

ELJWP



East London Joint Waste Plan

Waste Management Topic Paper

Update to accompany Publication (Regulation 19) of the Submission Draft East London Joint Waste Plan

October 2025

**Barking &
Dagenham**



Havering
LONDON BOROUGH

Newham London

London Borough of

Redbridge



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Table of Contents

Abbreviations	iv
Glossary.....	v
1 Executive Summary	1
2 Introduction	3
3 Existing waste management	4
Waste Datasets	4
Local Authority Collected Waste	5
Construction, Demolition and Excavation Waste.....	6
Wastewater and Sewage Sludge.....	8
Agricultural Waste	8
Low level radioactive waste	8
4 Waste Management Facilities.....	10
Existing Waste Management Estate in East London	10
5 The Policy Context.....	12
National Policy.....	12
Circular Economy	14
Environment Act 2021 Targets	15
Climate change	16
Net self sufficiency.....	17
The Proximity Principle.....	18
Waste Movements.....	19
Regional Policy – The London Plan.....	19
6 Future requirements for waste management capacity.....	23
Management Capacity for Apportioned Waste.....	23
Management Capacity for C, D & E Waste	23
Management Capacity for Hazardous Waste.....	23
Permanent Deposit of Waste to Land Capacity.....	24
<i>Non inert Waste Landfill Capacity.....</i>	<i>24</i>
Providing for Waste From Beyond the Plan Area	24

Abbreviations and Glossary

Abbreviations

Acronym	Full Term
CHP	Combined Heat and Power
DEFRA	Department for Food & Rural Affairs
EA	Environment Agency
EfW	Energy from Waste
ELWA	East London Waste Authority
EWC	European Waste Catalogue
HIC	Household, Industrial, and Commercial (Waste)
HWRC	Household Waste Recycling Centres
LACW	Local Authority Collected Waste
LCA	Lifecycle assessment
LLW	Low Level Radioactive Waste
LP	London Plan
LPA	Local Planning Authority
MBT	Mechanical Biological Treatment
MSW	Municipal Solid Waste
NPPF	National Planning Policy Framework (last updated 19 December 2023)
NPPW	National Planning Policy for Waste (last updated 16 October 2014)
PPG	Planning Practice Guidance
RWS	Resources & Waste Strategy (2018)
WDI	Waste Data Interrogator
WDF	Waste Data Flow
WPA	Waste Planning Authority

Glossary

Term	Definition
Apportionments	Tonnages of HIC waste allocated to each Borough through the London Plan for provision of qualifying management capacity.
Anaerobic Digestion	A process to manage organic matter including green waste and food waste broken down by bacteria in the absence of air, producing a gas (biogas) and nutrient rich solid or liquid (digestate). The biogas can be used to generate energy either in a furnace, gas engine, turbine or to power vehicles, and digestate can be applied to land as a fertiliser.
Asset Management Plans	Plans produced by water companies setting out business plan for next five-year period. These are submitted to Ofwat for scrutiny prior to adoption.
Biogenic	Material within the waste stream that has been generated by the bio-cycle and was growing in the last hundred or so years. Examples include food, paper, garden waste, wood/timber.
Circular Economy	The circular economy means decoupling economic activity from the consumption of resources. It is based on three principles: Design out waste and pollution; keep products and materials in use; regenerate natural systems.
Combined Heat and Power (CHP)	The harnessing of both electricity and heat from power generating plants in this case incinerators burning waste.
Commercial Waste	Waste from factories or premises used for the purpose of trade or business, sport, recreation or entertainment.
Composting	A process in which biodegradable waste (such as green waste and kitchen waste) is broken down in aerobic conditions by naturally occurring micro-organisms to produce a material suitable for use as a soil improver.
Department for Food & Rural Affairs	The UK Government department responsible for developing national waste management policy.
Deposit Return Schemes	Scheme to incentivise return of single-use drinks containers for recycling.
East London Boroughs	The London Boroughs of Barking & Dagenham, Havering, Newham and Redbridge that are collaborating to produce a joint waste plan for East London as waste planning authorities for their respective areas.
East London Waste Authority	The statutory Waste Disposal Authority (WDA), responsible for the disposal of LACW collected by or on behalf of the London Boroughs of Barking & Dagenham, Havering, Newham and Redbridge.
Energy from Waste	The conversion of the calorific value of waste into energy, normally heat or electricity through applying thermal treatment of some sort. May also include the production of gas that can be used to generate energy.

Environment Agency	The body responsible for the regulation of waste management activities through issuing permits to control activities that handle or produce waste. It also provides up-to-date information on waste management matters and deals with other matters such as water issues including flood protection.
Environmental Permits	A regulatory document that sets out legally enforceable parameters within which regulated waste management facilities must operate, issued by the Environment Agency.
Extended Producer Responsibility	Scheme to introduce management obligations on entities that put household packaging waste and packaging onto the UK market.
European Waste Catalogue	Comprehensive listing of wastes, divided into 20 chapters, most of which relate to the type of industry that produced the waste, although some are based on materials and processes. Each waste type is assigned a unique six-digit code. The EWC is transposed into UK law through The List of Wastes (LOW) Regulations.
Foul sewer	A system of underground pipework maintained by the local statutory sewerage undertaker that carries used and dirty water to a wastewater treatment plant for cleansing.
Gasification	A thermal process that converts carbonaceous materials into gases, such as syngas, that may be used for energy production or chemical synthesis.
Household, Waste	Waste from households collected through kerbside rounds, bulky items collected from households and waste delivered by householders to household waste recycling centres and "bring recycling sites". along with waste from street sweepings, and public litter bins.
Household Waste Recycling Centres	A waste management facility provided by ELWA, where members of the public living in East London may take their household waste for management.
Inert waste	Waste which is neither chemically nor biologically reactive and will not decompose or will only do so very slowly. Examples of this are soils, concrete, and bricks.
Life Cycle Assessment (LCA)	Life Cycle Assessment involves an analysis of the burden provision of a product or service makes on planetary resources and systems. It provides a framework for measuring the relative impact of different waste management options to facilitate decision making.
Local Authority Collected Waste	Waste collected by or on behalf of a local authority. Includes household waste and business waste and non-household fractions such as construction and demolition waste delivered to HWRCs.
Local Plans	Prepared by local planning authorities, which in this case are each of the East London boroughs. Local Plans guide decisions on any future development proposals for an area. They set out policies to be used in decision making which are

	supported by a vision for how the local planning authority want the Plan area to develop.
Local Planning Authority	Local council with responsibility for determining planning applications and producing local plans. In this case the East London Boroughs.
(The) London Plan	The Spatial Development Strategy for Greater London produced by the Mayor. Latest version is 2021.
Low Level Radioactive Waste	Radioactive waste that contains relatively low levels of radioactivity. Includes items such as scrap metal, paper and plastics and smaller amounts come from medical and research facilities.
Mechanical Biological Treatment	A waste facility that combines a sorting facility with a form of biological treatment such as composting, bio-drying or anaerobic digestion
Municipal Waste (MSW)	A term that covers household waste and household-like commercial and industrial waste (e.g. from offices or hotels) regardless of its fate.
Non-hazardous waste landfill	A landfill permitted to accept non-inert (biodegradable) wastes e.g. municipal and commercial and industrial waste and other non-hazardous (including inert) wastes. Some may also accept certain hazardous waste if a special cell is constructed.
Non-inert waste	Waste which is either chemically or biologically reactive and will decompose over time. All waste other than inert waste (see entry) and hazardous waste.
Ofwat	The Water Services Regulation Authority, or Ofwat, is the body responsible for economic regulation of the privatised water and sewerage industry in England and Wales.
Planning Practice Guidance	Guidance published by central Government to support plan making and development management decision making. Applicable across England.
Pyrolysis	Thermal process to promote the decomposition of organic (carbon-based) materials which, occurs in the absence or near absence of oxygen, and it is thus distinct from combustion (burning).
'R1' Recovery status	The definition in the revised Waste Framework Directive for a 'recovery' operation requires municipal waste incinerators to demonstrate a plant will achieve a minimum threshold of efficiency in converting municipal waste to energy. Plants operating at or above the stipulated thresholds can be classified as 'recovery operations' for the purposes of the waste hierarchy. Incinerators operating below the threshold are classed as 'disposal'.
Waste Data Interrogator	Environment Agency compiled dataset for waste accepted and removed from sites provided by operators of facilities subject to environmental permits for waste activities.

Waste Data Flow	Online data portal for use by English local authorities to report on LACW management data to central Government (DEFRA).
Waste Disposal Authority	A local authority responsible for managing the waste collected by councils acting as waste collection authorities and the provision of household waste recycling centres. In this case ELWA
(The) Waste Hierarchy	Priority listing of management methods for waste set out in the Waste Framework Directive, transposed into UK law. To be applied in priority order i.e. from the top down.

