

East London Joint Waste Plan

Soundness Checklist – December 2025

This 'Soundness Checklist' has been prepared to provide an assessment of the East London Joint Waste Local Plan (Regulation 19 Submission Plan) ('the Plan') against the tests of soundness and policy requirements in the National Planning Policy Framework and National Planning Policy for Waste. It is intended to support the independent examination of the Plan by identifying, for each soundness test and key policy requirement, the principal sources of evidence that demonstrate how the Plan has been positively prepared, justified, effective, and consistent with national policy.

The Checklist is based on a Planning Advisory Service template, updated to reflect current national policy (NPPF 2024) and tailored to focus on the matters of greatest relevance to the Plan.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Positively Prepared: the Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.		
<p>Have the LPAs clearly identified what the issues are that the Plan is seeking to address? Have priorities been set so that it is clear what the Plan is seeking to achieve?</p> <p>Does the Plan contain clear vision(s) and objectives which are specific to the place? Is there a direct relationship between the identified issues, the vision(s) and the objectives?</p> <p>Is it clear how the policies will meet the objectives? Are there any obvious gaps in the policies, having regard to the objectives of the Plan?</p> <p>Have reasonable alternatives to the spatial strategy been considered?</p> <p>Are the policies internally consistent?</p> <p>Are there realistic timescales related to the objectives?</p> <p>Does the Plan explain how its key policy objectives will be achieved?</p>	<ul style="list-style-type: none"> Sections of the Plan and other documents which set out (where applicable) the vision, strategic objectives, key outcomes expected, spatial portrait and issues to be addressed. Relevant sections of the Plan which explain how policies derive from the objectives and are designed to meet them. The strategic objectives of the Plan, and the commentary of how they derive from the spatial portrait and vision, and how the objectives are consistent with one another. Sections of the Plan which address delivery, the means of delivery and the timescales for key developments through evidenced infrastructure delivery Planning. Confirmation from the relevant stakeholders that they support the objectives and the identified means of delivery. Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each Plan showing how they combine to provide a coherent policy structure. 	<p>Chapter 2 of the Reg 19 East London Joint Waste Plan ('the Plan') sets out the context including the policies and issues affecting and to be taken into account when planning for waste management. It identifies current waste management, current and forecasts of future arisings and waste management needs (including to meet London Plan apportionments). Chapter 4 sets out future requirements for waste management in more detail reflecting the supporting evidence provided.</p> <p>Chapter 3 sets out the Vision and Strategic Objectives which provide the context for the Plan policies.</p> <p>Table 10 sets out how each Plan policy relates to and delivers against each Strategic Objective.</p> <p>For each Plan policy, the purpose is presented, together with supporting evidence and how the policy will be implemented.</p> <p>The Consultation Statement submitted with the Plan sets out engagement with stakeholders and comments received, including support, on the Reg 18 Plan.</p>
<p><i>The presumption in favour of sustainable development (NPPF paras 11-14)</i></p> <p>11. Plans and decisions should apply a presumption in favour of sustainable</p>	<ul style="list-style-type: none"> An evidence base which establishes the development needs of the Plan area (see Justified below) and 	<p>Chapter 2 of the Reg 19 Plan sets out the context including the policies and issues affecting and to be taken into account when planning for waste</p>

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<p>development. For Plan-making this means that:</p> <p>a) all Plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;</p> <p>b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:</p> <p>i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the Plan area; or</p> <p>ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.</p>	<p>includes a flexible approach to delivery (see 'Effective', below).</p> <ul style="list-style-type: none"> • An audit trail showing how and why the quantum of development, preferred overall strategy and Plan area distribution of development were arrived at. • Evidence of responding to opportunities for achieving sustainable development in different areas • Policies protecting areas and assets of importance 	<p>management. It identifies current waste management, current and forecasts of future arisings and waste management needs (including to meet London Plan apportionments). Chapter 4 sets out future requirements for waste management in more detail reflecting the supporting evidence provided.</p> <p>Separate Topic Papers submitted with the Reg 19 Plan setting out supporting information including:</p> <ul style="list-style-type: none"> - Waste Management - Waste management capacity in East London - Hazardous waste baseline and arisings - CDEW baseline and arisings - Strategically significant cross-boundary waste movements - Sites identified for release (from safeguarding policy) <p>Policy JWP4 requires design of facilities to avoid adverse environmental and amenity impacts and to mitigate and adapt to climate change impacts.</p>
<p><i>Objectively assessed needs</i></p> <p>The economic, social and environmental needs of the Plan area addressed and clearly presented in a fashion which makes effective use of land and takes account of cross-boundary and strategic issues.</p>	<ul style="list-style-type: none"> • Background evidence papers demonstrating requirements based on sound data and community needs, particularly assessment of waste management needs reflecting forecasts of tonnages requiring management over time, application of targets for different management types and routes, and assessment of existing and required management capacity required over the Plan period . • Technical papers demonstrating how the vision and objectives of the Plan are related to the evidence, and 	<p>Topic Papers on waste management, waste management capacity, and strategic cross-boundary movements of waste were submitted as part of the evidence base underpinning the Plan and its policies.</p> <p>The Duty to Cooperate Statement of Compliance submitted with Plan identifies strategic planning issues as sharing capacity between authorities within London, hazardous waste landfill provision, and significant imports/exports of waste from East</p>

