

# Statement of Common Ground Between the London Boroughs of Barking and Dagenham, Havering, Newham and Redbridge and the Mayor of London concerning the East London Joint Waste Plan

Date: 19<sup>th</sup> February 2026

## Version:

### 1. Overview

- 1.1 This document represents a Statement of Common Ground between the London Boroughs of Barking and Dagenham, Havering, Newham and Redbridge ('The East London Boroughs') and the Mayor of London, and concerns planning policies included in the East London Joint Waste Plan published for consultation in accordance with Regulation 19 stage of the Local Plan making regulations.
- 1.2 The East London Boroughs are the Waste Planning Authorities for their respective areas and so have a statutory responsibility for planning for the future management of waste in those areas. The East London Boroughs have chosen to work in partnership to review and update waste related planning policy currently set out in the adopted 'East London Waste Plan' (2012) by preparing a replacement plan known as the 'East London Joint Waste Plan'. Once adopted, the 'East London Joint Waste Plan' will set out how and where waste is to be managed in East London over the period to 2041. Among other things, this involves protecting existing waste management capacity and allowing the development of additional capacity in appropriate locations (where a need for such capacity is demonstrated).
- 1.3 The Mayor of London is responsible for producing the London Plan, which sets out the strategic vision for the development of London over the next 20-25 years. This includes policies on the provision of housing, the management of waste, protection of the environment, and promotion of economic development.

The East London Boroughs have added Appendix 2 to this SoCG. This is an updated version of the background paper 'Sites Identified for Release in Reg 19 ELJWP (v2.2 dated 08.05.2025)' which was published alongside their Regulation 19 plan. Although the GLA has not commented in detail on Appendix 2, the GLA position takes into account the information provided by the ELBs to date.

### 2. Duty to Cooperate

- 2.1 The East London Boroughs and the GLA have had a number of Duty to Cooperate meetings throughout the East London Joint Waste Plan process. A list of these meetings, with an overview of the matters discussed, is provided in Appendix 1.

### 3. Key Strategic Matters

- 3.1 Through correspondence and discussions between the East London Boroughs and GLA, the following were identified as strategic issues for ongoing liaison:
  - The provision of compensatory capacity for the release of a select number of existing waste sites;
  - Sharing of surplus capacity with other London Boroughs;
  - The inclusion of Appendix 4 'Longer Term Development Options' within the draft Plan;
  - The definition of a waste site (that is subject to safeguarding); and
  - The implementation of Policy JWP2

### 4. Matters where Parties Agree

- 4.1 Both parties agree that the East London Boroughs can meet their apportionment requirements, as set out within LP2021 Table 9.2.

- 4.2 Both parties agree that the development of the draft Plan has been supported by a detailed evidence base.
- 4.3 Both parties agree that the information provided within Section 5 of the Duty to Cooperate Statement is an accurate reflection of meetings held between the parties during the process of drafting the ELJWP.
- 4.4 Both parties agree that while Regulation 19 response to the East London Joint Waste Plan considered the plan to be in general conformity with London Plan, the GLA had outstanding concerns with key aspects of the policy approach for JWP2 and sharing of surplus capacity.

## **5. Matters where Parties disagree**

### ***Sharing of Surplus Capacity***

5.1 It is acknowledged by both parties that London Borough of Tower Hamlets (LBTH) has approached the East London Boroughs to request that some of the East London Borough's identified surplus capacity be considered for use in providing capacity for LBTH. To date, no agreement between ELBs and LBTH has been reached.

5.3 The GLA maintain its view as set out in their Regulation 19 response that the four sites proposed to be released should not be considered to be surplus to capacity until it has been confirmed that they are not required by others boroughs. With this in mind, the GLA is of the view that these four sites should not be released until an agreement between Tower Hamlets and ELBs has been reached, with any transfer of capacity being secured through the appropriate mechanism.

5.2 ELBs have raised concerns with the methodology Tower Hamlets have applied within their Employment Land study, and until these have been satisfactorily addressed no agreement to give LBTH some of their surplus capacity will be reached. Tower Hamlets are currently undertaking further work to address concerns raised, but as of the date of this agreement it has not been shared with the GLA. Until this further work has been completed by LBTH, and an agreement reached in terms of sharing capacity, this is considered to be an area of disagreement between the GLA and ELBs.

### ***Application of JWP 2***

5.3 The starting point of the LP2021 SI 9 is that all existing waste sites are safeguarded and retained in waste management use. This in turn can support in achieving waste net self-sufficiency aims. London Plan policy SI 9 also requires compensatory capacity to be secured for any waste site that is proposed to be lost. The supporting text (Paragraph 9.9.2) for this policy states that *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.

5.4 Draft policy JWP 2 seeks to apply a different waste definition to that included within the LP2021. The GLA consider that this could lead to some sites considered as a waste site through the London Plan, not being considered as a waste site through the emerging Waste Plan. The ELBs disagree with the position of the GLA, as set out in further detail in section 6 of this SoCG.

5.5 Draft Policy JWP2(B) allows for compensatory capacity to be secured for the loss of a waste site, but also allows for a waste site to be lost without compensatory capacity being secured should it be demonstrated that the loss of the site will not compromise the ability to meet the London Plan objective of net self-sufficiency.

5.6 The GLA considers that Part B of JWP2 is in direct conflict with LP2021, which is clear that a plan-led approach to waste planning should be taken, rather than the ad hoc release of waste sites. As drafted, JWP2(B) supports the release of waste sites through the development management process without compensatory capacity being secured. Allowing for the ad hoc release of waste sites through the development management process, and without compensatory capacity being secured, creates uncertainty that the East London boroughs

will be able to maintain meeting their apportionment requirements throughout the Plan period. The ELBs disagree with the position of the GLA, as set out in further detail in section 6 of this SoCG.