1 Executive Summary

- 1.1 This document provides an introduction to waste management in East London. This version has been updated to support submission of the East London Joint Waste Plan (ELJWP) for examination. It provides background information and justification for the approach and policies related to waste management included in the ELJWP. The document references several key documents that have informed the preparation of this topic paper, including assessments of existing waste management capacity and forecasts for different types of waste arising in East London.
- 1.2 The main types of waste produced in the East London Joint Waste Plan area are:
- Local Authority Collected Waste (LACW)
 - Commercial and Industrial Waste (C&I waste)
 - Construction, Demolition and Excavation Waste (C, D & E)
 - Hazardous Waste
 - Wastewater and Sewage Sludge
- 1.3 Local Authority Collected Waste (LACW) consists of waste collected by, or on behalf of, a local authority and includes household waste, bulky waste, street sweepings, and green waste. In 2023/24, 0.47 million tonnes of LACW was generated in East London, with 0.19 million tonnes managed through incineration with Energy from Waste (EfW), 0.13 million tonnes recycled or composted, and only 229 tonnes managed through disposal to landfill¹.
- 1.4 Commercial and Industrial waste (waste produced by business and industry) does not have readily available data on tonnages generated in East London. Projected tonnages are collectively accounted for in the London Plan (2021) apportionments of household, industrial, and commercial waste (HIC) to 2041 that each Borough is expected to plan for.
- 1.5 Construction, Demolition, and Excavation Waste (C, D & E) consists mainly of inert materials such as soils, stone, concrete, brick, and tile, as well as non- inert elements like wood, metals, plastics, and plasterboard. Different types of C, D & E waste require different forms of management, such as recycling or deposit on land for beneficial purposes e.g. landscaping and engineering works (depending on the nature of the waste). It has been estimated that 2.2 million tonnes of C, D & E waste was generated in East London in 2023, with 36% arising from construction and demolition activity and 64% from excavation works.

¹ The difference between the individual values and the total c.0.15Mt is principally made up by moisture loss at the two MBT plants that operate under the ELWA contract for managing LACW arising in East London.

At least 74% of the excavation waste was managed through recovery routes, while at least 72% of C&D waste was managed in this way.

- 1.6 In East London hazardous waste arises mainly from construction and demolition activity, vehicle maintenance and/or dismantling activity, and healthcare. It is estimated that nearly 71,000 tonnes of hazardous waste was produced in East London in 2023. Due to the relatively small amounts of hazardous waste and the need for specialist facilities, this waste may travel further afield for management and there is no policy expectation that it is to be managed within a specific Plan area.
- 1.7 Wastewater and the sewage sludge that results from its treatment is managed by Thames Water and Anglian Water. Wastewater treatment capacity is planned for in 'Asset Management Plans', and a major upgrade is underway at Beckton Sewage Treatment Works to address changing needs and provide for growth, resilience and consent compliance to a design horizon of 2036.
- 1.8 Agricultural waste arisings in East London are small, with quantities requiring offsite management assessed as being so low as to not require specific provision of management capacity.
- 1.9 Low-level radioactive waste (LLW) is mainly produced from hospitals, research establishments, and the nuclear industry. It is likely that very little LLW is produced in East London, and any resulting LLW will continue to be managed via existing arrangements.
- 1.10 Waste management facilities in East London generally require planning consent for a waste use granted by each Borough as Local Planning Authority (LPA) and Environmental Permits granted by the Environment Agency (EA). There are currently around 100 such sites in East London, managing waste.
- 1.11 In summary, this document provides an overview of the different types of waste generated in East London and the existing waste management infrastructure. It highlights the need for planning policies to encourage the management of waste in accordance with the waste hierarchy and the importance of considering specific waste characteristics for appropriate management technologies.

2 Introduction

- 2.1 This Topic Paper presents the background evidence on waste management in East London that underpins the Submission draft (Regulation 19) ELJWP (2025). The Topic Paper includes justification for the approach and policies relating to waste management, which is in addition to that included as supporting text in the Plan.
- 2.2 The preparation of this Topic Paper, has been informed by the London Plan 2021 and the following evidence base documents:
- Assessment of Existing Waste Management Capacity in East London (February 2025 Update)
 - Baseline & Forecast for Construction, Demolition & Excavation Waste Arising in East London to 2042 (January 2025 Update)
 - Baseline & Forecast for Hazardous Waste Arising in East London to 2042 (January 2025 Update)
 - Identification of Strategically Significant Cross Boundary Waste Movements, (October 2025); and
- 2.3 This paper sets out the current position in East London with regards to waste arisings, current management arrangements and existing management capacity and so underpins policies included in the Submission draft of the new joint waste plan for East London.
- 2.4 This version of the Waste Management Topic Paper is slightly updated to reflect factual updates to that published at the time the Submission Plan was published for representations in May 2025.

3 Existing waste management

- 3.1 The legal definition of waste, set out in section 75(2) of the Environmental Protection Act 1990, is “*any substance or object which the holder discards, or intends or is required to, discard*”. The key concept relates to the producer or holder's intention regardless of whether the material or item may have a value to the recipient.
- 3.2 The main types of waste produced in the East London Waste Plan area are:
- Local Authority Collected Waste (mainly household waste) (LACW);
 - Commercial and Industrial Waste (waste from businesses and industry) (C&I waste);
 - Construction, Demolition and Excavation Waste (C, D & E W);
 - Hazardous Waste from various sources; and,
 - Wastewater and Sewage Sludge.
- 3.3 The principal objective of planning for the management of waste² is to protect the environment and human health by:
- preventing or reducing the generation of waste;
 - where its production is unavoidable, reducing the adverse impacts of its generation and management; and
 - reducing the overall impacts of the use of resources from which waste may arise and improving the efficiency of such use.

By paying regard to the above objectives, the overall burden of the waste created by society should reduce and the value it contributes back to the economy maximised.

Waste Datasets

Environment Agency Waste Data Interrogator (WDI)

- 3.4 The Waste Data Interrogator is the Environment Agency dataset that reports annual tonnages and types of waste accepted and removed from sites with environmental permits for waste management activities. The WDI is the principal dataset used to account for waste arising within particular Plan areas. It uses the classification of waste set out in the European Waste Catalogue (EWC) and relies on data supplied by operators of permitted facilities.

² See [The Waste \(England and Wales\) Regulations 2011](#) (as amended) and [The Waste \(Circular Economy\) \(Amendment\) Regulations 2020](#).

Defra Wastedataflow (WDF)

- 3.5 Wastedataflow is an online data portal for use by English local authorities to report on LACW management data to central Government (DEFRA). Data submitted is used to report on national LACW management performance.

Local Authority Collected Waste

- 3.6 Local Authority Collected Waste (LACW) consists of waste that comes into the control of, the local authority i.e. the council in whose borough it arises. LACW collected by, or on behalf of, the East London Boroughs includes household waste collected from homes (residual, dry mixed recycling and food waste), bulky waste and other waste delivered to Household Waste Recycling Centres (HWRCs) provided by each Borough, street sweepings, green waste from the maintenance of public parks and open spaces, and a small quantity of clinical waste³. LACW can also include waste collected from businesses, known as 'trade waste', if a business specifically requests the local authority to collect it. Waste collected by a private contractor from businesses is known as 'Commercial and Industrial Waste'.
- 3.7 The LACW produced in East London is managed under a contract let and overseen by the East London Waste Authority (ELWA) - an entity that performs the waste disposal authority function of the four Boroughs⁴. In 2023/24 0.47 million tonnes of LACW was generated in East London. Of this, c.0.4 million tonnes arose from households. Of the total, 0.19 million tonnes was managed through incineration with Energy from Waste (EfW), 0.13 million tonnes was recycled or composted, with very little managed through disposal to landfill. The above data is based on returns submitted by ELWA to central Government via an online reporting portal known as WasteDataFlow.
- 3.8 ELWA adopted a Joint Strategy for the management of East London's LACW in 2022, covering the period 2027-57⁵. This Joint Strategy sets out the strategic aims and aspirations for resources and the management of LACW, for which the Partner Authorities have responsibility, between 2027 and 2057. The Strategy covers the period after the end of the current long-term contract for waste treatment services (2002 to 2027). The Joint Strategy recognises that

³ Household clinical waste is not deemed hazardous unless a particular risk has been identified (based on medical diagnosis).

⁴ <https://eastlondonwaste.gov.uk/>

⁵ A Joint Strategy for East London's Resources and Waste 2027 –2057

<https://eastlondonwaste.gov.uk/files/uploads/Joint%20Strategy%20for%20East%20Londons%20Resources%20and%20Waste%202027%20to%202057.pdf>

action to deliver improvements in the management of LACW needs to start as soon as possible to achieve future performance aspirations. Steps that the Partner Authorities are taking to improve performance in the intervening years, included development of an East London Waste Prevention Programme and Borough Reduction and Recycling Plans submitted to the Mayor of London for scrutiny against the Mayor's London Environment Strategy⁶. These Programmes and Strategies have also informed the development of the ELJWP. It should be borne in mind that while most visible, LACW only forms part of the total quantity of waste arising in East London that requires management.

