 2025**.

#### **5. How and where to view the East London Joint Waste Plan Regulation 19 Submission Plan**

- 5.1. The East London Joint Waste Plan Regulation 19 Submission Plan and other proposed submission documents listed in section 2 are publicly available for inspection for any interested stakeholders to submit a representation on the soundness, legal compliance, and compliance with the Duty to Cooperate of the East London Joint Waste Plan Regulation 19 Submission Plan.
- 5.2. The East London Joint Waste Plan Regulation 19 Submission Plan, the other proposed submission documents and our evidence base documents can be read or downloaded from our website (<https://consultation.havering.gov.uk/planning/east-london-joint-waste-plan-regulation-19>). The consultation page is hosted on Havering's citizen space consultation hub on behalf of all the East London boroughs.
- 5.3. Hard copies of the East London Joint Waste Plan Regulation 19 Submission Plan, the Policies Map (which comprises the maps of existing safeguarded waste sites shown in Appendix 3 of the East London Joint Waste Plan Regulation 19 Submission Plan), the East London Joint Waste Plan (Regulation 19) Integrated Impact Assessment Report and associated Non-Technical Summary, the Habitats Regulations Assessment of the East London Joint Waste Plan and the East London Joint Waste Plan Regulation 19 Submission Plan Consultation Statement (2025) are available at the East London borough's principal offices, Dagenham Library, and libraries in Newham, as follows:

*Barking and Dagenham*

- Principal office: Barking Town Hall, 1 Clockhouse Ave, Barking IG11 7LU. Open Monday – Friday 9am – 5pm.
- Dagenham Learning Centre, 1 Church Elm Ln, Dagenham RM10 9QS. Open Monday, Friday and Saturday 9am to 5pm; Tuesday, Wednesday and Thursday 9am to 7pm.

*Havering*

- Principal office: Havering Town Hall, Main Road, Romford, RM1 3BD. Open Monday – Friday 9am - 5pm

*Newham*

- Beckton Globe Library: 1 Kingsford Way, London E6 5JQ. Open Monday – Saturday 10am - 8pm; Sunday Closed.
- Canning Town Library: 18 Rathbone Market, London E16 1EH. Open Monday – Saturday 9am - 8pm; Sunday Closed.
- Custom House Library: Prince Regent Lane, London E16 3JJ. Open Monday, Tuesday, Thursday and Saturday 10am-6pm. Wednesday, Friday and Sunday Closed.
- East Ham Library: 328 Barking Road, London E6 2RT. Open Monday – Saturday 9am - 8pm; Sunday 12 noon - 4 pm.
- The Gate Library: Woodgrange Road, London E7 0QH. Open Monday – Saturday 9am - 8pm; Sunday Closed.
- Green Street Library: 337-341 Green Street, London E13 9AR. Open Monday – Saturday 10am - 8pm; Sunday Closed.
- Manor Park Library: 685-693 Romford Road, London E12 5BS. Open Monday – Saturday 10am - 8pm; Sunday Closed.
- North Woolwich Library: 5 Pier Road, London E16 2LJ. Open Monday, Wednesday and Friday 9:30am – 5:30pm; Tuesday and Thursday 9:30am - 8pm; Saturday and Sunday Closed.
- Plaistow Library: North Street, London E13 9HL. Open Monday, Tuesday and Saturday 9:30am – 5:30pm; Wednesday and Friday 9:30am – 5pm; Thursday 1pm – 8pm; Sunday Closed.
- Stratford Library: 3 The Grove, London E15 1EL. Open Monday – Saturday 9am - 8pm; Sunday 12 - 4 pm.
- Principal Office: Newham Dockside, 1000 Dockside Road, London E16 2QU. Open Monday – Friday 7am - 5pm. Closed Weekends and Bank holidays.

*Redbridge*

- Principal Office Ilford Town Hall, 128-142 High Road Ilford, IG1 1DD. Open Monday-Friday 9am-5pm, close Saturday and Sunday.

5.4. In addition to the proposed submission documents listed in section 2, the East London Joint Waste Plan is supported by a range of evidence base documents. Copies of the evidence base list can be viewed online at <https://consultation.havering.gov.uk/planning/east-london-joint-waste-plan-regulation-19>, including on computers at the Councils' libraries. If you wish to view any hard copies of the evidence base documents, you must make an appointment to view these at one of our principal offices via email to [eljointwasteplan@havering.gov.uk](mailto:eljointwasteplan@havering.gov.uk). Please note the documents will need to be printed upon request, so there may be a wait before you are able to view them.

5.5. Response forms can be posted to residents on request by emailing [eljointwasteplan@havering.gov.uk](mailto:eljointwasteplan@havering.gov.uk). The response form can then be posted to Havering Town Hall.

**6. How to make a representation?**

6.1. Submissions must be made in writing or by way of electronic communications via the following methods of submission. You must include your full name and contact details, as the Council will not accept anonymous submissions. Please note your submission is required to be made public alongside your name. All other personal information will not be published, and will only be shared with the Planning Inspector appointed by the Secretary of State to examine the plan and the examination Programme Officer. Detailed guidance on how to make a representation can be found in our Consultation Protocol.

6.2. All submissions will then be submitted to the Secretary of State for the Ministry of Housing, Communities and Local Government and the Planning Inspectorate as part of the submission of the East London Joint Waste Plan for examination.

**Methods of submission:**

- **Online response form:** submit responses using the online form on the East London Joint Waste Plan Regulation 19 Submission Plan consultation webpage (<https://consultation.havering.gov.uk/planning/east-london-joint-waste-plan-regulation-19>).
- **Downloadable response form:** submit responses using the downloadable response form on the East London Joint Waste Plan Regulation 19 Submission Plan consultation webpage (<https://consultation.havering.gov.uk/planning/east-london-joint-waste-plan-regulation-19>) and return the downloadable response form by:
  - Email to [eljointwasteplan@havering.gov.uk](mailto:eljointwasteplan@havering.gov.uk)

- Post to the Planning Policy Team, London Borough of Havering, Town Hall, Main Road, Romford RM1 3BB
- **Hard copies** of the response form are also available at the locations listed at paragraph 5.3 and can be returned by email or post, using the addresses above.

#### **Further guidance**

For further guidance on how to submit a representation you can view our **online informative session** on our consultation webpage. The online informative session will give you an overview of the East London Joint Waste Plan Regulation 19 Submission Plan and how to provide responses. You can also find written guidance in on how to submit responses in our Consultation Protocol.

Please see the privacy notice for more information about the privacy of your data.

## **7. Notification of the next steps of the East London Joint Waste Plan**

- 7.1. Once the Regulation 19 consultation period has closed, updates regarding the submission of the East London Joint Waste Plan will be published on the consultation webpages. You should notify us in your representation whether you would like to be notified of when the East London Joint Waste Plan is submitted for Examination, when we publish the Inspector's report and/or when the East London Joint Waste Plan is adopted.
- 7.2. For more information visit:
- the consultation website <https://consultation.havering.gov.uk/planning/east-london-joint-waste-plan-regulation-19>
  - or email us at [eljjointwasteplan@havering.gov.uk](mailto:eljjointwasteplan@havering.gov.uk)

## Appendix 2: Analysis of Comments received to Regulation 18 consultation on the Draft East London Joint Waste Plan from July to September 2024

<u>Part of Plan</u>	<u>Summary of comment</u>	<u>Borough Response including action arising</u>
<b>1. Introduction and Background</b>		
<b>Para 1.16</b>	Support for recognition that the planning system should not duplicate other regulatory regimes, an often overlooked but crucial concept. <i>[Heidelberg Materials UK]</i>	Noted. No action arising.
<b>General</b>	Support the proposed requirement that all local authorities must collect food waste weekly. <i>[resident]</i>	Noted. No action arising.
<b>2. The Context</b>		
<b>General</b>	Initiatives used in other countries to improve recycling rates should be adopted. Good examples include Germany and Switzerland. There is a need for more recycling sites and bins made available to households. <i>[resident]</i>	Plan is consistent with current Government policy and takes account new impacts of new initiatives intended to improve recycling such as consistent collection, DRS and EPR. JWP1 intended to ensure development comes forward that allows for greater recycling by ensuring appropriate storage for recyclate is included. No action arising.
	Concerns about littering causing accidents like slips and trips. In Rwanda there are fines for littering which are very effective - keeps city hygienic. <i>[resident]</i>	Provision of waste facilities as proposed by the Plan will help reduce litter. Policy JWP4 intended to ensure that litter is not produced from waste management facilities. No action arising.
	Fly tipping an issue in East London. <i>[Metropolitan Police Service and resident]</i>	The Plan safeguards existing waste management sites and provides for the development of new ones to ensure there is sufficient capacity to allow waste to be managed lawfully. No action arising.