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	how these are to be met, including from consultation and associated with the Duty to Co-operate .	London. It identifies organisations involved, the cooperation undertaken, and the outcomes.
<p>Justified: <i>The Plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.</i></p> <p>To be 'justified' a Plan needs to be:</p> <ul style="list-style-type: none"> Founded on a robust and credible evidence base involving: research / fact finding demonstrating how the choices made in the Plan are backed up by facts; and evidence of participation of the local community and others having a stake in the area. The most appropriate strategy when considered against reasonable alternatives. 		
<p><i>Participation</i></p> <p>Has the consultation process allowed for effective engagement of all interested parties?</p>	<p>The consultation statement should set out what consultation was undertaken, when, with whom and how it has influenced the Plan. The statement should show that efforts have been made to consult hard to reach groups, key stakeholders etc. Reference SCI</p>	<p>Boroughs' SCIs, the ELJWP Consultation Protocol and Consultation Statement are provided as supporting evidence</p>
<p><i>Research / fact finding</i></p> <p>Is the Plan justified by a sound and credible evidence base?</p> <p>What assumptions were made in preparing the Plan? Were they reasonable and justified?</p>	<ul style="list-style-type: none"> The studies, reports and technical papers that provide the evidence for the policies set out in the Plan, the date of preparation and who they were produced by. <p>AND</p> <ul style="list-style-type: none"> Sections of the Plan (at various stages of development) and SA Report which illustrate how evidence supports the strategy, policies and proposals, including key assumptions. <p>OR</p> <ul style="list-style-type: none"> A brief statement of how the main findings of consultation support the policies, with reference to: reports to the council on the issues raised during participation, covering both the front-loading and formulation phases; and any other information on community views and preferences. <p>OR</p> <p>For each policy (or group of policies dealing with the same issue), a very brief statement of the evidence documents relied upon and how they support the policy</p>	<p>Separate Topic Papers submitted with the Reg 19 Plan setting out supporting information including:</p> <ul style="list-style-type: none"> Waste Management Waste management capacity in East London Hazardous waste baseline and arisings CDEW baseline and arisings Strategically significant cross-boundary waste movements Sites identified for release (from safeguarding policy) <p>Chapter 2 of the Reg 19 Plan sets out the context including the policies and issues affecting and to be taken into account when planning for waste management. It identifies current waste management, current and forecasts of future arisings and waste management needs (including to meet London Plan apportionments). Chapter 4</p>

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	(where this is not already clear in the reasoned justification in the PLAN).	<p>sets out future requirements for waste management in more detail reflecting the supporting evidence provided.</p> <p>East London Joint Waste Plan (Regulation 19) Integrated Impact Assessment Report, February 2025.</p>
<p><i>Alternatives</i></p> <p>Can it be shown that the LPAs' chosen approach is the most appropriate given the reasonable alternatives? Have the reasonable alternatives been considered and is there a clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why the decisions were taken?</p> <p>Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the Plan from the start?</p>	<ul style="list-style-type: none"> • Reports and consultation documents produced in the early stages setting out how alternatives were developed and evaluated, and the reasons for selecting the preferred strategy, and reasons for rejecting the alternatives. This should include options covering not just the spatial strategy, but also the quantum of development, strategic policies and development management policies. • An audit trail of how the evidence base, consultation and SA have influenced the Plan. • Sections of the SA Report showing the assessment of options and alternatives. • Sections of the consultation document demonstrating how options were developed and appraised. • Report on how sustainability appraisal has influenced the choice of strategy and the content of policies. 	<p>The Integrated Impact Assessment (IIA) Report (LUC, February 2025) sets out 'reasonable alternatives'/ options to the proposed policies which are subject to the appraisal process. It sets out how the alternatives were identified, the assessment results, and why preferred approaches/policies have been selected.</p> <p>The IIA incorporates and fulfils requirements to undertake Sustainability Appraisal, Strategic Environmental Assessment, Health Impact Assessment, and Habitats Regulations Assessment</p>