5.8 In the absence of no amendments to the policy wording, this is an area of disagreement between the GLA and ELBs. The GLA's concerns can be resolved through removing Part B of JWP2.

#### ***Appendix 4 – Longer Term Development Options***

5.9 The draft East London Waste Plan includes Appendix 4, which identifies sites which are to be safeguarded as waste sites but could be released from safeguarding in the future.

5.10 The GLA is concerned that the identification of these sites is premature, particularly when a number of sites identified are Strategic Industrial Locations which are considered to be appropriate locations for waste uses. National guidance requires plans to be updated on a 5-year basis, and any future release of waste sites should be identified as part of this taking into account up-to-date evidence of waste capacity within the area. This is particularly pertinent noting the concerns raised in regards to the implementation of Policy JWP(2).

5.11 The ELBs consider the wording of the Plan to be sufficiently clear on the implementation of this point (set out in paragraph 5.4). These sites will only be considered for release through future Plan reviews by the boroughs, thereby according with the plan-led process for site release set out through the London Plan.

## **6. Table of representations and the East London Boroughs' response**

6.1 The below table details the matters raised by the GLA on behalf of the Mayor of London as representations to the Regulation 19 East London Joint Waste Plan, and the status of those representations.

6.2 The table seeks to provide clarification and clarity to the extent to which matters raised by the Mayor are resolved or remain unresolved. The table therefore represents the current agreed position in respect of the agreements and differences between the East London Boroughs and the Mayor.

Subject	GLA Regulation 19 Response	East London Borough Position	Further GLA comments	Common Ground Agreed?
General	<p>LP2021 Policy SI8(b) requires boroughs to allocate sufficient land and identify waste management facilities to meet the waste tonnages apportioned in LP2021. The East London Joint Waste Plan (ELJWP) covers the London Boroughs of Barking and Dagenham, Havering, Newham and Redbridge ('the Boroughs'). These boroughs have a pooled LP2021 apportionment of 1,497,000 tonnes per annum to 2041.</p> <p>The draft Plan identifies that East London currently has a capacity of 2,619,508 tonnes per annum (tpa) of qualifying waste capacity, based on the combined capacity of the Boroughs. We commend the draft ELJWP for its positive approach to meeting apportionment targets. Whilst it is considered that the draft Plan is in general conformity with LP2021, the Mayor has concerns in regard to the approach proposed for the implementation of Policy JWP2 and the release of waste sites within the Castle Green SIL.</p>	<p>Comment noted - in particular the view that the draft Plan is in general conformity with LP2021. Specific concerns in relation to JWP2 are considered below.</p>		N/A
General	<p>We have noted some inconsistencies in figures associated with the number of sites to be safeguarded and for the additional sites identified for potential future release, and request that they are corrected prior to the draft Plan being submitted.</p>	<p>The East London boroughs recognise there is a typographical error and to ensure the clarity of the plan therefore proposes the following minor wording change to paragraph 2.36 for the Inspector's consideration:</p> <p><del>665</del> sites are safeguarded by this Plan for waste management uses and their location is shown in Figure 4 below.</p>		Yes

