



## NH/25/11244 East London Joint Waste Plan Regulation 19 Submission Plan

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Date Mon 30/06/2025 11:48  
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**FAO:** Development Planning Team, London Borough of Havering

**Consultation:** East London Joint Waste Plan Regulation 19 Submission Plan

**Our ref:** NH/25/11244

Dear Development Planning Team

Thank you for your email dated 19 May inviting National Highways to comment on your Regulation 19 consultation for the East London Joint Waste Plan (ELJWP).

National Highways was appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We are specifically concerned with any proposals which have the potential to impact the M25, M11, A13 and A12 which experience congestion at peak times.

We have reviewed the ELJWP Submission Plan dated February 2025 which sets out the geographic context and existing waste management plan as well as the policy context and strategic objectives. Sections 4 and 5 set out the future requirements for Waste Management Capacity and identify the sites for waste management. We would be concerned if any material increase in traffic were to occur on the SRN as a result of planned growth in waste capacity without careful consideration of mitigation measures. When considering proposals for growth, any impacts on the SRN will need to be identified as far as reasonably possible.

The transportation of waste has the potential to generate a significant number of heavy goods vehicle (HGV) trips, a large proportion of which are likely to use the SRN. Although individual sites might not have a significant impact, cumulatively, developments have the potential to impact road safety and the operation of the SRN. In particular, we would be concerned with an increase in slow moving HGVs causing queuing at on-slips when accessing the SRN.

We support Strategic Objective 7 and Policy JW92 of the ELJWP which 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. As well as supporting proposals that promote alternatives to road based transport, we also look to site operators to investigate opportunities to further

minimise potential impacts to the SRN; i.e. by reducing trips during peak periods. This could be through construction and operational management plans to support individual proposals.

We note paragraph 6.44 states that there is currently an excess of waste management capacity in East London for current and future needs and therefore the ELJWP does not propose any new waste management sites at this stage. We therefore have no specific comments on any safeguarded site allocations at present, however we note that several are in close proximity to the SRN. If any new development does come forward in these locations, it should be ensured that Transport Assessments, comprising an assessment of the impact on the SRN, are submitted alongside planning applications for all developments. Similarly, if any of these safeguarded sites are instead released for other forms of development, we would again expect an assessment of SRN impacts to be provided. It would be preferred that National Highways should be consulted at pre-application stage for these developments but, should this not happen, National Highways should be consulted as soon as these applications are submitted.

Based on our review of the Submission Plan, we are satisfied that the East London Joint Waste Plan would not affect the safety, reliability and/or operation of the SRN (based the tests set out in DfT Circular 01/2022 and MHCLG NPPF 2024 [particularly paras 109 to 115]).

Thank you for consulting us and we look forward to continuing to participate in future consultations and discussions. In the meantime, if you have any questions with regards to the comments made in this response, please do not hesitate to contact us at [planningse@nationalhighways.co.uk](mailto:planningse@nationalhighways.co.uk).

Kind regards  
Diana

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