Public Document Pack

CABINET
SUPPLEMENTARY AGENDA

9 April 2025

The following reports are attached for consideration and is submitted with the agreement of the Chairman as an urgent matter pursuant to Section 100B (4) of the Local Government Act 1972

5 VIOLENCE AGAINST WOMEN AND GIRLS (VAWG) STRATEGY & ACTION PLAN 2025 - 2029 (Pages 3 - 4)

Comments from People Overview & Scruting Sub-Committee.

10 PROPOSED SUBMISSION EAST LONDON JOINT WASTE PLAN FOR CONSULTATION (REGULATION 19) (Pages 5 - 1202)

Appendices 1 – 18 attached.

Zena Smith
Head of Committee & Election Services

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Following the pre-decision scrutiny of the VAWG Strategy on 3rd April 2025, People OSSC ask Cabinet to:

1) Recognise that Violence Against Women and Girls (VAWG) training is essential for all members and agree to include it in new member induction training

2) Agree to include WAVE training as part of the Licensing Chair's training

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Havering
LONDON BOROUGH

CABINET

Subject Heading:	Proposed Submission East London Joint Waste Plan for Consultation (Regulation 19)
Cabinet Member:	Councillor Williamson, Cabinet Member for Regeneration
ELT Lead:	Helen Oakerbee
Report Author and contact details:	Cara Collier, cara.collier@havering.gov.uk, 01708434083
Policy context:	Havering Local Plan 2016-2031 Joint Waste Plan 2012 Draft East London Joint Waste Plan (Regulation 18, 2024)
Financial summary:	The limited costs associated with this decision will be met within the existing Local Plan Budget
Is this a Key Decision?	Yes - (c) Significant effect on two or more Wards
When should this matter be reviewed?	March 2027
Reviewing OSC:	Places

The subject matter of this report deals with the following Council Objectives

People - Supporting our residents to stay safe and well	X
Place - A great place to live, work and enjoy	X
Resources - Enabling a resident-focused and resilient Council	X

SUMMARY

In July 2024 Cabinet gave approval to consult on the East London Joint Waste Plan which, once adopted, will form part of the borough's development plan. The Joint Waste Plan is being prepared with the other East London Waste Authorities (the London Boroughs of Barking and Dagenham, Newham and Redbridge). This report provides an update on the consultation that took place in 2024 and how the Joint Waste Plan has progressed.

Member approval is now being sought to publish the Proposed Submission East London Joint Waste Plan for consultation.

The opportunity has been taken to review and update the Local Development Scheme (LDS). This sets out the programme for further work on planning policy documents, including the Joint Waste Plan. Member approval is therefore sought to publish the updated LDS.

RECOMMENDATIONS

Cabinet is recommended to:

1. Agree the publication of the Proposed Submission East London Joint Waste Plan and supporting documents (attached as Appendix 1-16) for at least a 6 week period of statutory public consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, with an anticipated start date in late May 2025.

2. Approve the new Local Development Scheme for publication (Appendix 17)

3. Delegate authority to the Assistant Director of Planning, following consultation with the Cabinet Member for Regeneration to:
    i. Make non material amendments to the Proposed Submission version ahead of publication under Regulation 19
    ii. Approve future iterations of the Local Development Scheme as required

REPORT DETAIL

Background and progress to date

2.1 It is a requirement for local authorities to produce a Waste Plan, setting out policies on future waste management and safeguarding waste sites for future waste management needs. Waste Plans in London also have to

account for the waste apportionment targets set out in the London Plan (2021). Havering produced a Joint Waste Plan in 2012 alongside Redbridge, Newham, and Barking and Dagenham. Since 2012, a new London Plan has been adopted, national waste policy has been updated, waste management technologies have evolved, and pressures to release existing safeguarded waste sites has increased as development pressures rise. Therefore, a new East London Joint Waste Plan (ELJWP) is needed.

2.2 Waste Plans follows the same path as a Local Plan. It forms part of the Development Plan and will be used when determining planning applications, alongside Havering's Local Plan. As with Local Plans, Waste Plans go through various statutory consultation stages, before being submitted to the Secretary of State for examination. A 'Regulation 18' consultation took place in summer 2024 on the first draft ELJWP. Comments from this consultation have now been assessed and considered and an updated ELJWP has been prepared. This is called the 'Proposed Submission' version, as it is the Plan in the form we are intending to submit to the Secretary of State for examination. The Proposed Submission ELJWP is now ready for consultation.

2.3 Consultation on the draft ELJWP took place 29th July – 16th September 2024. This was a joint consultation with the other East London Boroughs. Since the consultation, the Plan and its supporting documents have been updated. All but three of the supporting documents listed in para 2.23 were previously consulted on. A Consultation Statement (appendix 5) has been produced, setting out the details of the summer 2024 consultation, as well as a Duty to Cooperate Statement of Compliance (appendix 7), which sets out the ongoing discussions we have had with stakeholders throughout the production of the Plan. A Strategic Flood Risk Assessment (SFRA) position statement (appendix 16) has also been produced. All supporting documents are to be included in the Regulation 19 consultation alongside the ELJWP.

Content of the ELJWP

2.4 The Proposed Submission ELJWP plans for waste management up to 2041. It focuses on ensuring East London has sufficient land and facilities for future waste management. It does not deal with, or impact, local waste collections.

2.5 The Proposed Submission ELJWP includes a Vision and eight Strategic Objectives. Seven policies are included for use in determining the suitability of development proposals submitted to the Boroughs for planning permission. Implementation of the policies will ensure waste management facilities are well located and do not result in significant adverse impacts on local communities and the natural environment. They will also ensure that the right types of waste management capacity are developed to facilitate the achievement of targets such as those related to increasing recycling and diverting waste away from landfill.

2.6 The Proposed Submission ELJWP analyses the capacity East London has for different types of waste. The types of waste covered are; 'HIC waste' (Household, Industrial, Commercial Waste, the type of waste collected by Local Authorities), 'C, D and E waste' (Construction, Demolition, and Excavation Waste), and Hazardous waste. The capacity assessment shows us how much waste capacity the East London boroughs have minus the waste we produce, and are expected to produce in 2041.

2.7 The outcome of the capacity assessment is as follows;

2.8 **HIC waste =** capacity surplus of approximately 1,122,508 tonnage per annum (tpa) in 2041, as shown in Table 1 below.

Table 1: combined apportionment for the East London Boroughs compared to estimated capacity for HIC waste in East London

	2021	2041
Apportionment Forecast (apportionment target set by the London Plan)	1,409,000	1,497,000
Capacity	2,619,508	2,619,508
Difference	**+1,210,508**	**+1,122,508**

2.9 **C, D and E waste =** based on forecasted waste arisings of 2,203,591 tpa for C, D & E in 2041, and an estimated C, D & E waste management capacity of 3,185,500tpa, there is a capacity surplus of 980,000 tpa. The apportionment target set in the London Plan does not cover C, D, and E waste, which is why a forecasted waste arising is used to calculate capacity.

2.10 **Hazardous** = A forecast for hazardous waste arisings to 2041 suggests that 72,400tpa will be produced by 2041. This compares to existing hazardous waste management capacity of 54,000tpa which indicates there is a capacity deficit of approximately c.18,400tpa However, it should be noted that there is no policy expectation that individual Plan areas should be net self-sufficient for the management of hazardous waste produced in the area.

2.11 Therefore, the Proposed Submission ELJWP confirms that the four East London boroughs meet the London Plan apportionment targets. This surplus confirms that **East London does not need to develop additional waste capacity by developing new waste sites**.

2.12 The Plan shows a significant capacity across the East London boroughs, and therefore 2 of the 4 boroughs have decided to release some waste sites from their safeguarded designations. Even with these releases, there would still be significant additional waste capacity in East London, as laid out in

table 1. Havering has not proposed release for any waste sites in the borough.

Integrated Impact Assessment (IIA)

2.13 An IIA incorporates; Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA), Equalities Impact Assessment (EqIA), and Habitats Regulations Assessment (HRA). The term IIA is used as an umbrella term for these various documents. An IIA is an iterative process and has informed the preparation of the ELJWP. The IIA was consulted on in the previous consultation and now has been updated and will be consulted on during the Regulation 19 consultation.

2.14 Authorities are required to have regard to the provisions of the Equality Act, namely the Public Sector Duty which requires public authorities to have due regard for equalities considerations when exercising their functions. The EqIA of the ELJWP has been carried out as part of the SA by ensuring that the SA objectives against which the Plan is appraised address relevant Equalities issues.

What changes were made after the Regulation 18 consultation?

2.15 A total of 52 responses were received to the consultation held in summer 2024 from a range of stakeholders, including East London residents, London Boroughs, Waste Planning Authorities outside of London, the waste management industry, statutory consultation bodies and utilities companies. As the ELJWP is a very technical document, focused on one specific issue, this level of engagement is considered typical. Further detail of the responses received, and how the Proposed Submission ELJWP has responded to them, is included in the 'Consultation Statement' (appendix 5).

2.16 Key changes made from the comments received were;

- A new policy on wastewater has been added on the back of comments from Thames Water. Policy JWP2A has been included to address wastewater and sewage sludge management development. Specific consultation distances for development proposed proximate to waste water treatment works have been added.
- Policy JWP4 has been strengthened to ensure applications consider the safety of road users. Text clarifying the need for, and content of, Travel Plans and Transport Assessments to be submitted with applications has been added.
- The list of safeguarded waste sites has been updated to reflect waste sites with planning permission or a certificate of lawfulness.
- Minor updates made to the ELJWP and evidence base documents to reflect updated data, new government policies, and the updated NPPF.

Duty to Cooperate (DtC)

2.17 The ‘Duty to Cooperate’ was introduced through the Localism Act 2011. It places a legal duty on all local planning authorities in England and a number of other public bodies to: engage constructively, actively and on an ongoing basis in the process of the preparation of development plan documents so far as they relate to a strategic matter.

2.18 Appendix 7 ‘Duty to Cooperate Statement of Compliance’ lays out full details of DtC activities that have taken place over the development of the ELJWP. This includes ongoing conversations with London Boroughs, neighbouring authorities, and statutory consultees like the GLA. DtC is an ongoing process which will continue throughout the plan-making process.

Regulation 19 Consultation

2.19 ‘Regulation 19’ consultation is a statutory consultation stage that has specific requirements on what comments are submitted (also called ‘representations’), as set out in the Town and Country Planning (Local Development) (England) Regulations 2012. The purpose of a regulation 19 consultation is to seek views on whether the Waste Plan is ‘sound’ and legally compliant.

2.20 To be ‘sound’ the Proposed Submission ELJWP must be:

- Positively prepared: for example that it positively seeks to meet the requirements of the London Plan.
- Justified: that the policies in the plan are supported by evidence and are reasonably justified.
- Effective: that the policies in the plan can be delivered and have been formulated on the basis of effective joint working with partners.
- Consistent with national policy: that it has been prepared in accordance with the National Planning Policy Framework (NPPF).

2.21 The Proposed Submission ELJWP is considered the Council’s final version of the ELJWP. The Council must therefore be confident the Plan is ‘sound’ and that there will be minimal further change. Comments through the consultation are required to be on grounds of ‘soundness’ and legal compliance only. The public and stakeholders had the opportunity to comment on wider aspects of the ELJWP at the Regulation 18 consultation.

2.22 The GLA will be formally notified of the consultation under Regulation 21 of the Town and Country Planning (Local Planning) (England) Regulations 2012, seeking their opinion on the ELJWP’s conformity with the London Plan.

Consultation activities

2.23 The consultation will be carried out in accordance with all of the Borough’s Statement of Community Involvement (SCI’s). As an overview, the proposed consultation will;

- Ask participants (residents and stakeholders) for their input on whether the ELJWP is sound and legally compliant
- Run for at least 6 weeks
- Follow the consultation protocol commitments (see appendix 6), including publicising the consultation on social media, in the 'Living in Havering' newsletter, and on a dedicated citizen space page. The citizen space page will also include a pre-recorded presentation explaining the consultation and the contents of the Plan
- Notice in the Romford Recorder
- Press release
- Registered consultees and stakeholders will also be contacted via email, including those who made comments previously
- Publish a 'Statement of representations procedure', as required by the regulations

2.24 Documents included in the appendix are those that will be published for the consultation:

Appendix 1 – Proposed Submission ELJWP
Appendix 1a – Proposed Submission ELJWP Appendix 3, Maps of safeguarded sites
Appendix 2 – Proposed Submission ELJWP Integrated Impact Assessment
Appendix 3 – Habitats Regulation Assessment of the Proposed Submission ELJWP
Appendix 4 – ELJWP IIA Scoping Report (Feb 2024)
Appendix 5 – Consultation Statement
Appendix 6 – Updated Consultation Protocol (reg19)
Appendix 7 – Duty to Cooperate Statement of Compliance
Appendix 8 - Note on sites identified for release
Appendix 9 - Circular Economy Topic Paper
Appendix 10 - Climate Change Topic Paper
Appendix 11 - Waste Management Topic Paper
Appendix 12 - Waste Management Capacity in East London Report
Appendix 13 - Hazardous Waste Baseline and Arisings Report
Appendix 14 - CDEW Baseline and Arisings Report
Appendix 15 – Strategically Significant Cross Boundary Waste Movements
Appendix 16 - SFRA Position Statement

Local Development Scheme

2.25 Local planning authorities are required to prepare and maintain a Local Development Scheme (LDS) under Section 15 of the Planning and Compulsory Purchase Act 2004, as amended by the Localism Act 2011 and the Housing and Planning Act 2016. The Government requires local planning authorities to produce an updated LDS by 6 March 2025. The planning policy documents in the LDS includes the East London Joint Waste Plan, the Local Plan, and supporting documents.

2.26 The LDS 2025-2027 (appendix 17) meets these requirements and supersedes the previous LDS (2023-2025). The LDS sets out:

- The planning policy documents that Havering have already adopted;

- The planning policy documents that Havering intend to produce;
- The subject matter and geographical area of each of the proposed documents;
- The timetable for the preparation of the documents over the next three years; and
- The opportunities for the local community and stakeholders to be involved in preparing planning policies by setting out an indicative timetable for the preparation of each document.

2.27 Local Planning Authorities are required by regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) to review Local Plan every 5 years from their adoption date. The new Local Plan will need to be submitted no later than December 2026 in order to be examined under the existing 2004 Act system.

Next steps

2.28 Barking and Dagenham, Newham and Redbridge will undertake their own governance approval of the Proposed Submission ELJWP. Havering is the first borough to go through the formal approval process, which is why delegated authority has been sought for amendments that come out of these sign offs (recommendation 3i). Following approval by all boroughs, the formal statutory consultation is anticipated to start in late May and run for a period of 6 weeks.

2.29 Once the consultation has finished, officers will review and respond to the comments received. An assessment will be made as to whether, in light of the comments received, the Plan is considered to be sound and should be progressed to examination.

REASONS AND OPTIONS

Reasons for the decision: Consultation is the only option available to be able to move forward with the production of the ELJWP.

Other options considered:

1. **Do not consult.** This option was rejected as it is a statutory requirement to consult on development plan documents under the Town and Country Planning (local Planning) (England) Regulations 2012. Adoption of an up to date Waste Plan is dependent on progressing through the statutory consultation process.
2. **Do not continue with production of the ELJWP.** This option was rejected as it is a statutory requirement to have an up to date Waste Plan and the Inter-Authority Agreement signed in 2023 binds us to joint working and production of a new joint waste plan. A regulation 18 consultation has

already been held, and therefore the next step to progress the Plan is a regulation 19 consultation.

IMPLICATIONS AND RISKS

Financial implications and risks:

There are no material financial implications for the consultation of the ELJWP.

Legal implications and risks:

The Joint Waste Plan is a Development Plan Document (DPD). It is a statutory requirement for a local planning authority (LPA) to identify the strategic priorities for the development and use of land in the authority's area, and the policies to address these priorities must be set out in the LPAs development plan documents (DPDs), save where policies to address those priorities are set out in the spatial development strategy (the London Plan). Failure to progress the publication of this document and undertake this process will mean that planning policy will remain out of date, which could lead to judicial challenges to decisions made by the planning department. By continually updating planning policy, including through progressing this document, such challenges are minimised.

The preparation, consultation upon, examination and adoption of a DPD is controlled by the Planning and Compulsory Purchase Act 2004 ("the PCPA 2004") and the Town and Country Planning (Local Development) (England) Regulations 2012 ("the 2012 Regs"). Under these regulations two stages of statutory consultation are required and approval is currently being sought for the second stage.

Pursuant to Section 19 of the PCPA 2004 as part of the Council's development plan, the DPD must be prepared in accordance with the Council's Local Development Scheme; and taken as a whole include policies designed to secure that the development and use of land in the Council's area contribute to the mitigation of, and adaption to, climate change.

Section 19 of the PCPA 2004 and Regulations 8, 9 and 10 of the 2012 Regs set out the requirements for local development documents and matters to which the Local Planning Authority must have regard in preparing the plan, as follows:

- have regard to national policies and advice contained in guidance issued by the Secretary of State and the Spatial Development Strategy for London (i.e. the London Plan);
- comply with the Council's Statement of Community Involvement;
- carry out an appraisal of the sustainability of the proposals in the document and prepare a report of the findings of the appraisal; and

- comply with the duty to co-operate with other local planning authorities and prescribed bodies and persons in respect of strategic matters.

The report outlines officers' assessment that these legal requirements have been met.

Regulation 19 of the 2012 Regs sets out who the Council must notify and invite to make representations in the preparation of the DPD. The Draft Submission East London Joint Waste Plan Regulation 19 Consultation Protocol (Appendix 2) has set out how the Council will comply with the consultation requirements (as well as the duty to co-operate), in line with the Council's adopted Statement of Community Involvement.

In carrying out the function of preparing a DPD, the Council must have due regard to the need to eliminate unlawful conduct under the Equality Act 2010, the need to advance equality of opportunity and the need to foster good relations between persons who share a protected characteristic and those who don't. The report indicates that an equalities impact assessment has been carried out as part of the Integrated Impact Assessments for the DPD. The Integrated Impact Assessment also ensures that the Council complies with its duties under the Conservation of Habitats and Species Regulations 2010 and the Environmental Assessment of Plans and Programmes Regulations 2004.

The proposed delegation to the Assistant Director of Planning will ensure that changes which are not material to the substance of the DPDs can be made in order to improve clarity, provide further context, correct typos or make other textual/formatting improvements without the need for another Cabinet decision.

Human Resources implications and risks:

The recommendations made in this report do not appear to give rise to any identifiable HR risks or implications that would affect either the Council or its workforce.

Equalities implications and risks:

The Public Sector Equality Duty (PSED) under section 149 of the Equality Act 2010 requires the Council, when exercising its functions, to have 'due regard' to:
(i) The need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
(ii) The need to advance equality of opportunity between persons who share protected characteristics and those who do not, and;
(iii) Foster good relations between those who have protected characteristics and those who do not.

Note: 'Protected characteristics' are age, sex, race, disability, sexual orientation, marriage and civil partnerships, religion or belief, pregnancy and maternity and gender reassignment.

The Council is committed to all of the above in the provision, procurement and commissioning of its services, and the employment of its workforce. In addition, the Council is also committed to improving the quality of life and wellbeing for all Havering residents in respect of socio-economics and health determinants.

The Council seeks to ensure equality, inclusion, and dignity for all in all situations.

An EqIA of the ELJWP has been carried out as part of the SA by ensuring that the SA objectives against which the Plan is appraised address relevant Equalities issues (see appendix 2). There are not equalities and social inclusion implications and risks associated with this decision.

Health and Wellbeing implications and Risks:

There are no Health and Wellbeing implications from this decision. A Health impact assessment was competed as part of the Integrated Impact Assessment, which sits alongside the East London Joint Waste Plan (see appendix 2).

ENVIRONMENTAL AND CLIMATE CHANGE IMPLICATIONS AND RISKS

An Integrated Impact Assessment was carried out as part of the production of the ELJWP proposed submission version (see appendix 2). Climate change was considered as part of this.

The recommendations made in this report do not appear to conflict with the Council's policy on Environmental and Climate implications.

BACKGROUND PAPERS

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ELJWP

East London Joint Waste Plan

Regulation 19 Submission Plan

Final

19.02.25

Barking & Dagenham

Havering LONDON BOROUGH

Newham London

London Borough of Redbridge

Table of Contents

Abbreviations

AMR	Annual Monitoring Report
BAP	Biodiversity Action Plans
CCC	Climate Change Committee
CCS	Carbon Capture and Storage
CE	Circular Economy
C, D & E	Construction, Demolition and Excavation
C&I	Commercial and Industrial
ELJWP	East London Joint Waste Plan
HIC	Household, Industrial and Commercial waste
HRA	Habitats Regulation Assessment
LACW	Local Authority Collected Waste
LLDC	London Legacy Development Corporation
LNR	Local Nature Reserve
MBT	Mechanical Biological Treatment
NPPF	National Planning Policy Framework
OS	Ordnance Survey
PAN	Planning Advisory Note
RBMP	River Basin Management Plan
RDF	Refuse Derived Fuel
RWS	Resources and Waste Strategy
SIL	Strategic Industrial Location
SRF	Secondary Recovered Fuel
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SPA	Special Protection Area
tpa	Tonnes per annum
WDI	Waste Data Interrogator
WPA	Waste Planning Authority

Executive Summary

The efficient and effective management of waste (including wastewater) is an important aspect of a well- functioning modern society. Whilst essential, waste management has the potential to cause impacts on the environment and communities, including those related to climate change, if it is not undertaken in the right place and in the right way. Without proper consideration, built development may result in the production of excessive quantities of waste.

The future management of waste therefore needs to be carefully planned for, and it is a statutory requirement for each area to have a 'waste local plan' that sets out how and where waste will be managed. In East London, the predecessor waste local plan, known as the 'East London Waste Plan', was adopted in 2012 and planned for the management of waste over the period until 2021 within the following East London boroughs: Barking and Dagenham; Havering; Newham; and Redbridge. This Plan, the East London Joint Waste Plan (ELJWP), updates and replaces the East London Waste Plan.

The ELJWP deals with all waste but focusses on Local Authority Collected Waste (LACW), Commercial and Industrial (C&I) waste, Construction, Demolition and Excavation (C, D&E) waste, Hazardous waste and wastewater. The ELJWP takes account of the East London Waste Authority's strategy for managing Local Authority Collected Waste to 2057.

This document is the version of the Plan that the Boroughs intended to submit for examination and is published for representations on soundness and legality. The Plan includes a Vision and eight Strategic Objectives. Seven planning policies are included for use in determining the suitability of development proposals submitted to the Boroughs for planning permission. Implementation of the policies will ensure waste management facilities are well located and do not result in significant adverse impacts on local communities and the natural environment. They also ensure that the right types of waste management capacity are developed to facilitate the achievement of targets such as those related to increasing recycling and diverting waste away from landfill.

The most recent waste management capacity assessment demonstrates that, other than for landfill, there is a surplus of capacity necessary for the management of current and forecast future waste arisings. Therefore, there is no need for development of additional capacity to meet the London Plan 2021 apportionments within the Plan area. The Plan safeguards most existing sites and allows additional waste development in exceptional circumstances. On this basis no land is allocated specifically for the development of additional waste management capacity. This is a

significant change to the adopted East London Waste Plan that identified land for new waste management facilities.

Policy JWP1 is intended to ensure that all types of development, and not just those relating to the management of waste, come forward in a manner that minimises the production of waste and ensures that any waste that is produced can be managed sustainably. The overarching approach of the ELJWP can be summarised as follows:

1. Ensuring that waste produced from development, including during its occupation, is minimised and then reused or recycled;
2. existing waste management capacity is safeguarded;
3. allowing the development of new waste management capacity at existing sites if it will result in waste being managed more sustainably;
4. not allowing the development of new waste management sites except in exceptional circumstances including the site being in a sustainable location; and,
5. Any new capacity should be designed in a way that protects and enhances communities and the natural and historic environment.

1 Introduction and background

What is the East London Joint Waste Plan?

1.1. The efficient and effective management of waste and treatment of wastewater is an important aspect of a well-functioning modern society. While essential, waste management and wastewater treatment have the potential to cause impacts on the environment and communities if it is not undertaken in the right place and in the right way. Without careful consideration, built development may result in the production of excessive quantities of waste.

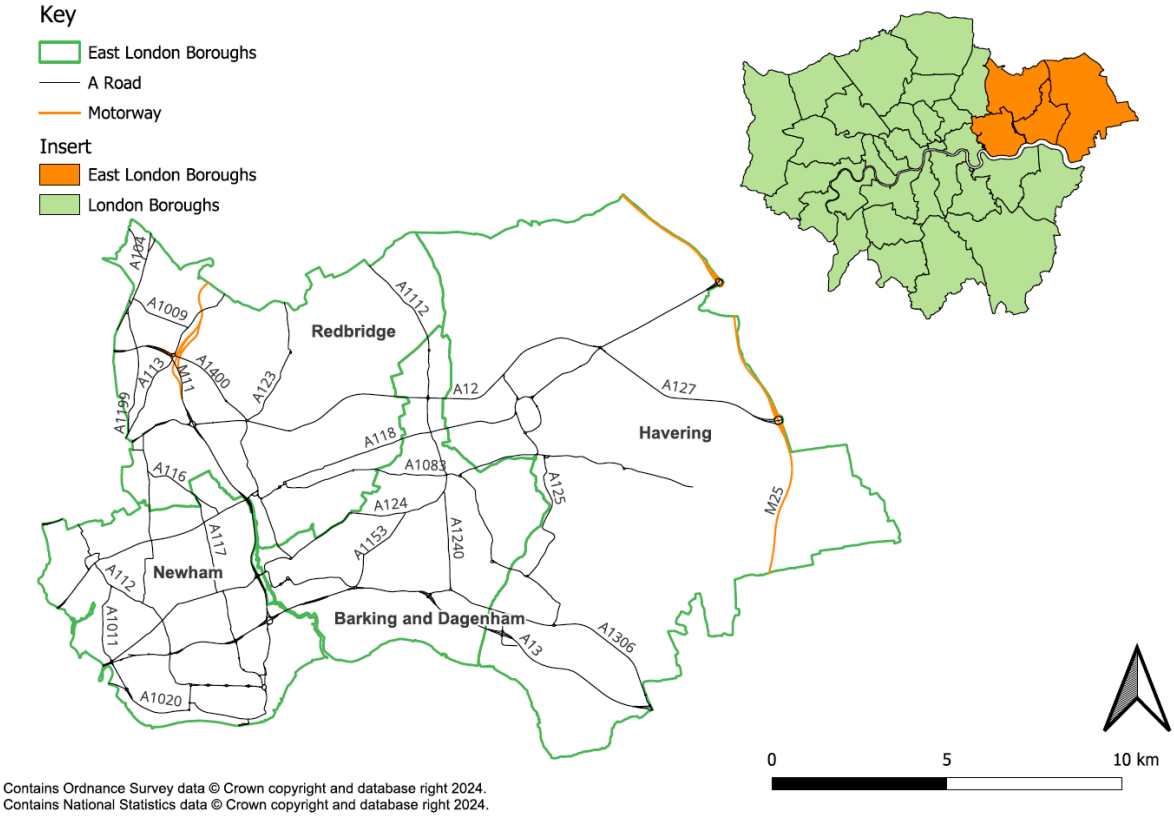
1.2. It is a statutory requirement for each area to have a 'waste local plan' that sets out how and where waste will be managed. Policies in waste local plans are used to determine planning applications affecting the management of waste.

1.3. In East London, the predecessor waste local plan, known as the 'East London Waste Plan', was adopted in 2012 and planned for the management of waste over the period until 2021 within the following East London boroughs ('the Boroughs'):

- London Borough of Barking and Dagenham
- London Borough of Havering
- London Borough of Newham
- London Borough of Redbridge

1.4. The East London Joint Waste Plan (ELJWP), updates and replaces the adopted 2012 East London Waste Plan. A map of the area to be covered by the Plan ('the Plan area') is provided in Figure 1.

Figure 1: The area covered by the East London Joint Waste Plan



1.5. The Plan area is bordered within London by the London Borough of Waltham Forest, London Borough of Hackney and the London Borough of Tower Hamlets to the west, and the London Borough of Greenwich and the London Borough Bexley to the south of the river Thames. To the north and east, outside of the Greater London area, are the Districts of Epping Forest and Brentwood (within the county of Essex) and the unitary area of Thurrock.

1.6. The ELJWP area is consistent with the geography for the East London Waste Authority[1]. The ELJWP also includes the area covered by the London Legacy Development Corporation (LLDC) within the London Borough of Newham though the planning powers of the LLDC returned to the Borough of Newham on 1 December 2024.

1.7. These planning applications concern proposals for new facilities, changes to existing facilities and proposals which might otherwise affect how waste is

1 East London Waste Authority (2022) Joint Strategy [online]. Available at: https://eastlondonwaste.gov.uk/east-london-waste-authority/jointstrategy

managed, for example proposals to redevelop existing waste management facilities for other non-waste uses or to change how a facility operates. The Plan is also concerned with how proposals for new development consider how waste will be managed during demolition and construction and operational phases of the development.