		No other inconsistencies in figures in the plan associated with the number of additional sites identified for potential future release were identified.																						
Sites Proposed for Release	<p>The draft ELJWP safeguards 66 waste sites within the Boroughs. Four sites are proposed to be released, which have a combined capacity of 38,125tpa apportioned waste and 425,316tpa Construction, Demolition, and Excavation (CDE) waste. These sites are identified in the below table</p> <table border="1" data-bbox="271 564 1032 943"> <thead> <tr> <th>Borough</th> <th>Site</th> <th>Permitted Use and Permit Details</th> <th>Assessed Peak Waste Capacity (tpa)</th> </tr> </thead> <tbody> <tr> <td>Barking and Dagenham</td> <td>Barking Eurohub, Box Lane</td> <td>Transfer Station taking Non-Biodegradables Wastes</td> <td>c313,500</td> </tr> <tr> <td>Barking and Dagenham</td> <td>Barking Eurohub, Box Lane, Annex to Shed A</td> <td>Non Haz Waste Transfer/Treatment</td> <td>c36,000</td> </tr> <tr> <td>Barking and Dagenham</td> <td>Old Bus Depot, Perry Road</td> <td>Non Haz Waste Transfer/Treatment</td> <td>c56,000 (CDEW) c22,000 (HIC)</td> </tr> <tr> <td>Newham</td> <td>Connolleys Yard, Unit 5c Thames Road</td> <td>Metal Recycling Site</td> <td>C35,000</td> </tr> </tbody> </table>	Borough	Site	Permitted Use and Permit Details	Assessed Peak Waste Capacity (tpa)	Barking and Dagenham	Barking Eurohub, Box Lane	Transfer Station taking Non-Biodegradables Wastes	c313,500	Barking and Dagenham	Barking Eurohub, Box Lane, Annex to Shed A	Non Haz Waste Transfer/Treatment	c36,000	Barking and Dagenham	Old Bus Depot, Perry Road	Non Haz Waste Transfer/Treatment	c56,000 (CDEW) c22,000 (HIC)	Newham	Connolleys Yard, Unit 5c Thames Road	Metal Recycling Site	C35,000	<p>Comment noted.</p> <p>For clarity, each site's management capacity by waste type is set out below:</p> <p>Borough: Barking &amp; Dagenham</p> <ul style="list-style-type: none"> <li>Site: Eurohub Box Lane, Box Lane (D B Cargo); Permitted Use &amp; Permit Details: Transfer Station taking Non Biodegradeable Waste; Assessed Peak Capacity (tpa): CDE W: 313,538</li> <li>Site: Eurohub, Box Lane, (Titan Waste); Permitted Use &amp; Permit Details: Non-Haz Waste Transfer/Treatment; Assessed Peak Capacity (tpa): HIC: 15,997 CDE W: 20,173</li> <li>Site: Old Bus Depot, Perry Road; Permitted Use &amp; Permit Details: Non-Haz Waste Transfer/Treatment; Assessed Peak Capacity (tpa): HIC: 22,128 CDE W: 56,647</li> </ul> <p>Borough: Newham</p> <ul style="list-style-type: none"> <li>Site: Connolleys Yard, Unit 5c Thames Road; Permitted Use &amp; Permit Details: Metal Recycling Site; Assessed Peak Capacity (tpa): CDE W: 34,958</li> </ul>		N/A
Borough	Site	Permitted Use and Permit Details	Assessed Peak Waste Capacity (tpa)																					
Barking and Dagenham	Barking Eurohub, Box Lane	Transfer Station taking Non-Biodegradables Wastes	c313,500																					
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		Totals: HIC: 38,125; CDE W: 425,316		
	It is noted that the released sites have reduced since the Regulation 18 consultation, which had identified seven sites for release. It is understood that the reduction between Regulation 18 and Regulation 19 is due to three sites having been granted consent for a change of use away from waste, and as such have been removed from this list.	Comment noted.		N/A
	As set out in paragraph 5.3 of the draft Plan, the four identified waste sites proposed for release have been identified for non-waste uses in Borough Plans, with no specific compensatory capacity proposed. While the GLA understands that the assessment of existing waste capacity of 2,619,508 tpa excludes the sites identified in the above table, LP2021 Policy SI9 is clear that all waste sites are safeguarded, and that an existing waste site should only be released to other land uses where waste processing capacity is re-provided elsewhere within London (based on the maximum throughput achieved over the last five years). The Mayor is concerned that releasing sites without re-provision elsewhere within London could impact on achieving some of the key aims of Policy SI8 and SI9. Further commentary on each of the four sites can be found below:	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the policy approach to be justified. It is the East London boroughs view that London Plan Policy SI 9c and paragraph 9.9.2 encourages the release of waste sites to be undertaken as part of a plan-led process, rather than on an ad hoc basis through the development management process. Requiring compensatory capacity through the plan-led process in the same way as requiring through individual planning applications would undermine the strategic approach to balancing various land-use objectives that plan-making affords.</p> <p>The rationale behind each individual site release is set out in further detail in the 'Sites Identified for Release in Reg 19 ELJWP' topic paper that supports the plan. None of the capacity offered by the four sites identified for release has been counted towards the starting apportionment capacity value arrived</p>	<p>London Plan policy SI 8 and SI 9 is explicit that compensatory capacity should be provided, including as part of the process of developing waste plans. The interpretation of Policy SI 9c has to be understood in the context of the strategic objective for net self-sufficiency. The inclusion of compensatory capacity in the plan-led process is fundamental to achieving this objective while also retaining sufficient flexibility for individual boroughs to work together to realise local land-use objectives that may impact on existing waste sites.</p> <p>Further, as stated in paragraph 9.8.6 of the LP20201, boroughs with a surplus of sites should offer to share these sites with those</p>	Not Agreed

		<p>at using 2023 data for East London as a whole of 2,619,508 tpa (reducing to 2,181,615tpa in 2041). Even with the release of capacity planned through the East London Joint Waste Plan, East London would still retain a significant surplus of management capacity, with between c.0.68 Mtpa (without MBT) and c.1.2Mtpa of apportioned waste surplus and 0.98 Mtpa of C,D&amp;E waste management capacity surplus by 2041.</p> <p>Furthermore, the release of four sites from safeguarding as set out in the ELJWP will not compromise the achievement of the requirements or targets in the London Plan set out in policies SI8 and SI9. The BPP Note of clarification entitled Note on Release of Sites for Redevelopment for Non-waste Uses previously shared with the GLA demonstrates this and is included as Appendix 2 to this SoCG. Note that this note has been updated to take account of the release of the Old Bus Depot sites as that was added after the note was originally prepared.</p> <p>The East London boroughs are satisfied that the plan is sound without the proposed changes.</p>	<p>boroughs facing a shortfall in capacity before considering site release. It is understood that discussions with Tower Hamlets, who have identified that they have shortfall in capacity, are underway but have not yet reached conclusion. The GLA therefore reserves the right to update these comments accordingly following the completion of these discussions.</p>	
	<p>Old Perry Bus Depot – officers understand that the Environment Agency (EA) has advised that the permit for this site has been revoked, that the operator will not be granted a further permit, and that due to proximity</p>	<p>Comment noted. The EA permit has been revoked. As stated in the evidence note, this site</p>	<p>On the understanding that the EA permit has been revoked and the Environment</p>	<p>Agreed</p>

	<p>to sensitive receptors it would be difficult for new owners to obtain a permit.</p>	<p>was subject to a validated planning application for change of use to non-waste. This application was subsequently withdrawn and the applicant is considering next steps to bring forward an alternate industrial use on this site.</p> <p>Redevelopment of this site will not adversely impact achievement of targets set out in policies SI8 and SI 9 of the London Plan.</p>	<p>Agency has indicated that it will not be possible for this site to obtain a new permit, this is agreed.</p>	
	<p>Connolleys Yard – the site allocation for this site within the Newham Local Plan (Regulation 19) is clear that the waste capacity at this site should be re-provided or compensatory capacity identified. We remain concerned about the loss of this waste site. It is noted that the draft site allocation includes the requirement to re-provide the waste site or provide compensatory capacity, however this requirement could fall away should Policy W1 of the Regulation 19 Newham Local Plan be adopted as drafted.</p>	<p>Comment noted.</p> <p>Connolley's Yard forms part of a wider strategic site allocation within both Newham's adopted and emerging Local Plans. These allocations are not considered suitable for the re-provision of the existing waste management use.</p> <p>Redevelopment of this site will not adversely impact achievement of targets in policies SI8 and SI 9 of the London Plan.</p>	<p>The GLA acknowledges that the Newham Local Plan was submitted on 18<sup>th</sup> July 2025 to the Inspector, with Hearings on Policy W1 being held on February 4<sup>th</sup> 2026.</p> <p>Policy W1 of the Newham Local Plan seeks to safeguard waste sites within the borough. The Policy also contains a reference to meeting apportionment requirements through the updated East London Waste Plan.</p> <p>Acknowledging the advanced stage of the Newham Local Plan, this is agreed.</p>	<p>Agreed</p>