<b><u>Part of Plan</u></b>	<b><u>Summary of comment</u></b>	<b><u>Borough Response including action arising</u></b>
<b>Paragraph 2.10</b>	Mention of Epping Forest SAC as a key designated site is welcomed <i>[Natural England]</i>	Noted. No action arising.
<b>Paras 2.21-2.23</b>	Updates to context needed regarding the water environment and management of wastewater. <i>[Environment Agency (EA)]</i>	Text in chapter 2 updated accordingly.
<b>Para 2.33</b>	Para 2.33, states that 480,000t waste produced and 190,000t were burnt, 130,000t recycled and only 117t sent to landfill so 160,000t needs explaining. <i>[resident]</i>	Values have been checked and updated as necessary.
<b>Para 2.33</b>	Please specify where incineration of waste arising in East London waste takes place - it would be better to manage within East London. <i>[resident]</i>	Information included in paragraph 2.33. The total capacity of waste management facilities in East London exceeds that which arises in East London. Waste is transported across boundaries for Management by EfW, especially in London due to economies of scale.
<b>Paragraph 2.35</b>	Agree that most CDE waste can be recycled or recovered, provided suitable facilities are available. <i>[Heidelberg Materials UK]</i>	Noted. No action arising.
<b>Para 2.45-2.47</b>	Thames Water is the statutory sewerage undertaker for the Boroughs of Newham, Redbridge and majority of Barking & Dagenham. The key sewage treatment works (STW) is Beckton STW, but there are strategic sewage pumping stations in these Boroughs. Support reference to wastewater and sewage sludge in paras 2.45-2.47, ELJWLP recognises the need for ongoing development at Beckton STW during the plan period i.e. up to 2041. <i>[Thames Water]</i>	New policy JWP2A added which includes supporting text with details of expected upgrades.
	Havering Borough includes our Riverside STW which will also require upgrading during AMP8 so support should be included for this. <i>[Thames Water]</i>	New policy JWP2A added which includes supporting text with details of expected upgrades.
	There is a need for a specific wastewater treatment/sewage sludge policy as fundamentally, waste water treatment has different geographical and technical requirements from other forms of waste management. <i>[Thames Water]</i>	New policy JWP2A added which includes supporting text with details of expected upgrades.
<b>Para 2.73 and 2.74</b>	Support for CCS and CCUS technologies in EfW facilities though this is still in early stages. Priority should continue to be reducing overall carbon emissions through	No action arising. Noted. ELJWP5 sets out need for CCUS and heat capture associated with EfW.

<u>Part of Plan</u>	<u>Summary of comment</u>	<u>Borough Response including action arising</u>
	heat capture for re-use as a low carbon heat source (secondary heat recovery) wherever possible. <i>[Barking Riverside Ltd]</i>	
<b>Para 2.7</b>	Support for recognition of road congestion issues in the ELJWP in particular those affecting the A12 and A13. <i>[City of London Corporation]</i>	Noted. No action arising.
<b>Para 2.88</b>	Statement that excavation waste is excluded from LP net self-sufficiency target as it is difficult to recycle is incorrect as it being more difficult for London to provide sites for management or beneficial use. <i>[Thurrock Council]</i>	Excavation waste is used for beneficial recovery rather than recycling as it is not suited to recycling. Beneficial use sites normally have significant footprints and therefore accommodating such projects within the confines of the urban area of London is challenging. No action arising.
<b>2.99</b>	LP requirement to share any surplus capacity with boroughs facing a shortfall before considering release of site from safeguarding protection is supported. In deciding which sites to offer to other boroughs consideration should be given to those best located to meet their needs to minimise vehicle miles. Riverside and perhaps rail side sites could be well suited in locational terms. <i>[TfL]</i>	The sharing of apportionment does not (and cannot) involve identification of specific sites with surplus capacity for specific waste types as the Plan cannot dictate which existing sites are used to serve which areas. No action arising.
<b>Paragraphs 2.112 to 2.118</b>	Text is not quite accurate as to the nature of East London Waste Authority (ELWA) or the East London Joint Resources and Waste Strategy (2027-57). <i>[ELWA]</i>	Text updated in accordance with ELWA advice.
<b>Pages 4 and 5</b>	Other than reference to heritage and archaeology in the geographical context section of the Plan, there is no reference to the historic environment which could be included at bullet point 5 in relation to projects designed to increase or upgrade waste management capacity. <i>[Historic England]</i>	Text added to overarching approach in executive summary.
<b>3. Vision</b>		
	Support for circular economy principles, aiming for landfill to be a last resort by 2041, and high-quality restoration of landfill sites. <i>[Various]</i>	Noted. No action arising.
	Support for the Vision – consistent with water industry approach. <i>[Water industry]</i>	Noted. No action arising.
	Support for Vision that waste will be managed efficiently by maximising existing capacity of facilities, releasing underutilised or poorly located sites, minimising	Noted. No action arising.

<b><u>Part of Plan</u></b>	<b><u>Summary of comment</u></b>	<b><u>Borough Response including action arising</u></b>
	transportation and using infrastructure established for alternative means of waste movement, in particular via the River Thames. <i>[Port of London Authority]</i>	
	Waste industry cannot control products on market; <i>[Integrated Skills Ltd]</i>	Noted. No action arising.
	Vision needs to cover 'prevention' level of waste hierarchy; <i>[resident]</i>	Already addressed by the Vision which states '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'. No action arising.
	Positive Vision but not reflected in Plan or background documents. Specifically, no information on transport of waste to authorities in the East of England. <i>[East of England Waste Technical Advisory Body]</i>	Figure 8 displays the balance between imports and exports by waste management method and waste type to and from East London in 2022. The report 'Identification of Strategically Significant Cross Boundary Waste Movements', BPP Consulting, April 2024 includes more details. No action arising.
	Vision and objectives should recognise the importance of the Local Nature Recovery Strategy being developed by the Greater London Authority (GLA) in helping to establish wider ecological connectivity. <i>[Natural England]</i>	The Vision and strategic objectives address the need to improve the natural environment (including biodiversity) in broad terms. Detail regarding the Local Nature Recovery Strategy being developed by the GLA has been inserted chapter 2 and in the supporting text to JWP4
<b>Strategic Objectives</b>		
<b>SO1</b>	Support for minimising waste from development. <i>[resident]</i>	Noted. No action arising.
	Net zero in waste management by 2041 will be difficult when waste industry cannot control products on market; <i>[Integrated Skills Ltd]</i>	The Government is introducing other initiatives to control products in the market that do not involve the waste industry. No action arising.
<b>SO2</b>	No specific comments	No action arising.

<b><u>Part of Plan</u></b>	<b><u>Summary of comment</u></b>	<b><u>Borough Response including action arising</u></b>
<b>SO3</b>	Strategic Objective 3 should also refer to the historic as well as natural environment. <i>[Historic England]</i>	Noted. Text of SO3 has been updated accordingly.
	Strategic Objectives 3 and 7 need to consider location of waste management capacity for those without access to a private car. For example, Havering has the Gerpins Lane RRC which is not accessible to anyone without a car. <i>[resident]</i>	Other communal facilities, not just, Reuse and Recycling Centres, and services are available for the management of waste from households. No action arising.
<b>SO4</b>	Support for strategic objective 4 seeking to ensure the high-quality restoration and aftercare of landfill sites maximize benefits to the community and the environment. <i>[Henry Boot Developments (HBD) and Barings]</i>	No action arising.
<b>SO5</b>	Does net zero include the production and use of the products, or just what happens after they become waste <i>[ELWA]</i>	The objective is concerned with achieving net zero in the management of waste i.e. how materials (which are waste) are managed. Although the use of recycled materials in the production of goods (or reduction in the use of materials e.g. light-weighting of packaging) reduces carbon impacts this is beyond the Plan's control except where those goods/materials are used in construction or refurbishment of development that requires planning permission. No action arising.
	Does plan consider fossil-based emissions, and biogenic emissions - if so, how will they be distinguished from one another? <i>[ELWA]</i>	The issue of distinguishing between fossil based and biogenic based carbon emissions only arises with regard to development of new energy from waste capacity. In such a case it will be necessary to make such a distinction as energy derived from biogenic sources is offset by the carbon absorbed when the biogenic material is produced whereas the production of fossil-based material (mainly plastic) does not involve absorption of carbon.
	Are emissions being counted even after waste has been exported, whether to other regions or abroad? <i>[ELWA]</i>	No because controlling the way in which exported waste is managed is beyond the remit of the Plan