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<p>Effective: the Plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.</p> <p>To be 'effective' a plan needs to:</p> <ul style="list-style-type: none"> • Be deliverable • Demonstrate sound infrastructure delivery Planning • Have no regulatory or national Planning barriers to its delivery • Have delivery partners who are signed up to it • Be coherent with the strategies of neighbouring authorities • Demonstrate how the Duty to Co-operate has been fulfilled • Be flexible • Be able to be monitored 		
<p><i>Deliverable and Coherent</i></p> <ul style="list-style-type: none"> • Is it clear how the policies will meet the Plan's vision and objectives? Are there any obvious gaps in the policies, having regard to the objectives of the Plan? • Are the policies internally consistent? • Are there realistic timescales related to the objectives? • Does the Plan explain how its key policy objectives will be achieved? 	<ul style="list-style-type: none"> • Sections of the Plan which address delivery, the means of delivery and the timescales for key developments and initiatives. • Confirmation from the relevant agencies that they support the objectives and the identified means of delivery, such as evidence that the Plans and programmes of other bodies have been taken into account • Section in the Plan that shows the linkages between the objectives and policies, and consistency between policies (such as through a matrix). 	<p>Table 10 sets out how each Plan policy relates to and delivers against each Strategic Objective.</p> <p>For each Plan policy, the purpose is presented, together with supporting evidence and how the policy will be implemented.</p> <p>The Consultation Statement submitted with the Plan sets out engagement with stakeholders and comments received, including support, on the Reg 18 Plan.</p>
<p><i>Infrastructure Delivery</i></p> <ul style="list-style-type: none"> • Have the infrastructure implications of the policies clearly been identified? • Are the delivery mechanisms and timescales for implementation of the policies clearly identified? • Is it clear who is going to deliver the required infrastructure and does the timing 	<ul style="list-style-type: none"> • A section or sections of the Plan where infrastructure needs are identified and the proposed solutions put forward. • A schedule setting out responsibilities for delivery, mechanisms and timescales, and related to a CIL schedule where appropriate. • Confirmation from infrastructure providers that they support the solutions proposed and the identified 	<p>Chapter 2 of the Reg 19 Plan sets out the context including the policies and issues affecting and to be taken into account when planning for waste management. It identifies current waste management, current and forecasts of future arisings and waste management needs (including to meet London Plan apportionments). Chapter 4 sets out future requirements for waste</p>

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of the provision complement the timescale of the policies?	<p>means and timescales for their delivery, or a Plan for resolving issues.</p> <ul style="list-style-type: none"> Demonstrable Plan-wide viability, particularly in relation to the deliverability 	<p>management in more detail reflecting the supporting evidence provided.</p> <p>The focus of the Plan is on safeguarding most existing waste management sites and capacity and so is reliant to an extent on existing infrastructure being retained and enhanced.</p> <p>The Consultation Statement summarises the range of views on the preferred approach and policies.</p>
<p><i>Co-ordinated Planning</i></p> <p>Does the Plan reflect the concept of spatial planning - go beyond traditional land use planning by bringing together and integrating policies for the development and use of land with other policies and programmes that influence the nature of places and how they function?</p>	<ul style="list-style-type: none"> Sections of the Plan that reflect the Plans or strategies of the local authorities and other bodies Policies which seek to pull together different policy objectives Expressions of support/representations from bodies responsible for other strategies affecting the area 	<p>As a Joint Waste Plan, the focus is on waste management across the constituent boroughs. The development plan also comprises the Borough Local Plans and the London Plan. These are described in Chapter 2.</p> <p>The East London Waste Authority have been engaged during the preparation of the Plan and contributed to its content.</p>
<p><i>Flexibility</i></p> <ul style="list-style-type: none"> Is the Plan flexible enough to respond to a variety of, or unexpected changes in, circumstances? Does the Plan include the remedial actions that will be taken if the policies need adjustment? 	<ul style="list-style-type: none"> Sections of the Plan setting out the assumptions of the Plan and identifying the circumstances when policies might need to be reviewed. Sections of the annual monitoring report and sustainability appraisal report describing how the LPAs will monitor: <ul style="list-style-type: none"> a. the effectiveness of policies and what evidence is being collected to undertake this 	<p>The Plan identifies no need for additional waste management capacity to meet London Plan apportionments and safeguards capacity that is more than sufficient to meet identified needs, providing flexibility should management requirements change (para 6.44 & Policy JWP2). Provision is also made for development of new capacity to move management up the waste hierarchy (para 6.47 & Policy JWP2)</p>