- 3.9 It should also be noted that the ELWA contract for the management of residual Local Authority Collected Waste (LACW) has recently been awarded to Cory Topco Ltd⁷, ensuring that the residual LACW arising in East London will be managed at an EfW plant located within London. It is anticipated that residual LACW will be moved by barge from an existing facility located at Barking to the Riverside complex in LB Bexley for treatment. As this contract is intended to be in place until 2037 at least (with an option to extend by a further five years), this greatly reduces the likelihood that a new EfW plant will need to be developed within the Plan area itself during the Plan period.⁸

Commercial & Industrial Waste

- 3.10 While national planning policy identifies Commercial and Industrial waste as a separate waste stream to LACW, in the London Plan it is combined with LACW and collectively referred to as household, industrial and commercial waste, or 'HIC waste' for short. These waste types are grouped together as there are similarities between their characteristics, particularly that element of commercial waste classed as 'municipal' alongside LACW, and hence they may be managed through similar types of waste management facility.
- 3.11 Data for tonnages of C&I waste generated in East London is not readily available due to the lack of clear definition in the available datasets⁹. Therefore, it is not possible to establish the management profile of this stream with the same degree of certainty as for LACW. However, for the purposes of planning

⁶ <https://www.london.gov.uk/programmes-and-strategies/environment-and-climate-change/london-environment-strategy>

⁷

<https://eastlondonwaste.gov.uk/articles/News+and+Public+Statements/Ratification+of+Residual+Waste+Contract+Award+Decision>

⁸ A Statement of Common Ground has been prepared between the East London Boroughs and ELWA.

⁹ The EWC categorises municipal waste under a single Chapter, Chapter 20, and this includes both LACW and waste arising from businesses. Differentiating between the data for C&I waste arisings and LACW reported in the Environment Agency Waste Data Interrogator, involves a complex process, and one that has not been taken in this case as the London Plan apportionments define the management requirements, or 'need', to be met through the Plan for these waste types combined together.

for this waste stream, the London Plan apportionments determine the future combined need for the management of HIC waste within East London through to 2041.

Construction, Demolition and Excavation Waste

- 3.12 C, D & E waste comprises waste arising from the construction and demolition activities, including excavation undertaken prior to construction. It consists mainly of inert materials such as soils, concrete, brick and tiles. Non-inert elements are also present in this waste stream such as wood/timber, metals, plastics, plasterboard, and green waste from site clearance works plus residual food wastes from canteens that construction workers attend. Hazardous waste (see below) may also be present particularly when development takes place on brownfield sites that have been affected by historical contamination such as former industrial sites like the land redeveloped for what is now the former Olympic Park.
- 3.13 Different types of C, D & E waste require different forms of management. For example, hard inert materials (such as concrete, brick and road planings arising from demolition and road maintenance) can be converted into materials which may be used to substitute for primary minerals in construction activities. Soft materials such as soils and sub-soils can be deposited for beneficial purposes such as the restoration of minerals workings (i.e. quarries) and engineering projects such as flood prevention schemes and acoustic bunds. The non-inert component such as metals and plasterboard may if separated be recycled back into products through manufacturing facilities. Ultimately there is very little C, D & E waste that cannot be recycled or recovered in some way.
- 3.14 The production of C, D & E waste is influenced by large-scale infrastructure and development projects such as the Thames Tideway Tunnel, as well as commercial and residential developments, which means that peaks and troughs in its production are often observed with arisings not necessarily following a consistent trend. In light of this the London Plan does not apportion quantities of C, D & E waste for management to individual Boroughs, but Boroughs are still required to plan for the management of this waste stream, as there is an expectation that waste plan areas aim to be net self sufficient in management capacity, except for excavation waste.
- 3.15 In 2023 it is estimated that 2.2 million tonnes of C, D & E waste was generated in East London¹⁰. Of this 36% arose from construction and demolition activity while 64% arose from excavation works. This difference is significant because

¹⁰ *Baseline & Forecast for Construction, Demolition & Excavation Waste Arising in East London to 2042 Update* BPP Consulting January 2025

the London Plan sets separate targets for the management of excavation waste, from those applied to construction and demolition waste. At least 74% of the excavation waste arising was managed through recovery routes while at least 72% of C&D waste was managed through recovery. The remainder in both cases was managed through transfer stations from where it would be transferred on to an unknown final fate.

- 3.16 Given it is a bulky and heavy waste type, C, D & E waste does not tend to travel significant distances from its source, unless transported by rail as indicated in the review of Strategic Flows¹¹ with over 125,000 tonnes travelling to Tinsley Sidings in Sheffield in 2023 (reported as going onward to a facility located in Rotherham).

¹¹ *Identification of Strategically Significant Cross Boundary Waste Movements*, BPP Consulting Updated October 2025.

Hazardous Waste

- 3.17 Hazardous wastes are categorised as those that are harmful to human health, or the environment, either immediately or over an extended period of time. In East London, hazardous waste arises mainly from: Construction and demolition activity, vehicle maintenance and/or dismantling activity and healthcare. Types of hazardous waste include contaminated soils, infectious clinical waste and waste oils.
- 3.18 It is estimated that nearly 71,000 tonnes of hazardous waste was produced in East London in 2023¹². The term 'hazardous waste' covers a wide range of waste types which each may require management at specialist facilities, such as hazardous waste landfills and high temperature incinerators. Given they generally arise in relatively small amounts, due to economies of scale, such facilities are often developed to manage quantities greater than that arising in a single Plan area. Therefore, this waste may travel further afield for management than most other waste types. For example, around 1,200 tonnes of soil and stones containing dangerous substances in 2022 was sent to a treatment site in Sandwell (West Midlands) for management, some 150 miles away from East London although it should be noted this appears to be a one-off, as no such movement is indicated in the updated 2023 review of flows¹³.

Wastewater and Sewage Sludge

- 3.19 Wastewater generally comprises effluent from homes and industrial and commercial premises and in some case surface water runoff from roads and other hard surfaces discharged to the foul sewer system from where it is channeled to wastewater or sewage treatment works for treatment¹⁴. Output of this treatment is sewage sludge that may, if it meets certain parameters, be applied to land as a fertiliser in accordance with the *Sludge (Use in Agriculture) Regulations 1989* and associated best practice guidance. Sludge applied in this manner falls outside the normal regulatory regime for waste. Alternatively, the sludge can be treated either through anaerobic digestion or incineration. The cleaner effluent may be discharged to a watercourse in accordance with a discharge consent granted by the Environment Agency.

¹² *Baseline & Forecast for Hazardous Waste Arising in East London to 2042* BPP Consulting Updated January 2025

¹³ *Identification of Strategically Significant Cross Boundary Waste Movements*, BPP Consulting Updated October 2025.

¹⁴ These works can provide a valuable function in managing wastes other than wastewater, that arise in liquid and sludge form such as septic tank emptyings that serve properties not connected to the foul sewer.

- 3.20 In East London, wastewater and the resulting sewage sludge are managed by Thames Water and Anglian Water. Wastewater treatment capacity is planned for in 'Asset Management Plans'. The water companies use information in the public domain to forecast when upgrades to wastewater treatment facilities will be required.
- 3.21 Beckton Sewage Treatment Works, located in the London Borough of Newham, is the key facility serving East London, being Thames Water's, and the UK's, largest sewage treatment works. To address changing need, a major upgrade is underway so it can receive wastewater from the new Thames Tideway Tunnel and provide for growth in housing in East London.

Agricultural Waste

- 3.22 Given the relatively small amount of land subject to cultivation in East London arisings of agricultural waste are small, with quantities requiring offsite management particularly low. The Environment Agency dataset, the WDI, indicates there is very little agricultural waste produced in East London requiring the provision of off-site management facilities.

Low level radioactive waste

- 3.23 Radioactive waste is any material that is either radioactive itself or is contaminated by radioactivity and for which no further use is envisaged. Radioactivity can pose health risks when organisms are exposed to elevated levels, and while potentially hazardous radioactive waste is not included in the definition of hazardous waste and is therefore accounted for separately. Most radioactive waste is produced from nuclear power stations and from the manufacture of fuel for these power stations. This is referred to as 'nuclear waste.' Radioactive waste also arises from nuclear research and development sites and Ministry of Defence sites. No such sites exist in East London.
- 3.24 Radioactive waste also arises from medical, industrial and research establishments such as hospitals and universities. This is sometimes referred to as 'non-nuclear waste'. Being of a low level of radioactivity this may be referred to as low level radioactive waste (LLW), or even very low level radioactive waste (VLLW).

3.25 LLW consists mainly of paper, plastics and scrap metal items that have been used in hospitals, research establishments and the nuclear industry. It is likely that very little LLW is produced in East London, and according to the Environment Agency public register, one organisation holds three permits covering two locations in Havering to keep and use radioactive materials in East London. Any resulting LLW will likely continue to be managed via existing arrangements.

