East London Joint Waste Plan

Note on Release of Sites for Redevelopment for Non-waste Uses Through the Reg 19 Submission Draft ELJWP

v2.7 13.01.2026

Contents

Introduction

1.1 Table 9 of the Regulation 19 Submission Draft ELJWP lists sites identified as existing waste sites under the London Plan definition proposed to be released through the ELJWP for redevelopment for non-waste uses. These sites are listed on the basis that their safeguarding for waste use would likely hinder wider planning and regeneration objectives.

1.2 Release is justified on the basis that each of the sites were identified within Local Plan allocations and the capacity assessment identified a substantial surplus of capacity, such that the objectives of the Plan (and those of the London Plan) would not be compromised by their release.

1.3 In addition, Appendix 4 of the Regulation 19 Submission Draft ELJWP lists five existing waste sites as 'long-term development options' for non waste use.

1.4 The East London Boroughs party to the ELJWP take the view that release for redevelopment of the sites listed in Table 9, and, in the longer term, sites listed in Appendix 4, is consistent with the expectation that release of existing waste sites be plan-led as set out in Paragraph 9.9.2 of the London Plan 2021 reproduced below:

> "9.9.2 Any **proposed release of current waste sites** or those identified for future waste management capacity should be part of a plan-led process, rather than done on an ad-hoc basis."

1.5 In that regard it is noted that the GLA response to the Regulation 19 Submission Draft Plan (dated 30th June 2025), while raising some specific concerns, concluded that in principle the release of these sites through the ELJWP did not cause the ELJWP to not be in general conformity with the London Plan.

1.6 Para 9.9.3 of the London Plan provides an alternative basis for the release of existing waste sites to that of providing like-for-like compensatory capacity on a site-by-site basis set out in Policy SI9. The text is reproduced below:

> "9.9.3 Policy SI 8 Waste capacity and net waste self-sufficiency promotes **capacity increases at waste sites** where appropriate to maximise their use. If such increases are implemented over the Plan period*, it may be possible to justify the release of waste sites if it can be demonstrated that there is sufficient capacity available elsewhere in London at appropriate sites over the Plan period to meet apportionment and that the target of achieving net self-sufficiency is not compromised.* In such cases, sites could be released for other land uses." (emphasis in italics added)

1.7 In relation to the ELJWP, as the existing surplus capacity in the Plan area would provide alternative management capacity for the waste that may have been managed at the existing waste sites included in Table 9 and Appendix 4, in effect compensating for their release, the Boroughs consider this is consistent with the approach set out in Para 9.9.3.

1.8 It should be noted that the listing of existing waste sites included in the Regulation 19 Submission Draft ELJWP is a rationalised version of that included in the Regulation 18 Draft Plan, which listed seven existing waste sites to be released from safeguarding in Table 9 and six sites in the Appendix as existing waste sites with potential for future release (Appendix 3 in the Reg 18 Plan).

1.9 The Regulation 19 Submission Draft ELJWP now only proposes four existing waste sites be released (Table 9), with five existing waste sites identified as 'longer term development options' in Appendix 4.

1.10 This note sets out and updates the position for each site falling under one of the two categories.

Sites To be Released on Adoption of ELJWP ('Table 9 Sites')

1.11 The Table 9 sites to be released on adoption of ELJWP are listed in Table 1 overleaf, along with their status.

			Assessed Capacity (5-year peak, tonnes)	*Assessed Capacity (5-year peak, tonnes)*			
Borough	**Site Name**	**Purpose of Release/ Proposed Use**	**Apportioned HIC Waste**	**CDEW**	**Planning Status**	**Environmental Permit Status**	**Status**
Barking & Dagenham	Eurohub, Box Lane, (D B Cargo)	Castle Green Masterplan	0	313,538	Permitted development Part 8 Class A	Permit issued 17/07/2018	Occupancy of waste uses to cease and Environmental Permits to be surrendered on vacation.
Barking & Dagenham	Eurohub, Box Lane, Annex to Shed A (Titan Bulk Haulage Ltd formerly Titan Waste)	Castle Green Masterplan	15,997	20,173	Granted permission by way of appeal against an Enforcement Notice. (granted 2021)	Permit issued 28/05/2019	Occupancy of waste uses to cease and Environmental Permits to be surrendered on vacation.
Barking & Dagenham	Old Bus Depot, Perry Road (Manns Waste Management)	Dagenham Dock and Freeport site allocation	22,128	56,647	Permanent Permission for Materials Reclamation Facility (granted 2009)	Permit revoked	Applicant was due to vacate site by October 2023
Newham	Connolleys Yard, Unit 5c Thames Road	Connaught Riverside	0	34,958	Use for the melting of scrap aluminium and the grading and recycling of	Permit surrendered	Site allocation in Reg 19 Newham Local Plan