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	<ul style="list-style-type: none"> b. changes affecting the baseline information and any information on trends on which the PLAN is based • Risk analysis of the strategy and policies to demonstrate robustness and how the Plan could cope with changing circumstances • Sections within the Plan dealing with possible change areas and how they would be dealt with, including mechanisms for the rate of development to be increased or slowed and how that would impact on other aspects of the strategy and on infrastructure provision • Sections of the Plan identifying the indicators of success of the strategy, and the remedial actions which will be taken if adjustment is required. 	<p>Appendix 1 sets out the Monitoring Framework with indicators against Strategic Objectives and policies.</p>
<p><i>Co-operation</i></p> <ul style="list-style-type: none"> • Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken appropriately for the Plan being examined? • Is it clear who is intended to implement each part of the Plan? Where the actions required are outside the direct control of the LPAs, is there evidence that there is the necessary commitment from the relevant organisation to the implementation of the policies? 	<ul style="list-style-type: none"> • A succinct Duty to Co-operate Statement which flows from the strategic issues that have been addressed jointly. A 'tick box' approach or a collection of correspondence is not sufficient, and it needs to be shown (where appropriate) if joint Plan-making arrangements have been considered, what decisions were reached and why. • The Duty to Co-operate Statement could highlight: the sharing of ideas, evidence and pooling of resources; the practical policy outcomes of co-operation; how decisions were reached and why; and evidence of having effectively co-operated to Plan for issues which need other organisations to deliver on, common objectives for elements of strategy and policy; a memorandum of understanding; aligned or joint core strategies and liaison with other consultees. 	<p>The Duty to Cooperate Statement of Compliance sets out how the Duty has been met.</p>

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<p><i>Monitoring</i></p> <ul style="list-style-type: none"> Does the Plan contain targets, and milestones which relate to the delivery of the policies? Is it clear how targets are to be measured (by when, how and by whom) and are these linked to the production of the annual monitoring report? Is it clear how the significant effects identified in the sustainability appraisal report will be taken forward in the ongoing monitoring of the implementation of the Plan, through the annual monitoring report? 	<ul style="list-style-type: none"> Sections of the Plan setting out indicators, targets and milestones Sections of the annual monitoring report which report on indicators, targets, milestones and trajectories Reference to any other reports or technical documents which contain information on the delivery of policies Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the Plan against the sustainability appraisal 	<p>Appendix 1 sets out the Monitoring Framework with indicators against Strategic Objectives and policies.</p> <p>Topic Papers set out supporting information, evidence and context for the Plan and its policies.</p>
<h2>Consistency with National Policy – NPPF (2024)</h2>		
<h3>Plan-Making – Strategic Policies (paras 20-23)</h3>		
<p>Strategic policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for...(b) infrastructure for waste management (d) conservation and enhancement of the natural, built and historic environment, and planning measures to address climate change mitigation and adaptation (20)</p>	<p>Spatial strategy for provision of sufficient waste management capacity/development, policies requiring high quality design and climate change mitigation and adaptation</p>	<p>The strategy is based on safeguarding existing waste sites and capacity (with release of four existing sites) which is more than sufficient to meet the needs over the Plan period. Policy JWP2 safeguards existing capacity while providing for new capacity in limited circumstances. Policy JWP2b safeguards wastewater treatment capacity. Policy JWP3 restricts development that may encroach on and constrain operations at safeguarded sites and applies the agent of change principle.</p>

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		Policy JWP4 requires development to incorporate measures to mitigate climate change (minimise greenhouse gas emissions, energy efficiency) and adapt to impacts (water efficiency, sustainable drainage, flood resilience).
Strategic policies should look ahead over a minimum 15 year period from adoption to anticipate and respond to long-term requirements and opportunities (22)	Plan period and evidence base for policies extending over sufficient period	The Plan period is to 2041 which will be 15 years from adoption
Broad locations for development should be indicated on a key diagram. Strategic policies should provide a clear strategy for bringing sufficient land forward, at a sufficient rate, to address objectively assessed needs over the plan period. This should include planning for an allocating sufficient sites to deliver strategic priorities. (23)	Plan to identify broad locations for development and set out measures to bring sufficient land forward to meet need for waste management.	The focus is on safeguarding and making the most of existing waste sites. Policy JWP2 (clauses 5 & 6) identifies broad locations for waste management development in priority order – safeguarded waste sites, SILs or LSISs, in proximity to safeguarded sites, local plan allocations on industrial land, previously-developed land, redundant agricultural or forestry structures and surrounds, or agricultural properties for Anaerobic Digestion..
Building a strong, competitive economy (paras 85-87)		
Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt . Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. (85)	<ul style="list-style-type: none"> • Policies encouraging investment, expansion and adaptation of waste management facilities and sites, and linking to wider economic development. • Safeguarding of waste uses which may be out-competed by other uses 	The policies (JWP2 and JWP2b) safeguard existing waste sites and capacity and support their enhancement to manage waste further up the waste hierarchy or increase throughput.