1.8. Once adopted, the East London Joint Waste Plan will form part of the Development Plan for the East London Boroughs. Each Borough has a separate 'Local Plan' that is concerned with other forms of development such as housing and employment. It is important to note that all the policies of the Development Plan will be taken into account when decisions of development proposals are made. Furthermore, Supplementary Planning Documents may also exist which provide further guidance on the acceptability of certain aspects of development (e.g. design).

The need to replace the current waste plan

1.9. As the Boroughs have regard to the waste local plan when making decisions on development proposals, it is essential that the plan provides an up to date and robust policy framework to support the sustainable management of waste. Since the current plan was adopted in 2012, a number of changes have occurred which include the following:

- Changes in the policy landscape, in particular a new London Plan was adopted in 2021, there have been several updates to national planning policy and the Boroughs have adopted new Local Plans.
- Evolution of waste management technologies and approaches.
- Current and emerging local conditions including pressure to release existing safeguarded waste sites to alternative development, in particular that relating to alleviating the pressures in London for more housing.
- Changes in patterns of waste production.
- Emergence of the 'Circular Economy' as a concept

1.10. The new plan, known as the 'East London Joint Waste Local Plan' (ELJWP) ('the Plan') updates the East London Waste Plan, by taking account of the changes listed above and covering the period to 2041.

1.11. The new ELJWP ensures that new waste management capacity is provided on the basis of the most up to date evidence and forecasts of waste arisings. The new ELJWP helps make sure that there continues to be sufficient capacity to manage waste in East London in the most sustainable way.

The process of preparing the East London Joint Waste Plan

1.12. There are several stages in preparing a Local Plan which are prescribed in legislation[2] and policy[3]. The way in which these stages are being applied to the preparation of the ELJWP is outlined in Table 1. Many of the stages offer opportunities for residents, businesses and other key stakeholders to comment and be involved in determining the content of the Plan.

Table 1- Anticipated Timetable for Development of the East London Joint Waste Plan

Key Stage	**When**
Draft ELJWP – 6-week public consultation ('Reg 18')	July-September 2024 (complete)
'Final' Submission ELJWP published for representations ('Reg 19')	Mid 2025
ELJWP submitted for independent examination	Late 2025/early 2026
Examination hearings (if needed)	Early-mid 2026
Main modifications (if needed) published for representations	Mid 2026
Inspector's Report	Mid-late 2026
Adoption	Late 2026

Key elements of the East London Joint Waste Plan

1.13. The key elements of the East London Joint Waste Plan are:

- Vision
- Strategic Objectives
- Policies
- Policies Map
- Monitoring Framework

1.14. Together these elements confirm how and where the Boroughs expect the waste management of waste to take place in East London.

2 Planning and Compulsory Purchase Act 2004 and the Town and Country (Local Planning) (England) Regulations 2012
3 National Planning Policy Framework, December 2024

1.15. The Vision and Strategic Objectives set out how it is proposed that waste be managed to ensure it benefits, protects and enhances communities and the environment of East London. The Policies and Policies Map are intended to ensure the Vision is realised and the Strategic Objectives are achieved.

1.16. To establish how the objectives of the Plan are being met, certain indicators will be monitored on a regular basis as detailed in Appendix 1.

1.17. The National Planning Policy Framework (NPPF) and National Planning Policy for Waste (NPPW) expect local planning authorities to focus on determining if a proposed development is a suitable use of land, and the consequences of the use, rather than managing any related processes or emissions, which are regulated under separate pollution control regimes. Local Planning Authorities (LPAs) should assume that these regimes will be applied effectively by pollution control authorities e.g. the Environment Agency. Similarly, once a planning decision has been reached for a specific development, the planning concerns should not be re-evaluated through the permitting regimes managed by pollution control authorities.

1.18. It is important that developers contact the pollution control authorities at the earliest design stages to ensure that proposals put forward take account of pollution control requirements.

This stage of preparing the ELJWP

1.19. This ‘Regulation 19’ Submission Version of the ELJWP has been prepared taking account of comments received on an earlier draft ELWJP (Regulation 18 version) that was consulted on from July to September 2024.

1.20. Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires the Waste Planning Authority (WPA) to publish the version of the Plan that is intends to submit to Secretary of State for examination on its legal compliance and soundness for a period of six weeks. During this period representations can be made on the soundness and legal compliance of the Plan. A representation form and guidance note is available and should be used and referenced by anyone wishing to make a representation.

1.21. The Plan has been evaluated through a Sustainability Appraisal which is incorporated into an ‘Integrated Impact Assessment’ (IIA) published with this Plan. In addition, a Habitat Regulations Assessment (HRA) has been undertaken to assess any potential adverse impacts on statutory nature conservation sites. The IIA serves as framework for assessing and communicating the impacts of a plan, and its reasonable alternatives, with a focus on key sustainability issues. The main objective of the IIA is to inform and influence the plan with a view to avoiding and mitigating negative

impacts. By adopting this method, the IIA aims to maximise the plan's contribution to sustainable development. The IIA and the HRA have been published as part of the consultation documents.

1.22. Other evidence base documents have been published which inform the approaches taken in the Plan.

1.23. Following the six week period for representations the Boroughs will submit the Plan for examination, along with the evidence base and all the representations received. The Plan can only be adopted by the Boroughs if, following the examination, the Inspector finds that the Plan is sound and legally compliant.

Supporting documents

1.24. This submission draft ELJWP is supported by evidence base documents including:

- Updated Waste Capacity Assessment and Arisings Estimates
- Strategic Waste Flows Report
- Safeguarded Sites for Release – Assessment Report
- Integrated Impact Assessment comprising:
  - Sustainability Appraisal
  - Habitats Regulation Assessment
- Climate Change Topic Paper
- Circular Economy Topic Paper
- Waste Management in East London Topic Paper

1.25. The submission draft ELJWP and all evidence base documents can be found on the following website: ELJWP project website.

How to comment on the Submission Draft ELJWP

1.26. You can submit representations on the soundness and legality of the ELJWP via the ELJWP project website until the deadline specified on the website.

1.27. Guidance on how to respond is included in the Consultation Protocol. The Consultation Protocol and representation forms are available online and at the Borough's main offices as listed below:

- London Borough of Barking & Dagenham: Barking Town Hall, 1 Town Square, Barking, IG11 7LU
- London Borough of Havering: Town Hall, Main Road, Romford, RM1 3BB
- London Borough of Newham: Newham Dockside, 1000 Dockside Road, London, E16 2QU
- London Borough of Redbridge::Lynton House, 255 - 259 High Road, Ilford, IG1 1NY

2 The Context

Geographical Context

Population

2.1 The population of the ELJWP Area has grown from 772,900 in the 2011 Census to 1,142,300 in the 2021 Census. The London Plan predicts that the population of London will increase by 70,000 every year, reaching 10.8 million in 2041, and East London will make a large contribution to this growth[4].

Table 2 – Population in East London

Borough	2021 census population total	2030 expected total population	Population increase since 2011 census	Projected population increase By 2030
Barking and Dagenham	218,900	238,044	17.7%	9%
Havering	262,100	299,000	10.4%	14%
Newham	351,000	465,035	14.0%	32%
Redbridge	310,300	362,000	11.2%	17%

Housing

2.2 The London Plan 2021 sets out the ten-year housing targets for each London borough as net housing completions for 2019/20 - 2028/29. The table below sets out the targets for East London boroughs.

Table 3 – Housing in East London

Borough	Total housing stock in 2017	Ten-year target for net housing completions (2028/29)	Projected total	Percentage increase from 2017 housing stock total
Barking and Dagenham	71,079	19,440	90,519	27%

4 https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

Havering	99,184	12,850	112,034	13%
Newham	100,062	47,600[5]	132,862	33%
Redbridge	101,348	14,090	115,438	14%
Authority Average	-	*16,340*	-	-

Economy[6]

2.3 The spatial make-up of London's economy shows that different sectors are important to different boroughs. In Newham, the largest employment sector is banking, finance and insurance, employing 29.8% of the workforce. In Havering, Barking and Dagenham and Redbridge, the largest percentage of residents aged 16 and over (27.8%, 23% and 26.7% respectively) are employed in the public administration, education and health sector. In Barking and Dagenham, the production industries account for 21.2% of total output.

2.4 Across London in the year ending June 2023, 75.1% of people aged 16 to 64 years were employed. This means that Barking and Dagenham and Redbridge are below the London average. Across London in quarter one of 2024, 5.1% of people aged 16 to 64 years were unemployed. This means that Barking and Dagenham and Redbridge have a higher unemployment rate than the London average. Barking and Dagenham has the highest unemployment rate out of all London boroughs.

Table 4 – Employment in East London

Borough	**Employment rate for 16–64 year olds**	**Unemployment rate for 16-64 year olds[7]**
Barking and Dagenham	73.1%	7.0%
Havering	82.6%	4.2%
Newham	75.5%	4.9%
Redbridge	72.5%	5.3%
Authority average	75.9%	4.7%

5 This reflects an element of the London Legacy Development Corporation target that Newham will be responsible for planning for.
6 Source: Greater London Authority (2016) Economic Evidence Base for London [online] Available at: https://www.london.gov.uk/sites/default/files/economic_evidence_base_2016.compressed.pdf
7 Source: Trust for London

2.5 Strategic Industrial Locations (SIL) are protected through Policy E5 of the London Plan which ensures that SILs are given strategic protection because they are critical to the effective functioning of London's economy. A map of SIL in East London is included in Figure 2 below.

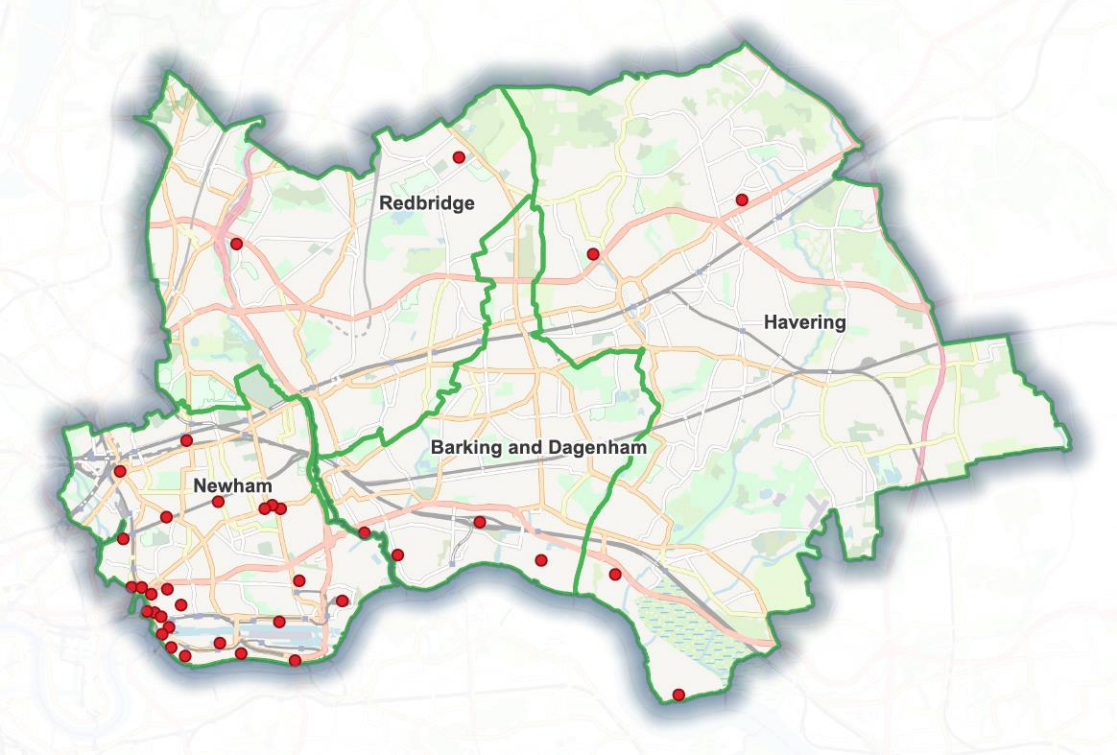


Figure 2 Strategic Industrial Locations in East London

2.6 SIL can accommodate activities which - by virtue of their scale, noise, odours, dust, emissions, hours of operation and/or vehicular movements - can raise tensions with other land uses, particularly residential development. The London Plan notes the importance of these locations in East London, and the role the Thames Gateway will play in a *'strategically co-ordinated plan-led consolidation of SILs in order to manage down overall vacancy rates, particularly in the boroughs of Newham and Barking & Dagenham'*. The East London Boroughs have, and will, explore the release of SIL for other land uses (such as housing) through the preparation of their Local Plans.

Transport infrastructure

2.7 Several of the ELJWP road links are inadequate, with several roads (e.g. A12 and A13) and junctions noted as being at or near to capacity, and many experiencing congestion at peak times. Adverse traffic conditions on these routes often have knock-on effects on local roads, leading to localised gridlock on occasion and impacting negatively on economic productivity. In addition, with planned developments and increased housing and job provision, more pressure may be placed on the road networks.

2.8 The London Infrastructure Plan 2050: Transport Supporting Paper notes that across London, trip rates are expected to remain constant on a per person basis, but that expected growth in population will require significant additional capacity across London's transport networks by 2050

Wharves and railheads

2.9 The London Plan reflects the NPPF in seeking to maximise recycling and reuse of construction, demolition, and excavation (C, D & E) wastes and the Boroughs should support the development of aggregate recycling facilities in their local plans. Moreover, in recognition of the heavy dependence of London on imports of crushed rock and marine (dredged) aggregates, the London Plan requires the Boroughs' local plans to safeguard wharves and railheads for aggregate distribution. The safeguarded wharves in East London are listed in table 4b and their location is shown in Figure 3 below.

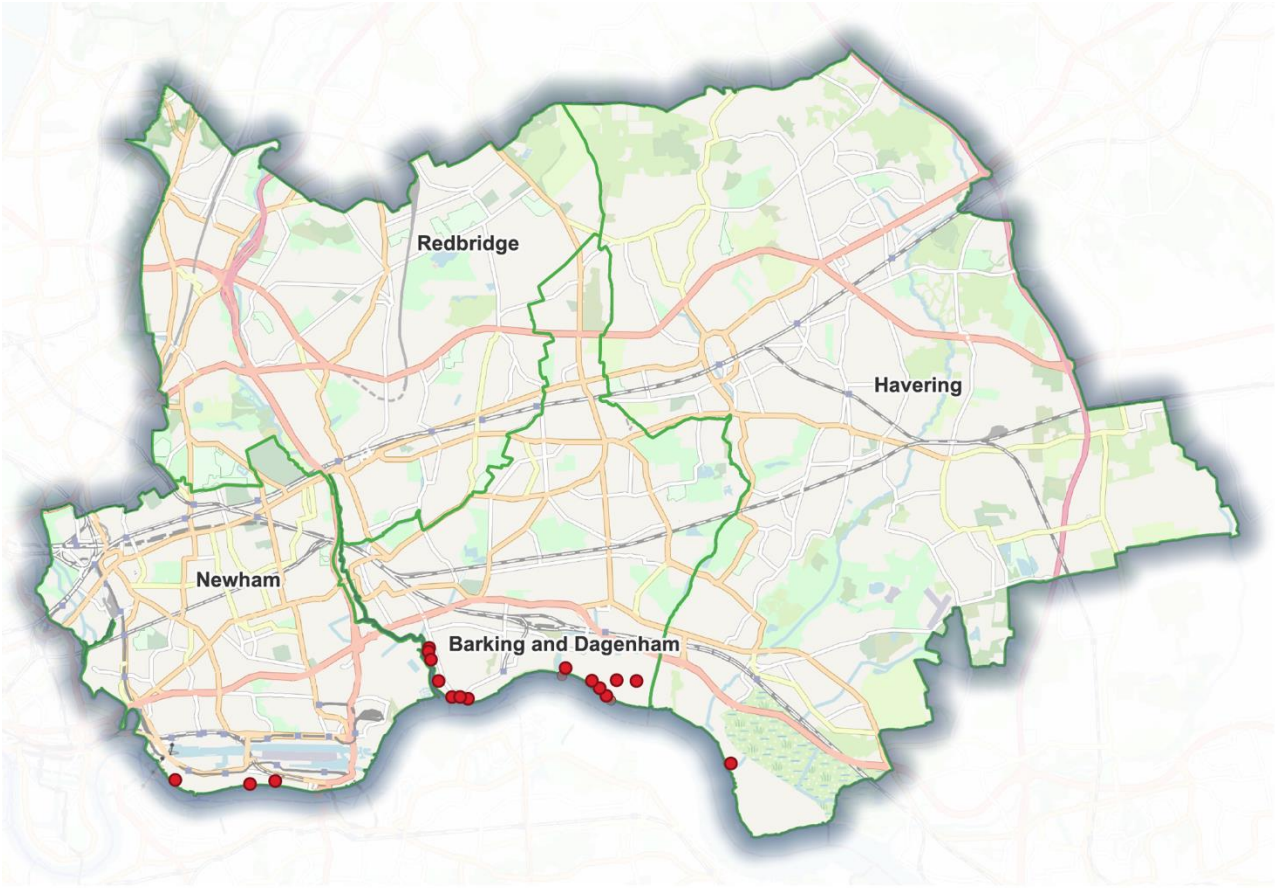


Figure 3 Location of Safeguarded Wharves in East London

Table 4b – Safeguarded Wharves in East London[8]

Barking and Dagenham
Alexander Wharf
Dagenham Wharf
De Pass Wharf
Docklands Wharf
East Jetty
Ford Dagenham Terminal
No.1 Western Extension
No.4 Jetty
Pinnacle Terminal
Pinns Wharf
Rippleway Wharf
Kierbeck and Steel Wharves
Victoria Stone Wharf
Havering
Halfway Wharf
Newham
Plaistow Wharf (Peruvian Wharf)
Royal Primrose Wharf
Thames Refinery

Nature conservation and biodiversity

2.10 The Plan area contains many areas of high ecological value ranging from European designated sites such as the Epping Forest SAC in Redbridge, to nationally designated Sites of Special Scientific Interest, Sites of Metropolitan Nature Conservation Importance and Sites of Importance for Nature Conservation (also known as Local Wildlife Sites) among local green spaces and networks that provide ecological connectivity and greater biodiversity, and there is proximity to sites of national importance. There is a need for continued preservation and long-term management of these areas within the Plan area, as well as consideration of potential effects on sites outside the Plan area boundary.

8 Source: https://www.london.gov.uk/programmes-strategies/planning/planning-applications-and-decisions/safeguarded-wharves-directions

2.11 Sites of Importance for Nature Conservation in each borough can be negatively impacted by actions such as inappropriate management, traffic pollution and recreational activities. If this continues, it could affect their wildlife value and contribution they make to biodiversity, landscapes and the natural environment.

2.12 A Local Nature Recovery Strategy (LNRS) for London is being prepared by the GLA. The LNRS will include a statement of London's strategic biodiversity priorities and propose actions in the locations where it would make a particular contribution to achieving those priorities. The LNRS will include an up to date spatial habitat map showing London's strategic Nature Recovery Network.

Landscape

2.13 The National Character Map defines the Plan area as lying within National Character Areas (NCA) 111 - Northern Thames Basin and Area 112 – Inner London. The Northern Thames Basin area is more diverse mix of urban and rural landscapes. The rural and dispersed landscape adjacent to Essex becomes increasingly urban towards the centre of London. There is a mix of historic settlement patterns, with remnants of historical orchards and other communal green and farmed spaces. Urban areas have low levels of tranquillity with pockets of perceived tranquillity, as with the Inner London area. Moving eastwards in the ELJWP area, tranquillity increases as green space and Green Belt areas increase.

2.14 Within the Inner London area, there is a strong sense of place along the Thames and particularly in the wharfs and creeks of East London as well as the parks and gardens, green spaces, rivers and other natural habitats. There are strong settlement patterns, and industrial features, with good public access to heritage assets. The whole NCA scores negatively for tranquillity, but there are good pockets of perceived tranquillity in public parks and other small spaces.

Open spaces and Green Belt

2.15 Barking and Dagenham has ambitions to be the 'Green Capital of the Capital'. One third of the Borough is green open space (463 hectares) and the Borough is in close proximity to Epping Forest.

2.16 More than 50% of Havering is classed as Metropolitan Green Belt, and the Borough has some of the most green space in London. Romford town centre has a lack of green space although it is within walking distance of number of local parks. This mirrors other areas of the Borough where, if there is a lack of one type of open space it is often met by another type of open space. There is generally a good coverage of parks, gardens, natural and semi natural spaces and amenity greenspaces across the Borough.

2.17 Newham has an existing network of natural spaces; not just nature reserves, parks, and rivers but also playgrounds, playing pitches, allotments, gardens, hedges, green walls, green/ brown roofs, cycle and footpaths, street trees, docks, lakes, and ponds. Specifically, Newham has a total of 926 hectares of open space, which includes the borough's 308 hectares of water spaces. The Borough has 16% tree cover, which is the second lowest in London. Green space is unevenly distributed across the borough and residents can have very different experiences when trying to access open space where they live.

2.18 Redbridge is one of London's greenest boroughs and comprises extensive Green Belt land (37% of total area) to the north-east. About 48% of the Borough comprises open spaces, including notable locations like Hainault Forest Country Park, Roding Valley Park, Fairlop Waters Country Park, Valentines Park, and around 120 hectares of countryside. These open spaces, including country parks and formal parks, contribute to the Borough's character, biodiversity, and climate change mitigation efforts.

Heritage and archaeology

2.19 The importance of protecting, conserving and enhancing both designated heritage assets and those more informally recognised, together with their setting, is generally recognised in the Borough Local Plans. The former includes those buildings, monuments, structures, parks, etc., that are subject to national listing/scheduling; the latter includes Locally Listed buildings and buildings that are yet not on the local register but the development management processes uncover their heritage value.

2.20 At local level, new developments, infrastructure and environmental pressures, such as extreme weather and flooding, present the greatest risk to cultural heritage assets.

2.21 Historic England has a Heritage at Risk Register which includes historic buildings, listed buildings, sites and Conservation Areas at risk of being lost through neglect, deterioration or decay. The register aims to highlight those places and buildings in greatest need of repair. As of 2023, there are eighty-one heritage assets registered as at risk within wider London. There are six heritage assets registered at risk within Barking and Dagenham, twelve within Havering, thirteen within Newham and ten within Redbridge.

Water environment

2.22 For each of the major catchments in the UK a river basin management plan (RBMP) has been prepared, which provides information about the current status of the different aspects of the water environment and sets targets for their improvement by 2027. The Boroughs contain waterbodies and catchments that lie within the areas covered by the Thames RBMP and the South East RBMP.

2.23 Several water bodies across the four Boroughs do not meet the required 'good' status, and a number of water bodies and watercourses are protected sites and sensitive to changes in water quality. In Newham, the Thames, Lea and Roding rivers have not improved in water quality over the past few years, whilst the River Beam (from Ravensbourne to the Thames) is classified as 'Bad' and the Lower Roding, Mayesbrook River and the Goresbrook in Barking and Dagenham all fail against chemical quality targets.

2.24 There are a number of groundwater Source Protection Zones (SPZs) in East London. A map of these zones and how they are defined is publicly available[9]. Areas in Source Protection Zone 1 (SPZ1) are the catchment areas for sources of potable, high quality water supplies usable for human consumption. Groundwater at this location is therefore particularly vulnerable to polluting uses on the surface. All development proposals, including waste sites, are carefully monitored within SPZ1.

2.25 A number of sensitive aquifers span the study area, which can be viewed online[10]. A large amount of the superficial geological deposits within East London are classed as 'Secondary A', which comprise permeable layers that can support local water supplies and may form an important source of base flow to rivers. These shallow aquifers are most at immediate risk from any spills, leakages and leaching of contaminants from waste materials not stored on impermeable ground, and so protection against this is crucial.

2.26 The majority of the bedrock aquifer within East London is classed as 'Unproductive London Clay', however there is Secondary A Lambeth Group and Principal Chalk present to the south. Principal aquifers provide significant quantities of water and can support water supply and/or baseflow to rivers, lakes and wetlands on a strategic scale. They typically have a high intergranular and/or fracture permeability meaning they usually provide a high level of water storage.

9 Groundwater source protection zones (SPZs) - GOV.UK (www.gov.uk)
10 Magic Map Application (defra.gov.uk)

2.27 Under predicted climate change scenarios, more frequent drought conditions are expected in London and the South East of England, along with increased demands on water resources. Future developments will create additional demand for water abstraction from surface and groundwater sources in London. At a high level, it is broadly assumed that the quality of water bodies will improve in line with national objectives. However, water quality is influenced by a wide range of internal and external factors, including climate change, geology and soils, human consumption and population change, and pollution from human activities such as industry, agriculture, contaminated runoff from roads and other built surfaces, combined sewer overflows, and nutrient enrichment from treated wastewater. Future development, particularly in areas close to water bodies, may therefore hamper efforts to improve water quality.

Climate change

2.28 Climate change presents a global risk, with a range of different social, economic and environmental impacts that are likely to be felt within the Plan area across numerous receptors. A key challenge in protecting the environment will be to tackle the causes and consequences of climate change: warmer, drier summers and wetter winters with more severe weather events all year, higher sea levels and increased river flooding.

2.29 There has been a general trend towards warmer average temperatures in recent years with the most recent decade (2012–2021) being on average 0.2°C warmer than the 1991–2020 average and 1.0°C warmer than 1961–1990. All the top ten warmest years for the UK in the series from 1884 have occurred this century.

2.30 Given the trends in carbon emissions and energy consumption at both national and local level, carbon emissions in London, and each of the four London Boroughs within the ELJWP area, are likely to continue declining.

Flood risk

2.31 Heavy rainfall and flooding events have been demonstrated to have increased potential to occur in the UK as the climate has generally become wetter. For example, for the most recent decade (2012–2021) UK summers have been on average 6% wetter than 1991–2020 and 15% wetter than 1961–1990.

2.32 The effects of climate change in the ELJWP area are likely to result in extreme weather events becoming more common and more intense. Flood risk is of particular significance in this regard, alongside heatwaves and drought. Fluvial and surface water flooding poses the most significant risk to the plan area, particularly in areas in close proximity to the River Thames.

Existing waste management

2.33 The legal definition of waste, set out in section 75(2) of the Environmental Protection Act 1990, is “any substance or object which the holder discards, or intends or is required to, discard”. The key concept relates to the producer or holder's intention regardless of whether the waste may have a value to the recipient.

2.34 The main types of waste produced are:

- Local Authority Collected Waste (mainly household waste) (LACW);
- Commercial and Industrial Waste (waste from businesses and industry) (C&I waste);
- Construction, Demolition and Excavation Waste (C, D & E waste);
- Hazardous Waste from various sources; and,
- Wastewater and Sewage Sludge

2.35 Planning Practice Guidance also expects Waste Planning Authorities to plan for the management of Agricultural Waste and Low Level Radioactive Waste.

2.36 There are a range of waste management facilities that handle waste both from within and beyond East London. 65 sites are safeguarded by this Plan for waste management uses and their location is shown in Figure 4 below.

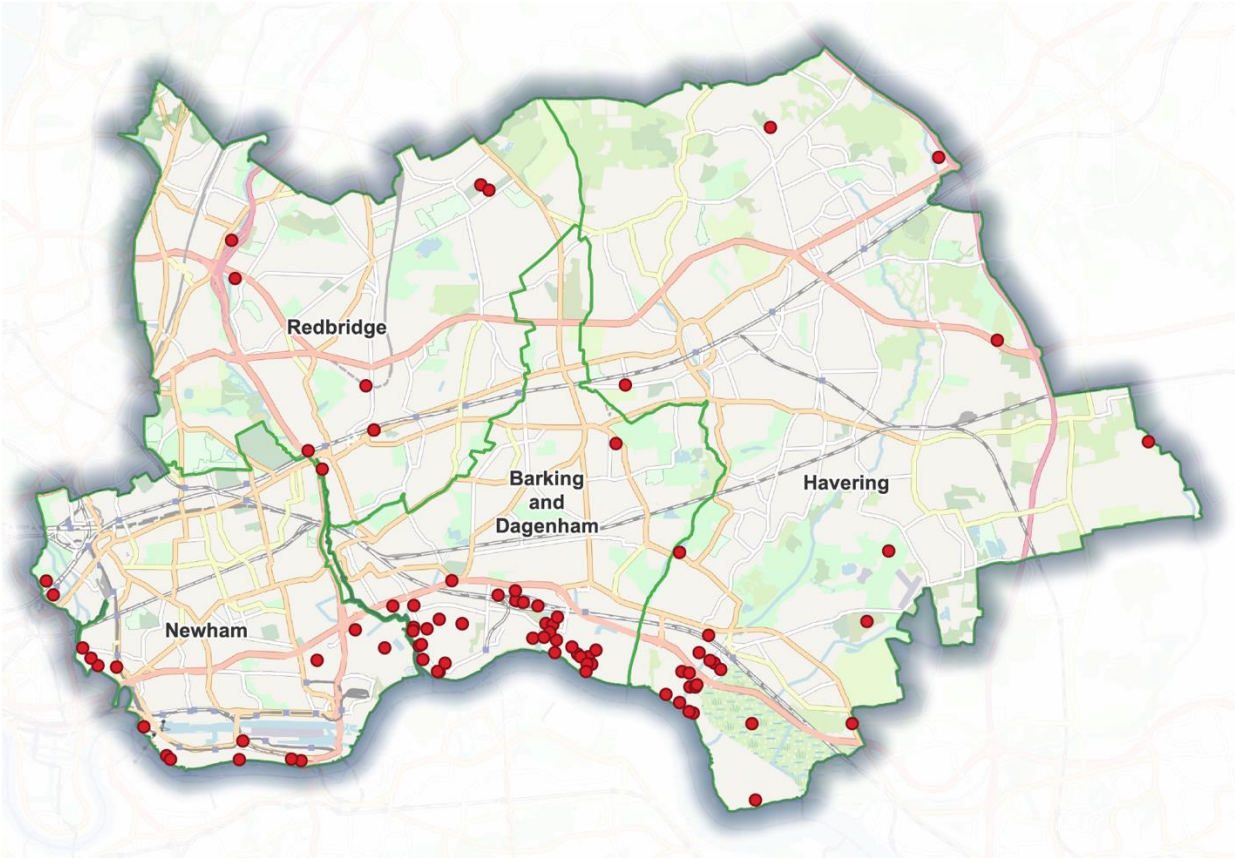


Figure 4: Map of Existing Waste Sites in East London

Local Authority Collected Waste

2.37 Local Authority Collected Waste (LACW) waste consists of waste which comes into the possession of, or under the control of, the local authority and includes waste collected from households (household waste). LACW collected by the Boroughs can include household waste (residual, dry mixed recycling and food waste), street sweepings, green waste from maintenance of open spaces, and a small quantity of clinical waste[11]. Depending upon the local arrangements, LACW can include commercial waste collected by trade waste operations.