4 Waste Management Facilities

- 4.1 There is a multiplicity of ways in which waste may be managed. Much depends on the specific characteristics of the waste itself as this can determine its suitability for management through the application of different technologies. For example, only waste that may degrade when subject to biological processes is suitable for management through organic waste treatment technologies such as mechanical biological treatment, anaerobic digestion and composting. Similarly, only waste capable of combustion should be subjected to thermal treatment processes such as incineration, gasification or pyrolysis. The cleanliness of waste materials can play a major role when it comes to considering its suitability for onward recycling through reprocessing plants such as paper mills and glass factories. This in turn may be heavily influenced by the collection methods used and the facilities provided at the point where the waste arises.
- 4.2 In general, facilities where waste is managed require express planning consent for a waste use. In addition, they also generally require Environmental Permits that in England are granted by the Environment Agency.

Existing Waste Management Estate in East London

- 4.3 The ELJWP area has a range of permitted waste management facilities that handle waste both from within and beyond East London. Data for 2022 indicates there are around 100 sites in East London currently managing waste under environmental permits granted by the Environment Agency. Figure 1 shows the distribution of the existing waste management facilities in East London.
- 4.4 The principal types of waste management facilities within East London are as follows:
- Non-hazardous landfill including silt lagoons
 - MBT plants (x2)
 - C, D & E waste recycling facilities
 - HIC waste recycling facilities
 - Metal recycling sites
 - HWRCs (x4).

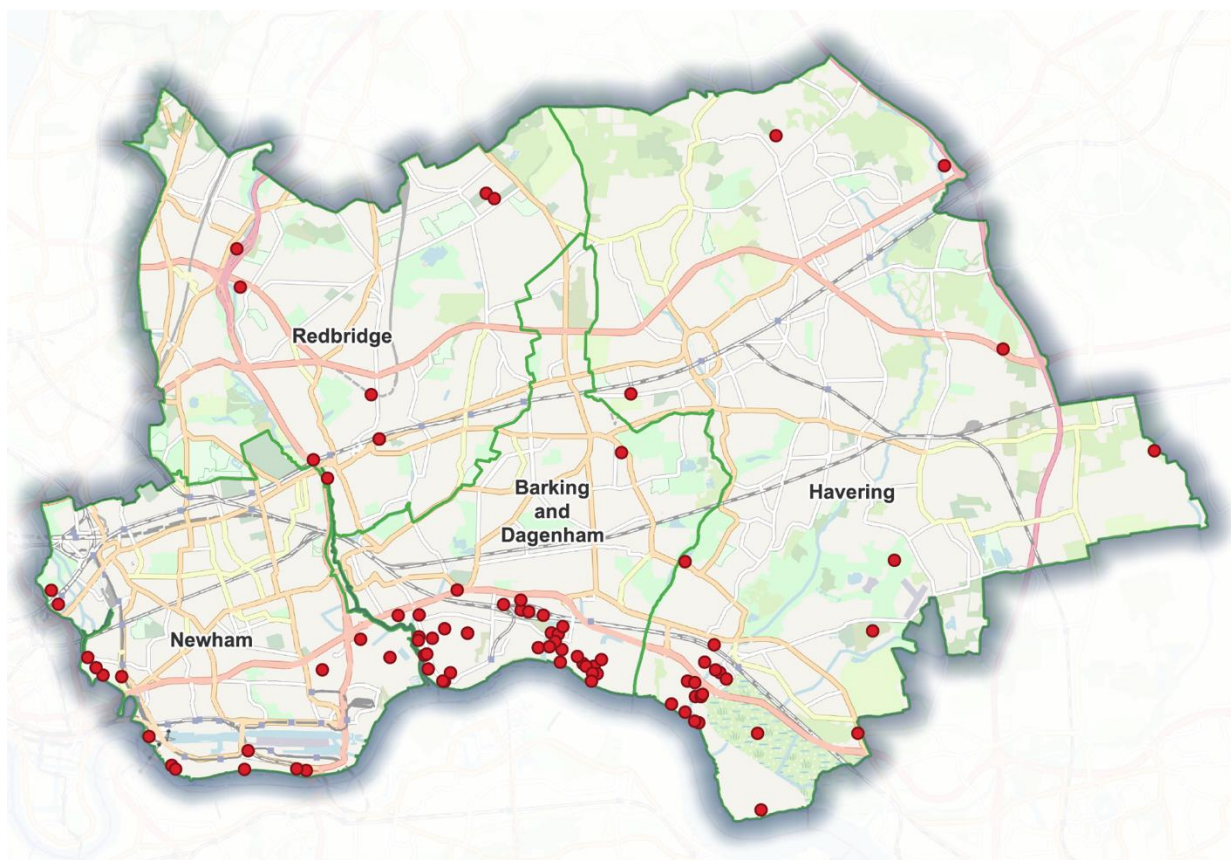


Figure 1: Map of Permitted Waste Sites in East London

5 The Policy Context

5.1 The policy context within which the ELJWP has been prepared is set out in Figure 2 below.

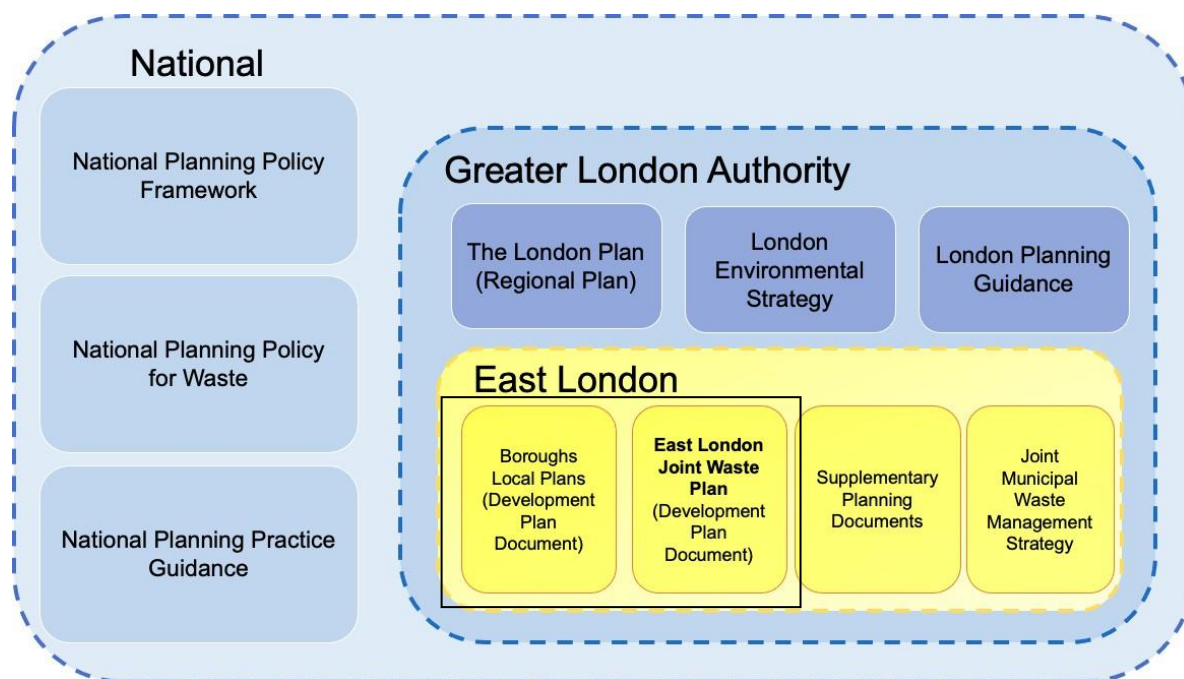


Figure 2 – The ELJWP Within the Wider Policy Context

National Policy

5.2 The key objective of national policy for managing waste ¹⁵is to protect the environment and human health by:

- preventing or reducing the generation of waste;
- where its production is unavoidable, reducing the adverse impacts of its generation and management; and
- reducing the overall impacts of the use of resources from which waste may arise and improving the efficiency of such use.

The National Planning Policy for Waste 2014 (NPPW)¹⁶, associated Planning Practice Guidance (PPG) and the Resources and Waste Strategy for England 2018 (RWS)¹⁷ set the policy context for waste management in England. Whilst the National Planning Policy Framework (NPPF) does not contain policies

¹⁵ See *The Waste (England and Wales) Regulations 2011(as amended)* and *The Waste (Circular Economy) (Amendment) Regulations 2020*.

¹⁶ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf

¹⁷ <https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england> This was published under the 2016 to 2019 May Conservative government.

specific to waste, its principles are relevant. The Waste Management Plan for England¹⁸ signposts policies concerning waste management in England in particular those included in the RWS as a route to demonstrating compliance with Waste Framework Directive requirements. This was updated in 2021 and such is considered to be the most current expression of Government policy on the subject.

5.3 Both NPPW and RWS require application of the Waste Hierarchy in priority order as one of the key principles of achieving sustainable waste management. The ‘Waste Hierarchy’ sets out different ways of dealing with waste as shown in Figure 3 below. ‘Prevention’ is the preferred option with ‘Disposal’ at the bottom being the option of last resort.