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<p>Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations. (87)</p>	<ul style="list-style-type: none"> • Identification of appropriate sites for waste development including clusters of development 	<p>Policy JWP2 (clause C4) supports consolidation and co-location of facilities.</p>
<p>Planning policies should:</p> <ol style="list-style-type: none"> set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration; set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the Plan period; seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and be flexible enough to accommodate needs not anticipated in the Plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances. (86) 	<ul style="list-style-type: none"> • Policies encouraging waste development on appropriate sites meeting specified criteria, consistent with the spatial strategy • Provide flexibility to accommodate unforeseen needs 	<p>Policy JWP2 (clause D4 & D5) sets out locational criteria which provide flexibility while setting out the types of location to be given priority. Clause E also provides for greenfield sites if special circumstances can be demonstrated.</p>

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Promoting sustainable transport (paras 109-113)		
<p>Transport issues should be considered from the earliest stages of Plan-making and development proposals, so that:</p> <ol style="list-style-type: none"> the potential impacts of development on transport networks can be addressed; opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated; opportunities to promote walking, cycling and public transport use are identified and pursued; the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places. (109) <p>The Planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel</p>	<ul style="list-style-type: none"> Policies encouraging development which facilitates the use of sustainable modes of transport and a range of transport choices where appropriate A spatial strategy and policies which seeks to reduce the need to travel Policies promoting a mix of uses and access by sustainable transport modes. <p>Spatial strategy and policies focusing and directing development to sustainable locations close to where waste arising (proximity principle) with potential for sustainable transport modes (water and rail) and where road vehicle movements and mileage can be minimised.</p>	<p>Policies JWP2 (clause D4i &ii) and JWP4 (clause 11) encourage and give preference to minimising transport and use of non-road modes.</p> <p>As the focus is on existing waste sites, the spatial strategy reflects the distribution of these which may constrain potential for non-road modes of transport.</p>

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<p>and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both Plan-making and decision-making.(110)</p> <p>Planning policies should:</p> <ul style="list-style-type: none"> a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities; b) be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned; c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development; (111) 		
Achieving well designed and beautiful places (paras 131-141)		
Plans should, at the most appropriate level, set out a clear design vision and expectations , so	Policies which seek to increase the quality of development	Policy JWP4 sets out the design requirements for waste developments. A number of the criteria in

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<p>that applicants have as much certainty as possible about what is likely to be acceptable. (132)</p> <p>Planning policies and decisions should ensure that developments</p> <ul style="list-style-type: none"> a) Will function well and add to the overall quality of an area; b) Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; c) are sympathetic to local character and history...; d) establish or maintain a strong sense of place...; e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and f) create places that are safe, inclusive and accessible and which promote health and well-being (135) 		<p>the NPPF are not particularly relevant to waste development.</p>
Protecting Green Belt land (paras 142-151)		
<p>Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. (148)</p>	<p>If Green Belt locations are identified as suitable for waste development, policies should prioritise PDL and grey belt.</p>	<p>No Green Belt sites identified for development, and no additional policy regarding Green Belt adding to that in the NPPF or the Boroughs' Local Plans.</p>
Meeting the challenge of climate change, flooding and coastal change (paras 161-186)		

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<p>Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure. (162)</p> <p>New development should be planned for in ways that:</p> <p>a) avoid increased vulnerability to the range of impacts arising from climate change.</p> <p>b) help to reduce greenhouse gas emissions, such as through its location, orientation and design (164)</p>	<ul style="list-style-type: none"> • Planning of new development in locations and ways which reduce greenhouse gas emissions. • Require design for energy efficiency and low-carbon energy supply and use in development • Require design to incorporate climate mitigation (carbon reduction) and adaptation measures. 	<p>Policy JWP4 (clause A1) requires waste development to minimise greenhouse gas emissions. Clause 4 requires energy and water efficiency, clause 5 require climate change adaptation measures and clause 9 requires achievement of BREEAM 'Excellent' standard.</p> <p>Policy JWP5 requires energy-from-waste facilities to demonstrate operation as a combined heat & power plant (clause 5) and minimising carbon emissions (clause 6).</p>
<p>To help increase the use and supply of renewable and low carbon energy and heat, Plans should:</p> <p>a) Provide a positive strategy for energy from these sources, that maximises the potential for suitable development, and their future re-powering and life extension, while ensuring that adverse impacts are addressed appropriately (including cumulative landscape and visual impacts);</p>	<ul style="list-style-type: none"> • A strategy and policies to promote and maximise energy from renewable and low carbon sources, • Identification of suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources (including energy from waste) • Identification of where development can draw its energy supply from decentralised, renewable or low carbon supply systems and for co-locating potential heat customers and suppliers. 	<p>Policy JWP4 (clause A1) requires waste development to minimise greenhouse gas emissions. Clause D4v requires energy-from-waste facilities to be close to current or future heat users or networks, and where carbon capture and storage is feasible.</p> <p>Policy JWP5 requires energy-from-waste facilities to demonstrate operation as a combined heat &</p>