<b><u>Part of Plan</u></b>	<b><u>Summary of comment</u></b>	<b><u>Borough Response including action arising</u></b>
	Details of benchmarks and models used may be required for other stakeholders to engage effectively on the delivery of this SO <i>[ELWA]</i>	Explanatory text is included in relevant policies any benchmarks and models used will have to be consistent with accepted practice at the time an application is made.
<b>SO6</b>	Support for safeguarding existing capacity <i>[Various including waste industry and local authorities]</i>	Noted. No action arising.
<b>SO7</b>	Support for alternative modes of transport including the River Thames <i>[Various including Port of London Authority]</i>	Noted. No action arising.
	Support SO7's aim to minimise transportation of waste and improve road safety by locating facilities as close as possible to their sources and establishing alternative transport means, including utilising the River Thames and railheads. <i>[Various including National Highways, Port of London Authority]</i>	Noted. No action arising.
	SO7 should be strengthened. River transportation is also largely fossil fuel powered. Emphasis should be given to the energy efficiency of transport i.e. water-based transport is considerably more efficient than land-based, regardless of energy source. <i>[EA]</i>	Noted. Text of SO7 has been updated accordingly.
	Move toward non road transport is welcomed however would only be realistic for the sites nearest the Thames. This proposal could help to achieve air quality and climate change targets due to less HGVs.	Noted. No action arising.
	Support SO7 which is in line with London Plan Policy T1. To deliver on this objective the strategy should take account of opportunities for the movement of waste by sustainable means, such as by river and rail if appropriate, and also ensuring location of facilities close to major generators of waste and places where there is demand for waste by products as well as reducing the amount of waste. <i>[TfL]</i>	Policy JWP2 encourages the development of facilities which are close to arisings and can make use of river and rail transportation. The Plan seeks to minimise waste production via Policy JWP1. No action arising.
<b>SO8</b>	What would amount to exceptional circumstances for landfill? <i>[Integrated Skills Ltd.]</i>	This is set out in Policy JWP6 No action arising.
	Restriction of landfilling to exceptional circumstances welcomed, but unclear if this applies to landfill within the Plan area or outside it. <i>[East of England Waste Technical Advisory Body]</i>	The policies of the Plan can only be applied to the area covered by the Plan.

<u>Part of Plan</u>	<u>Summary of comment</u>	<u>Borough Response including action arising</u>
<b>4. Future Requirements for Waste Management Capacity</b>		
	Data in the plan needs cross checking with the Waste Needs Assessment documentation in particular relating to construction demolition and excavation waste. <i>[Integrated Skills Ltd.]</i>	Data has been checked and updated to ensure data in Plan is consistent with that in the data reports
	Table needed detailing waste exports. Authorities outside East London are currently not planning for waste from the area and so exported waste may have to travel further resulting in high financial and environmental costs. <i>[East of England Waste Technical Advisory Body]</i>	Such a table could be included but this would only be a snapshot. The scale of imports and exports is shown in Figure 8. DtC dialogue underway to establish likely management routes relating to waste exports.
	Add text highlighting that ongoing engagement and robust monitoring with regional waste technical groups and adjoining authorities to further understand the implications of flows of inert excavation waste will be needed. <i>[East of England Waste Technical Advisory Body]</i>	Text added to supporting text to JWP6 and related monitoring indicators.
	Request for quantified capacity transfers of 26,363 tpa of HIC capacity and 56,935 tpa of C&D capacity (highlighting the proximity principle and London-wide net self-sufficiency as key considerations) and formal recognition of historic re-provision of capacity from Hepscott Road (LLDC area) to River Road (LB Barking & Dagenham), asking that this contributes towards LBTH's need (the 26,363 tpa HIC figure). <i>[LBTH]</i>	LBTH has not adequately demonstrated that its needs for capacity could not be wholly met within its own area
	It is premature to release safeguarded sites until capacity-sharing outcomes are known - sites currently receiving significant LBTH waste continue to be safeguarded to ensure continuity of management capacity.	Request for capacity has been responded to and so the outcome is known. Sites are safeguarded as requested.
<b>Para 4.5</b>	Combining all forms of construction demolition and excavation waste management together may present misleading picture regarding capacity requirements especially if Demolition and Excavation waste are combined. <i>[Integrated Skills Ltd.]</i>	C, D & E waste capacity is considered in greater detail in the separate evidence base report. The London Plan does not distinguish between the components of C, D & E waste other than excavation waste.
<b>Para 4.9</b>	Dialogue sought with respect to sharing surplus capacity to allow Western Riverside Waste Authority boroughs to meet their London Plan apportionments for HIC waste. <i>[Western Riverside Waste Authority]</i>	Affected boroughs (Lambeth and Wandsworth) have since confirmed that they do not wish to rely on surplus capacity in the ELJWP.

<b><u>Part of Plan</u></b>	<b><u>Summary of comment</u></b>	<b><u>Borough Response including action arising</u></b>
	Does the capacity assessment consider the impact from changes to the Permitting Regulations which will close sites operating T8 and T9 exemptions? <i>[Integrated Skills Ltd]</i>	<p>Details of changes to the permitting regulations are still awaited and so it is not possible to state with any certainty what the impact will be. In any event sites which currently benefit from an exemption may continue to operate with an Environmental Permit.</p> <p>Note that if the capacity assessment were to include sites currently operating under the T8 and T9 exemptions, assessed available capacity would increase.</p>
	Encourage further engagement with GLA to ensure there is a more formalised mechanism for accounting for the tonnage of materials shared between the boroughs for apportionment purposes going forward. This is so the overall strategic picture can be planned with more certainty with a pragmatic methodology which suits the needs of London as a whole. <i>[EA]</i>	Ongoing engagement with GLA is already taking place. Statement of Common Ground (SoCG) with GLA to be prepared.
<b>5. Sites for Waste Management</b>		
<b>Table 9 Existing Waste Sites Proposed for Release from Safeguarding</b>	London policy requirements relating to release of waste sites have not been met - the loss of any waste site would need evidence of the requisite alternative capacity being provided elsewhere in London – this is a general conformity issue. <i>[GLA]</i>	Only a small number of sites are proposed for release and there is substantial surplus capacity remaining. Sites proposed for release are those which are not compatible with wider Borough development aspirations, in particular relating to the provision of housing and regeneration which is also an important use of land. The London Plan allows for sites to be released under such circumstances providing the apportionments are still met and net self-sufficiency is not compromised. SoCG with GLA to be prepared.
	If the principle of releasing waste sites is established, their capacity should be offered to boroughs with a shortfall in waste capacity. The GLA is aware that some	All Boroughs have been contacted and invited to consider whether surplus capacity in East

<b><u>Part of Plan</u></b>	<b><u>Summary of comment</u></b>	<b><u>Borough Response including action arising</u></b>
	London boroughs cannot meet their borough apportionment targets and have a shortfall in waste capacity. <i>[GLA]</i>	London should be used to help meet waste requirements in their areas.
	All sites with Planning Permission or Environmental Permit should be safeguarded. <i>[GLA]</i>	See above.
	Annex of Shed A, Box Lane has full planning permission and an Environmental Permit. Shed A itself has full permission (granted May 2022) and a permit. Both sites located in SIL. Draft B&D Local Plan specifically identifies Box Lane for larger logistics and distribution and heavier industrial activities with rail connections. Removal of Box Lane sites (Eurohub, Shed A and the Annex) is in conflict with the LP and the draft local plan. <i>[Integrated Skills Ltd.]</i>	Sites to be released at landowner request as occupancy of waste uses to cease in 2025 and Environmental Permits to be surrendered on vacation.
	Loss of three sites proposed for release are located in the Castle Green Masterplan area: (1) Eurohub Box Lane (D B Cargo) (2) Eurohub Box Lane (Titan Waste) (3) Renwick Road Rail Hub (Biffa Waste Services) This is within SIL – any loss of industrial capacity or changes to SIL designation will need consideration of how any change in status could impact on a borough's industrial capacity and ability to meet its industrial needs as required by LP. <i>[GLA]</i>	Renwick Road Rail Hub (Biffa Waste Services) to be safeguarded. Other sites to be released at landowner request to enable the regeneration of the site as a freight terminal, as occupancy of waste uses to cease in 2025 and Environmental Permits to be surrendered on vacation.
	The existing Box Lane (Eurohub) site offers potential for transporting waste by rail including to Europe. Existing plans for redevelopment are entirely dependent on commercial viability; it is crucial that the site be allowed to offer a wide range of capabilities in order to optimise its chance of commercial success and so there is a need for some flexibility in redesignating the site. It will need to be able to handle waste to and from trains and the Plan should not prejudice that capability. <i>[Legal &amp; General Investment Management]</i>	The site does not have full planning permission and is currently safeguarded only by virtue of Environmental Permits being in place. Sites to be released at landowner request to enable the regeneration of the site as a freight terminal, as occupancy of waste uses to cease in 2025 and Environmental Permits to be surrendered on vacation.
	Support for not safeguarding the Old Bus Depot waste management site <i>[City of London Corporation]</i>	Noted. No action arising.
	Support for not safeguarding the Dagenham Dock Sustainable Industries Park which is allocated in the adopted 2012 ELWP, in particular a site at Plot 64, Hindmans Way, Dagenham Dock, Barking. <i>[City of London Corporation]</i>	Noted. Parts of the Dagenham Dock Sustainable Industries Park that accommodate facilities classed as Existing Waste Sites under the London Plan will be safeguarded, but the

