

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

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Part A – Contact Details

	Personal details* <i>*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in the second column.</i>	Agent details (if applicable)
Title	Mr	Ms
First Name	Gavan	Angela
Last Name	Mackenzie	Schembri
Job Title (where relevant)		Senior Planning Director
Organisation (where relevant)	IXDS Ltd	RPS Consulting Services Ltd
Address Please include post code		
Telephone Number		
Email address		<hr/>

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

Name or Organisation: IXDS Ltd _____

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

Policy	N/A	Implementation Text / Paragraph / Table / Figure / Policies Map	Paragraph 5.3 & Table 9
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2. Do you consider the East London Joint Waste Plan: (please tick as appropriate)

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

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

Despite the 'Mayer Parry, Bidder Street' site not being included in the Reg 19 ELJWP Appendix 3 – Maps of Safeguarded Sites and therefore the change in status recognised, within the draft Plan itself, and within all of the evidence base reports (prepared by BPP Consulting) since 2024, including the 'Safeguarded Sites for Release – Assessment Report' (prepared by BPP Consulting, 2025), it is not referred to and the draft Plan is therefore silent on its release through the ELJWP.

This is despite the Regulation 19 Draft ELJWP incorporating a section (at Paragraph 5.3 and Table 9) indexing sites which have been identified for redevelopment in Borough Plans and which are therefore no longer safeguarded.

Given that the 'Mayer Parry, Bidder Street' site is identified in the current ELJWP as a safeguarded waste site, but that the site no longer performs this function (in connection with redevelopment under LB Newham planning permission reference: 24/00088/FUL granted 14.4.25) and is not identified as safeguarded in the Appendix 3 maps, the absence of its mention within Paragraph 5.3 / Table 9 of the Regulation 19 ELJWP draft is incorrect and does not correlate with the approach for the other sites being released. This results in the draft ELJWP not reflecting the correct status of the site and the Plan being unsound.

We would therefore request that the change in circumstances for the 'Mayer Parry, Bidder Street' site is recognised, and that this site is explicitly included as one which has been released from its safeguarded status in the ELJWP, within Table 9, for the avoidance of any doubt.

This same request was raised by IXDS Ltd in its representation made to the Regulation 18 Draft ELJWP consultation in 2024. It does not appear that the request has been considered or actioned.

In providing further explanation of this request, the representation that was submitted by IXDS Ltd as part of the Regulation 18 consultation for the ELJWP in 2024, which remains relevant, is attached alongside this response form.

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

The following entry should be added to Table 9 of the draft ELJWP (additions shown in **bold underlined** text):

Table 9: Existing Waste Sites Released from Safeguarding

Borough	Site	Permitted Use	Assessed Peak Waste Capacity (tpa)
Barking & Dagenham	Barking Eurohub, Box Lane, Barking (D B Cargo)	Transfer Station taking Non-Biodegradable Wastes	c313,500
Barking & Dagenahm	Barking Eurohub, Box Lane, Annex to Shed A (Titan Waste)	Non Haz Waste Transfer / Treatment	c36,000
Barking & Dagenham	Old Bus Dept, Perry Road	Non Haz Waste Transfer / Treatment	c56,000 (CDEW) c22,000 (HIC)
Newham	Connolleys Yard, Unit 5c Thames Road, London, E16 2EZ	Metal Recycling Site	c35,000
<u>Newham</u>	<u>Mayer Parry, Bidder Street</u>	<u>Metal Recycling Site</u>	<u>c150,000</u>

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. **After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

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

☒

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

☐

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

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

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

N/A

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

7. Do you wish to be notified about:

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

Yes ☒ No ☐

b. the publication of the Inspector's report

Yes ☒ No ☐

c. the adoption of the Joint Waste Plan

Yes ☒ No ☐

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