2.38 In 2022/23 0.42 million tonnes of LACW was generated in East London, with 0.19 million tonnes managed through incineration with Energy from Waste (EfW) (at facilities outside of East London), 0.13 million tonnes recycled or composted, and only 117 tonnes managed through disposal to landfill.

Construction, Demolition and Excavation Waste

2.39 C, D & E waste comprises waste arising from the construction and demolition industries, including excavation during construction activities, and is made up of mainly inert materials such as soils, stone, concrete, brick and tile. However, there are also non-inert elements in this waste stream such as wood, metals, plastics, cardboard, and residual household-like wastes. Hazardous waste are also present particularly when development takes place on brownfield sites that have been affected by historical contamination. Due to their weight, the inert elements make up the majority of the total tonnage.

2.40 Different types of C, D & E waste require different forms of management. For example, hard inert[12] materials (such as concrete, brick and road planings arising from demolition and road maintenance) can be recycled for use as an aggregate, while soft materials such as soils and sub-soils can be deposited on land for beneficial purposes such as the restoration of minerals workings and in other engineering projects. The non-inert component includes timber, plasterboard and plastics may be recycled if separated. Ultimately there is very little C, D & E waste that cannot be recycled or recovered in some other way.

2.41 Soft inert excavation material may be deposited on land for beneficial purposes which may be consented as non-waste development and, either subject to an Environmental Permit as a recovery to land operation or managed under the CL:AIRE definition of waste protocol. If the latter case applies, the material managed through this route is not classed as waste.

2.42 The London Plan does not apportion quantities of C, D & E waste for management, but boroughs are still required to plan for this waste stream.

2.43 The production of C, D & E waste is influenced by large-scale infrastructure projects, as well as commercial and residential developments, which means that peaks and troughs in its production are often observed with arisings not following a regular pattern. Given it is a bulky and heavy waste type it does not tend to travel significant distances from source for management.

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11 Household clinical waste is not deemed hazardous unless a particular risk has been identified (based on medical diagnosis).
12 Inert waste is defined as “waste that does not undergo any significant physical, chemical or biological transformations”.

Table 5: Non-hazardous C, D & E Waste arisings from East London 2023 (tonnes)

Category	Type	Tonnes	
C&D waste	Inert	345,495	795,002
	Non-inert	449,507	
Excavation waste	Inert	1,397,953	1,408,589
	Non-inert	10,627	
Total Non hazardous C, D & E waste:		2,203,591	

2.44 The management routes for Non-hazardous C, D & E waste (including inert waste) arising in East London in 2023 is set out in Table 6 below.

Table 6: Non-hazardous C, D & E Waste in East London Waste Management Profile 2023 (% of Total Arisings)

Category	Waste Type	Recycling	Recovery	Landfill	Transfer	Mobile Plant
C&D Waste	Inert	41%	1%	<1%	4%	0%
	Non-inert	28%	2%	<1%[13]	23%	0%
	Subtotal C&D	**69%**	**3%**	**1%**	**27%**	**0%**
Excavation Waste	Inert	30%	44%	0%	25%	1%
	Non-inert	<1%	0%	<1%	0%	0%
	Subtotal Excavation	**30%**	**44%**	**<1%**	**25%**	**1%**

2.45 The management profile for Non-hazardous C&D waste is as set out below:

- 69% was managed at recycling facilities;
- 3% was recovered (either through incineration or recovery to land);
- 1% was managed at permitted landfills;
- 27% was managed at intermediate sites and transferred on for recovery or disposal; and

- 0% was managed via mobile plant (normally for recycling or reuse).

2.46 The management profile for Non-hazardous excavation waste is as follows:

- 30% was managed at recycling facilities;
- 44% was recovered (through recovery to land including use in restoration or operational needs on permitted landfills);
- <1% was managed at permitted landfills (dredging spoil);
- 25% was managed at intermediate sites and transferred on for recovery or disposal; and
- 1% was managed via mobile plant (normally for recycling or reuse).

2.47 This compares with the following targets in the London Plan for C, D & E waste management in Policy SI 7 *Reducing waste and supporting the circular economy*:

> *meet or exceed the targets for each of the following waste and material streams:*
>
> - *construction and demolition – 95 per cent reuse/recycling/recovery*
> - *excavation – 95 per cent beneficial use overall and 100% of inert excavation beneficial used.*[14]

Table 6b: Non-hazardous C, D & E Waste attributed to East London plus reattributed Non-hazardous C, D & E Waste from London as whole Combined Waste Management Profile 2022

Category	Activity	Recycling	Recovery	Landfill	Transfer	Mobile Plant	Total
C&D	Recovery inc recycling	69%	3%	-	27%	0%	**>99%**
	Other	-	-	<1%		-	**<27%**
Inert Excavation	Recovery inc recycling	30%	44%[15]	0%	25%	1%	**>99%**
	Other	-	-	-		-	**<30%**
All Excavation	Recovery inc. recycling	30%	44%	0%	25%	1%	**>99%**
	Other	-	-	<1%		0%	**<25%**

14 London Plan Footnote 164

[15] Taken to be used for restoration or operational purposes which is classed as recovery.

2.48 To summarise the management profile for non-hazardous C& D waste managed at permitted facilities reporting through the WDI is as set out below:

- At least 72% was managed through recycling or recovery;
- With less than 1% disposed at permitted landfills; and
- 27% transferred on for recovery or disposal.

2.49 It should be noted that waste going for reuse may not be managed through permitted sites, plus a substantial amount of the fraction of C&D waste that constitutes hardcore may be managed on the site of production and converted into recycled aggregate either used on site or sold offsite[16]. Hence the recycled value should be taken to be a minimum 'at least' value.

2.50 The management profile for non-hazardous excavation waste is as set out below:

- At least 74% was managed through recycling or recovery (inc mobile plant);
- With <1% disposed at permitted landfills; and
- 25% transferred on for recovery or disposal. Given that disposal would only be to landfill, and backfilling of mineral workings and other uses would be classed as recovery, it is considered highly unlikely that the inert fraction of this stream would actually end up being disposed of.

Hazardous Waste

2.51 Hazardous wastes are categorised as those that are harmful to human health, or the environment, either immediately or over an extended period of time. In East London, hazardous waste arises mainly from: construction and demolition activity, vehicle maintenance and/or dismantling activity and healthcare.

2.52 It is estimated that around 71,000 tonnes of hazardous waste was produced in East London in 2023. Hazardous waste covers a wide range of waste types which each may require management at a range of specialist facilities for treatment and disposal, and given they generally arise in relatively small amounts, such facilities are developed to manage quantities greater than that arising in a single Plan area. Therefore, this waste may often travel further than non-hazardous wastes for management.

16 Data provided by the National Federation of Demolition Contractors.

Wastewater and Sewage Sludge

2.53 Wastewater generally comprises surface water runoff and effluent discharged to the foul sewer system from homes and industrial and commercial premises from where it is channelled to wastewater treatment works for treatment[17]. Output of this treatment is sewage sludge that may, if it meets certain parameters, be applied to land as a fertiliser or soil improver in accordance with the Sludge (Use in Agriculture) Regulations 1989 and associated best practice guidance. Sewage sludge (biosolids) applied in this manner falls outside the normal regulatory regime for waste. Alternatively, the sludge can be treated either through anaerobic digestion or incineration. The cleaner effluent may be discharged to a watercourse in accordance with a discharge consent granted by the Environment Agency.

2.54 In East London wastewater and sewage sludge are managed by Thames Water and Anglian Water (in Havering only). Wastewater treatment capacity is delivered through 'Asset Management Plans'. Thames Water use information in the public domain to forecast when upgrades to wastewater treatment facilities will be required.

2.55 Beckton Sewage Treatment Works is the key facility serving East London, being Thames Water's and the UK's largest sewage treatment works. It is located in the London Borough of Newham. To address changing need, a major upgrade is underway so it can receive wastewater from the new Thames Tideway Tunnel and provide for growth, resilience and consent compliance to a design horizon of 2036.

Agricultural Waste

2.56 Given the relatively small amount of agricultural land in East London arisings of agricultural waste are small, with quantities being so low as to not require specific provision of management capacity.

17 These works can provide a valuable function in managing wastes, other than wastewater, that arise in liquid and sludge form such as septic tank emptyings.

Low level radioactive waste

2.57 Radioactive waste is any material that is either radioactive itself or is contaminated by radioactivity and for which no further use is envisaged. Radioactive waste is not included in the definition of hazardous waste and therefore needs to be accounted for separately. Most radioactive waste is produced from nuclear power stations and the manufacture of fuel for these power stations. This is referred to as “nuclear waste.” Radioactive waste also arises from nuclear research and development sites and Ministry of Defence sites. No such sites exist within East London.

2.58 Radioactive waste also arises from nuclear research and development sites. Some also arises from Ministry of Defence sites and medical, industrial and educational establishments, such as hospitals and universities. This is sometimes referred to as “non-nuclear waste”. Being of a low level of radioactivity this may be referred to as low level radioactive waste, or even very low level radioactive waste.

2.59 Low level radioactive waste (LLW) does not normally require shielding during handling or transport. LLW consists largely of paper, plastics and scrap metal items that have been used in hospitals, research establishments and the nuclear industry.

2.60 According to the EA public register, there are two organisations holding four permits to keep and use radioactive materials in East London, mainly in Havering. LLW is not managed within East London and it is likely that very little LLW is produced in East London and that which is produced will likely continue to be managed via existing specialist arrangements.

The Policy Context

2.61 The main policy context within which the ELJWP is prepared is illustrated in Figure 5 below.

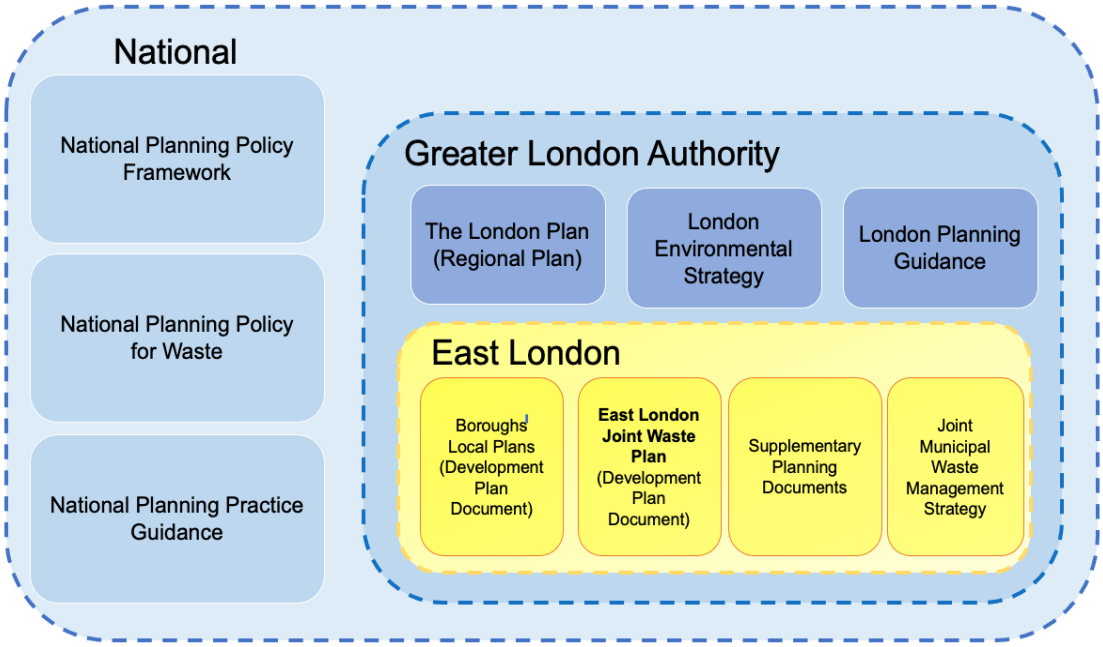


Figure 5 – The ELJWP Within the Wider Policy Context

2.62 To be found sound the ELJWP will need to be in general conformity with the London Plan and consistent with national policy.

2.63 The ELJWP is also aligned with the policies of the adopted Local Plans in East London. This is intended to ensure there are no policy tensions (i.e. contradictions) within the Development Plan. Having said that, the ELJWP may update the Development Plan and where any conflict between policies exists the latest policy to have been adopted generally takes precedent in decision making. One adopted, the policies in the ELJWP supersede the policies in the ELWP and Appendix 5 shows how the ELWP policies are replaced by the ELJWP.

National Policy

2.64 The key objective of national policy for managing waste[18] is to protect the environment and human health by:

- Preventing or reducing the generation of waste;
- where its production is unavoidable, reducing the adverse impacts of its generation and management; and
- reducing the overall impacts of the use of resources from which waste may arise and improving the efficiency of such use.

2.65 The National Planning Policy for Waste 2014 (NPPW))[19], associated Planning Practice Guidance and the Resources and Waste Strategy for England 2018 (RWS)[20] currently set the planning policy context for waste management in England. Whilst the NPPF does not contain policies specific to waste, its principles remain relevant. The Waste Management Plan for England[21] was updated in 2021 and signposts policies concerning waste management in England in particular those included in the RWS.

2.66 Both NPPW and RWS require application of the Waste Hierarchy in priority order as one of the key principles of sustainable waste management. The 'Waste Hierarchy' identifies different ways of dealing with waste as set out in Figure 6 below. This shows that 'Prevention' is the most preferred option with 'Disposal' at the bottom being the option of last resort.

18 See The Waste (England and Wales) Regulations 2011 and the Waste (Circular Economy) (Amendment) Regulations 2020

19 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf

20 https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england

21 https://www.gov.uk/government/publications/waste-management-plan-for-england-2021

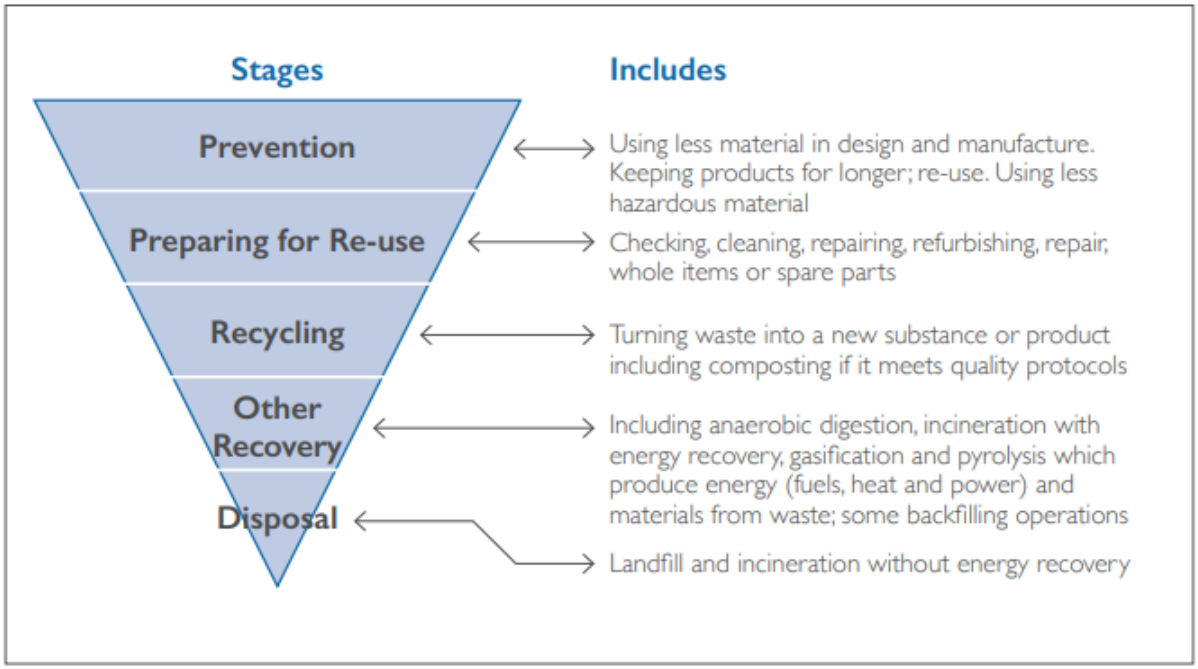


Figure 6 The Waste Hierarchy

2.67 The RWS sets out Government thinking on waste management in England, including how the country is to minimise waste and manage it more effectively through maximising opportunities to generate value from material that is both prevented from entering, and extracted from, the waste stream.

2.68 The RWS identifies five strategic ambitions:

- To work towards all plastic packaging placed on the market being recyclable, reusable or compostable by 2025;
- To work towards eliminating food waste to landfill by 2030;
- To eliminate avoidable plastic waste over the lifetime of the 25 Year Environment Plan;
- To double resource productivity by 2050; and
- To eliminate avoidable waste of all kinds by 2050.

2.69 The RWS is also concerned with ensuring that society's approach to waste aligns with the following circular economy principles:

- Design out waste and pollution;
- keep products and materials in use; and
- regenerate natural systems.

2.70 The role waste management plays in the material cycle that is central to creating a more circular economy is illustrated in Figure 7 below.

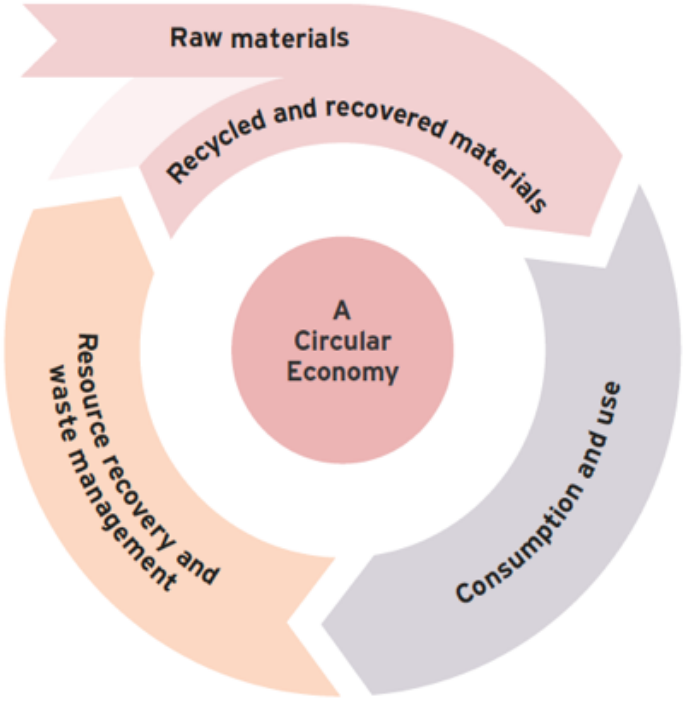


Figure 7 Circular Economy[22]

2.71 The Circular Economy is another key tool for tackling the climate emergency. When applied to the built environment, circular economy principles significantly reduce greenhouse gas emissions by avoiding extraction of raw materials, reducing production of construction materials, retaining embodied carbon and eliminating waste.

2.72 The Environment Act 2021 requires Government to set long-term, legally-binding environmental targets[23], including those for resource efficiency and waste reduction. In response to this requirement the Government set the following targets in the Environmental Improvement Plan 2023, which build on existing recycling and landfill diversion targets:

- Eliminate avoidable waste by 2050 and double resource productivity by 2050;
- explore options for the near elimination of biodegradable municipal waste to landfill from 2028;
- eliminate avoidable plastic waste by 2042;
- seek to eliminate waste crime by 2042; and,

22 Source: Resources and Waste Strategy, DEFRA, 2018
23 https://www.gov.uk/government/publications/environment-bill-2020/august-2020-environment-bill-environmental-targets

- halve ‘residual’ waste (excluding major mineral waste) produced per person by 2042. For the purposes of this target, ‘residual’ waste is defined as waste that is sent to landfill, put through incineration or used in energy recovery in the UK, or that is sent overseas to be used in energy recovery.

2.73 The EIP states that the targets will be achieved by the following actions:

- Implementation of packaging extended producer responsibility from 2024 (delayed to October 2025) ;
- introduction of a deposit return scheme for plastic and metal drinks containers from October 2025 (to be implemented in October 2027);
- implementation of consistent recycling collections between different councils (to be implemented by 31 March 2026);
- mandate recycling labelling for packaged products by 31 March 2026 except for plastic films which will be mandated by 31 March 2027;
- banning the supply of single-use plastics (e.g. plastic plates and cutlery) from October 2023;
- introduction of a mandatory digital waste tracking service to modernise existing waste record keeping;
- implementation of reforms to the waste carriers, brokers and dealers regime and bringing forward legislation to tackle abuse of certain types of waste exemptions; and,
- launching a call for evidence to support development of a plan to achieve the near elimination of biodegradable municipal waste going to landfill from 2028.

2.74 The target for the reduction in residual waste is enshrined in The Environmental Targets (Residual Waste) (England) Regulations 2023 which came into force on 30 January 2023. The waste target is for the reduction of residual waste (excluding major mineral wastes) on a kg per capita[24] basis by 50% by 2042 from 2019 levels (574 kg per capita). Accordingly, the residual waste long-term target is that by the end of 31 December 2042 the total mass of residual waste for the calendar year 2042 does not exceed 287 kg per capita. Waste routes which will count as residual are:

- Sent to landfill in the United Kingdom;
- put through incineration in the United Kingdom;
- used in energy recovery in the United Kingdom; or
- sent outside the United Kingdom for energy recovery.

24 Per head of population in England

2.75 In July 2023 the Government published a national waste prevention plan titled 'Waste prevention programme for England: Maximising Resources, Minimising Waste'. This document sets out how strategic principle 2 of the Resources and Waste Strategy – *to prevent waste from occurring in the first place and manage it better when it does* – will be achieved.

2.76 The Plan also notes that:

- the Government intends to prepare a 'Waste Sector Decarbonisation Plan' that will set out how the waste sector will; contribute to the targets in the 6th Carbon Budget (see below);
- the National Model Design Code published in 2021[25] provides tools and guidance for planning authorities to embed circular economy principles in new development;
- NPPW expects planning authorities to ensure that new development includes proposals for handling waste arising from the construction and operation of development maximise reuse and recovery opportunities, and minimises off-site disposal; and,
- Chapter 2 of the NPPF recognises the need for the planning system to consider the prudent use of natural resources and waste minimisation in the pursuit of sustainable development.

25 https://www.gov.uk/government/publications/national-modeldesign-code

2.77 In addition to the above, in 2024, the Government announced its ambition for the country to achieve a ‘zero waste economy’ by 2050.

2.78 In December 2024, The Government published a ‘Residual waste infrastructure capacity note’ indicating that, following the implementation of policies mentioned above, there would ‘be sufficient residual waste infrastructure capacity to treat forecast municipal residual waste arisings at a national level’.

Climate change

2.79 To achieve ‘net zero’ in carbon emissions by 2050, in 2021 the Government acknowledged that, overall, CO2 emissions need to fall by around two thirds by 2035[26].

2.80 The RWS includes plans to:

- Reduce the generation of greenhouse gas (GHG) emissions associated with breakdown of biodegradable waste by diverting it from landfill (with a focus on food waste); and
- to increase recycling, which typically results in lower carbon emissions in comparison to manufacturing products from virgin materials.

26 UK Industrial Decarbonisation Strategy, April 2021

2.81 In December 2020, the Climate Change Committee (CCC) published its Sixth Carbon Budget[27] that considered measures required to achieve the UK Government target net zero carbon emissions by 2050. The UK Government accepted the report's key recommendation of a 78% reduction in UK territorial emissions between 1990 and 2035 which essentially brought the UK's previous target of 80% reduction by 2050 forward by 15 years[28]. At COP29 the UK Government announced a new target to reduce greenhouse gas emissions by 81% (on 1990 levels) by 2035.

2.82 The Committee's Sixth Carbon Budget noted that emissions associated with waste management accounted for 6% of UK GHG emissions in 2018. While they have fallen to 63% of 1990 levels, due to a reduction in biodegradable waste being landfilled, in recent years emissions have stopped falling due to a plateau in recycling and significant growth in carbon emissions from the fossil sourced component (i.e. oil based plastics) of Energy from Waste plant feedstock.

2.83 Broadly, the Committee's Budget concludes that the management of waste in accordance with the waste hierarchy is consistent with the achievement of reductions in carbon emissions and includes the following specific recommendations:

- A ban on landfilling biodegradable waste by 2025;
- recycling increasing to 70% by 2030;
- additional focus through the chain from manufacturing to the consumer to reduce the amount of waste; and,
- All energy from waste facilities plants to be fitted with Carbon Capture and Storage (CCS) by 2040.

2.84 In 2021 the Environmental Services Association[29] published a Net Zero Strategy[30] that includes the following targets:

- Start fitting Carbon Capture, Utilisation and Storage (CCUS) technologies to EfW facilities from 2025, with all plants fitted with CCUS where feasible by 2040.

27 The Sixth Carbon Budget The UK's path to Net Zero Committee on Climate Change December 2020 Presented to the Secretary of State pursuant to section 34 of the Climate Change Act 2008
28 UK enshrines new target in law to slash emissions by 78% by 2035, Government Press Release, April 2021
29 The Environmental Services Association (ESA) is the trade association for the waste management industry in the UK.
30 http://www.esauk.org/application/files/7316/2496/7294/ESA-Net-Zero-Exec-Summary.pdf

- Ensure that all new plants are built with CCUS fitted or are CCUS-ready from 2025 onwards.

2.85 In March 2023, the Government consulted on updates to its '2009 Carbon Capture Readiness' requirements. The consultation considered the need for carbon capture relating to Energy from Waste facilities and noted that:

- 'Whilst the EfW sector is relatively small, we expect that it will represent a significant proportion of residual emissions from the power sector in the 2030s, as other forms of generation are rapidly decarbonised. It is therefore important that it is targeted with emissions reduction policies'

2.86 As part of this consultation, the Government proposed that Energy from Waste plants, which are of a size which require a Development Consent Order, should be included in 'decarbonisation ready' requirements and that this would be administered by the Environment Agency as part of the Environmental Permitting, rather than the planning consent, process.

2.87 In its June 2023 report, 'Progress in reducing emissions 2023 Report to Parliament', the CCC summarised its findings in regard to the progress made within the waste management sector to reducing emissions as follows:

- 'Greater strategic coordination of plans to decarbonise the waste sector is needed including: much greater emphasis on waste prevention, clarity on future residual waste capacity needs, and the suitability of incentives and interactions with other sectors such as waste as a feedstock for Sustainable Aviation Fuels. Energy from Waste (EfW) emissions are already higher than the Government's CBDP[31] anticipates and EfW capacity is set to increase in the coming years. A comprehensive systems-approach to control and reduce EfW emissions is urgently needed, including clarity on carbon pricing. We recommend a moratorium on additional EfW capacity until a review of capacity requirements has been completed and an updated assessment of residual waste treatment capacity requirements published.'

2.88 At the time of publishing its note of the need for residual waste infrastructure (as mentioned above), the Government announced that energy recovery developments *'must be able to demonstrate that making use of the heat they produce is viable and that they can be built carbon capture ready'.*

31 CBDP = Carbon Budget Delivery Plan

Waste movement and net self sufficiency

2.89 The 'proximity principle' is set out in paragraph 4 of Part 1 of Schedule 1 to the Waste (England and Wales) Regulations 2011. This is within the context of the requirement for mixed municipal waste collected from private households to be disposed of, or recovered, in one of the nearest appropriate installations, by means of the most appropriate methods and technologies, in order to ensure a high level of protection for the environment and public health.

2.90 This is to be achieved by establishing an integrated and adequate network of installations for disposal and recovery of mixed municipal waste collected from private households. The requirement also extends to where the collection includes similar types of waste collected from non-household sources (e.g. waste from offices and retail).