<u>Part of Plan</u>	<u>Summary of comment</u>	<u>Borough Response including action arising</u>
		remaining land currently allocated for waste development will be released.
	The Mayer Parry Wharf site at Bidder Street, London, E16 4ST is safeguarded by the adopted ELWP 2012 but is proposed for redevelopment without compromising waste capacity within the ELJWP area and should be expressly identified as a site to be released from safeguarding. <i>[IXDS Ltd]</i>	<p>This site has already been effectively released from safeguarding when EMR relocated to Unit 6 Standard Industrial Estate in Newham and so was not counted as an existing waste site in the capacity assessment nor identified in Appendix 1 and 2. There is therefore no need for this site to be mentioned specifically.</p> <p>The site at Standard Industrial Estate is listed in the ELJWP as a safeguarded site.</p>
	Object to release of 5 sites in Barking which will result in 'redirection' of waste to two sites in Newham resulting in increased impacts from traffic. <i>[resident]</i>	<p>Unclear which two sites in Newham this comment relates to, but existing waste sites have been granted planning permission on the basis that they will not cause unacceptable adverse impacts the highway including congestion. Note that 3 of the site in B&amp;D do not benefit from planning permission for waste, and the remaining two are inactive (hence any waste managed at these sites will already be being managed elsewhere).</p> <p>No action arising.</p>
<b>Paragraph 5.1.2</b>	It could be clarified that the provisions of Paragraph 5.1 indent 2 only apply to Local Plans adopted prior to the adoption of this emerging WLP. <i>[Barking Riverside Limited]</i>	Add 'adopted and emerging' before 'Local Plans' to clarify the position.
	Concern that proposals will lead to more traffic in Newham as the airport creates pollution and there are residential buildings and schools around the area. <i>[resident]</i>	The Plan includes policy which is intended to ensure new waste management development will not cause unacceptable impacts on congestion.
	Reducing sites when there is ever increasing population is short sighted. <i>[resident]</i>	In most case the release of sites is intended to facilitate the development of housing to accommodate the growing population. An assessment of capacity has been undertaken

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		that shows there will be sufficient capacity to meet future needs with release of the sites identified. No action arising
	Renwick Road Rail should be safeguarded. <i>[Biffa]</i>  Strongly oppose the release of railhead sites Barking Eurohub and Renwick Road Railhub from safeguarding due to the potential impact on waste management and the likely impact on sustainable transport initiatives. <i>[EA]</i>	The Renwick Road Rail site is now included as a site to be safeguarded.  Other Barking Eurohub sites are proposed for released to facilitate redevelopment of the area as a freight terminal in accordance with the Local Plan and in response to landowner request as occupancy of waste uses to cease in 2025 and Environmental Permits to be surrendered on vacation.
	Release of land should take into account whether the site is subject to any specialist transfer or treatment of hazardous waste on site. <i>[EA]</i>	This has been undertaken. None of the sites proposed for release provide specialist transfer or treatment of hazardous waste. This information will be included in the evidence base. No action arising.
	As waste is moved up the hierarchy it needs more area per tonne to manage it. It is important that the current waste estate is maintained and loss of sites is minimised, especially those of strategic significance in terms of size or logistical considerations. <i>[EA]</i>	Only a small number of sites are proposed for release and there is substantial surplus capacity remaining. Only one of the sites proposed for released might be classed as making a strategic contribution to management of East London's waste (Eurohub) and this does not benefit from permanent planning permission for waste. No action arising.
	If sites are to be released for housing, there is a need to consider the relationship with other adjacent remaining industrial and related uses to ensure that it is a feasible and suitable location for residential development taking account of the agent of change principle. We suggest that surplus sites are considered for other similar uses (e.g. bus garages, logistics) when in SIL or LSIS before release. <i>[TfL]</i>	Policies of the Borough Local Plans would ensure that proposals for redevelopment of waste sites for residential uses take account of the Agent of Change principle contained in the NPPF and are appropriate for the particular location. No action arising.

<u>Part of Plan</u>	<u>Summary of comment</u>	<u>Borough Response including action arising</u>
	Support approach that no land is proposed to be allocated specifically for the development of additional waste management facilities. <i>[Henry Boot Developments (HBD) and Barings]</i>	Noted. No action arising.
	No allocations being proposed means there is less chance of a site allocation having an impact on protected sites <i>[Natural England]</i>	Noted. No action arising.
<b>6. Policies</b>		
<b><i>Policy JWP1: Circular Economy</i></b>		
	Support for minimising waste from development <i>[Various]</i>	Noted. No action arising.
	Support for application of the circular economy to all forms of development. <i>[Various]</i>	Noted. No action arising.
	Support for JWP1 – consistent with water industry ambition. <i>[Water Industry]</i>	Noted. No action arising.
	Plans for infrastructure support such as sites for construction waste e.g. Circular Economy Construction Hubs) to facilitate a circular economy should be set out. <i>[Heidelberg Materials Ltd.]</i>	Noted. No action arising.
	Support for requirement for circular economy statements for major development proposals. <i>[Various]</i>	Noted. No action arising.
	Pleased to see flats included when considering recycling plans but not convinced will this be enforced especially with current purpose-built flats. Currently experiencing unsatisfactory arrangements with insufficient collection facilities. How will the plan require new and existing flat developments to include recycling facilities and then enforce this? <i>[resident]</i>	Noted. JWP1 is intended to ensure new development only comes if appropriate recycling facilities are proposed to be included. The policies of the Plan can only be applied to determining proposals for new development which require planning permission and therefore cannot influence practice in existing development.
	Concerned that waste arrangements for the 6,000 or so flats which will be built along Rom Valley Way help to maximise recycling - often there is a tail-off in recycling levels in densely developed flatted areas - and that effective arrangements	Policy JWP1 is intended to ensure that appropriate and effective recycling provision is made in all forms of residential development

<b><u>Part of Plan</u></b>	<b><u>Summary of comment</u></b>	<b><u>Borough Response including action arising</u></b>
	are in place to ensure that bin areas in flats are kept clean and reduce smell from them. <i>[Romford Civic Society]</i>	which, if maintained, would not result in nuisance. No action arising.
	Support for more Repair centres with good access by public transport. <i>[resident]</i>	Noted. No action arising.
	Clause D requiring visitor facilities is generally not practical in most cases due to need to protect health and safety of visitors and sites often being inaccessible <i>[ELWA]</i>	The policy concerns 'major' waste facilities however it is recognised that it may not be practicable to incorporate waste facilities in every such development. In terms of providing such facilities, general meeting rooms included within facilities will often suffice. Amended wording policy is proposed (some changes to the supporting text are also necessary)
	Current waste sites should be safeguarded as much as possible and loss minimised, especially those of strategic significance in terms of size or logistical considerations. <i>[EA]</i>	Only a few sites are proposed for release and only one of the sites proposed for release might be classed as making a strategic contribution to management of East London's waste (Eurohub) and this does not benefit from permanent planning permission for waste.
<b>Para 6.13</b>	Support for introduction consistent collection of materials and weekly food waste collections. <i>[resident]</i>	Noted. No action arising.
<b>Para 6.15</b>	Specific figures relating to the Envac system at Barking Riverside should be removed as these are no longer accurate. <i>[Barking Riverside Limited]</i>	Information on Envac system at Barking Riverside has been updated.
<b>Para 6.20 (table)</b>	Table is unclear should be revised to show a total household recycling rate that combines dry mixed recyclables and food waste. Heading other wastes is ambiguous does this relate to non-household developments. <i>[Barking Riverside Limited]</i>	The table has been updated to ensure its meaning is clear.
<b>Paras 6.22 to 6.27</b>	Issues relating to bin stores being used for rough sleeping and drug dealing have been ascribed to bin stores being left open during collection times for excessive periods or not being shut properly. Should require consideration of security (e.g. gating, doorsets/windows, access control/CT measures, lighting and CCTV etc.) for Major and Non-Major development proposals where bin stores are incorporated. <i>[Metropolitan Police Service]</i>	Supporting text updated to mention 'Secured by Design (SBD)' initiative.