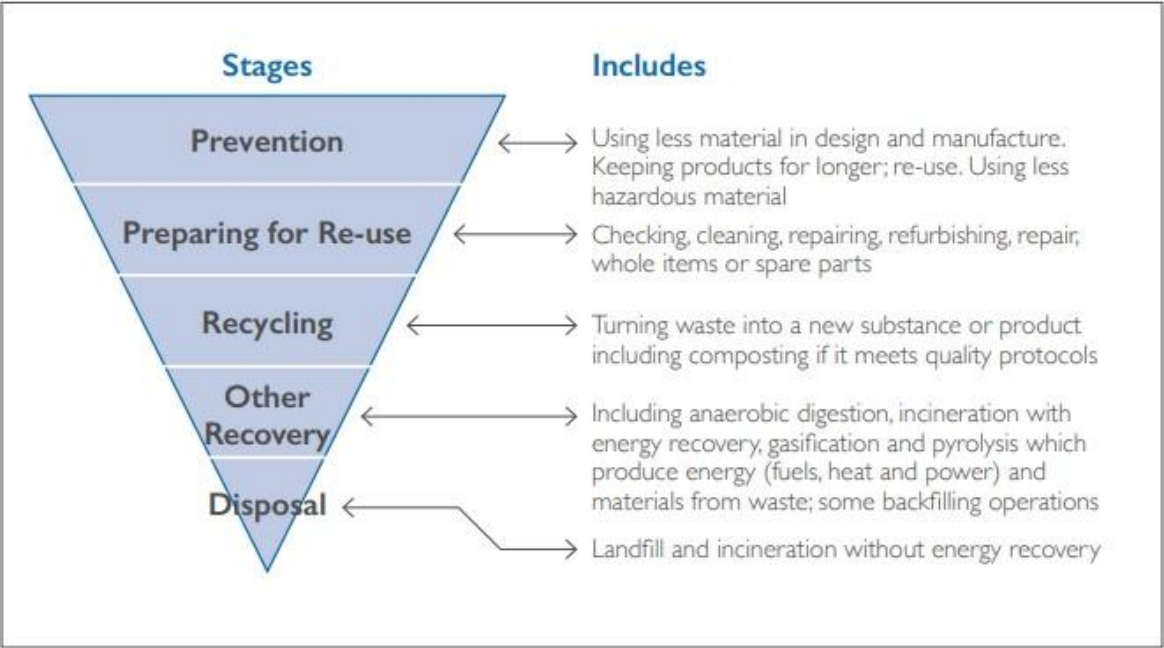


Figure 3 The Waste Hierarchy¹⁹

5.4 The RWS remains the national strategy for waste management in England, including how the country is to minimise waste and manage it more effectively through maximising opportunities to generate value from material that is both prevented from entering, and extracted from, the waste stream.

¹⁸ <https://www.gov.uk/government/publications/waste-management-plan-for-england-2021>

¹⁹ Source: *National Planning Policy for Waste*, MHCLG, 2014. It should be noted that the most recent Govt publication showing the hierarchy included anaerobic digestion in the recycling tier.

5.5 The RWS identifies five strategic ambitions:

- To work towards all plastic packaging placed on the market being recyclable, reusable or compostable by 2025;
- To work towards eliminating food waste to landfill by 2030;
- To eliminate avoidable plastic waste over the lifetime of the 25 Year Environment Plan;
- To double resource productivity by 2050; and
- To eliminate avoidable waste of all kinds by 2050.

5.6 The RWS is also concerned with ensuring that society's approach to waste aligns with the following circular economy principles:

- design out waste and pollution;
- keep products and materials in use; and
- regenerate natural systems.

Circular Economy

5.7 The role waste management plays in the material cycle that is central to creating a more circular economy is illustrated in Figure 4 below.

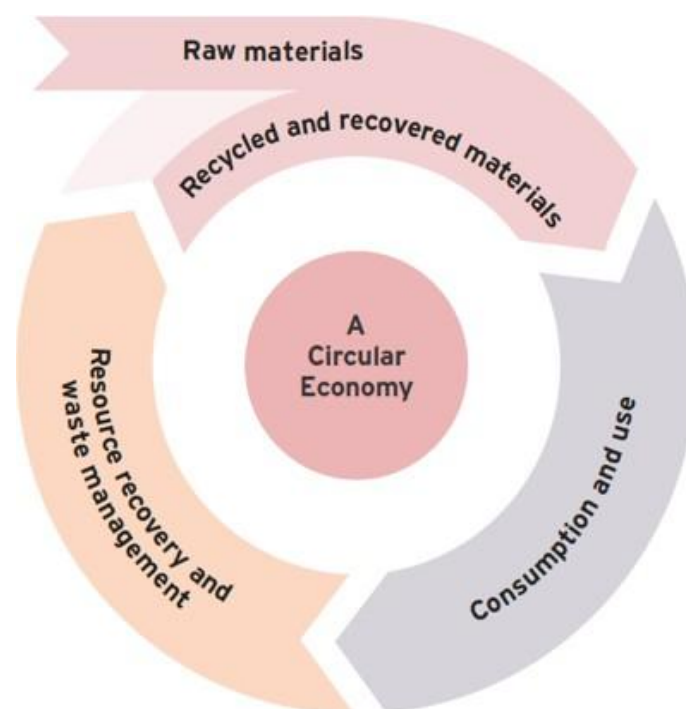


Figure 4 Circular Economy²⁰

²⁰ Source: Resources and Waste Strategy, DEFRA, 2018

5.8 The Circular Economy can also aid in tackling the climate emergency. When applied to the built environment, circular economy principles significantly reduce greenhouse gas emissions by avoiding extraction of raw materials, reducing production of construction materials, retaining embodied carbon and eliminating waste. In July 2023 the Sunak Conservative Government published its waste prevention plan titled 'Waste prevention programme for England: Maximising Resources, Minimising Waste'. This is considered in detail in the separate topic paper on Circular Economy.

Environment Act 2021 Targets

5.9 The Environment Act 2021 requires the Government to set long-term, legally-binding environmental targets²¹, including those for resource efficiency and waste reduction. In response to this requirement the Government in power at the time set the following targets in its Environmental Improvement Plan 2023, which build on the targets in the RWS set out previously. These are as follows:

- eliminate avoidable waste by 2050 and double resource productivity by 2050;
- explore options for the near elimination of biodegradable municipal waste to landfill from 2028;
- eliminate avoidable plastic waste by 2042; and,
- halve 'residual' waste (excluding major mineral waste) produced per person by 2042.

5.10 The target for the reduction in residual waste is enshrined in The Environmental Targets (Residual Waste) (England) Regulations 2023 which came into force on 30 January 2023. The target is for the reduction of residual waste (excluding major mineral wastes) on a kg per capita²² basis by 50% by 2042 from 2019 levels (574 kg per capita). Accordingly, the residual waste long-term target is that by the end of 31 December 2042 the total mass of residual waste for the calendar year 2042 does not exceed 287 kg per capita. Routes through which waste is managed as residual are:

- sent to landfill in the United Kingdom;
- put through incineration in the United Kingdom;
- used in energy recovery in the United Kingdom; or
- sent outside the United Kingdom for energy recovery.

²¹ <https://www.gov.uk/government/publications/environment-bill-2020/august-2020-environment-bill-environmental-targets>

²² Per head of population in England

- 5.11 The residual waste reduction targets are expected to be achieved through a combination of waste prevention and increased recycling rates. Government modeling has shown recycling rates may need to reach 75% by 2042. This is expected to be achieved through a combination of measures including the introduction of Extended Producer Responsibility initiatives for certain products and materials, and a deposit return scheme relating to packaging waste, and the adoption of a simpler approach to recycling involving the statutory requirement for the separate collection of at least five materials: glass; metals; plastics; paper; and, food waste, from all households and business premises by 2028. Where source separated materials need to be bulked up and/or treated (e.g. food waste) this may require provision of additional waste management facilities.
- 5.12 Alongside separate collection and extended producer responsibility initiatives for household and business waste, the Routemap for Zero Avoidable Waste in Construction was launched in 2021²³. To achieve zero avoidable waste by 2050, this includes the following targets:
- By 2040 eliminate all but hazardous C&D waste entering landfill.
 - By 2040 reduce soil to landfill by 75% based on 2020 level and reduce to zero by 2050 unless required for landfill operation purposes.
- Other targets may be set for construction waste reduction and recovery including cost reduction through designing out waste and material optimisation.
- 5.13 In addition to the above measures relating to construction, the NPPW requires that when determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that the handling of waste arising from the construction and operation of development maximises reuse and recovery opportunities, and minimises off-site disposal. Additionally, Chapter 2 of the National Planning Policy Framework (NPPF) recognises the need for the planning system to consider the prudent use of natural resources and waste minimisation in the pursuit of sustainable development. The National Planning Policy Framework and the National Planning Policy for Waste are material considerations when decisions on planning applications are being made and when local planning authorities are preparing local plans.
- 5.14 In light of the aforementioned targets and initiatives over the forthcoming plan period, a substantial shift towards a more sustainable waste management system is anticipated. This entails a heightened focus on recovering value from a wider range of materials and reducing the amount/proportion of waste

²³ <https://www.constructionleadershipcouncil.co.uk/news/zero-avoidable-waste-routemap-launch/>

buried or burnt. This may require additional and different waste management facilities, coupled with source/supply chain initiatives that extend beyond the scope of waste management planning as currently understood/applied. The composition of waste requiring management is also expected to change over time, as it has done in the past.