	<p>Eurohub sites in Barking and Dagenham – both sites fall within the Castle Green SIL and currently have active throughputs. We are aware of future aspirations for the Castle Green area, with references within the supporting evidence being made to the Castle Green Masterplan. The Castle Green Strategic Industrial Location (SIL) remains a designated SIL in the very recently adopted Barking and Dagenham Local Plan (September 2024), which states that plans for its future redevelopment will be considered in a future Local Plan review. As stated in paragraph 9.8.11 [of the London Plan], land in SIL will provide the main opportunities for locating waste treatment facilities. As such the proposal to release these two sites seems premature.</p>	<p>Comment noted.</p> <p>The Plan proposes the removal of waste safeguarding of the Castle Green sites to enable the reconfiguration of the site and to align with the landowners’ aspirations for the rail freight terminal. The site would remain SIL, as per LBBDD’s recently adopted Local Plan, and would continue to be a key industrial site in the borough.</p> <p>Redevelopment of this site will not compromise achievement of the requirements and targets set out in policies SI8 and Si 9 of the London Plan.</p>	<p>Not Agreed. The Eurohub sites have been identified to be retained in industrial use in the recently adopted Barking and Dagenham Local Plan, with the supporting evidence base identifying the Euro Hub site for long-term intensification and densification. LP2021 identifies industrial areas, specifically Strategically Industrial Locations (SI 8 (B(4))), as being suitable locations for wastes sites, as evidenced by the number of waste facilities that are located within this area.</p> <p>Further, as Plans have to be reviewed on a regular basis, the release of these waste sites in what is an appropriate location for them and in an area which has been identified for long-term, rather than short-term, intensification for industrial uses, seems premature.</p>	<p>Not Agreed.</p>
<p>Surplus Capacity and Duty to Cooperate</p>	<p>Paragraph 9.8.6 of LP2021 states that boroughs with a surplus of waste sites should offer to share these sites with those boroughs facing a shortfall in capacity before considering site release. The GLA is aware</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as paragraphs 4.11 and 4.12 seek to</p>	<p>Paragraph 9.8.6 of the London Plan 2021 is clear that boroughs with surplus of sites should offer to share these</p>	<p>Not Agreed</p>

	<p>that there are London Boroughs who cannot meet their borough apportionment targets and have a shortfall in waste capacity.</p> <p>The GLA is aware that London Borough of Tower Hamlets (LBTH) has approached the Boroughs to discuss sharing East London’s surplus capacity. This engagement has been noted within the duty to cooperate statement that has been published to support the draft Plan. These discussions with Tower Hamlets should continue, with any agreement reached being reflected within the draft Plan.</p> <p>For clarity, the GLA is of the view that the four sites proposed to be released from safeguarding should not be considered to be surplus to requirements until it has been confirmed that they are not needed by other boroughs within London to meet apportionment needs.</p>	<p>positively and effectively meet the needs of other London boroughs unmet need through the Duty to Cooperate process. To inform this process, a methodology for assessing requests to share surplus capacity is set out in Appendix 2 of the Duty to Cooperate Compliance Statement (Proposed criteria for assessing surplus capacity requests). This methodology is justified, having been primarily informed through the London Plan policy SI 8 and SI 9 requirements, while seeking to ensure that boroughs optimise their ability to manage waste within their own boundaries, supporting the proximity principle. This also means that the maximum amount of east London’s surplus waste management capacity can be retained to meet other areas of London’s management needs as required over the course of the plan period.</p> <p>Any agreements are to be formalised through a Statement of Common Ground. This approach is effective and allows for capacity sharing agreements to be agreed through the lifetime of the plan, recognising each waste planning authority is at different stages of plan preparation. This accords with paragraph 22 of the National Planning Policy Framework, which states that plans should anticipate and respond to</p>	<p>sites with those boroughs facing a shortfall in capacity before site release is considered. It is understood that discussions with Tower Hamlets, who have identified that they have shortfall in capacity, are underway but has not yet reached conclusion. The GLA therefore reserves the right to update these comments accordingly following the completion of these discussions.</p>	
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		<p>long-term requirements and opportunities. Formalising a single capacity sharing agreement through the wording of the plan would undermine this flexibility and effectiveness of the approach and may compromise east London's future ability to contribute towards London's net self-sufficiency aims.</p> <p>The agreement of capacity sharing through Statements of Common Ground accords with the London Plan's supporting text, which states that boroughs may pool apportionment requirements through "bilateral agreements". This approach allows for flexibility in allowing capacity sharing agreements at different points of the plan's lifecycle, while ensuring borough's planning to utilise east London's surplus capacity optimise sustainable management capacity within their boundaries. A similar agreement has been utilised in south-east London through periodical updates to the 'Southeast London joint waste planning technical paper'.</p> <p>We note the London Plan at paragraph 9.8.6 states that boroughs with a surplus of waste sites should offer to share these sites with those boroughs facing a shortfall in capacity before considering site release. We consider</p>		
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		<p>our approach is in general conformity with the principle of this supporting text. As per the Duty to Cooperate Statement of Compliance, we have contacted all London Boroughs with an offer to request reliance on surplus capacity in East London for meeting waste management requirements in their areas. The London Borough of Tower Hamlets are the only borough who have directly requested a proportion of East London's management capacity surplus. While the plan does propose site release, the plan wording provides guidance for how East London proposes to share capacity with other London boroughs, contributing to the London Plan objective of delivering net self-sufficiency. While the Greater London Authority have highlighted the need to adhere to this supporting text in their response to the Regulation 19 consultation, they have also not raised a general conformity objection to this policy approach.</p> <p>Currently, the East London boroughs retain concerns with regards to Tower Hamlet's response to the methodology criteria, namely their prioritisation of their Strategic and Local Industrial designations for uses other than waste in their Regulation 19 Local Plan, as well as their lack of duty to cooperate</p>		
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		<p>engagement with other London boroughs with which they share established waste management flows. We do not current consider that Tower Hamlets have adequately demonstrated that there is an unmet need for waste management capacity in their area. Therefore, we are not currently in a position to agree sharing our capacity surplus, although we have agreed to continue attempting to resolve these matters through duty to cooperate discussions.</p> <p>The East London boroughs are satisfied that the plan remains sound without the proposed changes.</p>		
Additional Sites for Potential Future Release	Appendix 4 of the draft Plan has identified a number of sites as ‘Longer Term Development Options’ with potential for future release but sitting outside the draft Plan. The draft Plan states that the assessed capacity of the sites identified within this appendix is circa 230,397tpa (154,148 apportioned waste, 71,929 CDE waste and 4,320 hazardous waste).	A change to this policy approach has not been made. We did not consider this change to be necessary as the policy approach in the Submission East London Joint Waste Plan is justified.		Not Agreed
	The draft Plan indicates that a surplus of at least 310,000tpa will be safeguarded to facilitate the future release of the sites identified within Appendix 4. As noted above, LP2021 Policy SI9 is clear that all waste sites are safeguarded, and that an existing waste site should only be released to other land uses where waste processing capacity is re-provided elsewhere within London. The proposed approach of safeguarding a proportion of surplus capacity, rather than providing compensatory capacity, to facilitate the release of these sites is not considered to be in alignment with LP2021. We would also re-iterate that no sites should be considered surplus to capacity until it has been	Appendix 4 sites are additional existing waste management sites which might make good candidates for redevelopment for non-waste uses in future. Noting each of the East London boroughs are at different stages of the plan-making process (through which industrial land boundary changes could be made), the appendix signposts those sites the boroughs may plan for		Not Agreed