<u>Part of Plan</u>	<u>Summary of comment</u>	<u>Borough Response including action arising</u>
<b><i>Policy JWP2: Safeguarding and Provision of Waste Capacity</i></b>		
	Support for safeguarding existing waste management capacity <i>[Various including local authorities]</i>	Noted. No action arising.
	Support for the development of new waste management facilities in sustainable locations <i>[Various]</i>	Noted. No action arising.
	Policy JWP2 is overly complex and restrictive as part of the policy does not allow for any growth in CDE waste to be met. <i>[Heidelberg Materials UK]</i>	No action arising. Policy does allow for new capacity in certain, albeit limited circumstances.
	Waste sites should be located away from people and residential areas <i>[resident and Henry Boot Developments (HBD) and Barings]</i>	Policy JWP2 requires that facilities are developed in locations that will not cause unacceptable adverse impact on communities. No action arising.
	Safeguarding waste management capacity is essential. London is not net self-sufficient in waste capacity and the LP apportionments will not be met. East London will likely have to make a greater contribution to the management of waste in London overall. <i>[East of England Waste Technical Advisory Body]</i>	No evidence provided to justify statement that <i>'London is not net self-sufficient in waste capacity and the LP apportionments will not be met.'</i> The LP apportionments are set at a level which takes account of the fact that East London is expected to make a greater contribution to the management of waste produced in London and the capacity assessment shows that this will be met through to 2041. Local Plans in areas surrounding London should take account of the possibility of inert excavation waste being transported to its area as the London Plan 2021 recognises that the export of such waste to areas beyond London for management is likely to happen.

<b><u>Part of Plan</u></b>	<b><u>Summary of comment</u></b>	<b><u>Borough Response including action arising</u></b>
		The approach to safeguarding in Policy JWP2 has been updated but a small number of sites are still proposed for release (see separate report).
	The wording of Policy SI8 in the LP concerning release of waste sites based on compensatory capacity being available elsewhere and achievement of net self-sufficiency should be included in the Plan. <i>[Lester Harrison &amp; Partners, Chartered Surveyors]</i>	There is no need to repeat the text of the LP in the ELJWP - the text of the ELJWP already references and reflects the text of the LP. No action arising.
	What would the policy position be if land was allocated in a district local plan but did not come forward? <i>[Essex County Council]</i>	Assumed that this comment concerns the Borough Local Plans. Any allocation in the Borough non waste Local Plans would need to be consistent with the ELJWP or justify any divergence. In most instances, the latest policy to be adopted takes precedent. No action arising.
	Text of clause e should be made amended so it is clearer when waste development would be 'particularly needed' on greenfield land. <i>[Essex County Council]</i>	This has been covered in the supporting text.
	All sites should be safeguarded and release of safeguarding should not take place unless WPAs have been consulted in accordance with DtC. This is especially important for site close to boundary of the Plan area where release may result in waste arising in the Plan area being exported to other areas even though there is sufficient capacity across the area as a whole. <i>[Essex County Council, Cambridgeshire County Council]</i>	Very few sites are proposed for release and those that are those identified as not being compatible with wider Borough development aspirations, in particular relating to the provision of housing which is also an important use of land. The London Plan allows for sites to be released under certain circumstances. DtC discussions are taking place with other Boroughs and neighbouring WPAs. The approach to safeguarding in Policy JWP2 has been updated but a small number of sites are still proposed for release (see separate report).
	Change to operations associated with decarbonisation of waste management, as well as movement up the waste hierarchy, may mean operations have a reduced throughput and this form of repurposing should be allowed as well. <i>[ELWA]</i>	Not clear what process, which did not involve moving waste up the hierarchy, is envisaged that would lead to better carbon outcomes.

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	Suggest clarifying that 'new waste management capacity' includes re-purposing of existing waste management capacity in paragraph 6.36. <i>[ELWA]</i>	Text updated accordingly
	When accounting for capacity MBT facilities be considered as being at the 'recovery' level of the waste hierarchy. <i>[ELWA]</i>	Noted. In establishing whether there is sufficient capacity to meet the management of the London Plan apportioned HIC waste, other than avoidance of management by landfill, all forms of management contribute to the management of apportioned waste.
	Maximum flexibility for the development at safeguarded waste sites should be allowed in light of potential changes to the uses of existing waste sites during the plan period <i>[ELWA]</i>	Improvements to existing sites are encouraged in principle by the Plan. The release of sites from safeguarding needs to be tightly controlled to ensure sufficient waste management capacity is maintained. The criteria for release also need to be in general conformity with the London Plan. No change proposed.
	Policy should provide the opportunity to review the policies and approach of the ELJWP if underlying assumption that there are surplus capacity changes. Changes to technology may also affect capacity requirements <i>[ELWA]</i>	It is highly unlikely that the 'assumption' that there is surplus capacity will change but the Plan includes a requirement for monitoring of waste capacity which will take place on annual basis. If monitoring reveals issues with the provision of capacity, then the Plan may be reviewed and updated accordingly. In any event the relevance of the Plan must be reviewed at least every five years.
	Safeguarding may help stimulate growth of 'green jobs'. Land is a scarce resource, and investment in new technologies to drive waste up the hierarchy will face significant competition for sites from other sectors. Safeguarding existing waste management site capacity may help to encourage diversification and innovation within the resources and waste sector in East London. <i>[ELWA]</i>	Support for safeguarding noted. No action arising.
	Where sites are co-located release of safeguarding provision may result in encroachment of the remaining sites by non-waste development. The WPA itself should agree to release rather than the Local Plan automatically removing any safeguarding provisions. <i>[Barking Riverside Limited]</i>	Any development of released site would need to consider location of existing facilities and Policy JWP3 would apply to ensure there would be no impacts.

<b><u>Part of Plan</u></b>	<b><u>Summary of comment</u></b>	<b><u>Borough Response including action arising</u></b>
	Clause 6v is too restrictive: Compost and digestate cannot be used repeatedly on adjoining land. Flexibility must be included to allow export. <i>[Integrated Skills Ltd.]</i>	Text updated to allow flexibility.
	Use of the word 'generally' should be removed as the LP safeguards all waste management sites with planning permission or a permit. <i>[Integrated Skills Ltd.]</i>	The ELJWP proposed release of some sites hence use of the term 'generally'.
	Hazardous waste disposal points should not be sited near proposed new builds and radioactive materials should be disposed of carefully at sites with appropriate Counter Terrorism measures in place. <i>[EA]</i>	Policy JWP2 in the Plan ensures appropriate siting of facilities and ensures these matters are taken into account.
	Specific concern with any proposals which have the potential to impact the M25, M11, A13 and A12 which experience congestion at peak times. <i>[National Highways]</i>	Policy JWP2 intended to ensure that no development would take place if it were likely to cause impacts on the SRN.
	Concern with any increase in slow moving HGVs accessing the SRN and the resulting potential impact to the safe and efficient SRN. <i>[National Highways]</i>	Policy JWP2 intended to ensure that no development would take place if it were likely to cause impacts on the SRN.
	Support JWP2's aim to minimise the transportation of waste and improve road safety by locating facilities as close as possible to their sources and establishing alternative transport means, including utilising the River Thames and railheads. <i>[National Highways]</i>	Noted. No action arising.
	Several safeguarded sites are proximate to the SRN. If any new development does come forward in these locations, it should be ensured that Transport Assessments are submitted with alongside planning applications. If safeguarded sites are released for other forms of development, an assessment of SRN impacts should be provided. National Highways should be consulted at pre-application stage if possible. <i>[National Highways]</i>	Transport Assessment would be prepared in accordance with Local Plan policy which would include an assessment of impacts on the SRN.
	Any proposals which include operations that have air quality impacts would need to be situated as far from designated sites like Epping Forest SAC as possible and would need to be assessed for their possible impacts on the site. <i>[Natural England]</i>	The Plan recognises the need to protect designated sites like Epping Forest SAC and includes policy to ensure this is taken into account.
<b><i>Policy JWP 3 Prevention of Encroachment</i></b>		
	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 existing / consented development in proximity to such	This is already specifically addressed by Clause D. 4 iv which only allows waste development where it avoids ' <i>creating an undue amenity</i> '