2.91 The network is to be designed in such a way as to enable movement towards the aim of self-sufficiency in the disposal and recovery of waste at a national[32] level, while giving consideration to geographical circumstances and/or the need for specialised installations for certain types of waste.

2.92 This principle is to be applied when decisions are taken on the location of facilities for the management of mixed municipal waste collected from private households and similar waste (see above) by disposal or recovery. This is recognised in NPPW that expects waste planning authorities to:

> *'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;'.*

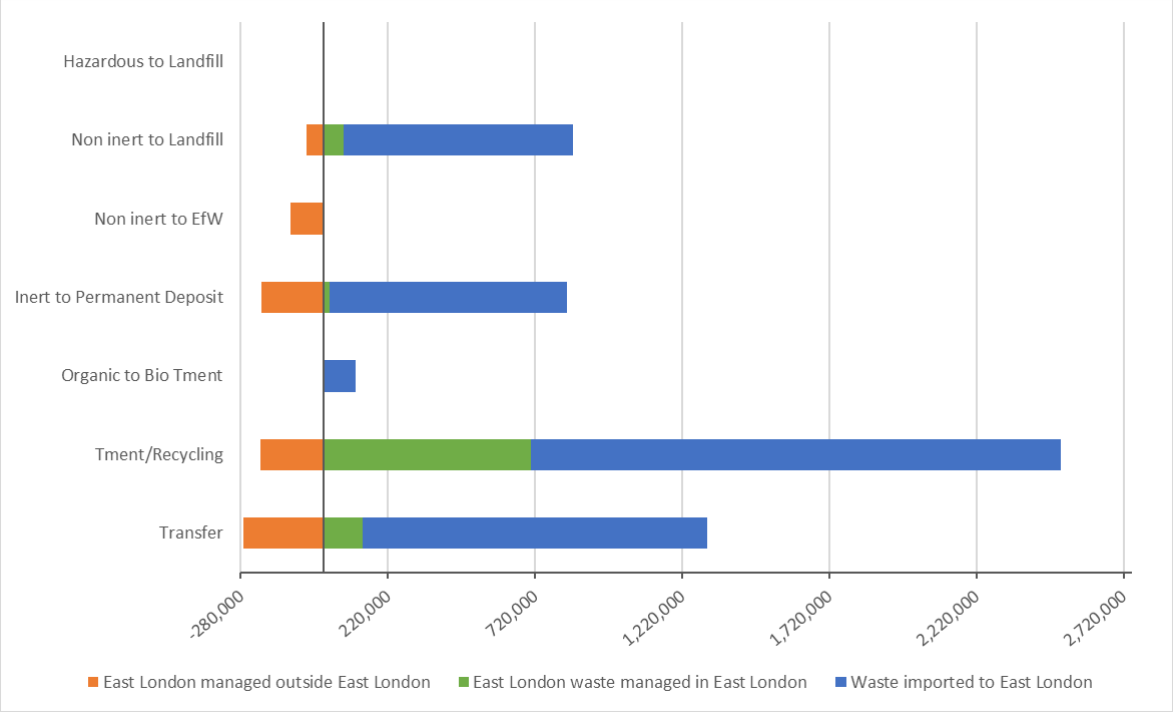
32 England and Wales

2.93 The NPPW requires local planning authorities, with responsibility as Waste Planning Authority for their area, to include policies in their development plans which set out an overall strategy for the pattern and scale of waste development, ensuring sufficient provision is made for infrastructure for waste management, and energy that may be produced (including heat).

2.94 Data shows that varying quantities of waste are routinely transported between East London and other Waste Planning Authority (WPA) areas[33]. This cross-boundary movement is typical of the way in which waste is managed in general, as it has little regard for administrative boundaries. Certain, strategic, flows of waste from East London have been identified which may be important to the management of waste arising in East London over the Plan period and the WPAs hosting facilities to which their flows relate have been contacted to confirm that such flows may continue over the plan period.

2.95 Figure 8[34] displays the balance between imports and exports by waste management method and waste type to and from East London in 2022.

Figure 8: Waste import and export balance in East London 2022 by management method and waste type where known (tonnes)



33 See 'Identification of Strategically Significant Cross Boundary Waste Movements', BPP Consulting, February 2025

34 Note that Figure 8 only includes waste managed at permitted sites in England and does not include any waste exported to Wales, Scotland or further afield as this is not reported in the WDI.

2.96 When planning for waste the NPPW expects WPA areas to assess whether the unmet needs of other areas could be met within their own areas.

Regional Policy – The London Plan

2.97 The administrative geography of London is overseen at a regional level by the Greater London Authority (GLA). There are thirty-three-administrative areas within London: twelve inner boroughs, twenty outer boroughs, and the City of London. Newham is the only inner borough within the ELJWP area.

2.98 The London Plan provides strategic planning policy for the whole of London and sets out how certain matters, including waste, should be addressed in borough Local Plans including waste local plans.

2.99 The London Plan states that London should manage as much of its waste within its boundaries as practicable, aiming to achieve waste net self-sufficiency by 2026 in all waste streams except for excavation waste. To meet this aim, the London Plan 2021 forecasts arisings of Local Authority Collected Waste (referred to as household waste) plus Commercial and Industrial waste (C&I waste) for London by borough to 2041 (collectively referred to as household, industrial and commercial waste (HIC)). These forecasts are used as a basis to apportion quantities of this waste for management to each borough so that the overall goal of managing the equivalent of 100 per cent of London's waste should be managed within London (i.e. net self-sufficiency) by 2026 (Policy SI 8) is achieved. Excavation waste is excluded from the London Plan net self-sufficiency target as it is difficult to recycle and it is more difficult for London to provide sites for management or beneficial use.

2.100 The borough apportionments were derived through an assessment process that included assessment of existing capacity in each borough along with a number of other factors that are considered to determine the ability of a particular borough to provide additional management capacity. The quantities arrived at are referred to as the London Plan apportionments (LP apportionments for short). The types of capacity considered to count towards the management of apportioned waste (hereinafter referred to as 'qualifying capacity') is defined in paragraph 9.8.4 of the London Plan as follows:

- Energy recovery in London;
- production of solid recovered fuel (SRF) and refuse derived fuel (RDF) in London;
- sorting or bulking for re-use or recycling including anaerobic digestion. The reuse or recycling may take place within or outside London providing the sorting and bulking capacity is located within London; and

- reuse or recycling including anaerobic digestion within London.

2.101 London Plan arisings and forecasts for the East London Boroughs are set out below in Table 7 below.

Table 7 London Plan Forecast Waste Arisings and Apportionments for the East London Boroughs

	Waste Arising		**Waste Management Apportionments**	
	2021	**2041**	**2021**	**2041**
Barking and Dagenham	214,000	230,000	505,000	537,000
Havering	229,000	249,000	370,000	393,000
Newham	244,000	260,000	383,000	407,000
Redbridge	196,000	216,000	151,000	160,000
Total	***883,000***	***955,000***	***1,409,000***	***1,497,000***

2.102 The apportionment targets for East London are significantly higher than the area's projected arisings which demonstrates how East London is expected make a major contribution to the London Plan 2026 net self-sufficiency target.

2.103 The London Plan also sets out management targets for waste generated in London in Policy SI 7 Reducing waste and supporting the circular economy. These targets reflect those in the London Environment Strategy (LES) as follows:

- ensure that there is zero biodegradable or recyclable waste to landfill by 2026
- meet or exceed the municipal waste recycling target of 65 per cent by 2030
- meet or exceed the targets for each of the following waste and material streams:
    - construction and demolition – 95 per cent reuse/recycling/recovery
    - excavation – 95 per cent beneficial use (with 100% inert put to use)

2.104 In addition, in connection with hazardous waste management capacity, paragraph 9.8.18 of the London Plan identifies *'..a need to continue to identify hazardous waste capacity for London.'*

2.105 The London Plan requires boroughs to allocate sufficient land and identify waste management facilities to provide capacity to manage the tonnages of waste apportioned in the plan and to plan for those waste streams not apportioned by the London Plan.

2.106 The London Plan includes a requirement for 'referable applications'[35] to be submitted with a "Circular Economy Statement" that demonstrates how the development will come forward in a manner which is consistent with achieving a circular economy. This includes how much waste the proposed development is expected to generate and where it will be managed. The GLA has published further guidance on the content of Circular Economy Statements[36].

2.107 The London Plan requires boroughs to "allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste". This is in line with the NPPW which requires waste planning authorities to "identify sites and/or areas for new or enhanced waste management facilities". The London Plan identifies existing facilities, Strategic Industrial Locations, Locally Significant Industrial Sites and safeguarded wharves as suitable for new waste facilities.

2.108 The London Plan makes clear that all existing waste sites should be safeguarded and retained in waste use. Paragraph 9.9.1 of the London Plan defines existing waste sites as those with planning permission for waste use or those with an Environment Agency permit.

2.109 The London Plan requires compensatory capacity elsewhere in London if a waste site is redeveloped for another use. Compensatory capacity must be at or above the same level of the waste hierarchy of that which is lost, and that any loss of hazardous waste capacity must be replaced with hazardous waste capacity. Existing waste sites can only be released without re-providing capacity if it can be demonstrated that there is sufficient capacity elsewhere in London and the target of achieving net self-sufficiency is not compromised.

2.110 The London Plan supporting text indicates that boroughs with surplus capacity share this with boroughs facing a shortfall before considering release of sites from safeguarding protection. The London Plan also acknowledges that it may not always be possible for boroughs to meet their apportionment within their boundaries and in these circumstances boroughs will need to agree the *'transfer of apportioned waste'*.

2.111 Furthermore, the London Plan includes policy (Part G of Policy D4 Housing quality and standards) that requires housing to be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) food waste as well as residual waste.

2.112 In December 2018, the London Assembly declared a climate emergency and called on the Mayor of London to do likewise and put in place specific emergency plans for London to achieve carbon neutrality by 2030. The Mayor declared a climate emergency shortly after the Assembly and set a target for London to be net zero-carbon by 2030.

Local Policy

Borough Local Plans and Related Plans and Guidance

2.113 Each Borough has prepared its own Local Plan that includes a Vision, Objectives and planning policies relating to all forms of development in its area. Policies in this Plan are to be considered alongside relevant policies in the Local Plans.

Barking and Dagenham

2.114 Barking and Dagenham's Local Plan was adopted in September 2024. Policy SP2 expects Circular Economy principles to be adopted in the design of new development. Policy SP7 contains strategic-level sustainable waste management principles. Policy DMSI8 addresses demolition, construction and operational waste associated with all forms of new development.

2.115 Other Plans and guidance relating to the management of waste in Barking and Dagenham are as follows:

- Barking and Dagenham Planning Advice Note (PAN3) – Waste and Recycling Provisions
- Barking and Dagenham Reduction and Recycling Plan April 2023 to March 2025

35 Referable applications include those for developments providing 150 residential units, other types of development of 20,000sq.m in central London or 15,000sq.m outside Central London, developments 25m high adjacent to the Thames or 30m high elsewhere in London.
36 https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance

Havering

2.116 Havering's Local Plan was adopted in 2021. The Local Plan relies on the ELWP for the determination of applications for waste management and includes Policy 35: On-site waste management which concerns the provision of suitable arrangements for the separate storage and collection of waste in new development.

2.117 The Havering Reduction and Recycling Plan April 2023 to March 2025 sets out initiatives in Havering intended to reduce waste production and increase recycling.

Newham

2.118 Newham's Local Plan was adopted in 2018. Policy INF3: Waste and Recycling includes sustainable waste management principles, repeats key strategy points from the ELWP pertinent to the Borough, and includes design criteria. The Local Plan is currently being reviewed and a 'Regulation 19' draft submission Plan was published for consultation in July 2024. The draft similarly contains policy relating to waste management which reflects the requirements of the 2021 London Plan policies. See below regarding the application of the London Legacy Development Corporation Local Plan within Newham.

2.119 Other Plans and guidance relating to the management of waste in Newham are as follows:

- Newham Recycling and Waste Collection Policy
- The Newham Recycling, Waste and Street Cleansing Strategy
- Newham Waste Management Guidelines for Architects and Property Developers
- Newham Reduction and Recycling Plan April 2023 to March 2025

Redbridge

2.120 Redbridge's Local Plan 2015-2030 was adopted in 2018. Policy LP17: Delivering Community Infrastructure includes safeguarding of existing waste sites and delivering the "ELWA Joint Waste Development Plan".

2.121 Other Plans and guidance relating to the management of waste in Redbridge are as follows:

- Redbridge Housing Design Supplementary Planning Document
- Redbridge Waste Reduction Strategy 2019
- Redbridge Reduction and Recycling Plan 2023-2025

London Legacy Development Corporation

2.122 The London Legacy Development Corporation (LLDC) is a Mayoral Development Corporation, which covers parts of four London Boroughs including Newham (see Figure 5 below). The LLDC Planning Policy & Decisions Team ceased its function as local planning authority for the LLDC area from midnight on the 30th November 2024, and returned planning powers to the local London Boroughs. The LLDC was both a local planning authority and a waste planning authority for part of Newham, however it was not given a separate apportionment target in the London Plan.

2.123 The LLDC Local Plan was adopted in 2020 and will continue to be implemented as part of the Development Plan for the part of the London Borough of Newham to which it relates until the replacement Newham Local Plan is adopted. It contains Policy S.7 which commits the LLDC to working with its constituent boroughs on matters of strategic waste management and planning, and taking account of their adopted local waste plans.

East London Waste Authority

2.124 The East London Waste Authority (ELWA) is a statutory joint 'waste disposal authority' (WDA) that was established on 1 January 1986 with responsibility for the management of household and commercial waste collected by the East London Boroughs. ELWA is also responsible for providing the public Reuse and Recycling Centres to serve local residents.

2.125 In 1996, ELWA developed its Integrated Waste Management Strategy (IWMS), aimed at dramatically increasing recycling and composting and reducing the amount of waste sent to landfill. In 2002, ELWA signed a 25-year contract with Shanks PLC (now Renewi), to deliver the IWMS. This involved investment of over £100 million in new and improved facilities, new ways to treat and transport waste.

2.126 ELWA worked with the East London Boroughs to develop the 'Joint Strategy for East London's Resources and Waste (2027-57)' (the Joint Strategy), which was formally adopted by all five authorities in early 2022. The Joint Strategy sets out the aims, objectives, priorities and actions for the partner authorities on preventing and reducing waste, increasing reuse and recycling, supporting improvements with infrastructure, and monitoring performance. The Joint Strategy covers a 30-year period from 2027 to 2057 to reflect the timing of the end of ELWA's long-term Integrated Waste Management Services contract, but work is already underway to meet the targets and ambitions set out in the document.

2.127 The ELWA Joint Strategy proposes a joint minimum recycling performance for local authority collected waste of 35% by 2030, with aspirations to reach 50% recycling of household waste. A reduced level of future recycling performance (when compared to its 50% target for London as a whole) was accepted by the GLA in recognition of the issues associated with achieving high recycling rates in flatted development and the fact that 90% of new housing in East London in future will be in the form of flats.

2.128 The Joint Strategy was produced at a time of rapidly evolving national policy changes affecting the waste and resources sector, including proposals for a Deposit Return Scheme for drinks containers, extended producer responsibility for packaging, and the Simpler Recycling agenda that seeks to establish consistent recycling collections across the country. Separate food waste collections for households and businesses will be required to be introduced in East London under these proposals.

2.129 ELWA has begun the procurement of new contracts to replace its long-term IWMS contract from late 2027. A 'disaggregated' approach is being taken, meaning that separate contracts will be let for different types of services rather than one fully-integrated contract. The procurement process will be making sites available for bidders to use and will maintain the four existing Reuse and Recycling Centres. However, the future use of the facilities at Jenkins Lane and Frog Island, which manufacture refuse-derived fuel (RDF) from residual household and commercial waste through mechanical-biological treatment (MBT), will be determined through the procurement process.

2.130 ELWA also maintains a Waste Prevention Programme, working with the East London Boroughs and other partners to deliver a range of projects and services aimed at reducing waste and increasing reuse. The latest Waste Prevention Action Plan is for 202/25 and includes various objectives relating to the reduction of the following waste streams:

- Bulky waste
- Textiles and nappies
- Food waste
- Electronics
- Mixed Organic Waste
- Other waste

Local Climate Change Strategies

2.131 London Borough Barking and Dagenham declared a climate emergency in 2019. London Borough of Havering declared a climate and ecological emergency in 2023. London Borough of Newham declared a climate emergency in 2019. London Borough of Redbridge has an action plan to be carbon neutral by 2030 and carbon zero by 2050.

3 Vision and Objectives

The Vision

3.1 The Vision below describes how the Boroughs envisage how waste, including wastewater[37], will be managed in East London by 2041. The 'Strategic Objectives' explain what needs to be achieved if the vision is to be realised.

3.2 The Vision and Strategic Objectives have drawn on Local Plans and strategies in East London as well as the London Plan and national policies and strategies. Planning policies are linked to the Vision and Strategic Objectives to ensure that development, that affects the way waste is managed and produced, will occur in a manner that helps achieve the Vision and Strategic Objectives.

East London Joint Waste Plan Vision

By 2041, the principles of the circular economy will be fully integrated into all forms of development within East London, resulting in reduced waste production and increased emphasis on repair, refurbishment and reuse including that associated with built structures.

A network of accessible service providers for reuse, repair, and recycling will be in place. Remaining waste will be viewed and managed as a resource, with hazardous properties virtually eliminated in construction and demolition waste. Priority will be given to using recycled materials in construction, and development projects will prioritise waste minimisation.

Sustainable waste management in East London will contribute to the area's regeneration, positioning it as a key part of London's industrial engine and a thriving economic centre. Waste management facilities will be located to protect and enhance communities and the natural environment, and be resilient to climate change. Waste will be managed efficiently by maximising existing capacity of facilities, releasing underutilised or poorly located sites, minimising transportation and using infrastructure established for alternative means of waste movement, in particular via the River Thames.

Net zero in waste management will have been achieved in East London through an understanding, and reduction, of lifecycle carbon impacts and incorporating renewable energy in waste management and transportation.

Sending waste to landfill will be a last resort, occurring only in exceptional circumstances, and any landfill in East London will be considered a strategic resource with carefully managed capacity.

37 Within the Vision and Strategic Objectives the term 'waste management' is taken to include wastewater treatment

Strategic Objectives

East London Joint Waste Plan Strategic Objectives

Strategic Objective 1: Significantly Reduce Waste Production Overall

- Encourage the integration of circular economy principles and the adoption of best practice design and construction approaches, to achieve a significant reduction in waste production by 2041.

Strategic Objective 2: All Built Development Will Contribute to the Achievement of a Fully Functioning Circular Economy by 2041

- Promote the use of circular economy principles in design, construction and development in the built environment, emphasising reduced waste production and increased reuse and repair practices.
- Encourage development to consider and minimise waste during construction and operation, following the waste hierarchy in priority order.
- Enable delivery of development which will help establish a viable and easily accessible network of re-use, repair, and recycling services.
- Foster a shift in perception such that waste materials are viewed as a valuable resource, ensuring sustainable waste management is integral to the development and use of all new development.
- Encourage development that prioritises the use of reused, reusable, recycled and recyclable materials and minimises the use hazardous materials which could result in the production of hazardous waste in construction projects in East London

Strategic Objective 3: Appropriately Locate Waste Management Capacity

- Locate, construct, and operate waste management facilities while protecting and enhancing communities, health, employment, and the natural and historic environment, and ensuring resilience to climate change.

Strategic Objective 4: Contribute to East London's Regeneration and Economic Growth

- Leverage sustainable waste management in a manner that contributes to East London's regeneration and economic growth.
- Ensure high quality restoration and aftercare of landfill sites which maximises benefits to the community and the environment.
- Ensure waste is managed using methods and in locations that contribute to measurable improvements in the natural environment, including biodiversity, of East London.

East London Joint Waste Plan Strategic Objectives *(continued)*

Strategic Objective 5: Achieve Net Zero Waste Management

- Attain net zero in waste management by 2041 by ensuring that whole lifecycle carbon impacts are taken into account in proposals for the management of waste.
- Provide waste management capacity that minimises greenhouse gas production and supports the development of a low carbon economy and decentralised energy.
- Promote development which allows for the exclusive use of renewable energy sources in waste management operations and transportation.

Strategic Objective 6: Optimise Existing Waste Management Capacity

- Realise the full potential of existing waste management capacity in East London, using only the minimum land necessary while ensuring the capability to manage at least the apportionment in the London Plan is maintained.
- Review and release land occupied by poorly located or under-utilised waste management facilities for other uses.

Strategic Objective 7: Minimise Transportation and Establish Alternative Infrastructure

- Minimise the transportation of waste by locating facilities as close as possible to its source
- Safeguard and establish alternative energy efficient transport infrastructure, including River Thames wharves, to allow movement without reliance on fossil fuel-powered HGVs.

Strategic Objective 8: Restrict Landfilling to Exceptional Circumstances

- Ensure the disposal of waste occurs only as a last resort and in exceptional circumstances.
- Ensure any landfill capacity is reserved solely for the disposal of waste which cannot be managed by any other means.

4 Future Requirements for Waste Management Capacity

4.1 In order to establish how much waste management capacity is needed over the Plan period a study[38] was completed that considered the requirements of the London Plan and how well the existing waste management capacity might meet those requirements. It is important to note that this study did not include existing capacity with temporary planning permission or very small sites and on this basis it may be considered to have underestimated existing capacity. The results of the study are set out below:

Management Capacity for Apportioned HIC[39] Waste

4.2 It is estimated that there is currently 2,619,508 tpa of qualifying waste management capacity in East London which is more than sufficient to manage the London Plan apportioned forecast arisings to 2041. This is shown in Table 8 below.

Table 8: Combined apportionment for East London boroughs compared to Estimated Apportionment Capacity in East London (after release of sites)

	2021	2041
Apportionment Forecast	1,409,000	1,497,000
Capacity	2,619,508	2,619,508
Difference	**+1,210,508**	**+1,122,508**

4.3 A sensitivity analysis was undertaken to account for the possible loss of MBT capacity after 2027 and this showed that this loss would not result in a capacity shortfall.

4.4 The surplus capacity for the management of apportioned waste at 2041 is estimated to range between c.0.68 Mtpa (without MBT) and c.1.2Mtpa.

38 East London Joint Waste Plan, Assessment of Existing Waste Management Capacity, BPP Consulting, 2025
39 Local Authority Collected Waste plus Commercial and Industrial waste

Management Capacity for C, D & E Waste

4.5 Based on an extrapolation of the forecast for C, D & E waste arisings included in an earlier report completed in 2022[40], a revised estimate of 2,203,591 tpa was derived for C, D & E waste arising in 2023 through to 2041. Comparing this to an estimate of existing C, D & E waste management capacity to be safeguarded of c.3,185,500 tpa reveals a capacity surplus estimated to be approximately 0.98 Mtpa in 2041.

Management Capacity for Hazardous Waste

4.6 An updated forecast for hazardous waste arisings to 2041 suggests that 72,400 tpa will be produced in 2041. This compares to existing hazardous waste management capacity of 54,000tpa which indicates there is a capacity deficit of approximately c.18,400tpa in 2041.

4.7 However, it should be noted that given the diverse nature of hazardous wastes, there is no policy expectation that individual Plan areas should be net self sufficient for the management of hazardous produced in the area. Instead, existing capacity should be safeguarded and additional capacity be sought in co-operation with other Plan areas. This is set out in the London Plan as follows:

"The main requirement is for sites for regional facilities to be identified. Boroughs will need to work with neighbouring authorities to consider the necessary facilities when planning for their hazardous waste." (paragraph 9.8.18)

4.8 Therefore, the estimated shortfall is not considered to be a barrier to release of other sites, or impose a requirement to provide for additional capacity through allocation in the ELJWP.

40 Evidence Base for the East London Joint Waste Plan, Anthesis, November 2022

Requirements for landfill

4.9 Non-hazardous waste will continue to be diverted from landfill due to the landfill tax escalator and other initiatives, slowing the depletion of available void space in existing sites. This helps to preserve remaining landfill capacity. When landfill operations at Rainham cease, the anticipated demand for non-inert landfill capacity in East London could potentially be met by landfills outside the Plan area.

4.10 Monitoring of landfill availability, and ongoing liaison with relevant WPAs will help ensure sufficient capacity is planned for while the Plan's focus remains on reducing the area's non-hazardous landfill requirement to an absolute minimum in line with the national residual waste reduction target.

Providing for Unmet Needs for Waste Capacity from Elsewhere within London

4.11 The London Plan[41] expects Boroughs with existing waste management capacity which exceeds their management needs (as prescribed by the London Plan), to offer to share the surplus with other London Boroughs that may be facing a shortfall when planning to meet the waste management needs of their Plan areas, before considering release of sites from waste use. In light of the identified surplus in C, D & E waste and apportioned HIC waste management capacity, the Boroughs invited other London boroughs to consider whether the surplus in East London might offer an opportunity for their unmet needs to be met. It should be noted that the most recent dataset for 2023 shows significant tonnages of waste that arise from outside the ELJWP area are managed at facilities located within the ELJWP area (hence the existence of the identified capacity surplus).

4.12 Any agreements on sharing capacity will be formalised in a Statement of Common Ground (or similar) to which all the East London Boroughs party to the ELJWP, and the Borough (or other Plan making entity) seeking to share East London capacity will be signatories. Such agreements would cover a specified period (which may be less than the period of this Plan) and be subject to review and renegotiation, including as part of future reviews of the ELJWP. Such agreements will be reported in the East London Boroughs' Authority Monitoring Reports.

41 Paragraph 9.8.6, London Plan 2021

5 Sites for Waste Management

5.1 As noted in section 4.0 above, there is sufficient waste management capacity in East London to meet requirements for C, D & E Waste and HIC over the plan period. In light of this the Plan:

1. Does not allocate specific areas of land for the development of additional waste management facilities;
2. does not expressly safeguard several existing waste management sites where such safeguarding protection would hinder the wider development aims of the Boroughs. For example, where existing waste facilities are situated on land that has been earmarked by the Boroughs for other forms of development in their adopted and emerging Local Plans; and,
3. safeguards all other existing waste sites with in accordance with Policy JWP2.

5.2 Safeguarded sites are listed in Appendix 2 with maps and further details included in Appendix 3. The safeguarding policy is included in section 6.0 below as Policy JWP2. JWP2 also sets out the circumstances when proposals for additional waste management capacity might be acceptable.

5.3 Existing sites identified for redevelopment in Borough Plans for non waste uses (and so not safeguarded) are listed in Table 9 below. The loss of these sites was considered in a separate report[42]. The assessment of existing waste management capacity, outlined in Section 4.0 above, factored in the loss of these sites.

Table 9: Existing Waste Sites Released from Safeguarding

Borough	Site	Permitted Use	Assessed Peak Waste Capacity (tpa)
Barking & Dagenham	Barking Eurohub, Box Lane, Barking (D B Cargo)	Transfer Station taking Non-Biodegradable Wastes	c313,500
Barking & Dagenham	Barking Eurohub, Box Lane, Annex to Shed A (Titan Waste)	Non Haz Waste Transfer / Treatment	c36,000

42 Safeguarded Sites for Release – Assessment Report, BPP Consulting, 2025

Borough	Site	Permitted Use	Assessed Peak Waste Capacity (tpa)
Barking & Dagenham	Old Bus Depot, Perry Road	Non Haz Waste Transfer / Treatment	c56,000 (CDEW) c22,000 (HIC)
Newham	Connolleys Yard, Unit 5c Thames Road, London, E16 2EZ	Metal Recycling Site	c35,000

5.4 The Plan also identifies additional existing waste management sites which might make good candidates for redevelopment for non-waste uses in future. These sites are listed in Appendix 4.The capacity assessment shows sufficient surplus to allow release of these sites, without the objectives of the Plan or that of the London Plan being compromised and on this basis the host boroughs may plan for the release of these sites through the allocation of sites in updated Local Plans. The assessed capacity of these sites is approximately 310,000 tpa in total (see Appendix 4 for capacity split) and so a surplus of at least this quantity will be safeguarded as compensatory capacity to facilitate their future release.

5.5 Available capacity will be monitored over the Plan period, taking account of any agreements reached with other boroughs and any future release of Appendix 4 sites. This assessment of capacity will be reported periodically through the joint AMR.

6 Policies

6.1 The policies set out below are applied when making decisions on the suitability of proposals for development in East London. All the policies apply to proposals relating to waste management and Policies JWP 1 and JWP 3 apply to all forms of development. Parts of Policy JWP 2 apply to proposals which involve the redevelopment of existing waste management facilities.

6.2 Relevant policies included in the adopted Local Plan of the Borough in which the proposal is located are also applied. Such policies may relate to wider issues concerning the protection and enhancement of communities and the natural environment. In some cases, there may be overlap between the policies of the Borough's Local Plans and the policies in this Plan, where this occurs the latest policy to have been adopted will take precedence.

