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East London Joint Waste Plan
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By email: eljjointwasteplan@haverling.gov.uk

Dear London Boroughs of Barking and Dagenham, Havering, Newham, and Redbridge

Re: East London Joint Waste Plan – Regulation 19

Thank you for the opportunity to comment on the Regulation 19 consultation version of the East London Joint Waste Plan (ELJWP). This response is submitted on behalf of the Oxfordshire County Council in its capacity as Waste Planning Authority.

Waste Management Capacity

We note that there is an estimated 2,619,508tpa waste management capacity in East London, which is anticipated to provide sufficient capacity for the London Plan apportioned forecast arisings for the Plan period (2041), however it is considered that there is insufficient information on how East London will meet future landfill and hazardous waste requirements. The ELJWP does not include any allocated sites for waste facilities.

Hazardous Waste

The Plan states there is an estimated capacity surplus of 0.98Mtpa for C, D & E waste however, there is a capacity deficit of approx. 18,400tpa for Hazardous waste and that additional capacity be sought in co-operation with other Plan areas. We appreciate the challenges in managing hazardous waste, however in the first instance the authority should try and seek to provide suitable waste management facilities within their own Plan area before looking to other Authorities to meet their needs. Therefore, Policy JWP2: Safeguarding and Provision of Waste Capacity could be strengthened to facilitate the permission of Waste Management sites for Hazardous waste where appropriate.

Non-Hazardous Landfill

The Plan also notes that when landfill operations at Rainham cease, demand for non-inert landfill capacity could potentially be met by landfills outside the Plan area. Oxfordshire already receives levels of non-hazardous waste considered to be strategic (movements over 5,000tpa as agreed by the South East Waste Planning Advisory Group) from the East London Authorities, all of which, in 2021, 2022, and 2023 according to the WDI, went to one non-hazardous landfill facility in Oxfordshire, Sutton Courtenay.

The Oxfordshire Minerals and Waste Local Plan – Part 1 Core Strategy (2017) makes provision for the disposal of Oxfordshire's non-hazardous waste (under Policy W6 at existing facilities, whilst also recognising those other areas export waste to these facilities).

As there is sufficient capacity to manage Oxfordshire's arisings over our Plan period, Policy W6 sets out that further provision for the disposal of non-hazardous waste by means of landfill will not be made. As previously set out within our Duty to Cooperate planning permissions for Oxfordshire's non-hazardous landfill sites expire by 2031 and so we would expect the ELJWP to demonstrate how it is going to manage their future non-hazardous waste arisings over their Plan period, and preferably within their own Plan area.

Sites for Waste Management

The ELJWP does not allocate land for additional waste management facilities, however all existing waste sites are safeguarded from non-waste development with the exception of four sites to support the wider development aims of the Boroughs. It is noted that the waste capacity figured accounted for the loss of these sites.

The ELJWP also identifies further sites which may be suitable for release through allocation for development in Local Plans and it is noted that compensatory capacity will need to be safeguarded to enable this release. We welcome the policy provision for safeguarding compensatory capacity in Policy JWP2: Safeguarding and Provision of Waste Capacity.

Circular Economy and Waste Reduction

We support the strong emphasis on circular economy principles, and the requirement to submit a Circular Economy Statement. We support the reference to reducing waste from construction and demolition and the identification of premises to keep materials out of the waste stream.

Energy from Waste (EfW)

Policy JWP5: Energy from Waste seeks to ensure that EfW facilities are developed appropriately. We support the policy in that it seeks to only permit EfW sites where they qualify as recovery and where the waste cannot be managed further up the waste hierarchy. We suggest the policy and supporting text could go further to ensure the any future waste source material required for use as fuel does not require regional imports.

We appreciate the opportunity to contribute to this consultation and look forward to engaging with the future preparation of the New East London Joint Waste Plan.

Yours sincerely

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