<u>Part of Plan</u>	<u>Summary of comment</u>	<u>Borough Response including action arising</u>
	waste sites. Policy JWP3 should be amended to make clear that new or expanded operations should have regard to impacts on existing and future occupiers of lawful development. <i>[Barking Riverside Ltd]</i>	<i>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;</i> No action arising.
	Development proposals for waste sites in or near SILs should not hinder their industrial function. <i>[City of London Corporation]</i>	See above No action arising.
	JWP3 is an important policy and is welcomed. <i>[Various including waste industry and developers]</i>	Noted. No action arising.
	Policy JWP3 and its supporting text should be combined with the safeguarding elements of Policy JWP2, and those parts of JWP2 associated with new capacity should be turned into a new Policy JWP3, which would then focus solely on new capacity. <i>[Essex County Council]</i>	Considered that separation of matters between JWP2 and JWP3 as proposed is not necessary.
	For waste local plans within the Anglian Water region there is generally a 400m waste consultation zone around water recycling centres to ensure that any necessary noise or odour assessments are provided to facilitate appropriate mitigation measures. Size of encroachment buffers for Water Recycling Centres are risk assessed according to the size of the works and the population it serves. For Upminster water recycling centres, a 250m encroachment buffer should be specified in the Policy. <i>[Anglian Water]</i>	Supporting text updated to specify 250m consultation zone for all wastewater treatment works except Beckton which has an agreed 800m zone.
	Policy should be clear whether it will also apply to extensions/new treatment facilities at the Upminster water recycling centre. <i>[Anglian Water]</i>	Supporting text updated to include wastewater treatment facilities.
<b>Para 6.50</b>	'Odour' should be included in the list of potential impacts that might arise from proposed developments with sensitive receptors within 250m radius of the Upminster Water Recycling Centre. <i>[Anglian Water]</i>	Supporting text (para 6.50 in the Reg 18 Draft) updated to take this into account
	Reference to transport impacts should be included. <i>[TfL]</i>	Supporting text updated.
	Support for JWP3 specifically ensuring that existing safeguarded waste management facilities are safeguarded from nearby development. <i>[Various including waste industry]</i>	Noted. No action arising.
<b><i>Policy JWP4: Design of Waste Management Facilities</i></b>		

<u>Part of Plan</u>	<u>Summary of comment</u>	<u>Borough Response including action arising</u>
	General support for Policy ELJWP 4 <i>[Various]</i>	Noted. No action arising.
	Biodiversity measures should be integrated into new buildings, e.g. biodiverse roofs, swift bricks or boxes, green walls. <i>[Swifts Local Network: Swifts &amp; Planning Group]</i>	Achievement of BNG might require such measures to be installed. Supporting text added.
	No measures mentioned about security. Some of the sites can count as part of the critical infrastructure and so could be targeted. New and existing sites should review areas such as gating, doorsets/windows, access control/CT measures, lighting, CCTV, staffing levels and intruder alarms to ensure that facilities are fit for purpose. <i>[Metropolitan Police Service]</i>	Supporting text updated to include mention of 'Secured by Design (SBD)' initiative.
	In line with the NPPF (including Section 8) and PPG (Health and wellbeing section) consideration should be given to how new development will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help. <i>[Sport England]</i>	Such matters are dealt with in the Borough Local Plans which would also need to be taken into account when proposals are considered.
	Supporting text should note detail needed to show how use of non-road transportation has been considered, for example through a Transport Assessment that specifically looks at the rail/river transportation opportunities. <i>[Port of London Authority]</i>	Text added setting out need for Transport Assessments. This is considered more relevant to Policy JWP2 which requires that proposals will: <i>i. Minimise transportation of waste by being well located in relation to the sources of waste to be managed; and,</i> <i>ii. have good access to railheads and wharves and utilise non road modes of transportation or demonstrate why this would not be practicable; and,</i> <i>Subject to criteria i., have good access to the road network and will not cause unacceptable adverse impacts on road safety or unacceptable adverse effects on the road network;</i>
	Achievement of BREEAM excellent or equivalent is too onerous for waste operators, and generally not applicable to waste facilities. The application of CEEQUAL standards for development/redevelopment of waste sites. <i>[EA]</i>	The clause states: 'achievement of a BREEAM 'Excellent' rating or its equivalent unless it is demonstrated that this isn't practical;' In light of the caveat included it is considered that this recognises that in certain circumstances

<u>Part of Plan</u>	<u>Summary of comment</u>	<u>Borough Response including action arising</u>
		waste facilities may not be able to achieve an excellent rating. No action raising
	Would expect risk to groundwater to be included as part of this policy. <i>[EA]</i>	Text updated to mention the 'water environment'. Definition of 'water environment' added to the glossary.
	Reference to historic environment should be added to clause A e.g. ' <i>Any adverse impacts on the historic environment, including measures to avoid and/or mitigate effects.</i> ' <i>[Historic England]</i>	Policy updated.
	The ELJWP 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. The Plan should reference TfL's Vision Zero Action Plan. <i>[TfL]</i>	Supporting text referencing the Direct Vision standard has been added.
	Not all storage and management of waste is required to take place in a building. Composting takes place in the open. For the avoidance of doubt, the plan should define a building or ensure that flexibility is permitted on a case-by-case basis; <i>[Integrated Skills Ltd]</i>	The supporting text of Policy JWMP4 states: ' <i>Enclosure of operations within a building, <b>where operationally feasible</b>, will be required as the best means of reducing noise, dust and odour. <b>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</b></i> ' Therefore, in certain circumstances, such as open windrow composting, it may be possible for proposals with operations which are not fully enclosed to be allowed. It should be noted Supporting text updated to note that the need for enclosure of operations is also prescribed via the Environmental Permitting process.
	Operations at EMR Silvertown, 6 Standard Industrial Estate cause noise nuisance from 7am Monday to Saturday - any development here opposed due to noise and disruption. How is noisy activity allowed from such an early hour; Object to development close to residential area; Noise levels and hours of operation have to be taken into consideration when building such facilities in built up areas. <i>[resident]</i>	Policy JWP4 is intended to ensure proposals for new development take account of the need to avoid noise nuisance by locating in suitable areas and providing appropriate mitigation. The Local Authority and/or the Environment Agency

<u>Part of Plan</u>	<u>Summary of comment</u>	<u>Borough Response including action arising</u>
		can take action regarding noise nuisance resulting from existing waste facilities. No action arising.
	Requirement for considering Biodiversity Net Gain is welcomed. <i>[Natural England]</i>	Noted. No action arising.
	Support requirement for the efficient use of water - this helps reduce the volume of wastewater treated at water recycling centres which saves energy. <i>[Anglian Water]</i>	Noted. No action arising.
	Support 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. <i>[Anglian Water]</i>	Noted. No action arising.
<b>Policy JWP5: Energy from Waste</b>		
	The policy should make clear that requirements set out in the policy would apply only to new EfW facilities, and not to existing permissions or operations	All policies of the Plan can only apply when an application for planning permission is made and therefore could not be applied to development that has already been granted planning permission. No action arising.
	Opposed to policy which might allow for burning waste. Support for policy but not convinced it will be effective in stopping waste that is not residual from being burned as economic will mean operators will seek waste to manage. EfW undermines recycling and genuine low carbon electricity and heating. Disagree that increasing energy efficiency will mean less CO2 is produced as the energy could be produced by solar and wind instead. <i>[resident]</i>	EfW is an accepted form of waste management which can be deployed in certain limited circumstances as described by policy JWP5 which includes the need for maximum heat recovery and capture of non-biogenic gaseous carbon emissions. The London Plan also requires a minimum performance level of 400g of CO2 equivalent per kilowatt hour of electricity produced
	Need to recognise role of incineration in management of hazardous waste which may not always able to achieve commercially viable scales for energy or heat recovery. <i>[EA]</i>	Supporting text and text to policy added to recognise this issue.
	The policy does not reflect commercial or current policy and legislative realities – there are insufficient powers to require full segregation of reusable or recyclable items from mixed residual wastes, and post-collection sorting yields low-quality	Text updated as suggested.