6.3 Table 10 below shows how the Strategic Objectives of this plan are implemented by the policies.

Table 10: Relationship Between Strategic Objectives and Policies

Strategic Objective	Related Policies
Strategic Objective 1: Establish a Fully Functioning Circular Economy by 2040	Policy JWP1: Circular Economy
Strategic Objective 2: All Built Development Will Contribute to the Achievement of a Fully Functioning Circular Economy by 2041	Policy JWP1: Circular Economy Policy JWP4: Design of Waste Management Facilities
Strategic Objective 3: Appropriately Locate Waste Management Capacity	Policy JWP2: Safeguarding and Provision of Waste Capacity Policy JWP2B: Safeguarding and Provision of Wastewater Treatment Capacity Policy JWP 3 Prevention of Encroachment Policy JWP5: Energy from Waste Policy JWP6: Deposit of Waste on Land
Strategic Objective 4: Contribute to East London's Regeneration and Economic Growth	Policy JWP1: Circular Economy Policy JWP2: Safeguarding and Provision of Waste Capacity Policy JWP2B: Safeguarding and Provision of Wastewater Treatment Capacity Policy JWP4: Design of Waste Management Facilities Policy JWP5: Energy from Waste Policy JWP6: Deposit of Waste on Land

Strategic Objective	Related Policies
Strategic Objective 5: Achieve Net Zero Waste Management	Policy JWP1: Circular Economy Policy JWP4: Design of Waste Management Facilities Policy JWP5: Energy from Waste Policy JWP6: Deposit of Waste on Land
Strategic Objective 6: Optimise Existing Waste Management Capacity	Policy JWP2: Safeguarding and Provision of Waste Capacity Policy JWP2B: Safeguarding and Provision of Wastewater Treatment Capacity Policy JWP 3 Prevention of Encroachment
Strategic Objective 7: Minimise Transportation and Establish Alternative Infrastructure	Policy JWP4: Design of Waste Management Facilities Policy JWP5: Energy from Waste
Strategic Objective 8: Restrict Landfilling to Exceptional Circumstances	Policy JWP6: Deposit of Waste on Land

Policy JWP1: Circular Economy

Purpose of Policy

To encourage and support development that is consistent with the achievement of a circular economy by, amongst other things, requiring all forms of development (not just those concerned primarily with the management of waste) to demonstrate that it will not result in the production of waste that practically could have been prevented over its lifespan.

6.4 Many forms of development are key to facilitating a Circular Economy in the ways they provide for goods and materials to be re-used, repaired and refurbished. Examples include the following:

- Repair/refurbishment workshops;
- other uses associated with repair of products e.g. tailors;
- shops selling second hand goods;
- lending libraries (e.g. 'Library of things');
- hire shops; and
- 'reuse hubs'.

6.5 While these types of development are considered 'everyday', they have a key role to play in a circular economy and it is important that their contribution is recognised. In many cases such development is covered by general land use classes, however where specific decisions are needed on proposals, support will be provided for development which incorporates such uses in suitable locations. Newham is currently exploring the concept of dedicated 'Circular Economy Construction Hubs' which may be developed to offer space for the storage, sorting, testing and redistribution of reclaimed construction materials; a centre for the repair, remanufacture and retail of reclaimed building components, and potentially consumer items (i.e. paint, timber etc); as well as related training and skills development (e.g. training in specific trades related to construction with emphasis on repair and use of reused, recycled and low carbon materials).

6.6 Goods and materials that have become waste will have been produced and transported usually using energy that was derived from fossil fuels and so resulting in carbon emissions. The carbon associated with this energy is known as ‘embodied carbon’ and when waste materials are disposed of, it is not only the materials that are wasted but also the energy and hence the associated embodied carbon cost. Vast amounts of energy have been used in the production of materials, e.g. steel, glass, concrete, used in buildings (including in their construction). Waste relating to development activity is therefore intrinsically linked to carbon emissions and associated climate change.

6.7 It is increasingly acknowledged that even though older structures might not be as energy efficient during their use phase, the carbon footprint of constructing a new, energy efficient building may exceed any savings achieved during its operational phase, particularly where retrofitting measures to improve energy efficiency is possible.

6.8 The quantity and the nature of waste resulting from built development relates directly to how a building is designed. It is expected that proposals will be accompanied by an assessment that shows why the service, e.g. housing, provided by the development is genuinely needed and cannot be met in a way that does not involve demolition of existing buildings and/or the construction of new ones. Consideration of whether existing development can be refurbished and/or put to the required use should occur at the earliest design concept stage.

6.9 The London Plan recognises that ‘London should move to a more circular economy’. Policy SI 7 expects proposals for development which are of such a size and nature that they are referrable to the Mayor, to be ‘net zero waste’. To demonstrate consistency with Policy SI 7, ‘Circular Economy Statements’ are required to be submitted with referrable applications. The London Plan supports boroughs who adopt lower thresholds for requiring Circular Economy Statements in their Local Plans. Lower thresholds are included in this Plan such that all proposals for major development should be accompanied by a Circular Economy Statement.

6.10 A shift in mindset is needed to ensure that circular economy principles are integral to thinking around the provision of built development that is needed to meet society’s needs. To that end, where it is practicable to do so and the health and safety of visitors can be safeguarded, major waste proposals are expected to provide opportunities to educate their employees and the local communities that they serve about the importance of moving towards a circular economy and how this can be achieved.

Policy JWP1: Circular Economy

A. Development that constitutes or incorporates activities compatible with the circular economy will be encouraged.

B. All development should follow the principles of a circular economy during construction and operation phases, which includes:

1. **Preserving and repurposing existing structures where practical and appropriate; or**
2. **demonstrating that repurposing existing built development is not practicable and/or consistent with Development Plan objectives and/or the best environmental option; and**
3. **reducing the generation of construction, demolition, and excavation waste and managing any such waste that arises from the development in accordance with the waste hierarchy and on the site of production where practicable; and**
4. **designing for flexibility and longevity, recyclability, repurposing and refurbishment; and,**
5. **using sustainable construction methods, including maximising the use of reused, recycled and recyclable materials and techniques that reduce waste and facilitate the deconstruction and reuse of building components.**

For major developments, this should be demonstrated through the submission of a Circular Economy Statement. All proposals should set out how waste arising from demolition (if applicable) and construction will be managed in a Site Waste Management Plan which, as appropriate, should incorporate a Pre-demolition Audit.

C. New development (not including minor householder applications) should include detailed consideration of waste arising from its occupation and/or use including how waste will be stored, collected and managed through a Recycling and Waste Management Strategy that demonstrates:

1. **Sufficient storage space will be provided to accommodate source separation and separate storage of recyclable materials; and,**
2. **Waste will be stored in accordance with 'Secure by Design' principles; and,**
3. **in flatted development and houses in multiple occupation, sufficient temporary on site storage, including for separated recyclables (including food waste) until it is collected; and,**
4. **storage and collection systems (such as dedicated spaces, storage areas, chutes, or underground waste collection systems) will ensure adequate and convenient access for all users and waste collection operatives, ease of maintenance and separation collection of recyclable materials and reusable items; and,**
5. **systems and infrastructure will be monitored and maintained including contingency arrangements for system/infrastructure failures; and,**
6. **for applications referable to the Mayor of London, temporary storage space for items for reuse.**

D. Where practical, major waste sites should incorporate facilities for visitors to allow educational opportunities relating to the circular economy.

Implementation

6.12 Where it is demonstrated that new development is necessary, issues needing consideration to ensure that the development is compatible with the circular economy, include:

- the efficient use of land – how well development is designed to ensure the use of the land where it is located is optimised;
- the resilience of development i.e. will it last. This not only concerns sound construction but also relates to how easily a building can be adapted to meet different requirements over time;
- how a building will be dismantled at the end of its life and whether components and materials can be easily reused and recycled;
- consumption of materials, not just in construction but also in its use, and how renewable those materials are;
- reduction of waste, through modular construction, project and materials management and procurement;
- the management of waste arising from demolition and construction as high on the waste hierarchy as possible. This also relates to the materials used in construction, for example how easily surplus material can be re-used;
- the design of the development to provide for waste which arises during its use and occupation to be managed in accordance with the waste hierarchy.

6.13 Major development proposals (including waste management) should include a Circular Economy Statement showing how the matters set out in Policy JWP1 have been taken into account. This statement should be prepared in accordance with the related GLA guidance[43] (and any update) and, amongst other things, include a waste management audit outlining plans for waste handling throughout construction, including any demolition and refurbishment, as well as during the development's occupation and use. Where required, it is recommended that Circular Economy Statements be prepared alongside Whole Lifecycle Carbon Assessments.

43 Circular Economy Statement Guidance, GLA, 2022

6.14 Non major development proposals should be submitted with a Site Waste Management Plan which details how waste arising from construction, demolition and excavation will be minimised and then how any waste which does arise will be managed in accordance with the waste hierarchy. Site Waste Management Plans must include targets for retaining, reusing, or recycling materials arising for the development. Ideally these should link to online databases of reclaimed materials (e.g. the Excess Material Exchange[44]) where developers list materials on web-based platforms and network locally to salvage and reuse materials.

6.15 Development proposals involving demolition are required to be supported by a 'Pre-demolition Audit'. The 'Pre-demolition Audit' is a survey conducted on existing buildings, structures, and hard-standing surfaces before demolition or major redevelopment that identifies the type and volume of materials that will arise as a result of deconstruction. The audit will support preparation of Circular Economy Statements, Site Waste Management Plans and Whole Lifecycle Carbon Assessments.

6.16 Waste Management Strategies are required to be submitted with non major development that considers the types of waste that will be produced during the occupation and use of the development and how this will be managed. A template of a Waste Management Strategy is included with the Tower Hamlets Reuse and Recycling Supplementary Planning Document. While this document was prepared by a different London Borough, it was prepared with the support of the London-wide waste advisory organisation 'ReLondon' and is currently considered to represent best practice. This document also includes information on best practice approaches to maximising recycling (e.g. provision of signage) and specifies the space that should be provided for storage of waste in development pending its collection for off site management. Similar related guidance prepared by the East London Boroughs should be referred to such as the Newham Waste Management Guidelines for Architects and Property Developers (2024). Thresholds for sizes of development requiring certain arrangements for waste management included in Local Plans should be followed. Flatted development above shops is known to present particular challenges and it is important that proper provision of the storage and collection of waste is considered at the earliest stage of design.

6.17 The documentation provided with planning applications should demonstrate how the development is designed to achieve:

1. The following rates of recycling:

Type of development	Dry Mixed Recyclables	Food Waste	Other wastes (non-household waste)	Overall recycling rate
Houses	50%[45]	50%	-	50%
Flats	50%	50%	-	50%
Shops	-	-	65%	65%
Offices	-	-	65%	65%
Light industrial	-	-	65%	65%
Heavy industrial	-	-	65%	65%

2. Zero biodegradable or recyclable waste to landfill by 2026: and,
3. 95% recycling of Construction, Demolition and Excavation waste

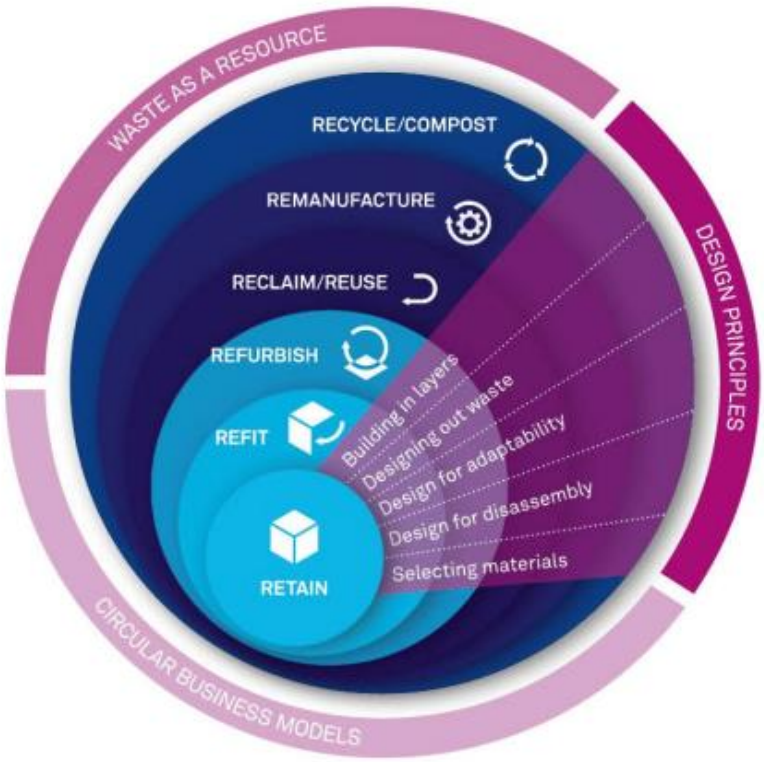
6.18 In order to maximise the opportunities for residents to reuse and recycle their household waste, planning applications involving additional residential development[46] should include the following details:

- Measures to be taken to show compliance with this policy and potential future collection arrangements e.g. food waste; and
- the details of the nature and quantity of any construction, demolition and excavation waste which will arise from the development and its subsequent management.

6.19 Figure 9 below illustrates approaches related to the circular economy and the built environment.

44 Excess Materials Exchange, London Borough of Enfield
45 ELWA Strategy Borough / LES Household Recycling Aspiration
46 Excluding householder applications; reserved matters applications; minor extensions; and non-material amendments to current planning permissions

Figure 9 Circular Economy hierarchy for building approaches (from London Plan Policy D3 Figure 3.2)[47]



6.20 The optimal use of land is particularly important in the more built-up areas of East London and policies in the Boroughs' Local Plans seek to address this as appropriate.

6.21 Efficient modular off-site construction methods are now commonly used as a means of minimising the wastage of materials used in construction.

6.22 In 2023, the UK Government announced it's 'Simpler Recycling' initiative which is a plan to standardise recycling across England which includes the following:

1. Consistent Collection of Materials: Both local authorities and businesses in England are required to collect a consistent set of materials for recycling. These include dry recyclables such as glass, metal, plastic (including plastic film), paper and card, and organics like food waste and garden waste.
2. Flexibility in Collection Methods: Local authorities have the flexibility in the method of collection for dry recyclables in terms of level of separation and

47 Source: Building Revolutions (2016), David Cheshire, RIBA publishing©

number/type of container. An exemption would allow authorities to collect dry recyclables co-mingled.

3. Weekly Food Waste Collection: Collection authorities will be required to collect food waste weekly. The preference is for food waste to be treated by anaerobic digestion.
4. Fortnightly Residual Waste Collection: A The government is proposal to ing the requirement for residual waste to be collected at least fortnightly.
5. Designing Business Premises for Waste Storage: Business premises must be designed with sufficient space for the storage of materials to be separately collected.

6.23 Where these requirements are not already in place, they will be brought in by March 2026 and this confirms the need for all buildings to be designed with sufficient space to allow for the separate collection and storage of these materials. All Boroughs provide separate collection of recyclable materials and the ELWA strategy anticipates 'separate food waste collections for street level properties and blocks of flats, in line with anticipated regulations and Government guidance'.

6.24 Different storage and collection systems are needed for different types of development, for example, the Barking Riverside mixed use development incorporates a vacuum system for collecting waste from apartments. The system processes three fractions: residual, cardboard and dry recyclables and reduces the need for storage facilities (460 collection inlets replace 19,000 traditional bins) and vehicle movements.

6.25 Proposals should be consistent with the police 'Secured By Design' initiative which demonstrates, for example, how the need for security (e.g. gating, doorsets/windows, access control/counter terrorism measures, lighting and CCTV etc.) measures has been considered for development proposals where bin stores are incorporated.

6.26 Proposals for 'Circular Economy Construction Hubs' which provide dedicated space and facilities for the storage and repair of waste materials, as well as opportunities for the development of skills needed to achieve a circular economy e.g. repair workshops, are encouraged.

Policy JWP2: Safeguarding and Provision of Waste Capacity

Purpose of Policy

To ensure that:

- Existing consented waste management sites are appropriately safeguarded from loss to non waste uses;
- additional waste management capacity is consented on a limited basis, to meet specific needs in certain circumstances such that unnecessary capacity is not developed;
- existing waste management sites fulfil their potential to maximise the management of waste in accordance with the waste hierarchy and other relevant objectives; and,
- waste management facilities are only developed in locations where the environment and communities will be protected and enhanced.

Safeguarding of existing waste management capacity

6.27 This policy (and supporting text) concerns the management of solid and liquid waste. Policy JWP2B concerns the management of wastewater.

6.28 The purpose of safeguarding waste management sites is to maintain waste management capacity that contributes to meeting the objectives and targets for waste management set out in the Plan.

6.29 The 2021 London Plan allows existing waste management sites to be redeveloped for non-waste uses if an equivalent amount of management capacity is established and/or if there is already sufficient capacity to allow London Plan objectives to be met elsewhere in London[48]. Compensatory capacity should be based on the highest throughput achieved by the site in question over the past five years, or, if such data is unavailable, an appropriate assessment of potential capacity. The Environment Agency's Waste Data Interrogator tool is recommended for this assessment for sites that have been operational.

48 London Plan Policy SI9 and paragraph 9.9.3

6.30 Existing waste sites are defined by the London Plan as sites that benefit from permanent planning permission that expressly consents the management of waste, and sites subject to an Environmental Permit that permit a waste management activity. The London Plan definition does not include sites with a use that is lawful by virtue of time where a particular area of land has been continuously used for a specific waste related activity and is therefore immune from enforcement action. The lawful status of such sites can be confirmed by issue of a Certificate of Lawful Existing Use or Development (CLEUD). This Plan safeguards such sites along with sites with planning permission for a waste use.

6.31 In the case of sites for which a CLEUD has not been granted, evidence of the activity taking place continuously for 10 years or more, for example an Environmental Permit covering the same area and activity issued over 10 years ago, has been taken to establish a waste use deemed to be lawful over time for the purpose of application of this policy. In addition, in order to avoid the safeguarding of sites that make a minor contribution to capacity in East London that may inhibit redevelopment schemes, sites that consistently managed less than 500 tonnes a year and were not providing specialist waste management capacity have been excluded.

6.32 Under the London Plan definition of an existing waste use, sites which do not have planning permission specifically for a waste use but are subject to an Environmental Permit would be safeguarded. Sites safeguarded by virtue of an Environmental Permit alone would lose their safeguarded status if/when the Permit ceases to exist. This may be by the permit holder choosing to surrender the permit or where the permit holder ceases to exist, such as a company becoming insolvent. Since 2012 the grant of an Environmental Permit by the Environment Agency can occur independently of the land-use planning system. This means, an Environmental Permit may be granted for an activity that is unlawful under the planning system, 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. Therefore, this Plan does not safeguard such sites, although they remain safeguarded under the London Plan until the relevant permit ceases to exist, or until such time as the London Plan definition changes.

6.33 Some sites may have a time limited planning permission for a waste management use and the temporary nature of the permission means that it has been determined that it is not desirable for the use permitted to continue beyond a certain date. For this reason, sites with time limited planning permission are only safeguarded by the ELJWP up to the date on which the permission expires. This is regardless of the status of any related Environmental Permit for the site e.g. if it has been surrendered. In addition, in cases where land on which the waste use is lawful under the land use planning system and land covered by an Environmental Permit don't align, the area to which the lawful use under planning applies is taken as that to be safeguarded. Finally, where a site is subject to planning enforcement action against the continued use, safeguarding will not take effect/is held in abeyance until the matter has been resolved regardless of permitted status.

6.34 As noted in Section 5.0, a small number of existing waste sites have not been safeguarded on the basis that their re-development will achieve wider planning objectives and will not significantly impact the achievement of the London Plan strategic objective of net self sufficiency and this Plan's objectives for the management of waste. These sites are identified in Table 9.

6.35 Sites that are not safeguarded by this Plan but are subject to Environmental Permits are still safeguarded by virtue of the existing Policy SI9 of the current London Plan and so the policy applies to proposals for redevelopment of such sites until such time as the Environmental Permit is surrendered/ceases to exist. Any relevant changes to the London Plan approach to safeguarding would then apply to sites not expressly safeguarded by this Plan.

6.36 An assessment of the capacity for each safeguarded site in East London was undertaken and included in a separate Waste Management Capacity Assessment[49].

6.37 Applicants seeking permission to redevelop an existing safeguarded waste site for a non-waste use in East London will need to demonstrate that other existing waste sites already provide sufficient capacity to meet both the apportionment targets for the Plan area and the net self-sufficiency target for the city as a whole or that they have secured appropriate compensatory, replacement capacity before the change in use will be permitted. Replacement capacity can be achieved either by enhancing an existing safeguarded waste site or through securing a compensatory site capable of managing at least the assessed peak annual throughput, as per Policy JWP2 requirements.

6.38 Replacement capacity must be at least equivalent in terms of: Type of waste managed (HIC (LACW & C&I), C, D & E, Hazardous); throughput (lower throughput for management further up the hierarchy than that being lost may be acceptable); and position on the waste hierarchy.

6.39 There must also be no existing, or proposed developments that could constrain the operation of the replacement capacity such that the required capacity might not be realistically achieved.

6.40 Boroughs will enforce this through conditions or legal agreements to ensure that compensatory capacity is confirmed and delivered before a permission that results in a change of a safeguarded waste site to a different use is implemented. In accordance with Policy SI 9 of the 2021 London Plan, this additional capacity should be located in London (unless the nature of the facility to be lost is such that it serves a larger than regional catchment) and ideally within the Plan area.

6.41 The provision of compensatory capacity in East London for the loss of waste capacity outside the Plan area will not typically be permitted unless there is clear justification. Such justification should include the following:

- the compensatory provision is necessary for London to manage its waste sustainably and achieve net self-sufficiency;
- the capacity lost cannot be provided through adapting or intensifying existing facilities within that Plan area;
- no suitable alternative sites are available for the development of additional waste capacity within the host Plan area (in which the waste site is proposed for redevelopment); and,
- the proposed compensatory provision would manage waste as high up the waste hierarchy as practically feasible.

6.42 Development of new and/or re-purposing of an existing waste management facility that reduces overall throughput of an existing site may be acceptable where this enables management of the waste further up the waste hierarchy. This should be demonstrated through supporting evidence including:

- A list of the types of waste that would be managed at the facility;
- The type of management that will be undertaken and its place on the hierarchy;
- How the waste being managed will be managed as high up the hierarchy as practicable; and,

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49 See East London Waste Capacity Assessment, 2025, BPP Consulting

- Ongoing management arrangements to ensure that the waste hierarchy continues to be applied.

Need for additional capacity and waste hierarchy

6.43 'Waste management capacity' is the amount of waste that can be managed at a site or facility (generally measured in tonnes per annum throughput, or, for permanent deposit to land e.g. landfill, may be overall volume in cubic metres).

6.44 The most recent waste management capacity assessments[50] demonstrate that there is a surplus of capacity needed for the management of current and forecast future waste arisings in East London. Therefore, there is no need for development of additional capacity to meet the London Plan apportionments within the Plan area. The capacity of sites that are safeguarded for waste use[51] exceeds that required over the Plan period. This provides a degree of flexibility should waste management requirements change.

6.45 However, there may be scope for development of additional capacity, including through intensification of existing sites, to provide for management further up the waste hierarchy, for example waste managed through MBT to RDF, might otherwise be managed through a MRF and recycled. The potential loss of MBT capacity (as contracts end) may also require provision of replacement or new capacity.

50 See East London Waste Capacity Assessment, 2025, BPP Consulting
51 See Appendices 2 and 3.

Location

6.46 The London Plan (Policy SI8 B4) identifies suitable locations for waste management as existing waste sites, especially transfer facilities, where capacity can be maximized, Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs), and safeguarded wharves with existing or potential for waste management.

6.47 While existing capacity is adequate to meet management needs over the Plan period, development of new capacity, for example to move waste management up the waste hierarchy or to provide compensatory capacity, might be acceptable where it is located on existing waste sites, or on industrial land identified as suitable in Borough Local plans, where these are consistent with other policies of the development plan including those protecting the environment, health and amenity.

6.48 Impacts on ease of transport and air quality caused by congestion and HGV movements are key areas of concern for local communities. Preferred locations are therefore those close to railheads and wharves and/ or close to the strategic road network (motorways and trunk and principal roads). It is also important that the full potential of locations which allow for non-road modes of transport I.e. by rail and waste, are utilised and transport of waste by road is minimised.

Policy JWP2: Safeguarding and Provision of Waste Capacity

Safeguarding existing capacity

A. Existing waste sites safeguarded from non-waste development are listed in Appendix 2 and detailed in Appendix 3 (hereinafter referred to as "safeguarded waste sites"). If a waste site does not have express planning permission for a waste management use, benefit from a CLEUD or have become lawful over time and is safeguarded under London Plan policy only by virtue of it having an Environmental Permit for a waste activity, the site will cease to be safeguarded if/when the Environmental Permit is surrendered/ceases to exist. Where a site benefits from a time limited planning permission, the site will cease to be safeguarded on the date when the planning permission expires, regardless of its permitted status.

B. Development that would lead to the loss of capacity and/or constrain current operations of a safeguarded waste site or future committed operations subject to an active planning permission[52A] will not be permitted unless:

1. **it can be demonstrated that equivalent, suitable, and appropriate compensatory capacity is provided within the Borough where the site is located, or if this is demonstrated not to be possible, elsewhere in East London, or finally, elsewhere in London; or**
2. **it has been demonstrated that the capacity of the facility to be lost would not compromise the ability of London to meet the London Plan objective of net self sufficiency for London as a whole.**

Overarching need for new capacity

C. Proposals for the management of HIC waste (LACW and C&I waste) which would result in waste management capacity exceeding that required to meet the London Plan apportionment for East London and any proposals for the management of other waste streams beyond those needed to meet Plan targets, will not be permitted unless they would:

1. **Provide appropriate compensation for the loss of existing capacity which is needed for London to be net self-sufficient in waste management capacity overall; or**
2. **result in waste being dealt with further up the hierarchy (unless a life cycle assessment demonstrates that the method of management proposed is appropriate); and,**
3. **subject to criterion C2 above, increase the throughput of an existing waste management facility; or**
4. **consolidate waste management activities taking place at more than one site in East London at a single location (subject to cumulative impacts being acceptable and compliance with other policies in the Development Plan).**

52A ‘Active planning permission’ refers to planning permission granted for waste management use which may or may not have been implemented or be operational, and the permission is still valid i.e. it is within the time limit for implementation

Waste hierarchy and location

D. Subject to criterion C above, proposals for waste management uses, including changes to the operation and layout of safeguarded waste sites, will be permitted where it is demonstrated that:

1. **The waste to be managed could not practically be avoided or managed by a means further up the waste hierarchy unless a life cycle assessment demonstrates that the method of management proposed is appropriate; and,**
2. **by-products and residues are minimised; and,**
3. **any proposed decrease in the throughput of safeguarded waste sites would result in waste being managed further up the waste hierarchy.**
4. **The proposal will:**
    - i. **Minimise transportation of waste by being well located in relation to the sources of waste to be managed; and,**
    - ii. **have good access to railheads and wharves and utilise non road modes of transportation or demonstrate why this would not be practicable; and,**
    - iii. **Subject to criteria i., have good access to the road network and will not cause unacceptable adverse effects on the road network; and,**
    - iv. **avoid creating an undue amenity impact on existing permitted non-waste uses, or land allocated, or land with permission for non-waste uses that could conflict with the proposed waste management use; and,**
    - v. **for energy from waste facilities, be close to current or future heat users or networks and locations where resultant carbon may be captured for use; and,**
    - vi. **for operations which generate bioaerosols (like composting), be situated at least 250m from sensitive receptors.**
5. **In the following priority order, the proposal is situated:**
    - i. **On a safeguarded existing waste site; or**
    - ii. **where it is demonstrated that the use could not be located on an existing safeguarded waste site, in a Strategic Industrial Location (SIL); or**
    - iii. **where it is demonstrated that the use could not be located in a SIL, in a Local Industrial Location (LIL) as appropriate.**

6. Where it is demonstrated that SIL and LIL is not available, and that the proposal is consistent with all other policies in the Development Plan, proposals may be permitted in the following locations:

- **i. In or near safeguarded waste sites especially where this enables synergistic relationships between facilities; or,**
- **ii. Local Plan allocations identified as suitable for industrial uses; or,**
- **iii. previously developed, contaminated, or brownfield land not allocated for other non-industrial uses; or,**
- **iv. redundant agricultural and forestry structures and their surroundings; and,**
- **v. where composting or anaerobic digestion is proposed, farm properties where the resulting compost/digestate will be utilised including on adjacent land.**

E. Proposals on greenfield land will not be permitted unless it can be demonstrated that special circumstances require that the proposed waste management development is particularly needed in that location.

F. Proposals must be in accordance with other policies of this Plan, in particular Policy JWP4 relating to the protection of residential amenity, together with other relevant policies of the appropriate borough's Development Plan.

Implementation

6.49 This policy applies to sites where the management of controlled waste takes place. Policy JWP2B below is concerned with the safeguarding and provision of capacity relating to the treatment of wastewater.

Safeguarding of existing capacity

6.50 At the time of the Plan's adoption, safeguarded existing waste sites are those listed in Appendix 2 and detailed in Appendix 3. During the plan period changes such as new sites being granted planning permission may occur, which will result in a change to the available management capacity in East London. Details of any changes in capacity, including provision of additional capacity, will be reported through the Boroughs' Authority Monitoring Reports. Compensatory capacity relied upon to justify release of any safeguarded waste site capacity will also be recorded. Appendices 2 and 3 of the Plan will be shown as updated in the Authority Monitoring Reports to reflect and consolidate these changes on an occasional basis.