	<p>confirmed that they are not needed by other boroughs to meet apportionment needs.</p>	<p>the release of through the allocation of sites in updated Local Plans. This approach seeks to reflect paragraph 22 of the NPPF, which states that “Strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities.” It also reflects the London Plan supporting paragraph 9.8.10, which states that “Plans or agreements safeguarding waste sites should take a flexible approach. They should be regularly reviewed and updated to take account of development that may lead to the integration of waste sites or appropriate relocation of lost waste sites.”</p> <p>This capacity will also need to be considered in discussions with other London boroughs around sharing capacity, noting the need to ensure we do not undermine future strategic planning aspirations alongside maintaining east London’s management capacity surplus. The Plan fully acknowledges that Appendix 4 sites would only be released if a surplus of capacity to compensate for the site's loss exists at the time the site(s) is/are allocated for non-waste use at the Local Plan stage.</p>		
<p>It is also noted that two of the sites identified within this Appendix also fall within the Castle Green masterplan area, in which the concerns noted for the above Eurohub sites would also be applicable. The other two sites fall within the Havering area, with it being identified that the future of these sites would be considered as part of the new Havering Local Plan.</p>			<p>Not Agreed</p>	
<p>The release of waste sites should come forward as part of an updated Waste Plan and/or Development Plan Document, with this being supported by robust evidence. Given the policy requirements and evidence required for consideration of the release of existing waste sites from safeguarding, it is suggested that Appendix 4, and references to the potential for future release of these sites, are removed from the Plan.</p>	<p>It is understood that further discussions with Tower Hamlets are taking place, but to date, no surplus capacity has been offered.</p>		<p>Not Agreed</p>	

		<p>We note the London Plan at paragraph 9.8.6 states that boroughs with a surplus of waste sites should offer to share these sites with those boroughs facing a shortfall in capacity before considering site release. We consider our approach is in general conformity with the principle of this supporting text. As per the Duty to Cooperate Statement of Compliance, we have contacted all London Boroughs with an offer to request reliance on surplus capacity in East London for meeting waste management requirements in their areas. The London Borough of Tower Hamlets are the only borough who have directly requested a proportion of east London's management capacity surplus. While the plan does propose site release, the plan wording provides guidance for how east London proposes to share capacity with other London boroughs, contributing to the London Plan objective of delivering net self-sufficiency.</p> <p>Currently, the East London boroughs retain concerns with regards to Tower Hamlet's response to the methodology criteria, namely their prioritisation of their Strategic and Local Industrial designations for uses other than waste in their Regulation 19 Local Plan, as well as their lack of duty to cooperate</p>		
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		<p>engagement with other London boroughs with which they share established waste management flows. We do not currently consider that Tower Hamlets have adequately demonstrated that there is an unmet need for waste management capacity in their area. Therefore, we are not currently in a position to agree sharing our capacity surplus, although we have agreed to continue attempting to resolve these matters through duty to cooperate discussions.</p> <p>With regards to sourcing compensatory capacity for plan-led release of sites, it is the east London boroughs view that London Plan Policy SI 9c and paragraph 9.9.2 encourages the release of waste sites to be undertaken as part of a plan-led process, rather than on an ad hoc basis through the development management process. Requiring compensatory capacity through the plan-led process in the same way as requiring through individual planning applications would undermine the strategic approach to balancing various land-use objectives that plan-making affords. It also risks hindering the delivery of wider planning objectives and the efficient use of appropriate land/sites.</p>		
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		<p>Even with the release of capacity planned through the East London Joint Waste Plan, East London would still retain a significant surplus of management capacity, with between c.0.68 Mtpa (without MBT) and c.1.2Mtpa of apportioned waste surplus and 0.98 Mtpa of C,D&amp;E waste management capacity surplus by 2041. This would allow the boroughs to comfortably meet Tower Hamlets unmet needs (if proven), alongside the release of sites identified in the plan and those sites identified in Appendix 4 through the plan-led process.</p> <p>The East London boroughs are satisfied that the plan remains sound without the proposed changes.</p>		
Safeguarding of Waste Sites	<p>Draft Policy JWP2 seeks to safeguard existing wastes sites listed in Appendix 2 of the plan from non-waste development. The principle of safeguarding of waste sites through this policy is welcomed. There is, however, concern with the implementation of JWP2(B), which states that developments that lead to the loss of capacity and/or constrain current operations will not be permitted unless compensatory capacity is provided, or it has been demonstrated that the loss of the facility will not compromise the ability to meet the London Plan objective of net self-sufficiency for London.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the policy approach is justified and reflects the supporting text of the London Plan at paragraph 9.9.3. This states that is capacity increased are permitted at waste sites 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</p>	<p>SI8A(2) is clear that all existing waste sites should be safeguarded, and makes reference to SI9. This is distinct from SI8A(1), which relates to net self-sufficiency. Policy SI8(B) sets out clear parameters for what Development Plans should do in relation to apportioned waste. Policy SI9 is clear about the requirement for compensatory capacity, and this is reflected in recently</p>	Not Agreed