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<p>b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and</p> <p>c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co- locating potential heat customers and suppliers. (165)</p>		<p>power plant (clause 5) and minimising carbon emissions (clause 6).</p>
<p>Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. (170)</p> <p>Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. (171)</p> <p>All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. (172)</p>	<ul style="list-style-type: none"> • Account taken of the impacts of climate change. • Allocations for development to avoid flood risk areas through a sequential test, based on a SFRA. • Policies to manage risk, from a range of impacts, through suitable adaptation measures 	<p>Policy JWP2 (clause 5) requires development to demonstrate flood resistance and resilience.</p> <p>The Strategic Flood Risk Assessment Position Statement, submitted as supporting evidence, highlights that most existing waste sites safeguarded in the Plan and which are the focus of future development, are within the ‘less vulnerable’ NPPF definition, which are appropriate in all Flood Zones except 3b (functional floodplain). No additional sites are allocated for waste development. Existing Borough Local Plan policies seek to minimise increased risk of flooding and are supported by borough-level SFRAs.</p>
<p>Conserving and enhancing the natural environment (paras 187-201)</p>		

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Planning policies and decisions should contribute to and enhance the natural and local environment by:</p> <ul style="list-style-type: none"> a) Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils; b) Recognising the intrinsic character and beauty of the countryside; c) maintaining the character of the undeveloped coast; d) minimising impacts on and providing net gains for biodiversity; e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability; f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate. (187) 	<p>A strategy and policies that:</p> <ul style="list-style-type: none"> • create, protect, enhance valued landscapes and the countryside; • minimise impacts on and enhance biodiversity and establish ecological networks • minimising adverse effects on soil, air quality, water, noise and land instability • Remediate land where appropriate 	<p>Policy JWP2 (clause 2) requires development to avoid visual intrusion. The focus on existing waste sites will reduce the potential for impact on valued landscapes, and on biodiversity and soil. Clause 2 also requires avoidance of unacceptable adverse impacts on the environment and amenity. Clause 6 requires enhancement of biodiversity</p>
Conserving and enhancing the historic environment (paras 202-221)		
<p>Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:</p> <ul style="list-style-type: none"> a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation; 	<p>A policy or policies which require new development to avoid harm to the significance of assets and that will make a positive contribution to character and distinctiveness.</p>	<p>Policy JWP4 (clause 7) requires avoidance and mitigation of adverse impacts on the historic environment.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; c) the desirability of new development making a positive contribution to local character and distinctiveness; and d) opportunities to draw on the contribution made by the historic environment to the character of a place. (203)		
Facilitating the sustainable use of minerals (paras 215-218)		
Planning policies should: b) as far as practicable take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials c) safeguard mineral resources (223) Local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working. (225)	<ul style="list-style-type: none"> • Provision for C & D waste recycling to provide recycled aggregates • Encouragement of use of bottom ash as secondary aggregate • Avoid development in Mineral Safeguarding Areas unless of overriding importance or does not sterilise mineral resources 	The provision for CDE waste management (safeguarding a surplus of capacity) will contribute to supply of recycled aggregate – 69% of C&D waste is already recycled (the CDEW Baseline report indicates 84% of C&D waste may be recycled).
Consistency with National Policy – National Planning Policy for Waste		