6.51 Applicants for development that would result in loss or reduction in capacity of lawful existing waste management sites and facilities are required to demonstrate that either there is sufficient capacity remaining to meet both the apportionments for the Plan area and achieve net self-sufficiency for the city as a whole, or that compensatory capacity has been secured, preferably within the Borough, the Plan area, or, failing that, in London. This will be applied through condition(s) for retention, and provision, of on-site capacity and/or legal obligations securing off-site provision. Consideration of impacts of other development on existing sites extends to the potential impacts on future 'committed' operations and development at the site which includes development with an active planning permission which has not been implemented.

6.52 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.

6.53 Through the plan-making process described in paragraphs 6.29 to 6.36 above, a number of existing waste sites have been omitted from the list of safeguarded sites in Appendix 2.

6.54 If it is demonstrated that the capacity proposed to be lost is not actually required to for the objectives of this Plan and the London Plan to be met, for example if up to date monitoring of the London Plan indicates that net self-sufficiency in London has been achieved, then a site may be released without compensatory provision being made.

6.55 Due to pressures for development on land in East London, some of the safeguarded existing waste management sites which may be more suitable for release in the longer term have been identified in Appendix 4.

Waste Hierarchy and Location

6.56 In most cases, management of waste in accordance with the waste hierarchy results in the least impact, on environment and communities. However, there may be circumstances where it is appropriate to deviate from the waste hierarchy. An example of this is the management of food waste by anaerobic digestion. Anaerobic digestion is currently categorized within the 'other recovery' tier of the waste hierarchy. LCA studies[52] have shown that management of food waste in this way is the best environmental option being more acceptable than composting. Policy JWP2 allows for other such instances where LCA demonstrates that waste is better managed at a lower level of the waste hierarchy.

6.57 Proposals will show how the use of non-road forms of transport has been considered and, if necessary, why this has been ruled out. Proposals will need to show how transport by road will be minimised and how the strategic road network has been utilised to help manage and mitigate impacts on road safety and congestion. Proposals should demonstrate that the highway network is able to accommodate the traffic flows that would be generated.

6.58 The term 'greenfield land' in Policy JWP 2 means land that has not been previously developed or built upon. Typically found in rural or semi-rural areas, greenfield sites are undeveloped agricultural or natural spaces that may be considered for development. These areas include Metropolitan Open Land (MOL) and other Borough green spaces and contrast with "brownfield land," which refers to previously developed sites that may be reused or redeveloped. Other development plan policies on development on such greenfield land including MOL and development within the Green Belt will also apply.

52 LCA is widely used to compare different waste management options, such as recycling, landfilling, composting, and incineration. LCA evaluates all aspects of the management option and compares the impacts on the environment of each aspect.

Policy JWP2B: Safeguarding and Provision of Wastewater Treatment Capacity

Purpose of Policy

To ensure that:

- Existing consented wastewater treatment (including sludge management) facilities are safeguarded from loss to non-wastewater treatment uses;
- additional wastewater treatment capacity is consented to meet specific needs in certain circumstances such that unnecessary capacity is not developed;
- existing wastewater treatment facilities fulfil their potential to maximise the treatment of wastewater in accordance with relevant objectives; and,
- wastewater treatment facilities are developed in a manner which ensures the environment and communities will be protected and enhanced.

Safeguarding of wastewater treatment capacity

6.59 The ability to treat wastewater is an essential element of all forms of development and so related capacity must be protected from redevelopment by other uses. The redevelopment of all wastewater treatment infrastructure is therefore not permitted other than in exceptional circumstances and only when alternative suitable compensatory capacity has been identified. Boroughs will enforce this through conditions or legal agreements to ensure that compensatory capacity is confirmed and delivered before releasing a safeguarded waste site for a different use.

6.60 The redevelopment of wastewater treatment facilities in East London is not anticipated during the plan period, however, there is a possibility that proposals for development proximate to existing infrastructure might come forward which would hinder the normal operation of that infrastructure. Policy JWP3, which applies to development adjacent to wastewater treatment facilities and waste management sites, is intended to address this issue.

Need for additional wastewater treatment capacity

6.61 Policy SI5 of the London Plan 2021 relates to wastewater infrastructure and supports the provision of such infrastructure to service development.

6.62 The need for additional wastewater treatment capacity is determined through the 'Asset Management Planning' (AMP) process. The AMP process identifies the need for new and enhanced wastewater treatment capacity over a five year period. The next AMP five year period is 'AMP8' that commences on April 1 2025 and will run until March 2030. The AMP process considers the strategic context and conducts a risk-based assessment of the catchment areas to identify potential risks and vulnerabilities associated with existing wastewater treatment infrastructure.

6.63 Demonstration of the need for additional capacity will need to be made by direct reference to an Asset Management Plan.

6.64 AMP8 (and AMP7) identified the need for the following in East London:

- Upgrades to the Riverside wastewater treatment facility in Havering;
- A major upgrade to the Beckton wastewater treatment facility in Newham so it can receive wastewater from the new Thames Tideway Tunnel
- A number of strategic pumping stations throughout the Plan area which serve the wastewater treatment facilities need to be maintained and may require upgrade to meet the needs of new and existing development.

Development relating to the Riverside and Beckton improvements is already underway.

Location

6.65 Paragraph 9.5.9 of the London Plan 2021 notes that additional land may be required for upgrades or improvements at some wastewater treatment plants during the London Plan period. However, it is not expected that new wastewater treatment facilities will be developed in East London before 2041 and so this Plan does not identify specific areas where such development could come forward. In any event it is important to recognise that wastewater treatment has different geographical and technical requirements to solid waste management.

6.66 In particular, wastewater treatment facilities are constrained by the location of the sewerage network and need to be located close to where the sewerage network terminates (which is generally low-lying ground to enable flows to gravitate and avoid high energy consumption associated with unnecessary pumping) and need to be located close to a suitable receiving watercourse into which the treated effluent can be discharged.

6.67 In relation to existing wastewater treatment plants, maintaining an existing discharge point can often be a critical issue as effluent discharges can form a significant proportion of river flows which are required to be maintained by the Environment Agency.

6.68 As development land in East London becomes scarcer it will be necessary for any proposals to ensure the efficient use of land is maximised and environmental impacts are compatible with closer neighbours. Policy JWP4 is intended to ensure that new or extended wastewater treatment infrastructure is designed in a way that ensure unacceptable adverse impact on communities and the environment do not occur. Other policies in the Development Plan for the area in which any development is located will also apply.

Policy JWP2B: Safeguarding and Provision of Wastewater Treatment Capacity

Safeguarding existing capacity

A. Existing wastewater treatment facilities safeguarded from non-waste development are detailed in Appendix 2 (hereinafter referred to as "safeguarded wastewater sites").

B. Development that would lead to the loss and/or constrain current and future committed operation and development of safeguarded wastewater sites will not be permitted unless:

1. **it can be demonstrated that equivalent, suitable, and appropriate compensatory capacity is provided; or**
2. **it has been demonstrated that the capacity of the facility to be lost is not required to meet policy objectives and legal requirements related to the treatment of wastewater.**

New capacity

C. Proposals for the development of infrastructure for the management, treatment and disposal of wastewater and sewage sludge, including upgrades to existing wastewater treatment works, will be permitted, provided that:

1. **it is demonstrated that there is an identified need for such a facility to meet local and national policy objectives and legal requirements related to the treatment of wastewater which cannot be met at an existing facility; and,**
2. **it demonstrated that the proposed location for the development is the best practicable option; and,**
3. **the effective recovery of solid and gaseous by-products for beneficial use occurs as part of the treatment processes using best practice techniques.**

D. Proposals must be in accordance with other policies of this Plan, in particular Policy JWP4 relating to the protection of residential amenity, together with other relevant policies of the appropriate borough's Development Plan.

Implementation

Safeguarding of existing capacity

6.69 Safeguarded existing wastewater treatment facilities in East London are those with planning permission for wastewater treatment and, at the time of writing, are those listed in Appendix 2 and detailed in Appendix 3. During the plan period, any changes which occur, such as new sites or spatial extensions being permitted, will be reported on an annual basis in the Boroughs' Authority Monitoring Reports.

6.70 The Boroughs require applicants for development that would result in loss or reduction in capacity of existing wastewater treatment facilities to demonstrate that compensatory capacity has been secured. This will be applied through condition and/or legal obligations securing off-site provision. Consideration of impacts of other development on existing sites extends to the potential impacts on future 'committed' operations and development at the site which includes operations which have not been implemented but have active planning permission or those included in Asset Management Plans.

6.71 In exceptional (and unlikely) cases it may be possible to demonstrate that the capacity proposed to be lost is not actually required to meet the objectives of this Plan and the London Plan.

Operations

6.72 The normal operation of a wastewater treatment facility results in an effluent which is fit for discharge into the water environment, however by-products also arise and it is important these are appropriately managed to avoid adverse impacts and that their value is maximised e.g. biogas resulting from any anaerobic digestion of sewage sludge is used as an energy source. Proposals should therefore provide details of all by-products and describe how they will be managed in accordance with best practice.

Policy JWP 3 Prevention of Encroachment

Purpose of Policy

To ensure that existing safeguarded waste management and wastewater treatment facilities are safeguarded from nearby development that may limit or hinder their normal operation.

6.73 Existing waste management and wastewater treatment facilities can be adversely affected by non-waste development (i.e. development other than that which is principally intended for the management of waste or treatment of wastewater and sewage sludge) in proximity to them, even where this does not involve direct loss of an existing site. Some non-waste land uses, such as residential, can be sensitive to the impacts arising from the normal operation of waste management and wastewater treatment, including noise, odour and transport and are unlikely to be compatible with a nearby existing waste management site or wastewater treatment facility. 'Normal operations' relate to the operations at a site associated with its day to day running and not that associated with breakdowns or unforeseen events which effect the effective operation of the site. This can lead to unacceptable living conditions and resultant complaints, which may lead to constraints being imposed, such as restriction of operating hours or vehicle movements, which can reduce their current and future operations, with associated effects on available capacity.

6.74 The 'agent of change' principle in national policy (NPPF paragraph 200) and the London Plan (Policy D13) reflects this and requires new development that may be sensitive to the impacts of existing businesses (particularly noise but also other nuisances) to mitigate this through design.

6.75 The distance from an existing waste site at which such issues may arise will depend on site specific circumstances, including the size and nature of the facility and existing mitigation measures employed by the operation. Waste uses are subject to Environmental Permitting which requires measures to reduce and mitigate the potential effects of operations on amenity and the environment. In general, a 250m radius around safeguarded waste management sites, and wastewater treatment facilities, is an appropriate distance for consideration of potential effects of new development on safeguarding, and the sensitivity and compatibility of non-waste development.

6.76 Planning applications for development within at least 250m of safeguarded waste management sites and wastewater treatment facilities (except Beckton Sewage Treatment Works for which a distance of 800m is applied) will need to demonstrate that impacts, e.g. noise, dust, odour, light and air emissions, that may reasonably arise from the normal activities[53] taking place at a safeguarded site, including from transport, would not be experienced at a level which was unacceptable to the occupants of the proposed development and that vehicle access to and from the facility would not be constrained by the development proposed. Measures to mitigate potential adverse effects should be incorporated into the design and layout. Development proximate to a wastewater treatment facility may, in particular, be affected by odour arising from their operations.

Policy JWP 3 Prevention of Encroachment

Proposals for non-waste development in proximity to safeguarded waste management sites and wastewater treatment facilities must demonstrate that they would not prejudice the current or future committed operation of the safeguarded site, including through incorporation of measures to mitigate and reduce their sensitivity to operation of the safeguarded site through applying the 'Agent of Change' principle.

Implementation

6.77 The Boroughs will automatically scrutinise applications within 250m of existing waste management sites and 250m[54] of wastewater treatment facilities to assess their potential effect on safeguarding of those sites and their capacity. The Boroughs will consider applications at a greater distance depending on the nature of the proximate facility. For Beckton Sewage Treatment Works a custom distance of 800m has been applied.

6.78 Applicants for non-waste development within 250m[55] of an existing waste management site or existing wastewater treatment facilities are required to demonstrate that sensitivity to existing uses has been assessed and measures have been incorporated to ensure any unacceptable adverse effects are mitigated. Non waste development that is beyond 250m[56] of an existing waste management site or a wastewater treatment facility but is of a nature that may make it especially sensitive to the operations of the waste site e.g. schools, hospitals, may also be required to demonstrate that they would be designed to avoid any unacceptable adverse impacts from the waste site.

6.79 Where development is proposed within 250m of an existing wastewater treatment facility, an Odour Impact Assessment should be submitted which assesses the likelihood that odour would have a significant adverse effect, and details measures that will be taken or incorporated into the design of the development to mitigate adverse effects and minimise the risk of such effects occurring. Advice should be sought from Environmental Health teams at the pre-application stage highlighting any key issues with proposals relating to odour. Proposals should have regard to the latest Institute of Air Quality Management Guidance on the assessment of odour for planning

6.80 In addition, it may be that development proximate to a waste/wastewater site will be unlikely to be affected by an existing operation, depending on the type of activity, the type of waste, and the characteristics of the facility e.g. if it is enclosed within a building.

53 Normal activities are those related to the day to day operation of a site and do not include breakdowns.
54 800m for Beckton Sewage Treatment Works
55 800m for Beckton Sewage Treatment Works
56 800m for Beckton Sewage Treatment Works

Policy JWP4: Design of Waste Management Facilities

Purpose of Policy

To ensure waste management (including wastewater treatment) facilities are designed in a manner that protects and enhances host communities and the local environment which includes having regard to the need for climate change mitigation and adaptation.

6.81 It is not anticipated that there will be a need for new waste management capacity to be developed over the Plan period. However, there will continue to be investment in existing waste sites and facilities, including upgrades to wastewater treatment facilities, and inevitable changes in requirements over time, including some re-configuration and re-development.

6.82 Where new waste and wastewater capacity is developed, it should be of high quality and contribute to the achievement of other national and development plan policies and objectives including reducing greenhouse emissions, efficient resource use, protection and enhancement of the environment (including the water environment) and protection of amenity and health. For solid waste such requirements are set out in the London Plan (Policy SI8). This applies not only to their operational impacts but also to the 'whole life-cycle' carbon emissions associated with construction materials.

6.83 The policies of this Plan focus any new development on existing waste sites, industrial and previously-developed land, and so adverse effects on soils and biodiversity are likely to be limited. Biodiversity gain (of at least 10%) is now a mandatory requirement and so applications are required to be supported by a biodiversity assessment quantifying the existing pre-development value (previously-developed sites may host habitat of value), and consideration of how a minimum of 10% gain may be achieved (to be included within a Biodiversity Gain Plan).

6.84 Development design is crucial in managing and reducing adverse impacts on the environment and amenity. Enclosure of operations within a building, where operationally feasible, will be required as the best means of reducing noise, dust and odour. In exceptional cases, if it is shown that this is not a practicable option, other mitigation such as acoustic screening and operational management measures will be required. The need to enclose operations may also prescribed by the Environmental Permitting process. Re-configuration and intensification of existing waste management sites and wastewater treatment facilities may present opportunities to improve the design and performance of the facility.

6.85 Environmental permitting provides the appropriate mechanism for control of operational impacts and should be assumed to operate efficiently though it is strongly recommended that applicants to consider these matters in tandem with the planning application[57] and seek early advice from the Environment Agency.

6.86 Where development requires road transport it is important that optimum routes for HGVs are utilised and access to the site is safe and appropriate to the scale and nature of movements associated with normal operations.

6.87 Some larger facilities may be regarded as critical infrastructure and so should, in particular, be protected from acts of vandalism. Applications for new and existing sites should take account of the police Secured by Design guidance and consider areas such as gating, doorsets/windows, access control/counter terrorism measures, lighting, CCTV, staffing levels and intruder alarms to ensure that facilities are adequately protected.

57 NPPF paragraph 201

Policy JWP4: Design of Waste Management and Wastewater Treatment Facilities

A. Proposals for waste management and wastewater treatment development will only be permitted which have been designed to address the following during their construction and operation (including associated vehicle movements):

1. **The emission of greenhouse gases is minimised by working towards net zero where practicable or, where this isn't practical, an appropriate contribution will be made to the relevant Borough's carbon offset fund; and,**
2. **measures to avoid unacceptable adverse impacts arising from noise, dust, litter, vermin, vibration, odour, bioaerosols, external lighting, visual intrusion, traffic or associated risks to the environment (including the water environment) and health and wellbeing of local communities; and,**
3. **storage and management of waste (other than by landfill) and wastewater within a building or an appropriate level of protection is provided with respect to impacts on the local environment and amenity; and,**
4. **efficient use of energy and water; and,**
5. **climate adaptation measures such as sustainable drainage systems, flood resistance and resilience, water storage and recycling, open space design, green roofs and drought-resistant landscaping; and,**
6. **contributions to green and blue infrastructure, community benefits (including Public Rights of Way), and biodiversity enhancement and net gain where required; and,**
7. **The need to protect the historic environment including by including measures to avoid and/or mitigate adverse impacts; and,**
8. **protecting the best and most versatile agricultural land and soil quality more generally; and,**
9. **achievement of a BREEAM 'Excellent' rating or its equivalent unless it is demonstrated that this isn't practical; and,**
10. **the need to ensure development is secure in accordance with 'Secure by Design' principles; and,**
11. **preference being given to non-road transport where practicable; and,**
12. **measures to control and reduce vehicle impacts including:**
    i. **emissions, through the use of low emission vehicles, installation of vehicle charging points and scheduling and management of vehicle routing; and,**
    ii. **impacts on the safety of other road users including pedestrians.**

B. Proposals for development must demonstrate that opportunities will be provided for residents of the Borough in which the proposal is located, to access employment in both the construction and operational stages in accordance with relevant Local Plan policy and related guidance.

C. Proposals that have an adverse effect on the integrity of sites designated as Special Areas of Conservation (SAC), Special Protection Areas (SPAs) or Ramsar sites will not be permitted, in line with The Conservation of Habitats and Species Regulations 2017 (as amended). Any mitigation required to avoid adverse effects on their integrity, for example due to pollution risk or disturbance, must be detailed in, and secured as part of the grant of planning permission.

Implementation

6.88 Applicants are required to demonstrate that the design and operation of development contributes to the achievement of policy objectives in this Plan, and the wider development plan, through preparation and submission of supporting evidence which may include a design and access statement.

6.89 Planning applications should be supported by appropriate evidence e.g. a Climate Change Assessment and a BREEAM assessment, setting out measures considered, and incorporated, to improve energy efficiency and incorporate renewable and low carbon energy into the development and operation (including vehicles and transport) and achieve net zero[58], to reduce water consumption, and to adapt to the likely effects of climate change including extreme rainfall, drought and heatwave events.

6.90 Whilst a BREEAM rating of excellent (or equivalent), is sought, it is recognised that certain circumstances such as constraints on site and applicability of technology may means it is not practicable for such a rating to be achieved. In such instances. the application should demonstrate exactly why such a rating is not practical and show how the highest rating practicable will be achieved.

6.91 As a minimum requirement, all major waste and wastewater proposals must achieve net-zero carbon standards in alignment with London Plan Policy SI2. This can be accomplished by following the Mayor's energy hierarchy:

- Be Lean: Optimize energy use and manage demand during operation.
- Be Clean: Utilise local energy resources efficiently and cleanly (including secondary heat).
- Be Green: Maximize opportunities for on-site renewable energy production, storage, and usage.
- Be Seen: Monitor, verify, and report on energy performance.

6.92 Additionally, major and minor proposals must achieve a minimum 35% reduction beyond Part L 2013 standards on-site.

6.93 Where requirements for net zero and other enhancements cannot be delivered on-site, applicants may be required to contribute to wider Borough schemes including for carbon and air quality offsetting.

58 Consistent with London Plan Policy SI2B requirement for energy strategy

6.94 The application should show how potential impacts on the amenity of the area caused by the operations of the site have been identified and appropriate mitigation included, for example those resulting from noise, lighting, dust and odour. In many cases such impacts will be addressed by enclosing operations within a building as required by the policy.

6.95 An assessment of the risk to the normal operation of facility caused by climate change should be undertaken, taking account, for example, of the likelihood of higher rainfall and hotter temperatures. The proposal should show how it has responded to this assessment by incorporating measures to reduce the risk as far as practicable. Proposals in areas prone to flooding, as shown by Strategic Flood Risk Assessments, are required to produce a site specific flood risk assessment.

6.96 While Biodiversity Gain Plans are required to be submitted and approved prior to commencement, it will often be sensible to prepare drafts of such plans beforehand for submission with the planning application.

6.97 Measures to enhance biodiversity should be integrated into new buildings, e.g. biodiverse roofs, swift bricks or boxes, green walls and contribute to the achievement of the Local Nature Recovery Strategy for London[59]. Depending on the location in relation to protected habitats, and the nature of the proposal, a Habitats Regulation Assessment will need to be submitted.

6.98 Transport assessments and Travel Plans need to be submitted with applications for sites with an area of 2,500m^2 (or greater) which detail the impacts of transport to and from a proposed facility (including an extension or reconfiguration of an existing facility). Transport Assessment should follow Transport for London's Healthy Streets Transport Assessment format, or the latest version if updated over the course of the Plan period.

6.99 The Transport Assessment should illustrate accessibility to the site by all modes, the likely modal split of journeys to and from the site, impacts to the transport network, proposed measures to improve access or mitigate transport impacts using public transport, walking and cycling, as well as demonstrate compliance with other transport policies, including the London Plan (2021) Healthy Streets Approach. Applicants are recommended to discuss the potential transport implications of the development with the Boroughs' planning and transport teams, as well with relevant infrastructure providers such as Transport for London.

6.100 Proposals should reference the use of Direct Vision Lorries for waste vehicles or the use freight operators who can demonstrate their commitment to TfL's Freight Operator Recognition Scheme (FORS) or similar.

6.101 Transport for London's (TfL) Direct Vision Standard (DVS) for HGVs should be applied and freight operators should demonstrate their commitment to TfL's Freight Operator Recognition Scheme (FORS) or similar. The DVS is intended to enhance road safety by ensuring that HGV drivers have better visibility, thereby reducing the risk of accidents involving vulnerable road users like pedestrians and cyclists.

59 https://www.london.gov.uk/programmes-strategies/environment-and-climate-change/parks-green-spaces-and-biodiversity/local-nature-recovery-strategy

Policy JWP5: Energy from Waste

Purpose of Policy

To ensure energy from waste facilities are developed appropriately including utilisation of the maximum amount of energy produced.

6.102 Energy from Waste (EfW) generally takes the form of plants that incinerate waste and capture the heat to generate electricity. 'Surplus' heat may also be captured and utilised in heating, or cooling, of other development sometimes via the use of district heating schemes. Other forms of energy from waste such a pyrolysis and gasification are sometimes classed as 'Advanced Thermal Treatment'.

6.103 In terms of the waste hierarchy, EfW is classed as 'Other Recovery' and so, as a means of managing waste is generally less preferred than recycling but more preferred than disposal. To qualify as 'recovery', energy from waste plants must achieve a minimum level of energy efficiency as defined by 'R1' status[60]. Without R1 status such plants are technically classed as disposal.

6.104 Although planning permission has been grated for such a facility in Barking and Dagenham[61], at present there are no plants in East London which incinerate waste, however some facilities manufacture refuse derived fuel from residual waste arising in East London for incineration in elsewhere. Indeed, the assessment of future waste management capacity requirements indicates that there is no clear need for EfW capacity to be developed in East London, and the Boroughs are currently unaware of any specific proposals for such capacity. However, this form of waste management has certain characteristics which need particular consideration and so Policy JWP 5 is included to address these matters in the event that an application for planning permission for such a facility was received.

60 The 'R1' value relates to the energy efficiency factor of an incinerator which determines the extent to which an incinerator uses waste as a fuel to generate energy. The minimum R1 value is 0.65 for municipal waste incinerators permitted and in operation after 31 December 2008. For further information see https://www.gov.uk/guidance/waste-incinerator-plant-apply-for-ri-status

61 London Sustainable Industries Park

6.105 The burning of waste leads to the release of carbon dioxide, therefore, the more energy that can be recovered, the less carbon dioxide is emitted per energy unit. Policy SI 10 (E) 3) of The London Plan expects EfW facilities to meet a minimum performance of 400g of CO2 equivalent per kilowatt hour of electricity produced (this is known as the 'Carbon Intensity Floor'). To maximise their efficiency, it's important for Energy from Waste facilities to be designed and located in such a way that excess heat can be fully exploited. This could be through district heating or by a nearby industry that can utilise the process heat. This kind of EfW is known as Combined Heat and Power (CHP). The Borough Local Plan include separate policies related to developments that deliver heat and cooling to buildings near a CHP facility.

6.106 The combustion of the biogenic elements of residual waste can generate low-carbon renewable energy, whereas burning non-biogenic waste, which includes materials like oil-based plastics, does not. The split of biogenic and non-biogenic materials in residual waste is currently thought to be roughly equal, but this is likely to shift during the Plan period as measures like separate food waste collection from households and businesses are put into place. However, non-biogenic waste generally has high calorific value and so may be required to ensure EfW plants are viable.

6.107 The Sixth Carbon Budget of the Government's Climate Change Committee suggests that all EfW facilities should implement carbon capture and storage by 2040 to meet the national goal of net-zero carbon emissions by 2050. Considering that EfW plants have a minimum lifespan of 30 years, any EfW development proposal must account for this, as retrofitting Carbon Capture, Utilization, and Storage (CCUS) may not be feasible once the plant is operational. The Committee's budget also indicates that the required carbon reduction in waste management is anticipated to result from increased recycling, which should not be undermined by the creation of extra EfW capacity.

6.108 EfW results in the production of solid ash residues. In the case of mass burn incineration two types of ash are produced: 'bottom ash' (heavy material that falls through the grate) and 'air pollution control (APC) residues' (ash collected by emission control systems). Bottom ash can easily be recycled into an aggregate and technologies are now being developed which utilise the APC residue in the manufacture of construction materials avoiding the need for landfill.

6.109 Incineration offers an environmentally-safe disposal option for certain hazardous wastes. Specialised high-temperature incineration facilities may not always able to achieve commercially viable scales for energy or heat recovery, but may become an essential part of waste management infrastructure especially if the need for management of persistent organic pollutants and other chemicals increases in future.

Policy JWP5: Energy from Waste

Proposals for waste sites that use waste as a fuel source to produce energy will only be permitted where it is demonstrated that:

1. **They qualify as recovery, rather than disposal, operations (except if intended solely for disposal of hazardous waste); and,**
2. **the waste used as fuel will be waste that cannot be viably reused, recycled, or composted (as detailed in a Waste Hierarchy Statement); and,**
3. **solid by-products (e.g. bottom ash) from the process will be recycled or used as raw materials; and,**
4. **the use will be consistent with the proximity principle and not result in long distance vehicle movements; and,**
5. **the facility will operate as a combined heat and energy plant such that the facility is as energy efficient as possible; and,**
6. **the release of non-biogenic gaseous carbon emissions will be minimised, with mechanisms to capture for use and/or storage if use is not viable.**

Implementation

6.110 Applicants are required to demonstrate how any proposed Energy from Waste plant will achieve the requirements of Policy JWP5 through preparation and submission of supporting evidence including that relating to the adoption of technology designed to generate power and utilise surplus heat.

6.111 To ensure that waste managed at EfW facilities is genuinely residual, proposals need to be submitted with a Waste Hierarchy Statement. Such a statement should include:

- A list of the types of waste that would be managed at the facility and the reason why they cannot be managed further up the hierarchy;
- Details of the information that will be collected and retained that includes the sources of the waste after waste, that would be managed at higher levels of the hierarchy, has been removed;

- the arrangements to be put in place to ensure that as much waste, that could be managed at higher levels of the hierarchy, as is reasonably possible is removed from the waste to be managed at the facility, including any contractual measures put in place to secure the removal of such waste and that such waste is actually subject to management further up the hierarchy;
- the arrangements to be put in place to ensure that suppliers of waste work to a written environmental management system which includes establishing a baseline for the removal of waste that could be managed at higher levels of the hierarchy and working to specific targets for continuously improving and reporting on the percentage of such waste removed;
- the arrangements to be put in place for suspending and/or discontinuing supply arrangements from suppliers who fail to work to and report on compliance with any environmental management systems relating to waste reporting;
- the provision of an annual waste composition analysis of the waste received at the facility, with the findings submitted within one month of sampling being undertaken; and,
- the form of records to be kept for the purpose of demonstrating compliance with the matters above and the arrangements in place for provision of data and inspection of such records by the authorities.

Policy JWP6: Deposit of Waste on Land

Purpose of Policy

To ensure that the landfill of non-inert waste is minimised (in accordance with the waste hierarchy) and that potential impacts of landfill, including any reworking and restoration and aftercare are properly managed.

Non-inert Waste Landfill

6.112 The deposit of non-inert waste on land for disposal may occur as backfilling of old mineral workings (landfill), or by deposit on land where the ground levels have not been artificially changed (landraise).