		<p>target of achieving net self-sufficiency is not compromised.</p> <p>The supporting text for policy JWP2 in the East London Joint Waste Plan sets out how the policy requirement can be demonstrated through paragraph 6.52, which states that the determination of whether the loss of capacity will compromise the ability of London to achieve net self sufficiency as a whole will take account of any information published by the GLA concerning the achievement of the London Plan net self sufficiency target. For example this could include an Annual Monitoring Report publication.</p> <p>Similar policy approaches have been accepted in decision-making in recent years, including through <a href="#">decision reference 21/00460/FUL</a> in the part of Newham formerly administered by the LLDC.</p> <p>The East London boroughs are satisfied that the plan is sound without the proposed changes.</p>	<p>adopted waste plans, such as North London Waste Plan and South London Waste Plan. Supporting text paragraph 9.9.3 relates to capacity increasing at existing waste sites, as set out within SI8.</p> <p>As set out above, LP2021 does not encourage an ad hoc approach to releasing waste sites via the development management processes, as is currently proposed in draft policy JWP2. London Plan policy acknowledges that if Policy SI8 is effective in increasing capacity at existing waste sites over the London Plan period, there may be instances where plan-led release of waste sites without compensatory capacity could be supported. It is incorrect to interpret this as a local level DM policy, as currently proposed within JWP2.</p> <p>Subject to the outcome of discussions with Tower Hamlets, East London may be able to make this case for the 4 sites proposed for release. Regardless, the inclusion of a policy within the draft Waste</p>	
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			Plan that enables <i>ad hoc</i> release of safeguarded sites is in direct conflict with Policy SI8 and SI9.	
	<p>There is a strong concern that this policy could be misinterpreted, which in turn could lead to the loss of waste sites within the draft Plan area without appropriate compensatory capacity being provided. This appears to be counterintuitive to the aims of the proposed draft policy particularly when noting the supporting text. For example, it is not clear what evidence will be required by applicants to robustly demonstrate that the loss of their facility would not compromise the ability of London to meet net self-sufficiency. We cannot see how this can be achieved without a detailed assessment of all waste sites within London being undertaken for each application submitted without compensatory capacity being identified. We would welcome further discussions with the Boroughs on how this policy will operate in practice.</p>			Not Agreed.
	<p>Officers note that the draft Policy includes a definition for a Waste Site. This definition is different to that included within LP2021 and should be aligned with the definition given in the LP2021. It is useful to note that as part of the new London Plan, the definition of a waste site will be considered. A reference to the possible update of the waste site definition within the ELJWP would be welcomed</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the definition in the East London Joint Waste Plan is justified as per paragraph 6.32 of the plan. If the plan were to safeguard sites without planning permission this would risk legitimising sites which may be located in inappropriate areas, for example on land for which planning permission for a waste use has been refused or is subject to enforcement action against a waste use.</p>		Not Agreed

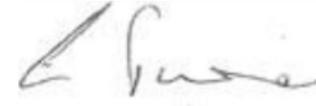
		<p>The East London boroughs are satisfied that the plan is sound without the proposed changes.</p> <p>However, noting the update to the London Plan which will take place over the course of the plan period, the East London boroughs recognise the importance of ensuring conformity with the London Plan and therefore proposes the following modification wording for the Inspector’s consideration:</p> <p>Additional sentence to be added to Paragraph 6.32: <u>Any revised London Plan definition of ‘waste site’ will be taken into account through a subsequent review of the ELJWP.</u></p>		
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Signatures

Signed on behalf of East London Boroughs:

<b>Signed on behalf of London Borough of Barking and Dagenham:</b>  <b>Name: Marilyn Smith</b> <b>Date: 20.2.26</b> <b>Position: Head of Planning and Assurance</b>
<b>Signed on behalf of London Borough of Newham:</b> <b>Name: Danalee Edmund</b>  <b>Date: 24/02/2026</b> <b>Position: Interim Planning Policy Manager</b>
<b>Signed on behalf of London Borough of Havering:</b> <b>Name: Kevin Waters</b>  <b>Date: 02/03/2026</b> <b>Position: Assistant Director of Planning</b>

Signed on behalf of the Greater London Authority



**Name:** Lucinda Turner

**Date:** 19<sup>th</sup> February 2026

**Position:** Assistant Director of Planning

**Signed on behalf of London Borough of Redbridge:**

**Name:** Robert Lancaster

A handwritten signature in black ink, appearing to read 'R. Lancaster', written over a faint circular stamp.