<b><u>Part of Plan</u></b>	<b><u>Summary of comment</u></b>	<b><u>Borough Response including action arising</u></b>
	recyclate for which there is little market. suggest that the word 'viably' should be inserted before the word 'reused'. <i>[ELWA]</i>	
	Support for EfW as not all waste can be recycled and burning it for energy is preferable to landfill. <i>[resident]</i>	Noted. No action arising.
	Regarding point 5 although heat and energy is stipulated, it is not a requirement to state in an application how this is achieved, so an extra point should be added for para 6.7 to address this. <i>[EA]</i>	Supporting text added to address this concern.
	Noted that no incinerators are proposed however this could be clarified to mention whether there are any within the plan area or not. When assessing the plan and its HRA it appeared to suggest that waste is aggregated within plan area for shipment out to incinerators (or Combined Heat and Power (CHP) facilities) but that no such facilities exist within the area. <i>[resident]</i>	There are currently no incinerators in the Plan area – this has been confirmed in additional supporting text.
	The waste hierarchy being the main drive of this plan (and dealing with waste as early on as possible) makes sense and should be the aspiration. This avoids incineration / landfill which should only be as a very last resort. <i>[resident]</i>	Noted. No action arising.
<b><i>Policy JWP6: Deposit of Waste on Land</i></b>		
	General support for JWP6. <i>[Various including resident]</i>	Noted. No action arising.
	Use of landfill sites outside the Plan area for waste arising in East London should be acknowledged and liaison is needed between East London and the authorities where the waste is received. <i>[East London Waste Technical Advisory Body]</i>	Noted. Liaison is taking place. Text of section 4 has been updated to reflect this.
	The deposit of waste on land for recovery purposes should match the requirements of the Environment Agency to avoid duplication of control. <i>[Integrated Skills Ltd.]</i>	The approach taken for planning and permitting reasons may not be the same as one is concerned with land use and the other is concerned with pollution control. No action arising.
<b>Para 6.77</b>	Should add flood defences as an engineering use for some inert waste. <i>[EA]</i>	Text added (see para 6.97)
	The word 'reworking' in the policy is vague. Does this relate to redevelopment of former landfill sites for other uses or possible 'landfill mining' activities to re-access discarded materials that have become valuable. <i>[ELWA]</i>	This is explained in the supporting text – it means extraction to free up land for development and/or recovery of recyclable or recoverable materials.

<u>Part of Plan</u>	<u>Summary of comment</u>	<u>Borough Response including action arising</u>
	Risk associated with extraction of landfilled waste would have to be weighed against the risks of leaving such wastes where they are. <i>[ELWA]</i>	This is already effectively noted by the supporting text.
	Text should be added to confirm need for ongoing liaison with neighbouring areas and monitoring regarding landfill of inert excavation waste. <i>[Thurrock Council]</i>	Text included.
<b>General</b>		
	Broad support for the ELJWP <i>[Various]</i>	Noted. No action arising.
	A specific policy that sets out how proposals for the management of wastewater will be considered should be included in the Plan (E.g. NLWP) <i>[Thames Water]</i>	Policy (JWP2A) and supporting text setting out how proposals for the management of wastewater will be considered has been included in the Plan. Text elsewhere has been updated to clarify how the Plan relating to wastewater.
	Clarity is needed concerning how the Plan relates to the management of wastewater <i>[Anglian Water]</i>	See above.
	Plan is too long, complicated and verbose. <i>[resident]</i>	The Plan is a detailed technical document by necessity as it must set out all the issues facing the management of waste and related policy must be carefully drafted to ensure it can be implemented which may add to the apparent verbosity of the document. Efforts have been made to use plain English and a glossary and executive summary are provided to help with understanding of the Plan. A further check of the use of plan English has been undertaken and changes made where it is considered that the text could be simplified.
	Request for explanation of terms: 'safeguarding'; 'circular economy'; 'encroachment'; 'energy from waste'; 'deposit of waste on land' <i>[resident]</i>	These terms are explained in the Plan specifically 'safeguarding', 'circular economy', and 'energy from waste' are already included in the Glossary. 'encroachment'; 'Energy from waste'; 'deposit of waste on land' added to the glossary

<b><u>Part of Plan</u></b>	<b><u>Summary of comment</u></b>	<b><u>Borough Response including action arising</u></b>
	Tighter vehicle restrictions at household sites will mean that this will increase fly tipping. <i>[resident]</i>	Noted however this is not a land use issue. The comment has been referred to ELWA for its attention as the body responsible for the provision of household waste sites.
	Western Riverside Waste authority report note capacity gap for LACW and C&I waste in its area, and an option could be for engagement with other boroughs and surplus capacity - engagement with East London boroughs would be beneficial for addressing the capacity gap for the London Borough of Wandsworth and the London Borough of Lambeth <i>[Western Riverside Waste Authority]</i>	Dialogue with London Borough of Wandsworth and the London Borough of Lambeth did not result in specific requests concerning capacity.
	Concern about waste collection and disposal in central Romford including Rom Valley Way to Roneo Corner, in particular overflowing trade waste bins in central Romford including meat waste in overflowing bins in Victoria Road. <i>[Romford Civic Society]</i>	Noted. Such issues should be reported to the Environmental Health team for action.
	Any public site locations are more easily accessible to the general public and thus less likely to result in fly tipping. It would be useful to assess currently identified fly tipping points to see if there is capacity for more locally placed sites or that any proposed sites may help to reduce this risk. <i>[Metropolitan Police Service]</i>	Sites are safeguarded and provided by the Plan to allow for the proper management of waste. Flytipping should be reported to the EA and the Borough.
	Planning policies in a plan should be based on a proportionate assessment of the need for sporting provision in its area. <i>[Sporting England]</i>	This matter is addressed in the Borough's Local Plans which would also need to be taken into account when considering proposals for waste management.
	No new sites being allocated so there should be no impact on National Grid assets. <i>[National Grid]</i>	Noted. No action arising.

## 7. Policies Map

	Would be useful to show existing sites numbered on a map to allow cross reference to location plans of sites. <i>[Natural England]</i>	Due to the number of sites such a map would be illegible.
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## 8. Appendices

### ***Appendix 1 – List of Safeguarded Sites***

<b><u>Part of Plan</u></b>	<b><u>Summary of comment</u></b>	<b><u>Borough Response including action arising</u></b>
	Not safeguarding certain waste sites may impact on the achievement of net self-sufficiency in London. <i>[East of England Waste Technical Advisory Body]</i>	Data shows sites can be released without impact net self-sufficiency. No action arising.
	The list of safeguarding sites does not include some of the sites included in the BPP assessment of existing waste management capacity. <i>[EA]</i>	The list of safeguarded sites has been updated and now reflects the assessment of capacity.
	The London Teleport site should not be included for safeguarding because there is sufficient capacity for metal recycling in Newham and safeguarding to 2041 will result in significant adverse impact on local communities and the environment e.g. housing developments on the east side of Store Road and on Pier Road. <i>[Lester Harrison &amp; Partners, Chartered Surveyors]</i>	The London Teleport Site benefits from permanent planning permission for waste and must operate within terms of the Environmental Permit enforced by the EA intended to ensure that unacceptable impacts do not arise from operation of the site
	The Heidelberg materials Dagenham wharf off Chequers Lane in Barking and Dagenham (TQ 49227 81902) has a permit for the processing of construction and demolition wastes and should be added to Appendix 1 (and 2) as a safeguarded site. <i>[Heidelberg Materials UK]</i>	Added to list of safeguarded sites
	Cemex site on land at Docks Estate, Choats Road, Dagenham, RM9 6LB should be identified as a safeguarding waste site given the extant planning permission and Waste Permit. The northern part of the Site is an existing waste recycling operation, processing returned concrete or construction and demolition waste to produce either single or grade aggregates. <i>[Cemex]</i>	Added to list of safeguarded sites
	The EfW facility in the London Sustainable Industries Park has an implemented planning permission for development of an energy from waste facility and should therefore be added to the list of safeguarded sites. <i>[Barking Riverside Limited]</i>	London Sustainable Industries Park added to list of safeguarded sites
	Veolia's operations at Coldharbour Lane, Rainham are negatively impacting the Momentum Logistics Park site. <i>[Henry Boot Developments (HBD) and Barings]</i>	Enforcement of the site's Environmental Permit by the EA should mean that impacts do not arise from operation of the site.
	Upminster Water Recycling Centre not listed in Appendix – this is an oversight as an encroachment buffer or identified waste consultation zone would be applicable for this type of waste site. <i>[Anglian Water]</i>	WWTs including Upminster Water Recycling Centre added to the list of safeguarded sites.
	The following safeguarded sites are also designated as safeguarded wharves: Barking and Dagenham - 60 River Road (Safeguarded Rippleway Wharf) - 12-14 River Road (Safeguarded Alexander Wharf)	Information added to Chapter 2.