6.113 The disposal of waste is at the bottom of the waste hierarchy as the least preferred form of waste management, and non-inert waste should be sent to landfill only if it cannot be handled using methods higher up the Waste Hierarchy. In exceptional circumstances it may be demonstrated that there are certain types of waste (e.g. some hazardous wastes) which cannot practically be managed by any other means and so landfill[62] is the only option. These wastes are generated in comparatively limited amounts and are handled at specific landfill sites designated for hazardous waste or within specially constructed cells at non-inert landfill sites.

6.114 Non-inert landfill has been undertaken in East London at Rainham for some time, although it is anticipated that the current site will close during the Plan period. No specific provision for additional non-inert landfill is allocated in this Plan. In East London, there are currently no additional suitable voids created by mineral working which would be appropriate for non-inert waste landfilling. Therefore, any provision would involve the creation of new void space either by extracting material for other purposes like engineering, or by altering the land's natural contours, or a combination of these two methods. Policy JWP6 has been included in this Plan to help determine any proposals that might be received for new non-inert waste landfill capacity.

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62 Landfill should also be taken to mean land raise.

6.115 Landfilled non-inert waste usually results in the production of landfill gas (including methane) and leachate, both of which need proper containment and management to ensure they do not cause pollution of the environment of harm to human health. In light of this, the provision of new capacity is largely reliant on the presence of certain geological and hydrogeological conditions needed to minimise the risk of groundwater pollution. While being a potential pollutant, landfill gas can be beneficial when captured and put to use as a fuel to produce energy.

6.116 In addition to generating more void space, the reworking (or 'mining') of current or historical and restored landfill sites could potentially free up land for development and/or result in the extraction of recyclable or recoverable materials that were previously discarded. Older landfills might also require reworking to remove waste causing pollution and/or to prevent the uncontrolled release of pollutants. However, there are significant risks associated with the reworking of landfill sites as materials may have been disposed of without being recorded. After the closure of landfills, other developments, such as housing, may have taken place nearby, which could be sensitive to any modification activity, and the need to avoid negative impacts must be considered. Generally, the modification of landfills containing hazardous waste is not recommended due to the potential impacts on communities and the natural environment. An Environmental Permit, intended to ensure there is no pollution of the environment or harm to human health will also likely be required for any such activity and advice from the Environment Agency should be sought.

6.117 The restoration of landfill sites will offer opportunities to enhance the environment for example by providing wildlife habitats and/or recreational opportunities e.g. country parks.

Deposit of Inert Waste on Land for Beneficial Purposes

6.118 Some inert waste (mainly excavation waste e.g. soils and subsoils) is of a nature that lends itself for use in engineering operations such as landscaping, flood defences and site restoration. To mitigate their impacts on landscape and visual amenity, voids created by mineral working frequently require restoration by backfilling.

6.119 In waste hierarchy terms, the beneficial use of inert waste on land is classed as 'other recovery'. Policy SI 7 of The London Plan expects that 100% of inert excavation waste will put to a beneficial use.

6.120 The availability of land in East London for the deposit of inert excavation waste is more constrained and so such waste is frequently transported to areas outside of London for management. This is recognised in paragraph 9.8.1 of the London Plan 2021 which observes that target net self-sufficiency by 2026 does not relate to this waste stream.

Policy JWP6: Deposit of Waste on Land

A. Proposals for the use of land for the disposal of non-inert waste to land will only be permitted where the following is demonstrated:

1. **The waste cannot be practically managed by other means further up the waste hierarchy; and**
2. **there is a management plan and end date for the operation, ensuring the timely completion and restoration of the site; and**
3. **fugitive emissions of landfill gas are minimised and energy recovery is maximised; and**
4. **a management system demonstrating how any leachate will be managed is provided; and,**
5. **restoration and aftercare of the site will be of a high quality that ensures demonstrable benefits to the environment and local communities.**

B. Proposals for the permanent deposit of inert waste on land will be permitted where it is demonstrated that:

1. **the waste will be deposited for a beneficial purpose, such as restoring landfill sites/mineral workings, rather than as part of a disposal operation; and**
2. **if the waste is intended for use in an engineering operation (other than landfill site restoration), it must be demonstrated that there is no local demand for its use in mineral working restoration; and,**
3. **the minimum amount of waste necessary will be used to achieve the intended benefit.**

C. Proposals for the reworking of old landfill sites will be permitted provided they meet the criteria in Part A above, and that:

1. **Hazardous waste was not disposed at the site; and,**
2. **any materials extracted will be managed as far up the waste hierarchy as practicable.**

Implementation

Non-inert waste

6.121 Proposals for non-inert landfill will need to demonstrate that the waste to be disposed is genuinely residual (following removal of all material that cannot be recycled or recovered) and cannot be managed by a means further up the waste hierarchy. This requires the submission of a Waste Hierarchy Statement as detailed under Policy JWP5 above.

6.122 The need for non-inert landfill capacity must be justified by showing that there will be enough residual waste for disposal to ensure the site's timely completion. Non-inert landfill sites should be filled in sections and progressively restored for beneficial uses such as agriculture, recreation, or biodiversity.

6.123 Proposals for non-inert landfill development must demonstrate how landfill gas would be managed, and its potential for energy generation maximised, during the operational and aftercare phases.

6.124 Any proposals for the reworking of old landfill sites will require a site investigation to identify and evaluate the presence of hazardous materials. Proposals would need to address the potential for negative impacts related to the release of leachate and landfill gas, the handling of hazardous materials, and potential impacts on existing restoration and aftercare arrangements.

6.125 Proposal for restoration should consider whether habitats can be protected and enhanced, and where possible contribute to delivery of Local Nature Recovery Strategies.

6.126 The provisions of this policy equally apply to proposals to extend existing non-inert landfill sites.

Inert Waste

6.127 Proposals involving the deposit of inert waste on land solely for disposal are not acceptable. Proposals will need to demonstrate how the inert waste will be used in a manner that results in a beneficial outcome. To qualify as recovery (rather than disposal), proposals need to demonstrate how the project will incorporate the least possible amount of inert waste material required to accomplish the intended result.

6.128 Proposals will need to demonstrate that the inert waste to be deposited consists of material that could not be recycled, for example it does not contain materials such as brick and concrete that could be used as a recycled aggregate. The deposit of hard inert construction waste e.g. brick and concrete for use in hardstandings and site roads is acceptable as material used in this way is considered to have been recycled for use as an aggregate.

6.129 In some cases, the need for the deposit of inert material may have been identified as part of a construction project and suitable material excavated as part of a different project may be used to fulfil that need. In such cases the “The Definition of Waste: Development Industry Code of Practice” (DoWCoP) may apply which would mean that the excavated material is not defined as waste and its deposit would therefore not be subject to Policy JWP6.

7 Policies Map

The Policies Map for the Plan comprises the maps shown in Appendix 3 of existing safeguarded waste sites.

8 Glossary

A	
Advanced Thermal Treatment (ATT)	Technologies that employ pyrolysis or gasification to process residual wastes. ATT facilities produce a gas (usually for energy recovery) and a solid residue which can often be recycled for secondary use.
Agent of change	A new development within an area that is of such a nature that it might be impacted by existing development or impact on that development (e.g. housing proposed within an industrial area). The 'agent of change principle' sets out a position that an applicant for planning permission (i.e. the 'agent of change') is responsible for managing any conflicts between the proposed development and existing development.
Aggregates and soils recycling	Rubble, hardcore and soil from construction and demolition projects can often be used on-site in place of primary aggregate. Alternatively, it can be taken to purpose-built facilities for crushing, screening and re-sale.
Agricultural waste	This mostly covers animal slurry/by products and organic waste,but also scrap metals, plastics, batteries, oils, tyres, etc. The regulations for this waste stream mean farmers cannot manage all of their own waste within the farm (historically the case). The agricultural waste regulations affect whether or not waste can be burnt, buried, stored, used on the farm or sent elsewhere.
Amenity	Amenity is a broad concept and is not specifically defined in Planning legislation. It is a matter of interpretation by the local planning authority and is usually understood to be the pleasant or normally satisfactory aspects of a location which contribute to its overall character and the enjoyment of residents, business users and visitors. Amenity can be adversely affected by development impacts such as noise, dust, odour and visual change.
Anaerobic Digestion (AD)	A process comprising the breakdown of organic material in the absence of air. It is carried out in an enclosed vessel and produces methane that powers an engine used to produce electricity. The useful outcomes of AD are electricity, heat, and the solid material left over called the digestate. Both the heat and the electricity can be used or sold if there is a market and the digestate can either be sold or used for agricultural purposes (land spread). AD can only be used for some biodegradable parts of the waste stream e.g. sewage sludge, agricultural waste and some organic municipal and industrial waste.

Annual Monitoring Report (AMR)	The AMR reports progress in meeting the milestones of the adopted Local Development Scheme and monitors the impact of policies when the plans are adopted. The AMR is formally known in legislation as the 'Authority Monitoring Report'.
B	
Best and most versatile agricultural land	Land categorised as being of grades 1, 2 or 3a under the Agricultural Land Classification system.
Bioaerosols	Airborne material containing biological material from animals, plants, insects or microorganisms. They are produced wherever biological material is being processed, milled, or chopped and are commonly associated with organic waste composting facilities. Bioaerosols can have impacts on health.
Biodegradable waste	Any waste that is capable of undergoing natural decomposition,such as food and garden waste, paper and cardboard.
Biodiversity	The variety of all life on earth (mammals, birds, fish, invertebrates, plants, etc). In planning, it is often used to refer to nature conservation.
C	
Catchment	The geographical area served by a particular waste management activity. This will vary according to the adequacy of transport links and the economics of transporting different types of waste
Circular Economy	A circular economy is an alternative to a traditional linear economy (make, use, dispose) in which resources are kept in use for as long as possible, the maximum value is extracted from goods and services whilst in use, and, finally, resources and products are recovered and regenerated at the end of each service life.
Climate change adaptation	Adjustments to natural or human systems in response to actual or expected climatic factors or their effects, including from changes in rainfall and rising temperatures, which mitigate harm or exploit beneficial opportunities
Climate change mitigation	Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.
Combined heat and power facilities (CHP)	CHP plants generate electricity as well as providing local heat, and sometimes even cooling, to various types of users.
Commercial and Industrial (C & I) Waste	Waste generated by business and industry, for example: wholesalers; catering establishments; shops and offices; factories and industrial plants. Generally, businesses are expected to make their own arrangements for the collection, treatment and disposal of waste generated by their actions. Waste from smaller businesses where local authority collection arrangements have been set up is considered as LACW.

Composting	The breaking down of organic matter aerobically into a stable material that can be used as a fertiliser or soil conditioner. This can be undertaken commercially in open air (in 'windrows') or inside containment ('in-vessel'), and at a smaller scale by households at home or collectively by communities.
Conservation Area	An area designated by the LPA because of its special architectural or historic interest, the character and appearance of which it is desirable to preserve or enhance.
Contaminated Land	Contaminated land is land that has been polluted or harmed in some way making it unfit for safe development and usage unless cleaned.
Construction, Demolition and Excavation (C, D & E) Waste	The combined waste produced from earth moving, demolition of buildings/structures and construction of new buildings/structures. It mostly comprises brick, concrete, hardcore, subsoil and topsoil, but can also include timber, metals and plastics.
D	
Decentralised Energy	Local renewable energy and local low-carbon energy usually but not always on a relatively small scale that may encompass a range of technologies.
Deposit of Waste on Land	The placement of waste on land for the purpose of its management. This may include landfill or landraise operations, or, in the case of inert waste may involve its use in engineering works such as landscaping mounds.
Development Plan	The development plan has statutory status as the starting point for decision making. Section 38(6) of the Planning & Compulsory Purchase Act 2004 and Section 70(2) of the TCPA 1990 require that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. For waste proposals within London the development plan comprises the London Plan, Borough Local Plans and DPDs, joint Waste Plans as well as neighbourhood plans.
Disposal	Disposal means any waste management operation which is not 'recovery' even where the operation has a secondary consequence, the reclamation of substances or energy
Dry Mixed Recyclables (DMR)	Typically composed of: Paper - e.g. dry paper waste, newspapers, office paper and magazines Cardboard – e.g. corrugated cardboard, cereal boxes and card Metal cans – e.g. clean, empty drinks cans and food tins Plastic – e.g. packaging films, rinsed out milk bottles, empty drinks bottles & clean salad trays, rinsed out margarine tubs & microwaveable meal trays
E	
Encroachment	Development which is sensitive to the normal operations of a waste/wastewater facility being built near to an existing such facility

	which may hinder its operation by requiring changes to its operating practices (e.g. reduced vehicle movements, operating hours)
Energy from Waste (EfW)	The process of managing waste to generate energy - usually in the form of electricity or heat usually by means of thermal treatment. Many wastes are combustible, with relatively high calorific values – this energy can be recovered through processes such as incineration with electricity generation, gasification or pyrolysis. EfW generally falls within the 'other recovery' category in the waste hierarchy.
Energy Recovery	Covers a number of technologies, though most energy recovery is through incineration. Many wastes are combustible, with relatively high calorific values – this energy can be recovered through processes such as incineration with electricity generation (and where possible heat recovery), gasification or pyrolysis.
European Site	Sites designated for their nature conservation importance (under the EC Birds Directive and EC Habitats and Species Directive) and protected by the Habitats Regulations. This includes Special Protection Areas (SPAs) for birds, and Special Areas of Conservation (SACs) under the Habitats Directive.
G	
Gasification	A technology that converts carbon-containing material (including waste) into gas (mostly methane) at high temperature. The gas (known as 'syngas') can either be used as a substitute for natural gas or used to power electricity generation.
Green Belt	A national planning designation, which aims to prevent urban sprawl by keeping land around certain cities and large built-up areas permanently open or largely undeveloped, defined more fully in the NPPF.
Greenfield land	Land that has not been developed. Not to be confused with Green Belt.
Greenhouse gas (GHG)	GHGs trap heat in the atmosphere. Many gases exhibit greenhouse properties, including carbon dioxide, methane, water vapour, and nitrous oxide.
Green and blue infrastructure	A network of multi-functional green space or wetlands and waterways, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.
H	
Habitats Regulation Assessment (HRA)	An assessment under the Habitats Regulations to test if a plan or project could significantly harm the designated features of a 'Habitat site'. Proposals affecting proposed SACs, potential SPAs, Ramsar Sites (wetlands of international importance) also require HRA.

Hazardous waste	Controlled waste that is dangerous or difficult to treat, keep, store or dispose of, so that special provision is required for dealing with it. Hazardous wastes are the more dangerous wastes and include toxic wastes, acids, alkaline solutions, asbestos, fluorescent tubes, batteries, oil, fly ash (flue ash), industrial solvents, oily sludges, pesticides, pharmaceutical compounds, photographic chemicals, waste oils, wood preservatives. If improperly handled, treated or disposed of, a waste that, by virtue of its composition, carries the risk of death, injury or impairment of health, to humans or animals, the pollution of waters, or could have an unacceptable environmental impact. It should be used only to describe wastes that contain sufficient of these materials to render the waste as a whole hazardous within the definition given above. Defined in the Hazardous Waste (England and Wales) Regulations 2005 (as amended).
Heritage assets	A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Designated Heritage assets are the most protected and include listed buildings, scheduled ancient monuments, registered parks and gardens, registered battlefields, and World Heritage Sites.
Household waste	This is waste from a domestic property, caravan, and residential home or from premises forming part of a university or school or other educational establishment and premises forming part of a hospital or nursing home.
I	
Incineration	This is the controlled burning of waste usually in purpose-built plant and is subject to stringent standards for emissions. Ash residues are often landfilled but bottom ash may also be used in building materials. Incineration that involves the capture of energy falls within the category ‘Energy from Waste’.
Inert waste	Inert waste means waste that does not undergo any significant physical, chemical or biological transformations when untreated. Inert waste will not dissolve, burn or otherwise physically or chemically react, biodegrade or adversely affect other matter with which it comes into contact in a way likely to give rise to environmental pollution or harm human health. The total leachability and pollutant content of the waste and the ecotoxicity of the leachate must be insignificant, and in particular not endanger the quality of surface water and/or groundwater. Non-inert (including non-hazardous) waste is all other waste other than as identified above.
L	

Landfill and landraise	The term landfill relates to waste disposal mainly below ground level (by filling a void) whereas landraise refers to waste disposal mainly above pre-existing ground levels. They are generally the least preferred method of waste management in the waste hierarchy.
Listed buildings	A building of special architectural or historic interest in a list compiled by the Secretary of State under the Planning (Listed Buildings & Conservation Areas) Act 1990, thereby having statutory protection. Listing of buildings includes the interior as well as the exterior of the building, and any nearby buildings or permanent structures within the curtilage (e.g. wells, outbuildings). Historic England is responsible for designating buildings for listing in England.
Local Authority Collected Waste (LACW)	All waste collected by a local authority. It includes household waste and business waste and construction and demolition waste where collected by the local authority. LACW is the definition that is used in statistical publications produced by Defra, which previously referred to 'municipal' waste.
Local Development Scheme	The timetable for the preparation of Local Plans.
Local Nature Reserves (LNRs)	An area designated by local authorities, in consultation with Natural England under the National Parks & Access to the Countryside Act 1949, to provide opportunities for educational use and public enjoyment, in addition to protecting wildlife or geological and physiographical features of special interest.
Local Planning Authorities (LPAs)	The public authority whose duty it is to carry out specific planning functions for a particular area.
Local Plan	A plan for the future development of a local area, drawn up by the LPA in consultation with the community. In law this is described as the development plan documents adopted under the Planning & Compulsory Purchase Act 2004. Current core strategies or other planning policies, which under law would be considered to be DPDs, form part of the Local Plan. The term includes old policies which have been saved under the 2004 Act.
Local roads	These are taken to include: A roads (not including trunk roads and primary routes). B roads – which are roads intended to connect different areas, and to feed traffic between A roads and smaller roads on the network. Classified unnumbered roads which are smaller roads intended to connect together unclassified roads with A and B roads, and often linking a housing estate or a village to the rest of the network. Similar to 'minor roads' on an Ordnance Survey map and sometimes known unofficially as C roads. Unclassified roads which are local roads intended for local traffic. The vast majority (60%) of roads in the UK fall within this category.

M	
Major development	For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m2 or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.
Mass burn incinerator	Large, complex facilities which are used to burn waste at very high temperatures.
N	
National Planning Policy Framework (NPPF)	The NPPF sets out the Government's planning policies for England and how these are expected to be applied.
National Planning Policy for Waste (NPPW)	Adopted in October 2014, this document sets out the Government's waste planning policies for England.
Net self-sufficiency	To provide enough waste management facilities to manage the equivalent amount of waste arising within the Plan area.
Non-inert waste	A waste that will biodegrade or decompose, releasing environmental pollutants. Examples include: wood and wood products, paper and cardboard, vegetation and vegetable matter, leather, rubber and food processing wastes.
O	
Open space	All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.
Other Recovery	Other recovery is not specifically defined in the revised Waste Framework Directive, although 'energy recovery' is referenced as an example. It can be assumed by their exclusion in the definition of recycling, that processing of wastes into materials to be used as fuels or for backfilling can be considered 'other recovery'.
P	

Plan area	The geographical area covered by the East London Joint Waste Plan i.e. the area covered by the London Boroughs of Barking and Dagenham, Havering, Newham, and Redbridge
Pollution	Anything that affects the quality of land, air, water or soils, which might lead to an adverse impact on human health, the natural environment or general amenity. Pollution can arise from a range of emissions, including smoke, fumes, gases, dust, steam, odour, noise and light.
Planning Practice Guidance (PPG)	Government guidance intended to assist practitioners in interpreting national planning policy.
Previously developed land	Land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed. Previously developed land excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.
Public Rights of Way (PRoW)	PRoW are paths that all members of the public can legally use: footpaths – for walking, running, in mobility scooters or powered wheelchairs; bridleways – for walking, horse riding, bicycles, mobility scooters or powered wheelchairs; restricted byways – for any transport without a motor and mobility scooters or powered wheelchairs; byways open to all traffic – for any kind of transport, including cars (but mainly used by walkers, cyclists and horse riders).
Pyrolysis	The combustion of waste in the absence of oxygen, resulting in the production of liquid, gas, char, whose after-use depends on the type of waste incinerated.
R	
Receptor	Existing land uses that could be affected by the proposed development at the site allocations. Some examples of receptors include: Residential dwellings; hospitals; commercial premises; and, footpaths.
Recovery	Recovery means any waste management operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy.

Recovery facilities	A facility that recovers value, such as resources and energy, from waste prior to disposal, includes energy from waste, biological treatment and physical treatment facilities.
Recovery to Land	This is considered to be the use of inert material for a genuine beneficial use such as landscape and/or amenity improvements.
Recycling	Recycling means any recovery operation by which waste materials are reprocessed into products, materials or substances whether for the original or other purposes. Includes the reprocessing of organic material but not energy recovery or the reprocessing into materials that are to be used as fuels or for backfilling operations.
Renewable and low carbon energy	Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass, ground and air, and geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).
Residual waste	The elements of the waste streams that remain following recovery operations. Residual waste usually needs to be managed by disposal e.g. landfill.
Restoration	Process of returning a site or area to a desirable condition following waste management use or mineral extraction.
Reuse	Re-using products and materials as part of the circular economy, avoiding generation of waste and the need for re-processing or disposal. The top priority on the waste hierarchy. The commercial sector can reuse products designed to be used a number of times, such as reusable packaging. Householders can buy refillable containers or reuse plastic bags. Reuse contributes to sustainable development and can save raw materials, energy and transport costs.
S	
Safeguarding	The process of protecting sites and areas that are used or have potential for waste development from other forms of development that may prevent or constrain such uses in the future
Sites of Special Scientific Interest (SSSI)	A site which is of special interest by reason of any of its flora, fauna, or geological or physiographical features and has been designated by Natural England under the Wildlife and Countryside Act 1981.
Special Areas of Conservation (SAC)	Areas defined by regulation 3 of the Conservation of Habitats and Species Regulations 2017 which have been given special protection as important conservation sites.
Special Protection Areas (SPAs)	Areas classified under regulation 15 of the Conservation of Habitats and Species Regulations 2017 which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds.

Strategic Industrial Locations	Sites identified (including in the London Plan, Policy E5) as critical to the economy and which can accommodate concentrations of industrial, logistics and related activities and land uses.
Sustainability Appraisal (SA)	A process of analysing and evaluating the environmental, social and economic impacts of the plan or programme, often in conjunction with an SEA.
Sustainable Waste Management	Waste management in line with the waste hierarchy in which waste generation is avoided as far as possible, materials and products are re-used, recycled or have as much value recovered from them as possible, before disposal is considered. This is delivered through product design, behaviour and choices, and through provision of sufficient waste management capacity of the required type, where possible proximate to where waste arises.
Supplementary planning documents	Planning documents which expand upon policy or provide further detail to policies in development plan documents, but do not have development plan status
T	
Thermal treatment	A waste management operation that involves the use of heat to process waste and generally involves the production of energy. Incineration is a thermal treatment but 'Energy from waste' is the term more generally used to describe waste management involving incineration.
Tonne	Metric Ton. 1000 kilos, equal to 2004 lbs.
tpa	Tonnes per annum
mtpa	Million tonnes per annum.
W	
Waste	Any substance or object that the holder or the possessor either discards or intends or is required to discard.
Waste arisings	This is the amount of waste produced in a given area during a given period of time, usually reported as tpa.
Waste Disposal Authority (WDA)	A local authority responsible for managing the waste collected by the collection authorities and the provision of household waste recovery centres.
Waste Hierarchy	A conceptual framework for management of waste, which ranks waste management options according to what is best for the environment. The most preferable option is preventing waste generation as far as possible, followed by preparing materials for re-use, recycling and composting, recovering as much value from them as possible including

	energy. Disposal to landfill or incineration without energy recovery is the least-preferred option.
Waste Planning Authority (WPA)	The local authority responsible for waste development planning and control. These are unitary authorities, including National Park Authorities, and county councils in non-unitary areas.
Waste streams	Waste produced by different sectors and with different composition such as ‘commercial and industrial’ or ‘hazardous’.
Waste transfer	Process where waste is taken from waste producers, and taken for treatment, recycling and/or disposal.
Wastewater	Water discharged to sewers and including waste in liquid form as well as surface water runoff. This raw wastewater is collected in sewers and transferred to wastewater treatment works where it is treated in such a way that produces largely reusable sewage sludge and effluent that is discharged to watercourses.
Water environment	The "water environment" encompasses all waterbodies and ecosystems that are influenced by water, including rivers, lakes, wetlands, groundwater, coastal waters, and seas. It also involves the complex interactions between water, land, and living organisms, as well as the human activities that affect these systems. The water environment therefore includes the broader ecological and environmental context in which water exists. This includes the quality, availability, and sustainability of water resources, as well as the impact of human activities on these water bodies.

9 Appendices

Appendix 1 – Monitoring Framework

Monitoring of the East London Joint Waste Plan will take place in accordance with the framework set out below. Results will be reported in a joint East London Joint Waste Plan Annual Monitoring Report.

Theme	Indicator	Targets / Milestones	Related Objective	Related Policy	Responsibility	Source	Frequency
Achieve Circular Economy	Quantity of household waste produced per head	50% reduction from 2019 levels	SO1	JWP1	East London Waste Authority (ELWA), East London Local Planning Authorities (LPAs)	Wastedataflow, WDI	Annual
	Percentage of LACW diverted from landfill	Divert 95% of LACW from landfill by 2030	SO2	JWP1; JWP2; JWP6	ELWA, LPAs, Waste Industry	Wastedataflow, WDI	Annual
	Recycling rates for C&I waste	Achieve 70% recycling rate for C&I waste by 2030	SO2	JWP1; JWP2	LPAs, Waste Industry	WDI, DEFRA	Annual
	Percentage reduction in C, D&E waste sent to landfill	100% of construction, demolition, and excavation waste to be diverted from landfill	SO2	JWP1; JWP6	LPAs, Waste and development industries	WDI, DEFRA	Annual

Theme	Indicator	Targets / Milestones	Related Objective	Related Policy	Responsibility	Source	Frequency
	Number of proposals considering circular economy strategies	100% of new major developments consider circular economy strategies by 2041	SO1	JWP1	LPAs	Planning Applications	Biannual
	Waste management capacity by waste category and position on the waste hierarchy (recycling / other recovery / disposal)	General trend observed of waste capacity positioned in accordance with the waste hierarchy	SO2, SO5, SO8	JWP2, JWP5, JWP6	LPAs, Waste Industry	Planning Applications	Biannual
Safeguard existing waste management capacity	Number of safeguarded sites lost to alternative development	No net loss of safeguarded waste management capacity	SO6	JWP2, JWP2B,	LPAs, Development Industry	Planning Applications	Annual
	Percentage of safeguarded sites operating at full capacity	95% of safeguarded sites operating at full capacity	SO6	JWP2, JWP2B, JWP3	LPAs, Waste Industry	Planning Applications, WDI	Biannual
	Waste management capacity by waste category and position on the waste hierarchy (recycling / other recovery / disposal)	Surplus capacity to be maintained equivalent to that of sites with potential for future release (Appendix 4)	SO2, SO5, SO6, SO8	JWP2, JWP5, JWP6	LPAs, Waste Industry	Planning Applications, WDI	Biannual
Protection of communities	Number of planning enforcement cases per	Trend of reducing annual planning	SO4	JWP2, JWP2B,	LPAs, Waste Industry	Environment Agency (EA)	Annual

Theme	Indicator	Targets / Milestones	Related Objective	Related Policy	Responsibility	Source	Frequency
and environment	annum related to operational impacts of waste facilities (e.g., noise, odour)	enforcement cases; zero by 2030 (ongoing)		JWP3, JWP4		& Borough Environmental Health Departments	
	Number of new waste developments with operations enclosed within buildings	100% new waste development within an enclosed building unless exceptional circumstances demonstrated	SO4	JWP2B, JWP4	LPAs, EA, Waste Industry	Planning Applications	Annual
Maximise energy recovery and minimise climate impacts	Percentage of Energy-from-Waste (EfW) proposals incorporating heat utilisation	100% of EfW capacity proposals to include heat utilisation	SO5	JWP5	LPAs, EA, Waste Industry	Facility Operation Reports	Annual
	EfW capacity incorporating Carbon Capture, Utilisation, and Storage (CCUS)	All new proposals for EfW capacity to include CCUS	SO5	Policy JWP5	LPAs, EA, Waste Industry	Facility Operation Reports	Annual
Sustainable landfill operations	New Non-inert landfill capacity permitted	Non-inert landfill capacity only permitted in exceptional circumstances.	SO5, SO8	Policy JWP6	LPAs, EA, Waste Industry	Planning Applications	Annual
	Quantity of landfill gas produced and amount of energy generated from landfill gas	100% landfill gas produced from landfill is utilised to generate energy.	SO5	Policy JWP6	LPAs, EA, Waste Industry	Facility Operation Reports	Annual

Theme	Indicator	Targets / Milestones	Related Objective	Related Policy	Responsibility	Source	Frequency
	Quantity of inert excavation waste deposited for beneficial use	0% of inert excavation waste is disposed of.	SO8	Policy JWP6	LPAs, EA, Waste Industry	Planning Applications, WDI, EA landfill records	Annual

Appendix 2 – List of Safeguarded Sites

Notes:

- Sites also safeguarded as wharves in the London Plan for water borne freight handling uses are marked with an asterisk
- Sites included in Appendix 4 as future development options are marked with a double asterisk.