	(Connolleys Metals)	Strategic Site			other non-ferrous metals (granted 1993).		Operation now relocated.
		Totals	**38,125**	425,316			

Table 1: Table 9 Site Status Summaries

Commentary

1.12 The status of the Table 9 sites is summarised in Table 2 below:

Table 2: Summary of Site Status

Key: Green = no barrier to release; Amber= Possible barrier to release; Red = Barrier to release

Site Name	Permanent Planning?	Permitted?	Active?
Eurohub, Box Lane, (D B Cargo)	N	Y	Y
Eurohub, Box Lane, Annex to Shed A (Titan Bulk Haulage Ltd formerly Titan Waste)	Y - on Appeal	Y	Y
Old Bus Depot, Perry Road (Manns Waste Management)	Y	N	N
Connolleys Yard, Unit 5c Thames Road (Connolleys Metals)	Y	N	N

1.13 It is apparent from Table 2 that each site presents a unique set of circumstances as further explained below:

Eurohub, Box Lane, (D B Cargo)

1. 1 Site in Castle Green (Barking & Dagenham) located at the Eurohub rail sidings operates under Permitted Development rights and benefits from an Environmental Permit. Given the lack of express planning consent for a waste use, this site will fall outside the 2021 London Plan definition of existing waste site on surrender of the Environmental Permit.

Eurohub, Box Lane, Annex to Shed A (Titan Bulk Haulage Ltd formerly Titan Waste)

2. 1 Site in Castle Green (Barking & Dagenham) located at the Eurohub rail sidings benefits from planning permission for a waste use and an Environmental Permit. Given its express planning consent, this site would remain within the 2021 London Plan definition of an existing waste site were the permit to be surrendered. However, continuing to safeguard the waste management capacity, which is surplus to requirements, will impede the redevelopment aspirations for the Eurohub site as a whole.

Old Bus Depot, Perry Road (Manns Waste Management)

3. 1 site located at the Old Bus Depot has planning permission but is not subject to an Environmental Permit, as that was revoked by the Environment Agency in October 2023 with the site being required to be returned to pre-permit condition. Given its express planning consent for a waste use, this site falls within the London Plan definition of existing waste site. However, the site forms part of the wider Dagenham Dock and Freeport site allocation in the Barking & Dagenham Local Plan, which supports sustainable industrial uses, and the release of the site will support such uses to come forward. In addition, the Environment Agency has advised that the grant of a new Environmental Permit for the management of waste at this site would be unlikely. In light of this, the site is identified for release. It should be noted that a validated planning application for a change of use on this site was submitted and subsequently withdrawn. The GLA did not raise any strategic issues on the application when consulted on it and concluded that Barking & Dagenham Council could proceed to determine the application without further reference to the GLA.[1].

Connolleys Yard, Unit 5c Thames Road (Connolleys Metals)

4. 1 site in Newham previously occupied by Connolleys Metals that provided 35,000 tpa of metal recycling capacity. This operator has now relocated to LB Havering and the waste use on the site has ceased with the Environmental Permit now being surrendered. Given this site has express planning consent for a waste related use, it falls within the London Plan definition of an existing waste site. However, the intention of the landowner is to redevelop the site for mixed use, and the site is allocated for mixed use development (under the Newham Local Plan site allocation S23 and emerging site allocation N2.SA3), to meet a pressing need to deliver housing on a part of the site allocation. In light of this, and the fact that the waste operation has now relocated to an existing waste site elsewhere in East London, it is considered appropriate to release the site.