Positive planning plays a pivotal role in delivering this country's waste ambitions through:	Policies requiring: <ul style="list-style-type: none"> • Waste to be managed as high on the waste hierarchy as possible. 	Management of waste as high up the waste hierarchy as possible is a theme running through the Plan.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<ul style="list-style-type: none"> • delivery of sustainable development and resource efficiency, including provision of modern infrastructure, local employment opportunities and wider climate change benefits, by driving waste management up the waste hierarchy; • ensuring that waste management is considered alongside other spatial planning concerns, such as housing and transport, recognising the positive contribution that waste management can make to the development of sustainable communities; • providing a framework in which communities and businesses are engaged with and take more responsibility for their own waste, including by enabling waste to be disposed of or, in the case of mixed municipal waste from households, recovered, in line with the proximity principle; • helping to secure the re-use, recovery or disposal of waste without endangering human health and without harming the environment; • ensuring the design and layout of new residential and commercial development and other infrastructure (such as safe and reliable transport links) complements sustainable waste management, including the provision of appropriate storage and segregation facilities to facilitate high quality collections of waste. (paragraph 1) 	<ul style="list-style-type: none"> • Consider waste management alongside wider planning objectives for housing, transport, climate change, economy and employment • Application of the proximity principle • Ensure waste management does not harm health or the environment 	<p>The waste hierarchy is explained in Chapter 2. Policy JWP1 (clauses A & B) encourages all development (not only waste management) to incorporate measures compatible with circular economy principles. Clause B3 requires management of CDE waste in accordance with the waste hierarchy (reflecting Strategic Objective 2).</p> <p>Policy JWP2 (clause C2) requires new HIC waste management capacity (where this is in excess of East London's assessed needs) to result in waste being managed further up the hierarchy. Clause D addresses the hierarchy specifically and requires demonstration that waste cannot be managed further up the hierarchy (clause D2) and that any decrease in throughput of a safeguarded site would result in waste being managed further up the hierarchy (clause D3).</p> <p>Policy JWP1 sets out how all forms of development should consider provision of appropriate storage and segregation facilities to facilitate high quality collections of waste. Policy on this matter may also be included in the Borough Local Plans.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>In preparing their Local Plans, waste planning authorities should:</p> <ul style="list-style-type: none"> ensure that the planned provision of new capacity and its spatial distribution is based on robust analysis of best available data and information, and an appraisal of options. Work jointly and collaboratively with other Planning authorities to collect and share data and information on waste arisings, and take account of: <ul style="list-style-type: none"> (i) waste arisings across neighbouring waste Planning authority areas; (ii) any waste management requirement identified nationally, including the latest advice on forecasts of waste arisings and the proportion of waste that can be recycled; ensure that the need for waste management facilities is considered alongside other spatial planning concerns, recognising the positive contribution that waste management can bring to the development of sustainable communities. (2) 	<p>Evidence base supporting the level of provision and spatial strategy</p> <p>Supporting documents including SA demonstrating selection of options and how these have been appraised</p> <p>Evidence of collaborative working across LPA boundaries on waste movements and provision</p>	<p>Topic Papers set out waste arisings, forecasts, and management capacity which underpins the approach of safeguarding existing sites and capacity with release of 4 sites, including:</p> <ul style="list-style-type: none"> - Waste Management - Waste management capacity in East London - Hazardous waste baseline and arisings - CDEW baseline and arisings <p>The IIA incorporates SA and sets out how reasonable alternatives were defined and appraised and presents the findings of the appraisal.</p> <p>The Topic Paper ‘Strategically significant cross-boundary waste movements’ identifies cross-border movements.</p> <p>The Duty to Cooperate Statement of Compliance submitted with the Plan identifies strategic planning issues as sharing capacity between authorities within London, hazardous waste landfill provision, and significant imports/exports of waste from East London. It identifies organisations involved, the cooperation undertaken, and the outcomes.</p>
<p>Plans should identify sufficient opportunities to meet identified waste management needs including through;</p> <ul style="list-style-type: none"> early and meaningful engagement with local communities so that Plans, as far as possible, reflect a collective vision and set of agreed priorities when planning for 	<p>Assessment of waste management needs</p> <p>Report of consultation process</p>	<p>The Topic Papers set out the evidence base for deriving waste management needs that underpins the Plan:</p> <ul style="list-style-type: none"> - Waste Management - Waste management capacity in East London - Hazardous waste baseline and arisings