Climate change

- 5.15 The production and management of waste needs to consider impacts on climate and how practices need to adapt in light of anticipated changes to the climate. This is considered in detail in the separate topic paper on Climate Change.

Net self sufficiency

- 5.16 Self-sufficiency in terms of waste, as outlined in Article 16 of the EU Waste Framework Directive²⁴, refers to the principle that each Member State of the European Union should aim to manage and dispose of its own waste within its borders, to the extent possible. This encourages Member States to take responsibility for their own waste and is designed to reduce the need for cross boundary waste movements, which can create inequalities between countries and 'waste tourism'. The principle applies at national level to England & Wales as a whole.
- 5.17 The principle of self-sufficiency has been adapted for local waste planning purposes to establish how much management capacity should be provided in each waste Plan area. Through the addition of the term 'net', this recognises that movements of waste occur between waste Plan areas, as waste management is not generally confined to administrative areas. Movements can be beneficial for optimising the waste management system where economies of scale apply. This means there is no expectation that each tonne of waste produced in a particular Plan area is to be managed within that particular Plan area. Rather that, overall, there should be a balance of provision. The objective of net self- sufficiency is therefore to ensure that there is sufficient capacity to manage the tonnage of waste equivalent to that predicted to arise within a Plan area. The degree to which a Plan area is net self-sufficient can be established by comparing the available capacity within the Plan area with the projected capacity requirements²⁵. A snapshot of the position for East London is presented in Figure 5, based on actual reported movements in 2023.
- 5.18 It should be noted that Figure 5 presents:

²⁴ <https://eur-lex.europa.eu/eli/dir/2008/98/oj>

²⁵ The London Plan applies the principle of net self sufficiency to waste management across London (see later section).

1. a snapshot in time for a single year; and
2. is not necessarily a true representation of net -self-sufficiency as actual inputs to facilities in 2023 may not be reflective of potential capacity of sites operating in East London (in most cases inputs will be lower than actual site capacity).

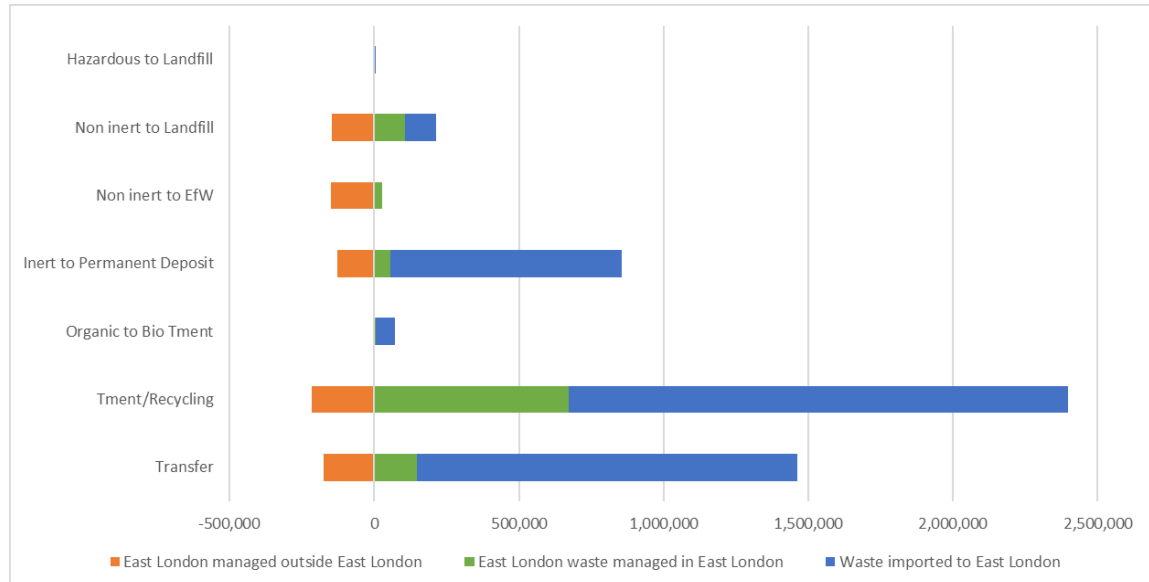


Figure 5 Waste import and export balance in East London 2023 by management method and waste type where known (tonnes)

The Proximity Principle

5.21 The disposal and the recovery of mixed municipal waste in particular is also subject to the proximity principle²⁶. This seeks to ensure that mixed municipal waste collected from private households and similar waste from commercial sources be disposed of, or recovered, in one of the nearest appropriate installations. This is to be by means of the most appropriate methods and technologies, in order to ensure a high level of protection for the environment and public health.

5.22 This is intended to result in the establishment of an integrated and adequate network of installations for the disposal and recovery of mixed municipal waste collected from private households across the country. The requirement also extends to where the collection includes similar types of waste collected from non-household sources (e.g. waste from offices and retail premises).

²⁶ As transposed in English law through *The Waste (England and Wales) Regulations 2011* as amended.

5.23 This principle is to be applied when decisions are taken on the location of facilities for the management of mixed municipal waste collected from private households and similar waste (see above) for disposal or recovery. This is reflected in NPPW that expects waste planning authorities to:

"...plan for the disposal of waste and the recovery of mixed municipal waste in line with the proximity principle, recognising that new facilities will need to serve catchment areas large enough to secure the economic viability of the plant;"

5.24 NPPW requires local planning authorities with responsibility as Waste Planning Authority for their area, to include policies in their development plans which set out an overall strategy for the pattern and scale of future waste development, ensuring sufficient provision is made for infrastructure for waste management, and energy that may be produced (including heat).

Waste Movements

5.25 Data shows that waste is routinely transported between East London and other Waste Planning Authority (WPA) areas both within London and without. This cross-boundary movement is typical of the way in which waste is managed in general, as it has little regard for administrative boundaries. Flows of waste from East London which may be strategic to the management of waste over the Plan period have been identified²⁷. Host WPAs were contacted as part of the consultation on the Draft ELJWP to confirm that such flows may continue over the plan period. Details of engagement with other WPAs are included in the Duty to Cooperate Statement of Compliance.

Regional Policy – The London Plan

5.26 There are thirty-three-administrative areas within London: twelve inner boroughs, twenty outer boroughs, and the City of London. Newham is the only inner London borough within the ELJWP area.

5.27 The administrative geography of London is overseen at a regional level by the Greater London Authority (GLA) which produces amongst other policy documents, The London Plan and the London Environment Strategy (LES). The London Plan provides strategic planning policy for the whole of London and how certain matters, including waste, should be addressed by Boroughs in preparing their Development Plan documents.

²⁷ See East London Joint Waste Plan, Identification of Strategically Significant Cross Boundary Waste Movements, BPP Consulting, February 2025 updated to 2023 in October 2025 so this followed the Regulation 18 consultation.

Apportionments

5.28 The London Plan states that London should manage as much of its waste within its boundaries as practicable, aiming to achieve net self-sufficiency by 2026 in all waste streams except for excavation waste²⁸. To meet this aim, the London Plan 2021 forecasts arisings of Local Authority Collected Waste (referred to as household waste) plus Commercial and Industrial waste (C&I waste) for London as a whole through to 2041, then splits the total down to Borough level. These forecasts are used as a basis to apportion quantities of this HIC waste for management to each Borough so that the overall goal of managing the equivalent of 100 per cent of London's HIC waste within London (i.e. net self-sufficiency) by 2026 (Policy SI 8) is achieved. The quantities arrived at are referred to as the London Plan apportionments ('LP apportionments' for short).

5.29 The Borough level LP apportionments were generated by the GLA through a process that included assessment of existing capacity in each Borough along with a number of other factors considered to influence the ability of a particular Borough to provide requisite HIC waste management capacity. The types of capacity considered to count towards the management of apportioned waste (hereinafter referred to as 'qualifying capacity') is defined in Paragraph 9.8.4 of the London Plan as follows:

- energy recovery in London;
- production of solid recovered fuel (SRF) and refuse derived fuel (RDF) in London;
- sorting or bulking for re-use or recycling including anaerobic digestion. The reuse or recycling may take place within or outside London providing the capacity is located within London; and
- reuse or recycling including anaerobic digestion within London.

5.30 London Plan arisings and forecasts for the East London Boroughs are set out below in 1 below. The former London Legacy Development Corporation (LLDC) did not have a separate waste apportionment through the London Plan 2021, and therefore waste management within the former LLDC's jurisdiction that falls within the ELJWP area was accounted for by the apportionment assigned to the London Borough of Newham.