Review of Historic Inputs to Sites to be Released - Origin WPA (WDI 2021)

1.14 To confirm that there is no strategic reliance on the sites in Table 9 for the management of waste arising elsewhere, a review of WDI data for a sample year (2021) relating to the management of waste at these sites was undertaken. The results of this exercise are displayed in Table 3 below.

[1] GLA consultation response letter dated 11.03.2025 Ref:24/01694/FULL.

Table 3: Origin of Waste Managed at Sites to be Released in Table 9

Source: WDI 2021

	Quantity of waste managed (t)	**Quantity of waste managed (t)**	**Quantity of waste managed (t)**	**Quantity of waste managed (t)**
Origin WPA (WDI)	Eurohub, Box Lane, (D B Cargo)	Eurohub, Box Lane, Annex to Shed A (Titan Waste)	Old Bus Depot, Perry Road (Manns Waste Management)	Connolleys Yard, Unit 5c Thames Road (Connolleys Metals)
London (WPA Not codeable[2])	149,153	0	0	0
Various	0	2,632[3]	0	0
East London (ELWA[4]) & B&D	0	0	41,520	0
South East (WPA not codeable)	0	0	0	30,398

1.15 Table 3 shows the following:

- The assessment was hampered to some degree by the lack of granularity in the returns data reported for 2 of the sites, Eurohub DB Cargo and Connolleys Metals.
- For Titan Waste the reported tonnages managed were spread across 17 WPAs and no single movement exceeded 300 tonnes (of C, D & E waste)
- All waste managed at the Old Bus Depot site was reported as arising within the East London Waste Plan area, so no WPAs outside the Plan area have a stake in its continued operation.

1.16 The overall conclusion is that no source WPAs are identified for which the loss of capacity at the sites should be problematic, as none have an apparent strategic reliance on the continued availability of their capacity.

1.17

[2] 'WPA Note Codeable' means the origin of the waste was not reported below the geographical area of London i.e. it is unknown which London Borough the waste originated from.

[3] Spread across 17 WPAs and no single movement exceeded 300 tonnes

[4] The WDI uses 'ELWA' as a proxy for the East London Waste Plan Grouping.

Longer Term Development Options (Appendix 4 Sites)

Table 4: Sites Identified as Longer Term Development Options - Appendix 4

Borough	Site Name	Reason	Assessed Capacity Apportioned Waste	Assessed Capacity C, D & E Waste	Assessed Capacity Hazardous	Planning Status	Potential trigger for release
Barking & Dagenham	Barking Waste Transfer and Recycling Facility (Biffa) (B&D 28)	Located within Castle Green site allocation subject to masterplan	108,712	0	0	Permanent Permission for Waste Transfer Station (89/00279/TP)	Redevelopment of housing or other non waste uses proposed in accordance with Castle Green masterplan, which is expected to be developed in 2026/27
	Alfred's Way, Barking (Creek Metals) (B&D 04)	As above	0	27,091	0	Change of use including end of life vehicle scrapping (2013)	Redevelopment of housing or other non waste uses proposed in accordance with Castle Green masterplan, which is expected to be developed in 2026/27
Havering	Off Crow Lane, Romford (Crow Metals) (HV 11)	Potential for re-location for longer term regeneration aims of the area	25,436	245	4,320	Permanent Permission for recycling, processing, storage and distribution of scrap metal (P0962.11)	The future of this site will be considered as part of the New Havering Local Plan and future site allocations.
	Land At York Road, Rainham (Kilnbridge Construction Services Ltd) (HV04)	This site does not fall in a designated employment use area. Therefore there is potential for re-location for	0	44,593	0	Permanent Permission as use as Recycling and Waste Transfer Facility & Depot (P1524.00)	The future of this site will be considered as part of the New Havering Local Plan and future site allocations.

		longer term regeneration aims of the area.					
Redbridge	Ilford Recycling Centre (Renewi UK Services Ltd)	May not be required for ELWA contract	20,000	0	0	Permanent Permission (1847/94)	Redevelopment to be considered if site not required to service future ELWA waste management contract
		Totals:	**154,148**	**71,929**	**4,320**		