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>sustainable waste management, recognising that proposals for waste management facilities such as incinerators can be controversial;</p> <ul style="list-style-type: none"> • Drive waste management up the waste hierarchy, recognising the need for a mix of types and scale of facilities, and that adequate provision must be made for waste disposal • In particular, identify the tonnages and percentages of municipal, and commercial and industrial, waste requiring different types of management in their area over the period of the Plan; • Consider the need for additional waste management capacity of more than local significance and reflect any requirement for waste management facilities identified nationally; • Take into account any need for waste management, including for disposal of the residues from treated wastes, arising in more than one Waste Planning Authority area but where only a limited number of facilities would be required; • Is there evidence of collaborative work with other Waste Planning Authorities through the duty to cooperate, to provide a suitable network of facilities to deliver sustainable waste management; 	<p>Policies requiring management as high up the waste hierarchy as possible</p> <p>Waste needs assessment identifying requirements in terms of tonnages of different types of waste and management capacity of different types required over the Plan period to achieve net self-sufficiency and application of the waste hierarchy (including assessment of existing capacity and potential for intensification of existing sites/facilities)</p> <p>Evidence of availability or need for strategic facilities serving cross-boundary needs</p> <p>Duty to Cooperate statement and evidence</p>	<ul style="list-style-type: none"> - CDEW baseline and arisings - Strategically significant cross-boundary waste movements <p>The Consultation Statement and Duty to Cooperate Statement of Compliance describe the consultation and DtC engagement process.</p> <p>Management of waste as high up the waste hierarchy as possible is a theme running through the Plan, reflected in Policies JWP1 and JWP2.</p> <p>Topic Paper ‘Strategically significant cross-boundary waste movements’ identifies significant cross-border waste movements.</p> <p>The Consultation Statement and Duty to Cooperate Statement of Compliance describe the consultation and DtC engagement process.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<ul style="list-style-type: none"> Consider the extent to which the capacity of existing operational facilities would satisfy any identified need. (3) 		
<p>Identifying suitable sites and areas:</p> <ul style="list-style-type: none"> Identify the broad type or types of waste management facility that would be appropriately located on the allocated site or in the allocated area in line with the waste hierarchy, taking care to avoid stifling innovation; 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; Consider opportunities for on-site management of waste where it arises; Consider a broad range of locations including industrial sites, looking for opportunities to co-locate waste management facilities together and with complementary activities. Support for using heat generated by waste treatment; Give priority to the re-use of previously-developed land, sites identified for employment uses, and redundant agricultural and forestry buildings and their curtilages. (4) 	<p>Evidence base and waste needs assessment</p> <p>Policies and spatial strategy identifying suitable sites or areas for waste management capacity</p> <p>Distribution of existing and proposed waste management sites and capacity reflecting arisings, including appropriate application of the proximity principle</p> <p>Identification of broad locations for waste management capacity.</p> <p>Policy directing waste management capacity to appropriate locations and prioritising industrial and previously-developed land and co-location of facilities, and consideration of locational criteria in Appendix B</p>	<p>Described in the Topic Papers</p> <ul style="list-style-type: none"> - Waste Management - Waste management capacity in East London - Hazardous waste baseline and arisings - CDEW baseline and arisings - Strategically significant cross-boundary waste movements <p>The focus of the Plan is on safeguarding and enhancement of existing waste sites, with no additional sites allocated or identified.</p> <p>Policy JWP5 requires development proposing to use waste as a fuel to produce energy to demonstrate consistency with the proximity principle (clause 4).</p> <p>Policy JWP2 (clause 5) sets out the priority order that must be followed by proposals for waste management, prioritising existing waste sites, SILs, LSISs/LILs. Clause 6 also sets out broad locations where industrial sites (SILs, LSISs/LILs) are not available, prioritising areas in proximity to existing waste sites where co-location and synergies are possible, local plan allocations, previously-developed land, redundant agricultural and forestry structures.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Policy JWP4 sets out criteria to be met by new waste development which reflect the locational criteria in NPPW Appendix B.</p> <p>Policy JWP5 requires energy-from-waste development to demonstrate operation as CHP (clause 5).</p>
<p>Waste Planning authorities should assess the suitability of sites and/or areas for new or enhanced waste management facilities against each of the following criteria:</p> <ul style="list-style-type: none"> the extent to which the site or area will support the other policies set out in this document; physical and environmental constraints on development, including existing and proposed neighbouring land uses, and having regard to the factors in Appendix B to the appropriate level of detail needed to prepare the Local Plan; the capacity of existing and potential transport infrastructure to support the sustainable movement of waste, and products arising from resource recovery, seeking when practicable and beneficial to use modes other than road transport; and the cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community, including any significant adverse impacts on 	<p>Evidence base including assessment of site suitability including taking account of the locational factors in Appendix B of the NPPW, including of potential for expansion or intensification of existing sites</p>	<p>All but four existing waste sites are safeguarded and will provide for the assessed waste management needs. Should new development be proposed, the criteria in Policy JWP2 will apply. Policy JWP4 sets out criteria to be met by new waste development which reflect the locational criteria in NPPW Appendix B.</p> <p>Policy JWP2 (clause 4) requires minimisation of transport, good access to railheads and wharves to enable use of non-road modes, and good access to the road network if non-road modes are not practicable. Clause C4 requires cumulative impacts to be acceptable where the proposal involves consolidation of activities on a site.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
environmental quality, social cohesion and inclusion or economic potential. (5)		
In preparing Local Plans, waste planning authorities, including by working collaboratively with other planning authorities, should first look for suitable sites and areas outside the Green Belt for waste management facilities that, if located in the Green Belt, would be inappropriate development. Local planning authorities should recognise the particular locational needs of some types of waste management facilities when preparing their Local Plan. (6)	Identification of sites and areas – prioritisation of areas outside of Green Belt or demonstration that very special circumstances apply	No sites are allocated for development. No policy addressing development in the Green Belt is included – the NPPF and the policies of the Borough development plans will apply (see para 6.58).
<p>Monitoring: To inform the preparation of Local Plans and to inform the determination of Planning applications as part of delivering sustainable waste management, local Planning authorities should, to the extent appropriate to their responsibilities, monitor and report:</p> <ul style="list-style-type: none"> • take-up in allocated sites and areas; • existing stock and changes in the stock of waste management facilities, and their capacity (including changes to capacity); • waste arisings; and, • the amounts of waste recycled, recovered or going for disposal. 	Monitoring framework with indicators reflecting NPPW	<p>A Monitoring Framework is set out in Appendix 1 including a range of indicators including:</p> <ul style="list-style-type: none"> - Quantity of household waste produced per household - % LACW diverted from landfill - Recycling rates for C&I - % Reduction in CDEW sent to landfill - Waste management capacity by waste category and position on the waste hierarchy - Number of safeguarded sites lost to alternative development - % safeguarded sites operating at full capacity - Waste management capacity by waste category and position on the waste hierarchy