**Date:** 20/02/2026

**Position:** Director of Planning & Building Control

**Appendix 1 – Overview of Meetings Between East London Boroughs and the GLA (THIS APPENDIX HAS BEEN DRAFTED, AND IS PROPOSED FOR INCLUSION, BY THE BOROUGHGS)**

Date	Summary of matters discussed	Key outcomes / agreed actions
09.01.24	East London Boroughs (ELBs) outlined the review timetable (Reg 18 draft targeted for May 2024, submission by June 2025); Initial discussion on releasing safeguarded waste sites via the plan-making route; GLA reiterated principle that no waste capacity should be lost without compensatory provision; GLA explained its limited London-wide monitoring of capacity and apportionment surpluses/deficits.	GLA welcomed early engagement and agreed to comment on the ELBs’ draft site release process when capacity allowed. Parties agreed to a follow-up meeting
12.03.24	Updated ELBs’ process for releasing sites shared; evidence confirmed a surplus of qualifying capacity allowing release of sites; GLA queried waste hierarchy level of “lost” capacity and expected proactive engagement with boroughs that have unmet apportionment needs (Tower Hamlets, Westminster, City of London, Western Riverside) and that a SoCG with those authorities engaged on their unmet needs	Agreed GLA would clarify whether hierarchy-specific analysis is required; ELBs to notify all London boroughs (via the London Waste Planning Forum, 19.03.24) of potential surplus and invite evidence-based requests for use of surplus.
07.08.24	ELBs presented Reg 18 draft ELJWP and evidence (Capacity Assessment & Safeguarded Sites for Release reports); Seven sites proposed for release, backed by c. 1.1 Mtpa surplus qualifying capacity. GLA commented that the group had not demonstrated that the surplus capacity was at the same level or higher in the waste hierarchy for what is proposed to be lost and requested further information.	ELBs to produce additional analysis showing that recycling targets remain achievable and to share it before the GLA’s formal Reg 18 response. ELBs to contact Westminster, Lambeth, Western Riverside Boroughs and Tower Hamlets directly regarding surplus capacity.
09.09.24	Reviewed August meeting notes; agreed need to formally sign off minutes going forward; Only Tower Hamlets had so far indicated potential reliance on EL surplus; mechanism for allocating surplus capacity discussed; ELBs tabled a note clarifying the types of capacity that would be lost due to the release of safeguarded sites. . Queries about the Castle Green sites was raised by the GLA.	GLA to review the clarification note and raise queries by 23.09.24 Sep 2024. Post-Reg18 consultation meeting pencilled for w/c 21 Oct 2024 to discuss GLA’s Reg 18 response and any apportionment-transfer ‘think-piece’.
28.10.24	Confirmed that future notes of meetings will feed directly into the SoCG; GLA’s response to Reg 18 ELJWP discussed and in light of this ELBs sought clarification: (i) evidence considered, (ii) consistency of approach to releasing safeguarded sites at plan vs. application stage, (iii) evidential “bar” for plan-led releases, (iv) treatment of permit-only sites, and (v) whether London Plan para 9.9.3 removes the need for site-specific compensatory capacity;  Updates on dialogue with other boroughs: Tower Hamlets, Western Riverside, Lambeth, Wandsworth (no capacity need), Westminster (meeting to be arranged);	GLA to: – confirm whether all additional information fed into its Reg 18 response and specify any further evidence required; – provide written clarifications on other 4 matters raised. Boroughs to: – draft first SoCG once GLA clarifications received; – arrange Westminster meeting;

Date	Summary of matters discussed	Key outcomes / agreed actions
	ELBs aim to present the Reg 19 ELJWP to members in Jan 2025; Agreed meeting notes to constitute formal Duty-to-Co-operate evidence base.	GLA to review and return comments on the meeting notes ASAP
16.04.25	The ELBs noted the intention to commence consultation on the Regulation 19 Submissions Draft ELJWP from mid-May. The ELBs provided an update on the approach to safeguarding sites, and changes made since the Reg 18 ELJWP. The ELBs also provided an update on duty to cooperate engagement with LB Tower Hamlets, and shared the proposed methodology to ensure requests for capacity sharing are reasonable and justified. The GLA provided an update on the new London Plan programme, and timelines for the production of evidence base.	ELBs to: <ul style="list-style-type: none"> <li>- circulate a link to the draft regulation 19 ELJWP ahead of consultation commencing</li> <li>- ELBs to reframe draft SOCG</li> </ul>
27.06.25	GLA outlined headline points for its forthcoming Reg 19 representation	GLA to issue (i) revised SoCG in new template within 3-4 weeks and (ii) detailed Reg 19 response by 30 Jun 2025. ELBs to verify safeguarded-site total and share examples where GLA previously accepted site release without compensatory capacity.

## 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**

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## 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.

			<i>Assessed Capacity (5-year peak, tonnes)</i>	<i>Assessed Capacity (5-year peak, tonnes)</i>			
<b>Borough</b>	<b>Site Name</b>	<b>Purpose of Release/ Proposed Use</b>	<b>Apportioned HIC Waste</b>	<b>CDEW</b>	<b>Planning Status</b>	<b>Environmental Permit Status</b>	<b>Status</b>
<b>Barking &amp; Dagenham</b>	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.
<b>Barking &amp; Dagenham</b>	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.
<b>Barking &amp; Dagenham</b>	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
<b>Newham</b>	Connolleys Yard, Unit 5c	Connaught Riverside	0	34,958	Use for the melting of scrap aluminium and the	Permit surrendered	Site allocation in Reg 19 Newham Local Plan

	Thames Road (Connolleys Metals)	Strategic Site			grading and recycling of other non-ferrous metals (granted 1993).		Operation now relocated.
		<b>Totals</b>	<b>38,125</b>	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 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.<sup>1</sup>.