Commentary

1.18 The status of the sites listed in Appendix 4 is summarised in Table 5 below:

Table 5: Summary of Site Status

Site Name	Permanent Planning?	Permitted?	Active?
Eastern works, Alfreds Way, Barking (Creek Metals) (B&D 04)	N (CLEUD)	Y - since 1994	Y
Maybell Farm, Barking Waste Transfer & Recycling Facility (Biffa) (B&D 28)	Y	Y - since 1994	Y
Land At York Road, Rainham (Kilnbridge Environmental Services Ltd) (HV04)	Y - on appeal. Site in Green Belt	Y - since 2004	Y
Off Crow Lane, Romford (Crow Metals) (HV 11)	Y	Y - since 2012	Y
Ilford Recycling Centre (Biffa Treatment Services Ltd) (RB08)	Y	Y - since 1994	Y - subject to ELWA Contract

1.19 Review of Historic Inputs to Appendix 4 Sites - Origin WPA (WDI 2023)

1.20 To assess strategic reliance on the sites in Appendix 4 for the management of waste arising elsewhere, a review of WDI data for a sample year (2023) relating to the management of waste at these sites was undertaken.

1.21 The following DtC Thresholds have been applied as screening guidelines for strategic waste movements:

- 10,000t inert waste
- 5,000t non-hazardous waste
- 500t hazardous waste

1.22 The results of this exercise are displayed in Table 6 below. The reported tonnages managed were spread across 45 WPAs with only six movements exceeding the strategic screening thresholds.

1.23

Table 6: Origin of Waste Managed at Sites Earmarked for Release where thresholds exceeded

Source: WDI 2023. Italicised entries from same source but below thresholds included for completeness. Total input for context.

Origin WPA (WDI)	Barking Waste Transfer & Recycling Facility (Biffa) (B&D 28)	Alfred's Way, Barking (Creek Metals) (B&D 04)	Off Crow Lane, Romford (Crow Metals) (HV 11)	Land At York Road, Rainham (Kilnbridge Construction Services Ltd) (HV04)	Ilford Recycling Centre (Biffa) (RB08)
Inert Waste 10,000t+					
London (WPA Not codeable)	1,527	14,396	0	*1,215*	0
HIC waste 5,000t+					
London (WPA Not codeable)	41,646	0	*2,783*	0	0
Redbridge	0	0	0	*0*	11,936
Essex	8,424	0	8,208	*2*	*869*
Hazardous 500t+					
Essex	0	*0*	1,727	0	0
London (WPA Not codeable)	0	*156*	*172*	0	0
Total Input	**52,738**	**14,552**	**21,354**	**26,776**	**12,805**

1.24 Table 6 shows the following:

- The assessment was hampered to some degree by the lack of granularity in the returns data reported for two of the sites, Creek Metal (Inert Waste) & Barking Transfer & Recycling (HIC waste) reporting bulk/all of input as London ('WPA not codeable' i.e. source Borough is unknown).

- For Ilford Recycling Centre the bulk of inputs originate from Redbridge, the host WPA. This is entirely sensible given the site currently serves the LACW management contract.

- Two sites appear to provide capacity of a magnitude that may be regarded as strategic for Essex: Barking Transfer & Recycling and Crow Metals.

1.25 The preliminary conclusion is that the only source WPA identified for which the loss of capacity at the sites might be problematic is Essex, as this is the only WPA that may have an apparent strategic reliance on the continued availability of capacity at Barking Waste Transfer & Recycling Facility and Crow Metals site. Hence further analysis of the waste types arising from Essex accepted at each site has been undertaken. This gives the breakdown shown in Table 7 below:

Table 7: Breakdown of Principal Waste Types Originating from Essex WPA Managed at Two Sites Earmarked for Release where strategic thresholds exceeded (tonnes) *italicised entries below threshold but included for completeness*

Source: WDI 2023

EWC Waste Description	Appendix 4 site	
	Barking Transfer & Recycling	Crow Metals
Mixed municipal waste	7,901	0
Lead acid batteries (from vehicles)	0	1,727
Metals from municipal sources	0	3,554
Non ferrous metals from other waste management facilities	0	3,667

1.26 To establish the relative importance of these sites to the management of waste arising in Essex, the next step is to determine whether the tonnages of each waste type would be significant in the management of the overall amount arising in Essex. This is set out in Table 8.