²⁸ Excavation waste is excluded from the London Plan net self-sufficiency target as it is more difficult for London to provide sites for its management or beneficial use due to the land area occupied by such management facilities. The London Plan also states that "*In line with circular economy principles, the management of excavation waste should be focused on-site or within local projects.*" (para 9.7.9)

Table 1 London Plan Forecast HIC Waste Arisings & Apportionments for the East London Boroughs

Borough	Forecast HIC Waste Arising		LP Apportionments	
	2021	2041	2021	2041
Barking & Dagenham	214,000	230,000	505,000	537,000
Havering	229,000	249,000	370,000	393,000
Newham	244,000	260,000	383,000	407,000
Redbridge	196,000	216,000	151,000	160,000
Total	883,000	955,000	1,409,000	1,497,000

5.31 Table 1 shows the apportionments for East London are significantly higher than the GLA's projected arisings of HIC waste from the Plan area. Hence East London is expected to make a substantial contribution towards London meeting the London Plan 2026 net self- sufficiency target.

5.32 The London Plan also sets out management targets for waste generated in London in Policy SI 7 Reducing waste and supporting the circular economy. These targets reflect those in the London Environment Strategy (LES) as follows:

- zero biodegradable or recyclable waste to landfill by 2026
- meet or exceed the municipal waste recycling target of 65 per cent by 2030
- meet or exceed the targets for each of the following waste and material streams:
 - construction and demolition – 95 per cent reuse/recycling/recovery
 - excavation – 95 per cent beneficial use (with 100% inert put to use)

5.33 In addition, in connection with hazardous waste management capacity, paragraph 9.8.18 of the London Plan identifies "*..a need to continue to identify hazardous waste capacity for London ...in co-operation with other Plan areas.*"

5.34 The London Plan requires boroughs to allocate sufficient land and identify waste management facilities to provide capacity in their plans to manage the tonnages of waste apportioned and for those waste streams not apportioned by the London Plan but still subject to the management targets set out in London Plan policy.

Circular Economy

- 5.35 The London Plan includes a requirement for 'referable applications'²⁹ to be submitted with a 'Circular Economy Statement' that demonstrates how the development will come forward in a manner which is consistent with achieving a circular economy. This includes how much waste the proposed development is expected to generate and where it will be managed. The GLA has published further guidance on the content of Circular Economy Statements.
- 5.36 The London Plan requires boroughs to “...*allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste*”. This is in line with the NPPW which requires waste planning authorities to “...*identify sites and/or areas for new or enhanced waste management facilities*”. The London Plan identifies existing waste management sites, Strategic Industrial Locations, Locally Significant Industrial Sites and safeguarded wharves as suitable for new waste management facilities.

Safeguarding

- 5.37 The London Plan seeks to safeguard all existing waste sites so they are retained in waste use. The London Plan defines 'existing waste sites' as those with planning permission for waste use or those subject to an Environment Agency environmental permit for waste management.
- 5.38 In the event that an existing waste site is subject to an application for development for a non waste use, the London Plan requires compensatory capacity to be provided unless the capacity is demonstrated to not be required to meet London's needs as a whole. Compensatory capacity must be at or above the same level of the waste hierarchy of that which is lost, and that any loss of hazardous waste treatment capacity must be replaced with similar. Existing waste sites may only be released without compensatory capacity being provided if it can be demonstrated that there is sufficient capacity elsewhere in London and the target of achieving net self-sufficiency is not compromised. This is to be achieved through a plan led approach.
- 5.39 The London Plan supporting text indicates that boroughs with surplus capacity should share this with other London boroughs facing a shortfall before considering release of sites from safeguarding protection. The London Plan also acknowledges that it may not always be possible for boroughs to meet their apportionment within their boundaries and in these circumstances the

²⁹ Referable applications include those for developments providing 150 residential units, other types of development of 20,000sq.m in central London or 15,000sq.m outside Central London, developments 25m high adjacent to the Thames or 30m high elsewhere in London.

‘transfer of apportioned waste’ may be agreed upon between donor and receiving boroughs. This may be achieved through specific commitments included in the host authority's local waste plan.

Housing design

- 5.40 Furthermore, the London Plan includes policy (Part G of Policy D4 Housing quality and standards) that requires housing to be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) food waste as well as residual waste.

6 Future requirements for waste management capacity

- 6.1 In order to establish how much waste management capacity may be needed over the Plan period, an assessment of existing permitted waste management capacity available within East London against the requirements of the London Plan has been undertaken³⁰. The findings of the study are set out below:

Management Capacity for Apportioned Waste

- 6.2 It is estimated that there is currently 2,560,000tpa of permitted capacity in East London capable of managing apportioned waste. This is more than sufficient to manage the London Plan apportioned forecast arisings of 1.5million tonnes in 2041. A sensitivity analysis was undertaken to account for the possible loss of MBT capacity after 2027 when the current treatment contract for the management of LACW let by ELWA terminates, and this showed that even with this loss, a capacity shortfall is not predicted to materialise over the Plan period.
- 6.3 The surplus capacity for the management of apportioned waste at 2041 is estimated to range between c.0.63 Mtpa (without MBT) and c.1.0Mtpa.

Management Capacity for C, D & E Waste

- 6.4 Based on an extrapolation of the baseline value for C, D & E waste arisings from East London in 2023 of 2.2 million tonnes, it has been estimated up to 2.6 million tonnes might arise in 2041. Comparing this to an estimate of existing C, D & E waste management capacity of c3.2 million tonnes reveals an estimated capacity surplus of approximately 0.99 million tonnes p.a.

Management Capacity for Hazardous Waste

- 6.5 Based on an extrapolation of the baseline value for hazardous waste arisings from East London in 2023 of 76,500 tonnes, it has been estimated a slightly lower tonnage of 72,400 may arise in 2041. Comparing this to an estimate of existing hazardous waste management capacity of c54,000 tonnes reveals a shortfall in capacity over the Plan period of c18,400tpa. However given the diverse nature of hazardous wastes, there is no policy expectation that individual Plan areas be net self sufficient for the management of hazardous waste forecast to be produced, rather that existing capacity be safeguarded and additional capacity be sought in co-operation with other Plan areas.

³⁰ East London Joint Waste Plan, Assessment of Existing Waste Management Capacity, Updated BPP Consulting, February 2025

- 6.6 Therefore the indicated presence of a shortfall should not be a barrier to release of other sites, or impose a requirement to provide for additional capacity through allocation in the ELJWP.
- 6.7 This study therefore confirms that no shortfalls in waste management capacity over the Plan period are predicted that warrant inclusion of specific land allocations in the ELJWP.

Permanent Deposit of Waste to Land Capacity

Non inert Waste Landfill Capacity

- 6.8 East London hosts the last remaining merchant non-hazardous waste landfill still operating in London, that of Rainham located in LB Havering. The site has operated since the 1970s and has accepted waste from East London, the wider London area and from outside London. This is illustrated in Figure 6 which shows reported input tonnages by origin for the 2018-2023 period.

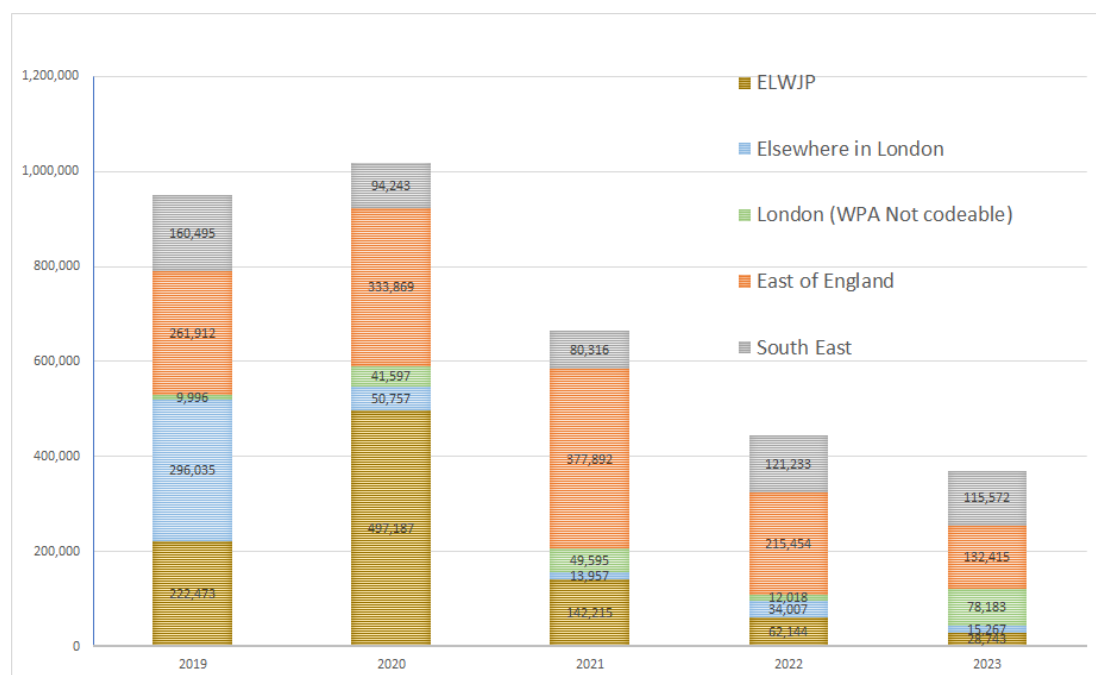


Figure 6 Inputs to Rainham Landfill 2018-2023

However, the planning consent for Rainham Landfill expires in 2029 (with restoration to be complete by the end of December 2031), and on closure, any waste or residues requiring disposal by landfill would need to be exported for management at landfills outside London.