### ***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.

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<sup>1</sup> 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)
<b>Origin WPA (WDI)</b>	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 <sup>2</sup> )	149,153	0	0	0
Various	0	2,632 <sup>3</sup>	0	0
East London (ELWA <sup>4</sup> ) & 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

<sup>2</sup> '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.

<sup>3</sup> Spread across 17 WPAs and no single movement exceeded 300 tonnes

<sup>4</sup> 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	Assessed Capacity	Assessed Capacity	Planning Status	Potential trigger for release
			Apportioned Waste	C, D & E Waste	Hazardous		
<b>Barking &amp; Dagenham</b>	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
<b>Havering</b>	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.					
<b>Redbridge</b>	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
<b>Totals:</b>			<b>154,148</b>	<b>71,929</b>	<b>4,320</b>		

## **Commentary**

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

**Table 5: Summary of Site Status**

<b>Site Name</b>	<b>Permanent Planning?</b>	<b>Permitted?</b>	<b>Active?</b>
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
Iford 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)
<b>Inert Waste 10,000t+</b>					
London (WPA Not codeable)	1,527	14,396	0	1,215	0
<b>HIC waste 5,000t+</b>					
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
<b>Hazardous 500t+</b>					
Essex	0	0	1,727	0	0
London (WPA Not codeable)	0	156	172	0	0
<b>Total Input</b>	<b>52,738</b>	<b>14,552</b>	<b>21,354</b>	<b>26,776</b>	<b>12,805</b>

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
<b>Lead acid batteries</b>	6,337	1,727	27%

<b>Metals from municipal sources</b>	42,327	3,554	<1%
<b>Mixed municipal waste</b>	1,213,598	7,901	<1%
<b>Non-ferrous metal from wm facilities</b>	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:

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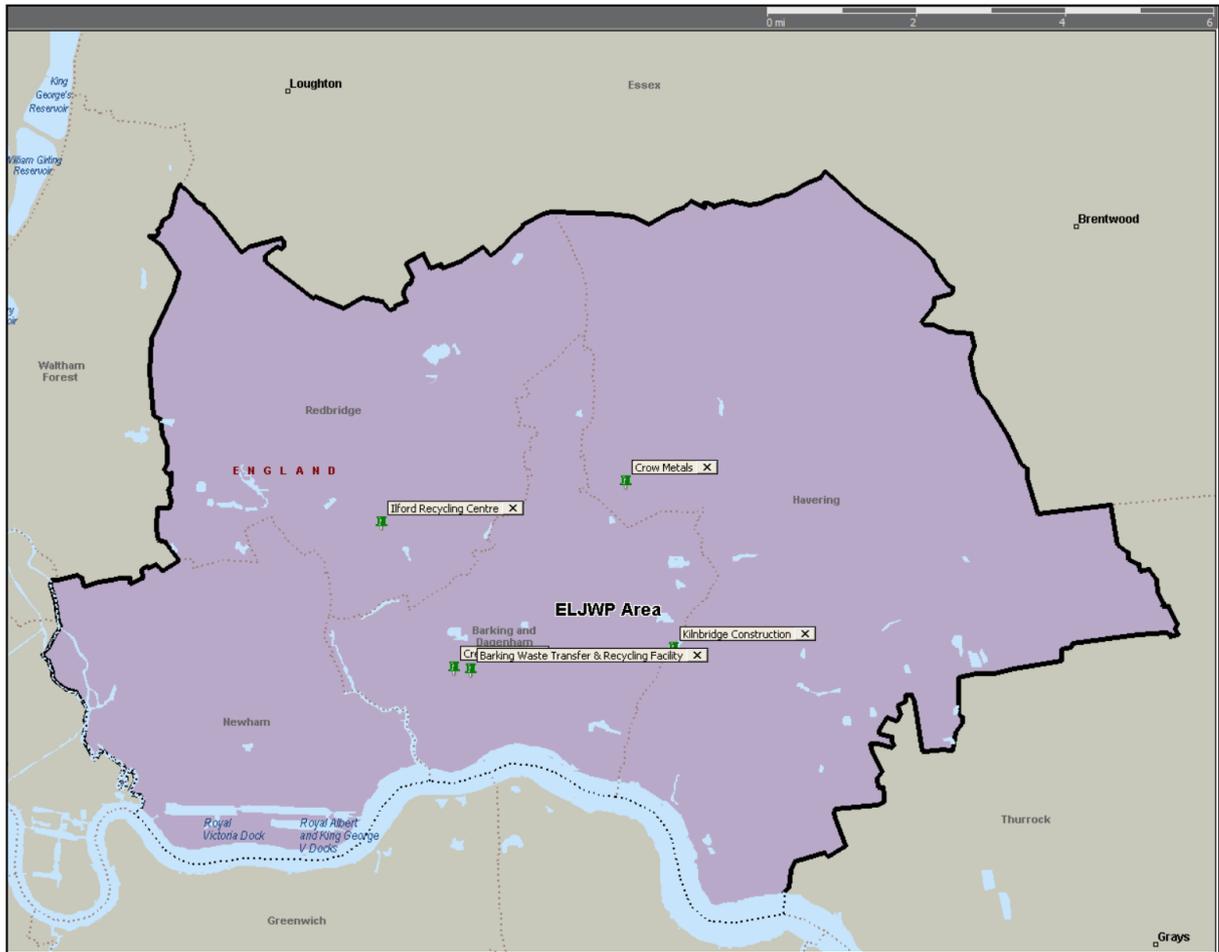
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### Crow Metals Romford

Crow Lane,  
Romford,  
Essex,  
RM7 0EE

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.**