Table 8: Percentage that Principal Waste Types Originating from Essex WPA Managed at Two Sites Earmarked for Release represents of total arisings from Essex managed at permitted sites in 2023

Source: WDI 2023

EWC Waste Description	Total Arising in Essex	Total managed at App4 sites (Table 7)	% managed at App 4 sites
Lead acid batteries	6,337	1,727	27%
Metals from municipal sources	42,327	3,554	<1%
Mixed municipal waste	1,213,598	7,901	<1%
Non-ferrous metal from wm facilities	20,716	3,667	17%

1.27 Table 8 shows that the tonnages of each waste type managed at the earmarked sites represent less than 1% of total arisings for two of the waste types arising in Essex managed at permitted facilities in 2023. In the case of Lead acid batteries it represented 27% of the total amount and for non ferrous metals from waste management facilities 17% of the total amount.

1.28 A final step in the analysis is considering how many sites received significant tonnages of each significant waste type arising in Essex in 2023.

Mixed Municipal Waste

1.29 The analysis shows that the Barking Transfer & Recycling Facility was one of nineteen transfer sites receiving tonnages of mixed municipal waste arising in Essex in excess of 5,000t, with another transfer site located in East London accepting more than 5,000t in 2023 (operated by SUEZ Recycling & Recovery Ltd) plus the Frog Island MBT plant accepting 16,829t of mixed municipal waste arising from Essex in that year as well.

1.30 This suggests there are a number of alternative outlets available for management of this waste type both within East London and elsewhere and therefore the potential loss of capacity would not pose a strategic risk for management of mixed municipal waste arising in Essex in the long term.

Lead Acid Batteries

1.31 The analysis shows that Crow Metals was one of only two sites receiving waste lead acid batteries arising in Essex in excess of 500t, the other site being Albion Yard (LB Bexley) 1,580t

Metals from Municipal sources

1.32 The analysis shows that Crow Metals was one of five metal recycling sites receiving tonnages of metals from municipal sources arising in Essex in excess of 1,000t, with one of the other sites, 72-76, River Road operated by S.Norton & Co Ltd located in Barking & Dagenham also being located in the ELJWP area.

1.33 This suggests there are a number of alternative outlets available for management of this waste type both within East London and elsewhere and therefore the potential loss of capacity would not pose a strategic risk for management of metals from municipal sources arising in Essex in the long term.

Non ferrous Metals from WM Facilities

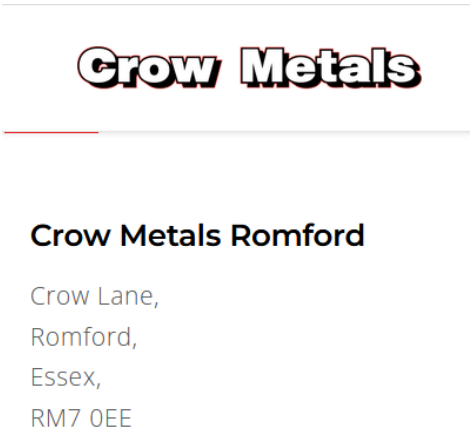
1.34 The analysis shows that Crow Metals was one of four metal recycling sites receiving tonnages of non ferrous metals arising in Essex in excess of 1,000t, with the other sites, being outside London and Essex. The fact this waste travels is taken to reflect its inherent value.

1.35 This suggests that this waste will travel to alternative available outlets and therefore the potential loss of capacity would not pose a strategic risk for management of metals from municipal sources arising in Essex in the long term.

Comment on Crow Metals

1.36 An internet search shows Crow Metals having three sites, all three of which are located within the ELJWP area with one located in Dagenham, one located in Rainham and the Appendix 4 site being located in Romford.