Providing for Waste From Beyond the Plan Area

- 6.9 When planning for waste, the NPPW expects WPAs to assess whether the unmet needs of other WPA areas could be met within their own areas. In light of the identified surplus in capacity for the management of waste apportioned to the London Boroughs through the London Plan and forecast to arise from other sources, as part of the preparation of the ELJWP, the East London Boroughs have invited other Boroughs, that may be unable to manage waste arising within their own areas to consider whether the surplus in east London might offer an opportunity for their unmet needs to be met. Details of this engagement are set out the Duty to Cooperate Compliance Statement.

Appendix 1: Non Hazardous Landfill Assessment

The purpose of this note is to consider how residual waste arising in East London identified as requiring management at non hazardous waste landfill might be provided for over the Plan period (to 2041).

Defining Residual Waste Requiring Non Hazardous Waste Landfill

While residual waste is defined in *The Environmental Targets (Residual Waste) (England) Regulations 2023* for the purpose of monitoring the national residual waste reduction target, this definition only identifies it by the particular fates it goes to i.e. it is either sent to landfill, put through incineration or used in energy recovery, and so is not actually characterised as such, other than by excluding major mineral wastes which are largely inert waste categories from construction, demolition, excavation and mining activities.

For the purposes of this exercise residual waste requiring non hazardous waste landfill is taken to be composed of materials that are either:

- Not suitable for combustion, being of low calorific value, such as trommel fines which are residues of the sorting of skip waste; which must meet the loss on ignition test to be landfilled as inactive waste under the Landfill Tax regime; or
- is difficult to recycle or reduce, such as fibreglass bathroom suites and other bulky items (not containing PoPs which must now be destroyed through incineration);

so disposal to non-hazardous waste landfill is still considered to be the only viable management option in the short to medium term.

Projected Non Hazardous Waste Landfill Requirement for Waste Arising in East London

The predicted requirement of non hazardous landfill capacity in East London is set out in the table below. This data is derived from the ELJWP CDEW Forecasts report³¹ and an assessment of diversion potential for HIC waste based on high levels already being achieved for LACW.

³¹ *Construction, Demolition & Excavation Waste Arising in East London to 2041 Regulation 19 Consultation Draft*
BPP Consulting January 2025

Table 2: Predicted Requirement of Non Hazardous Landfill Capacity in East London

Year	Annual Non-inert Waste Landfill Requirement		
	Non-inert C+D waste plus non-inert excavation waste to landfill (Table 17 ELJWP CDEW Forecasts)	2% reducing to 1% of London Plan HIC Forecast	Total tonnes per annum
2024	1,774	17,812	19,586
2025	1,774	17,326	19,100
2026	1,774	16,840	18,614
2027	1,774	16,354	18,128
2028	1,774	15,868	17,642
2029	1,774	15,382	17,156
2030	1,774	14,896	16,670
2031	1,774	14,410	16,184
2032	1,774	13,924	15,698
2033	1,774	13,438	15,212
2034	1,774	12,952	14,726
2035	1,774	12,466	14,240
2036	1,774	11,980	13,754
2037	1,774	11,494	13,268
2038	1,774	11,008	12,782
2039	1,774	10,522	12,296
2040	1,774	10,036	11,810
2041	1,774	9,550	11,324
Totals	31,932	246,258	278,190

Based on the above, the total projected non hazardous waste landfill requirement for East London over the Plan period is estimated to be c280,000 tonnes i.e c0.28Mt.

ELJWP Non Hazardous Waste Landfill Capacity

The Environment Agency Remaining Landfill Capacity Dataset identifies two non-hazardous waste landfill sites in East London having available void at the end of 2023 as follows:

1. Rainham Landfill (1.2Mm3) and
2. The Silt Lagoons at Wennington Marshes (2.3Mm3)

Given:

1. Rainham landfill is subject to a planning permission that expires in 2029; and
2. the limited range of waste types that may be received at the Wennington Marshes Silt Lagoons; and
3. The lack of apparent interest and opportunities for the development of additional non hazardous waste landfill capacity in East London;

it is predicted there will be a need for some residual waste arising in East London to be disposed at non-hazardous waste landfill sites outside East London over the Plan period.

Non Hazardous Waste Landfill Capacity Beyond East London

The projected requirement for non hazardous waste landfill identified in the ELJWP evidence reports has been compared with the availability of void at non hazardous landfills located within former planning regions adjoining East London. The remaining void in these areas has been derived from a review of the Environment Agency dataset for remaining landfill void at the end of 2023 as set out in the table below.

Table 3: Remaining Void At Non Hazardous Landfills Located Within Former Planning Regions Adjoining East London³²

Former Planning Region	WPA	Site Name	End Dates ³³	Void m3 (end of 2023)
East of England	Central Beds	Elstow South (Stewartby)	2040 ³⁴	2,500,000
	Cambridgeshire	Thalia Waste Management Park	2035 ³⁵	1,597,401
		Witcham Meadlands Landfill	2027	190,000
	Essex ³⁶	Bellhouse Landfill Site	2026	1,312,968
		Elsenham Landfill	2029	814,141
		SRC Martells Quarry	2041	1,327,973
	Norfolk	Feltwell Landfill Site	2042 ³⁷	1,204,035
	Suffolk	Folly Farm Landfill	Unknown	547,270
		Masons Landfill	Unknown	2,334,739
	Thurrock	Ockendon Area II & III Landfill	Unknown	3,288,928
South East	Buckinghamshire	Calvert Landfill Site	Unknown	6,593,996
		Land at Meadhams Farm Brickworks	Unknown	215,420
		Springfield Farm Landfill	Unknown	8,384,985
	Hampshire	Blue Haze Landfill	2029 ³⁸	362,395
	Kent	Shelford Landfill Site	2037	852,931
	Milton Keynes	Bletchley Landfill Site	2036 ³⁹	5,682,929
	Oxfordshire	Sutton Courtenay	2030	1,774,966
	Surrey	Redhill Landfill (North East Quadrant)	2030	2,242,522
Grand Total				41,227,599

The above Table shows that at the end of 2023 there was c41Mm3 of void (which equates to c35 million tonnes of non-hazardous waste after 15% inert waste for

³² "Unknown" entry denotes where a response to a request for end dates was not received from the relevant host WPA.

³³ Information sought from host WPAs during Regulation 19 consultation.

³⁴ Email from Jake Kelly Central Beds Council 14.03.2025.

³⁵ Email from Matthew Breeze Cambs CC 20.03.2025.

³⁶ End dates by Email from Gemma Bright Essex CC 03.04.2025

³⁷ Email from Mark Cheetham FCC Environment 17.03.2025.

³⁸ Email from Andy Denton Hants CC 13.03.2025

³⁹ Email from Mark Cheetham FCC Environment 31.03.2025.

restoration is discounted) available within Waste Planning Authorities located in the former planning regions adjacent to East London.

The landfill sites located in the adjacent WPAs offering the most substantial amount of capacity have been mapped in Figure 1.

To confirm the possibility of landfill capacity in these areas being available for the management of waste from East London, letters were sent to each waste planning authority to which 5,000 tonnes of non-hazardous waste had been sent for management in 2022 in August 2024 requesting the following information:

1. Do you anticipate such capacity being available within your Plan area up to 2041, and if so:
2. Is there any planning reason why such capacity would not be available to accept waste from East London?

Responses to the letters revealed that where non hazardous waste landfill sites existed, none were prohibited from the acceptance of waste from East London in principle, but some end dates would limit the availability of capacity for the full Plan period. However, given the low and predicted reducing need for non-hazardous landfill for residual waste from East London as set out in Table 2 above, it is considered that there is sufficient non-hazardous landfill capacity available across the East London catchment area for future needs to be met through to 2042.

It should be noted that in light of its response to the Regulation 18 Draft ELJWP and subsequent meetings, an SoCG with Thurrock Council was prepared, a draft of which was sent for to Thurrock Council inviting comments on 13 January 2025. At the time of writing (06.10.2025) no response has been received.

In light of the responses received to requests for information it was not envisaged that further SoCGs would be necessary.

The only WPA expressing concern about the management of residual waste from East London in its area at the Regulation 19 stage was Oxfordshire County Council and a Statement of Common Ground addressing this matter has been prepared.