<b><u>Part of Plan</u></b>	<b><u>Summary of comment</u></b>	<b><u>Borough Response including action arising</u></b>
	<ul style="list-style-type: none"> <li>- Pinns Wharf (Safeguarded Pinns Wharf) Newham</li> <li>- Knights Road (Safeguarded Royal Primrose Wharf)</li> <li>- Plaistow Wharf (Safeguarded Peruvian Wharf)</li> </ul> <p>The status of these sites as safeguarded wharves must be highlighted in the ELJWP for water borne freight handling uses and their use encourage for river-related transportation uses. <i>[Port of London Authority]</i></p>	
	The list of safeguarded sites is incomplete <i>[EA]</i>	The list of safeguarded sites has been updated to include additional sites
<b><i>Appendix 2 (Reg 18 ELJWP) – Maps of Safeguarded Sites</i></b>		
	<p>Appendix 2 should include:</p> <ul style="list-style-type: none"> <li>- Unit 11 Atcost Road</li> <li>- 5 and 10 Salamons Way</li> <li>- Perry Road RMS</li> <li>- York Road</li> <li>- Shed A and the Annex to Shed A;</li> </ul> <p><i>[Integrated Skills Ltd.]</i></p>	<p>5 and 10 Salamons Way, Perry Road (RMS) and Land at York Road added to list of safeguarded sites.</p> <p>Unit 11 Atcost Road not added to list of safeguarded sites as the site does not have permission for waste use.</p> <p>Shed A and the Annex to Shed A to be released from safeguarding to facilitate redevelopment of site</p>
<b>2 Choats Road</b>	<p>The Primary Electrical Substation Site north of Choats Road off of Reef Road should be excluded from the location plan. Boundary of 2 Choats Road shown in Appendix 2 includes land which does not form part of the existing waste site and should be excluded ownership.</p> <p><i>[Southern Electric Power Distribution and Barking Riverside Limited]</i></p>	Substation removed from within boundary of 2 Choats Road on location map in Appendix 3.
<b>Barking Waste Transfer and Recycling Facility, Ripple Road</b>	<p>Barking Waste Transfer And Recycling Facility, Ripple Road, IG11 0TT is in proximity to a nearby freight site and redevelopment is proposed. Additional details requested to allow thorough assessment of potential impacts and confirm associated risks and mitigation measures. <i>[Network Rail]</i></p>	This is an existing site with planning permission which will be safeguarded as such – it is not proposed in the Plan as a new location for waste development.

<b><u>Part of Plan</u></b>	<b><u>Summary of comment</u></b>	<b><u>Borough Response including action arising</u></b>
<b>Marshgate Sidings, Pudding Mill Lane</b>	This site is currently part of the larger masterplan development for the two Bow sites. There is spoil running through part of the site, and it has an environmental permit issued by the EA. Clarification requested on what the plan represents for the future of this site. <i>[Network Rail]</i>	Site is safeguarded, as an existing waste management facility, for future waste management uses.
	The Recycled Material Supplies Limited Physical Treatment Facility at Perry Road, Dagenham is missing from Appendices 1 and 2 (Safeguarded sites) <i>[Recycled Material Supplies Limited]</i>	Site map added and site included in list of safeguarded sites.
<b><i>Appendix 3 – Sites with Potential for Release from Safeguarding</i></b>		
<b>Old Bus Depot, Perry Road</b>	Support for consideration of potential release of the Old Bus Depot, Perry Road (Manns Waste Management) site from safeguarding as part of the ongoing transformation of the area. <i>[City of London Corporation]</i>	Noted. No action arising.
	Given policy requirements and evidence required for consideration of release of existing waste sites from safeguarding, sites included in Appendix 3 should be removed as their inclusion is not supported by such evidence. <i>[GLA]</i>	These sites are not proposed for release but included as those which may have potential for release in future. This helps ensure that the ELJWP is consistent with future Borough development aspirations. Note Appendix 3 in the Daft Plan has become Appendix 4 in the Reg 19 Submission Plan.
<b><i>Appendix 4 – Replacement of Policies in the ELWP</i></b>		
	No specific comments made on Appendix 4	No action arising.
<b>A. Evidence Base</b>		
<b>Waste Needs and Capacity Assessments</b>	Reliance on areas outside of London to manage inert waste. Management of inert waste from London has not been taken into account in the Cambridgeshire and Peterborough Minerals and Waste Local Plan. <i>[Cambridgeshire County Council]</i>	The London Plan recognises that the export of such waste to areas beyond London for management is likely to happen and this should

<b><u>Part of Plan</u></b>	<b><u>Summary of comment</u></b>	<b><u>Borough Response including action arising</u></b>
		be taken into account in the Cambridgeshire and Peterborough Minerals and Waste Local Plan.
	Evidence base reports including waste data are inaccurate and difficult to understand which undermines the Plan. Not possible to see how data and assumptions are derived. Liaison with neighbouring authorities cannot be meaningfully carried out until this is corrected. <i>[East of England Waste Technical Advisory Body]</i>	The data reports set out how findings have been derived. Reports have been checked and updated where the derivation of assumptions is unclear.
	The list of safeguarding sites does not include some of the sites included in the BPP assessment of existing waste management capacity.	The list of sites safeguarded by the Plan has been updated with the addition of a significant number of additional sites.
	CDE waste figures presented in the Plan need checking as don't appear to correspond with those in the Waste Needs and Capacity Assessments. There appear to be errors in the Construction, Demolition & Excavation Waste Arisings in East London to 2041 Report (2024). <i>[Integrated Skills Ltd, Heidelberg Materials UK]</i>	The report has been checked and updated as necessary.
	Table 9 in the report 'Assessment of Existing Waste Management Capacity (2024)' needs reworking with new supporting text to provide clarity on the figures and methodology used. <i>[Cambridgeshire County Council, Thurrock Council]</i>	The table has been checked and updated as necessary.
	Concern about cumulative impact of flows to Thurrock and how they impact upon the existing capacity of a range of waste facilities. Ongoing monitoring and assessment of flows should be undertaken to assess any more recent trends and ascertain that 2022 was not just an atypical year. <i>[Thurrock Council]</i>	SoCG with Thurrock being prepared.  Data for 2022 checked against 2023 data (now released)
	Agree with findings that no additional land is needed for new waste management facilities, as there is sufficient capacity until 2041. <i>[Barings/Henry Boot Developments]</i>	Noted. No action arising.
<b>'Assessment of Safeguarded Sites for Release' report</b>	Section 21 is incorrect when it states the London Plan has already taken into account the ability of Boroughs to accommodate waste management capacity when the apportionments were calculated as this is a complex formula. <i>[EA]</i>	The basis of the apportionments and the 'taking account' are not contradictory. All the ELJWP boroughs are expected to manage a greater tonnage than that which is predicted to arise (and has sufficient capacity to manage this) so the apportioned tonnages for East London do in fact cover that which is predicted to arise as stated. No action arising.

<b><u>Part of Plan</u></b>	<b><u>Summary of comment</u></b>	<b><u>Borough Response including action arising</u></b>
<b><i>Circular Economy Topic Paper</i></b>	No specific comments on the Circular Economy Topic Paper	No action arising.
<b><i>Waste Management Topic Paper</i></b>	Evidence base reports including waste data are inaccurate and difficult to understand which undermines the Plan. Not possible to see how data and assumptions are derived. Liaison with neighbouring authorities cannot be meaningfully carried out until this is corrected. <i>[Various local authorities and waste industry]</i>	The data reports set out how findings have been derived. Reports have been checked and updated where the derivation of assumptions is unclear. Separate targeted communication with neighbouring authorities has taken place with specific issues clearly explained as part of this dialogue.
<b><i>Climate Change Topic Paper</i></b>	No specific comments Climate Change Topic Paper	No action arising.
<b>B. Integrated Impact Assessment</b>		
	The IIA should assess an alternative where the ELJWP explicitly takes on apportioned waste from neighbouring boroughs.	The plan includes provisions to assess requests to share capacity
	Objective 10 outlined in the Integrated Impact Assessment to not increase flood risk from any sources is vague, and while climate change is mentioned, the TE2100 Plan and required design adaptations resulting from climate change are not specifically listed <i>[EA]</i>	Noted
<b>C. HRA</b>		
	Agree with the assessment conclusions, providing that all mitigation measures are appropriately secured in any planning permission given. <i>[Natural England]</i>	Noted.
	Impacts on the beechwood habitats of the Epping Forest SAC should be mentioned. The Atlantic acidophilous beech forests which are Annex 1 habitats under the designation of the site as a Special Area of Conservation should be screened in for further assessment in terms of air quality. <i>[Natural England]</i>	Noted.



## Appendix 3: Summary of Regulation 19 Representations and Borough Responses

See separate document