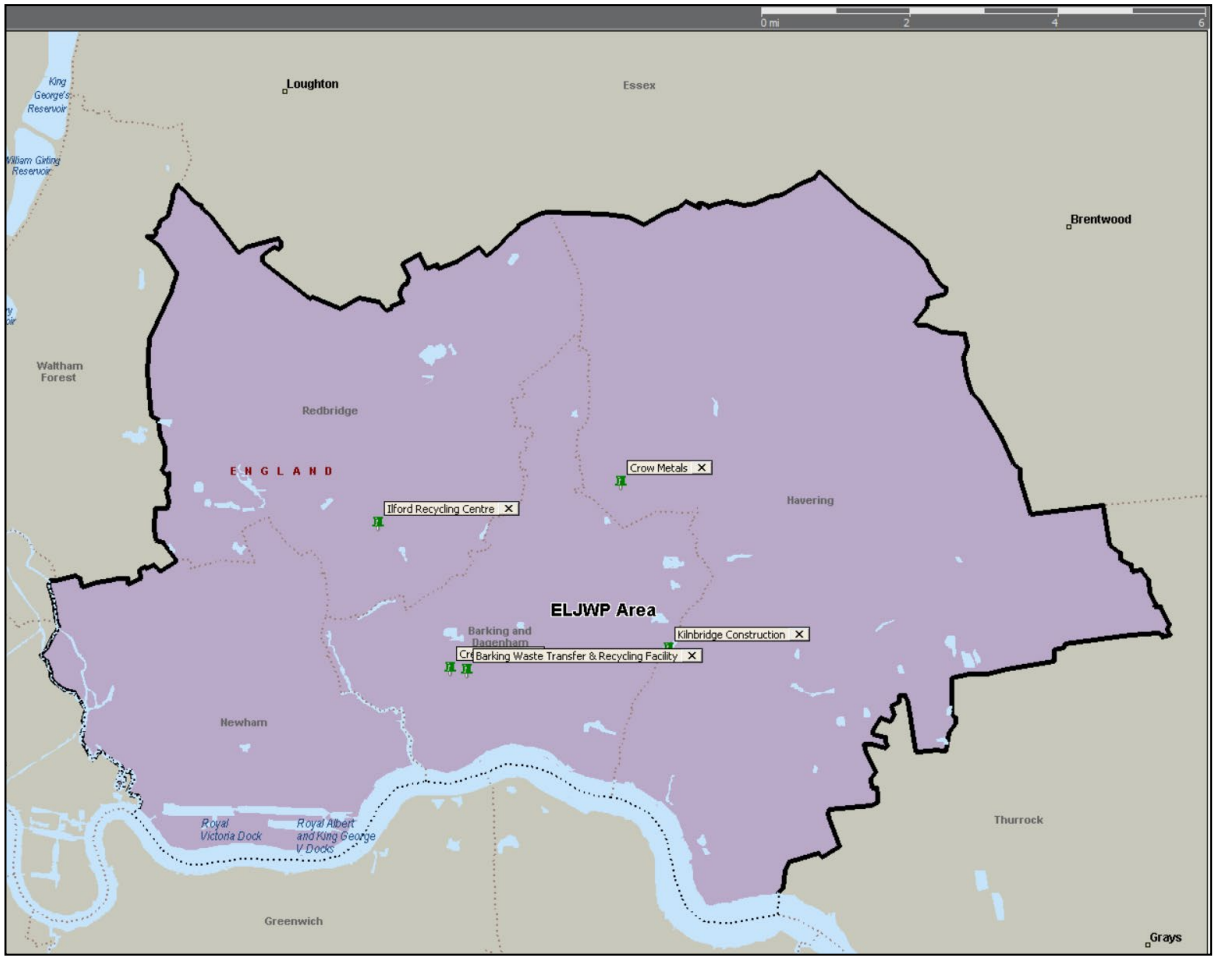
1.37 However, in two out of three cases the sites are listed as being located in Essex. Example displayed below:



Screenshot of https://crowmetals.co.uk/contact-us.php

1.38 This suggests that inputs from within the ELJWP area might have been misreported as arising in Essex. A check of the site returns does not report any waste being received from LB Havering (or any other LBs within the Plan area), which supports this assertion.

1.39 As shown in Figure 1 below the LB Havering shares contiguous borders with Essex, Thurrock, and the London Boroughs of Bexley, Barking & Dagenham and Redbridge. The Crow Metals site in Romford is located on the western border of the Borough, some c.30min drive from the nearest urban area in Essex (Brentwood) but within the urban area of Romford in LB Havering and close proximity to the other East London Boroughs.



1.40 The overall conclusion is that it is unlikely that there are any source WPAs for which the loss of capacity at the Appendix 4 sites should be problematic, as none have an apparent strategic reliance on the continued availability of their capacity.