Abbreviations

- CLEUD = Certificate of Lawful Existing Use or Development
- WTS = Waste Transfer Station
- MBT = Mechanical Biological Treatment Facility

London Borough of Barking and Dagenham

Location	Operator	Facility Type[63]	Grounds for safeguarding
2 Chequers Lane (B&D 02)	MMS Supplies Limited	Non-Haz Waste Transfer	Planning consent
2 Choats Road (B&D 03)	SUC Exc UK Ltd	Physical Treatment	CLEUD
12-14 River Road (Alexander Wharf)* (B&D 14)	ELG Metals UK Ltd	Metal Recycling	CLEUD
40 A&B River Road, Media Park (B&D 08)	SH & WS Company Limited	Non Haz Waste Transfer / Treatment	CLEUD
54-60 River Road (B&D 24)	Cory Barking Operations Ltd	Non-Haz Waste Transfer	Planning consent
72-76 River Road, Docklands Wharf Transfer Station (B&D 16 and B&D 40)*	S. Norton & Co. Ltd / Multi Services Kent Ltd	Metal Recycling / Haz Waste Transfer	Planning consent
75 - 77 Chequers Lane (B&D 25)	R White Waste Management Ltd	Haz Waste Transfer	Planning consent
Barking Transfer Station, 40 New Free Trade Wharf (B&D 27)	Suez Recycling & Recovery Ltd	Non-Haz Waste Transfer	Planning consent
Barking Waste Transfer and Recycling Facility, Maybell Farm (B&D 28)**	Biffa Waste Services Ltd	Non-Haz Waste Transfer	Planning consent

63 Site type based on Environment Agency permitting categories, and sites identified as waste transfer may be conducting treatment as well.

Location	Operator	Facility Type[63]	Grounds for safeguarding
Creek Road Waste Management Facility (B&D 06)	Workrate Ltd	Non-Haz Waste Transfer	Planning consent
Dagenham Dock Aggregate Recycling Facility (B&D 07)	Heidelberg Material UK	CDE Recycling Facility	Planning consent
Dagenham Plastics Recycling Facility (B&D 20)	Veolia E.S. (UK) Limited	Non Haz Waste Transfer / Treatment	Planning consent
Eastern Works, Alfred's Way (B&D 04)**	Creek Metals Limited	Metal Recycling	CLEUD
Frizlands Lane Reuse & Recycling Centre (B&D 31)	ELWA / Biffa	Non-Haz Waste Transfer	Planning consent
Halyard Street (B&D 21)	Cemex UK Material Ltd	Inert and Non Haz Waste Transfer / Treatment	Planning consent
Hindmans Way (Olleco) (B&D 36)	Stolthaven Dagenham Ltd	Treatment of non-hazardous waste	Planning consent
Hitch Street AD Plant (B&D 18)	ReFood UK Limited	Anaerobic Digestion	Planning consent
Hunts Wharf, Perry Road (B&D 17)*	HKS Dagenham Ltd	Metal Recycling	Planning consent
Kingsbridge Road (B&D 22)	G & S Tyre Services Limited	Non-Haz Waste Transfer	Planning consent
London Sustainable Industries Park North, Dagenham (B&D 32)	Thames Gateway Waste to Energy Ltd	Energy Recovery	Planning consent
Organic Waste Treatment Facility, Dagenham Dock, Choats Road (B&D 19)	East London Biogas Opco limited	Anaerobic Digestion	Planning consent
Perry Road Recycling Facility (B&D 11)	Recycled Material Supplies Ltd.	CDE Waste Physical Treatment Facility	Planning consent
Perry Road, off Chequers Lane (B&D 30)	Edwards Waste Paper Ltd.	Non-Haz Waste Transfer	Planning consent
Renwick Road Rail Hub, Barking (B&D 39)	Biffa	Non-Haz Waste Road to Rail Transfer only (N.B. no management capacity)	CLEUD
Thunderer Road (B&D 09 and 10)	Neptune Contract Services Ltd	CDE Waste Physical Treatment Facility	Planning consent

Location/Site Name	Operator	Facility Type	Grounds for safeguarding
5 Salamons Way (HV 30)	May Glass Recycling Ltd	Glass Recycling Facility	Planning consent
10 Salamons Way (HV 31)	Stokevale Ltd	Glass Recycling Facility	Planning consent
Albright Industrial Estate, Units 6A, 6B & 6 (HV 01)	Albright Transfer Station Ltd	Non-Haz Waste Transfer	Planning consent
B & P Scrap Co. Ltd New Road, Wennington (HV17)	City Metals Recycling Limited.	Non-Haz Waste Transfer	CLEUD
Car Breakers Yard, 2 Oaks, Broxhill Road (HV 07)	Randall, John t/a Randalls Car Dismantlers	Vehicle depollution facility	CLEUD
Centenary Works (HV 12)	F J Church & Sons Ltd	CDE Waste Physical Treatment Facility	Planning consent
Ferry Lane South WTF (HV 10)	Adler & Allan Limited	Non-Haz Waste Transfer	Planning consent
Frog Island MBT (HV 22) and WTS (HV 23)	ELWA/Biffa	Biological Treatment / Non-Haz Waste Transfer	Planning consent
Frog Lane, Off Marsh Way (HV 13)	Andrews Waste Management Ltd	CDE Waste Physical Treatment Facility	Planning consent
Gerpins Lane Reuse & Recycling Centre (HV 21)	ELWA / Biffa	CA Site	Planning consent
Grove Farm, Brook Street, Brentwood (HV 03 & HV34)	R J Skip Hire Ltd / South East Metals Ltd	Non-Haz Waste Transfer / Metal Recycling	Planning consent via Appeal against Enforcement Notice
Rainham Clinical Waste Treatment Centre (HV 14)	Sharpsmart Ltd	Clinical Waste Transfer	Planning consent
Rainham MRF Coldharbour Lane (HV 15 & 26)	Veolia ES Cleanaway (UK) Limited	Material Recycling Facility	Planning consent
Rainham Recycling Facility (HV 05)	Brett Aggregates Ltd.	CDE Waste Physical Treatment Facility	Planning consent
Riverside Sewage Treatment Works	Thames Water	Wastewater treatment facility	Planning consent
Silt Lagoons, Rainham and Wennington Marshes (HV 27)	Land & Water Remediation Limited	CDE Waste Physical Treatment Facility	Planning consent
Off Crow Lane (HV11)**	Crow Metals	Metal Recycling	Planning consent

Land At York Road, Rainham (HV 04)**	Kilnbridge Construction Services Ltd	Recycling and Waste Transfer Facility & Depot	Planning consent
Plot 22 Albright Industrial Estate (HV 28)	Excel Waste Management Ltd	Non-Haz Waste Transfer	Planning consent
Unit 7, Albright Industrial Estate, Ferry Lane (HV 09 & HV 20)	C T Wakefield & A Wakefield t/a Pier Metals / G&S Waste Management Ltd	Metal Recycling / Vehicle depollution facility / CDE Waste Physical Treatment Facility	Planning consent
Unit 13 Swift Business Park, Creek Waye (HV 19)	Citron Hygiene UK Ltd	Clinical Waste Transfer	Planning consent
Upminster Sewage Treatment Works	Anglian Water	Wastewater treatment facility	Planning consent

London Borough of Newham

Location/Site Name	Operator	Facility Type	Grounds for safeguarding
5, Eastbury Road Beckton (N14)	Terra Firma Pipeline Limited	Inert Waste Transfer	Lawful over time
Oasis Park, Stephenson Street (N 05)	Powerday Plc	Non-Haz Waste Transfer	Planning consent
Beckton Sewage Treatment Works (N 18)	Thames Water	Wastewater treatment facility	Planning consent
Bywaters Recycling & Recovery Centre, Unit J Prologis Park (N 11)	Bywaters (Leyton) Ltd	Material Recycling Facility	Planning consent
Canning Town Depot (N 01)	Pulse Environmental Limited	CDE Waste Physical Treatment Facility	Planning consent
9a Cody Business Centre, South Crescent Canning Town (N 08)	The Remet Company Limited	Metal Recycling	Lawful over time
EMR Silvertown, Unit 6, Standard Industrial Estate (N 09)	EMR	Metal Recycling	Planning consent
Jenkins Lane Reuse and Recycling Centre (N 15)	ELWA/Biffa	Household Waste Amenity Site	Planning consent
Jenkins Lane Waste Management Facility (N 16)	ELWA/Biffa	Biological Treatment	Planning consent
Knights Road, E16 2AT (N 02)*	JRL Environmental Limited	CDE Waste Physical Treatment Facility	Lawful over time
London Teleport Site Pier Road, Newham (N 17)	The Metal Recycling Company	Metal Recycling	Planning consent
Marshgate Sidings (N 03)	D B Schenker/D B Cargo	CDE Waste Physical Treatment Facility	Lawful over time

Marshgate Sidings (N 04)	S Walsh & Son Limited	Inert Waste Transfer	Lawful over time
Plaistow Wharf (N 06)*	Keltbray Environmental Ltd	Non-Haz Waste Transfer	Planning consent

London Borough of Redbridge

Location/Site Name	Operator	Facility Type	Grounds for safeguarding
45-47, Roebuck Road, Hainault Business Park (RB 04)	G & B Compressor Hire Ltd	Non-Haz Waste Transfer	Planning consent
Chigwell Road Reuse and Recycling Centre (RB 07)	ELWA / Biffa	Household Waste Amenity Site	Planning Consent
Ilford Recycling Centre (RB 08)**	ELWA / Biffa	Household Waste Amenity Site	Planning Consent
Ley Street Depot (RB 05)	Redbridge London Borough Council	Non-Haz Waste Transfer	Lawful over time
Unit U, Pegasus Works (RB 01)	N R M Metal Recycling Limited	Metal Recycling	Planning Consent

Appendix 3 – Maps of Safeguarded Sites (see Separate Document)

Included in separate document due to file size

Appendix 4 – Longer Term Development Options

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

		regeneration aims of the area.					
Redbridge	Ilford Recycling Centre (Renewi UK Services Ltd)	May not be required for ELWA contract	20,000	0	0	Permanent Permission (1847/94)	Redevelopment to be considered if site not required to service future ELWA waste management contract
		Totals:	**176,276**	**128,576**	**4,320**		

Appendix 5 – Replacement of Policies in the East London Waste Plan

The table below shows how the polices in the 2012 East London Waste Plan are replaced by those in the East London Joint Waste Plan

East London Waste Plan (2012) Policies		**Replacement Policies in the East London Joint Waste Plan**	
W1	Sustainable waste management	JWP1	Circular Economy
W2	Waste Management Capacity, Apportionment & Site Allocation	JWP2	Safeguarding and Provision of Waste Capacity
		JWP2B	Safeguarding and Provision of Wastewater Treatment Capacity
		JWP3	Prevention of Encroachment
W3	Energy recovery facilities	JWP5	Energy from Waste
W4	Disposal of inert waste by landfilling	JWP6	Deposit of Waste on Land
W5	General Considerations with regard to Waste Proposals	JWP4	Design of Waste Management Facilities

Appendix 3 – Maps of Sites Proposed for Safeguarding (Indicative Locations)

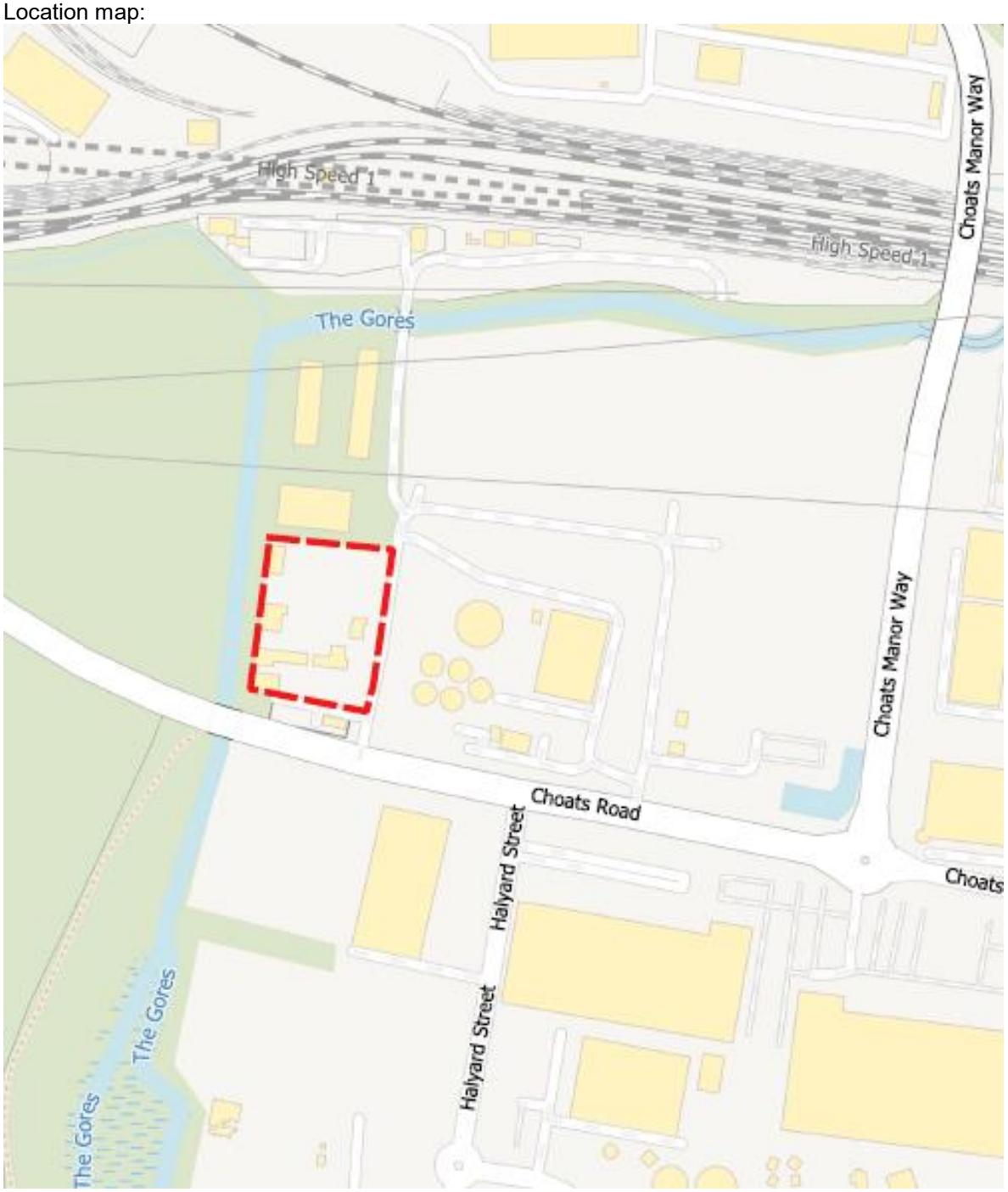
London Borough of Barking and Dagenham

Site name: Ref: B&D 02	**2 Chequers Lane**
Borough:	Barking and Dagenham
Site address:	2 Chequers Lane, Dagenham, RM9 6QJ
OS grid reference:	TQ 54889 18205
Site size (ha):	0.07

Location map:

Site name: Ref: B&D 03	**2 Choats Road**
Borough:	Barking and Dagenham
Site address:	Unit 2, Choats Road, Dagenham, London, RM9 6RJ
OS grid reference:	TQ 48153 82738
Site size (ha):	1.34

Location map:



Site name: Ref: B&D 14	**12-14 River Road (Alexander Wharf)**
Borough:	Barking and Dagenham
Site address:	12-14 River Road, Barking, Essex, IG11 0DG
OS grid reference:	TQ 45377 82670
Site size (ha):	0.67

Location map:

Site name: Ref: B&D 08	**40 A&B River Road (Media Park)**
Borough:	Barking and Dagenham
Site address:	Media Park, 40 A & B River Road, Barking, Essex, IG11 0DW
OS grid reference:	TQ 45547 82301
Site size (ha):	0.26

Location map:

Site name: Ref: B&D 24	**54-60 River Road**
Borough:	Barking and Dagenham
Site address:	54 - 60 River Road, Barking, Essex, IG11 0DS
OS grid reference:	TQ 45584 82008
Site size (ha):	4.08

Location map:

Site name: Ref: B&D 16 and B&D 40	**72-76 River Road, Docklands Wharf Transfer Station**
Borough:	Barking and Dagenham
Site address:	72-76 River Road, Barking, Essex, IG11 0DS
OS grid reference:	TQ 54588 181744
Site size (ha):	1.017

Location map:

Site name: Ref: B&D 25	**75-77 Chequers Lane**
Borough:	Barking and Dagenham
Site address:	75 - 77 Chequers Lane, Dagenham RM9 6QJ
OS grid reference:	TQ 48825 82106
Site size (ha):	1.74

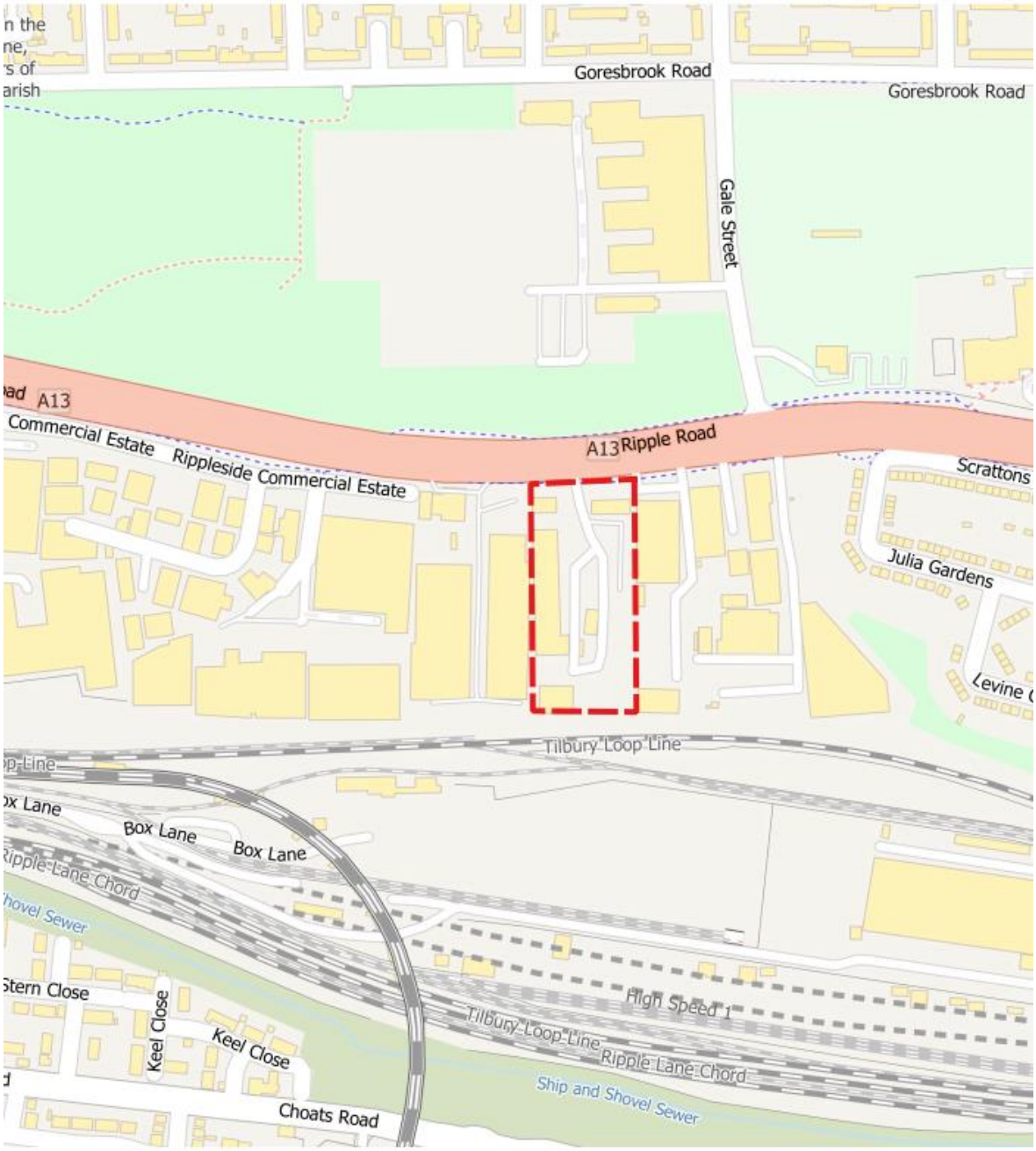
Location map:

Site name: Ref: B&D 27	**Barking Transfer Station**
Borough:	Barking and Dagenham
Site address:	New Free Trade Wharf, 40 River Road, Barking IG11 0DW
OS grid reference:	TQ 45499 82289
Site size (ha):	0.26

Location map:

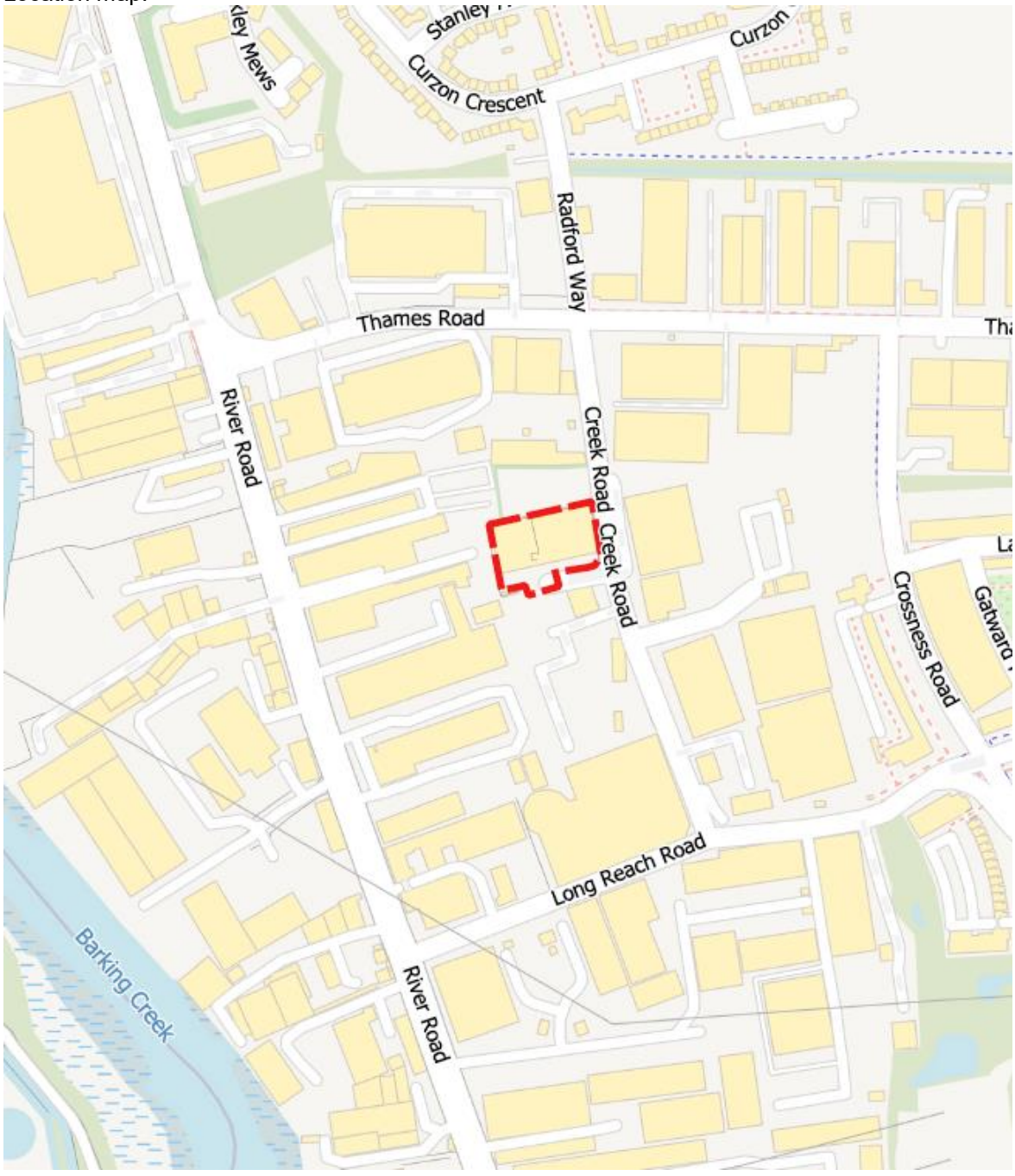
Site name: Ref: B&D 28	**Barking Waste Transfer and Recycling Facility**
Borough:	Barking and Dagenham
Site address:	Barking Waste Transfer and Recycling Facility, Maybell Farm, Ripple Road, Barking IG11 0TT
OS grid reference:	TQ 47499 83446
Site size (ha):	1.60

Location map:



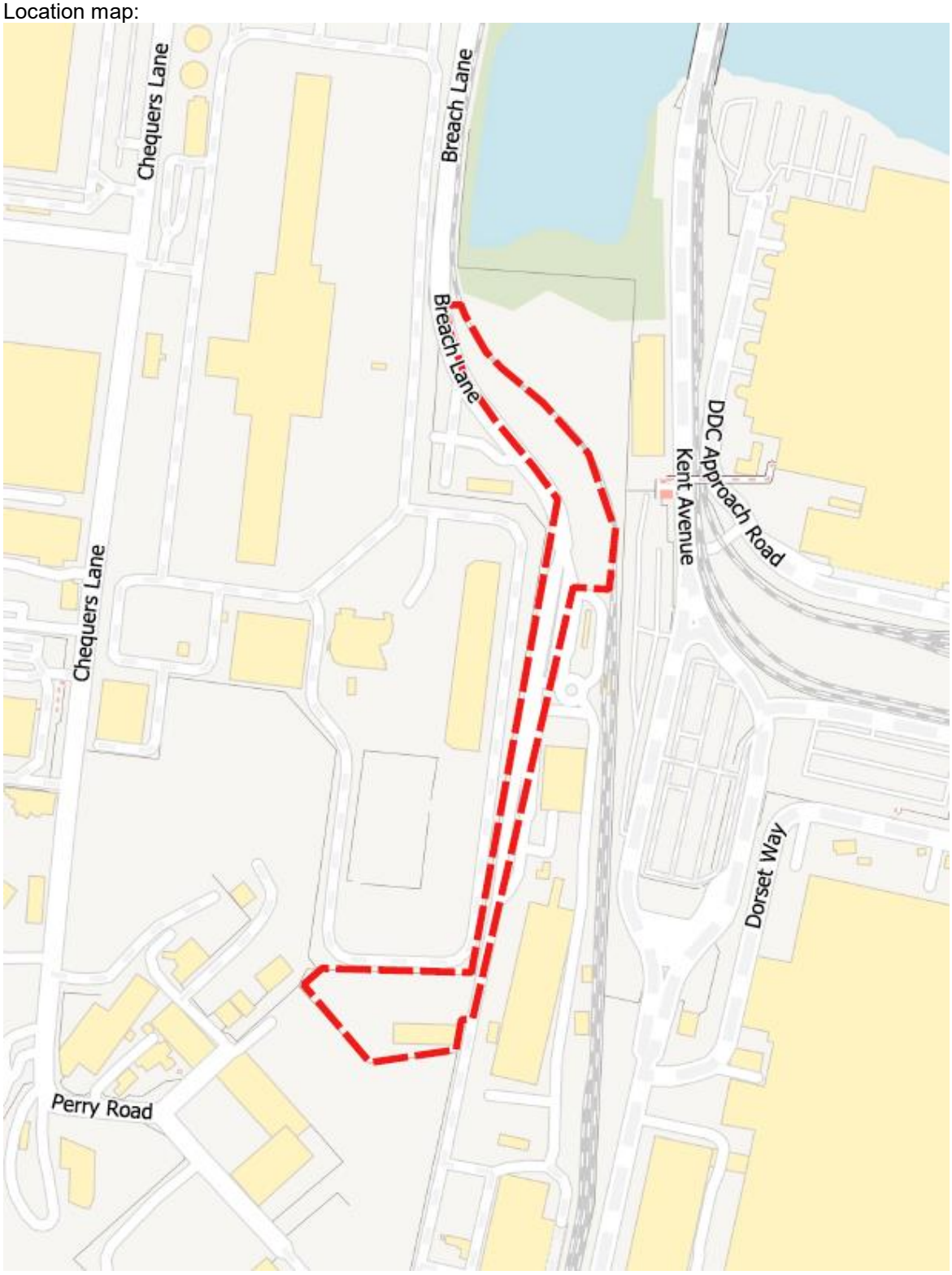
Site name: Ref: B&D 06	**Creek Road Waste Management Facility**
Borough:	Barking and Dagenham
Site address:	2 Creek Road, Barking, IG11 OJH
OS grid reference:	TQ 5456 1826
Site size (ha):	0.33

Location map:



Site name: Ref: B&D 07	**Dagenham Dock Aggregate Recycling Facility**
Borough:	Barking and Dagenham
Site address:	Land on Breach Lane, Dagenham Dock, Dagenham, RM9 6QD
OS grid reference:	TQ 54921 182193
Site size (ha):	1.64

Location map:

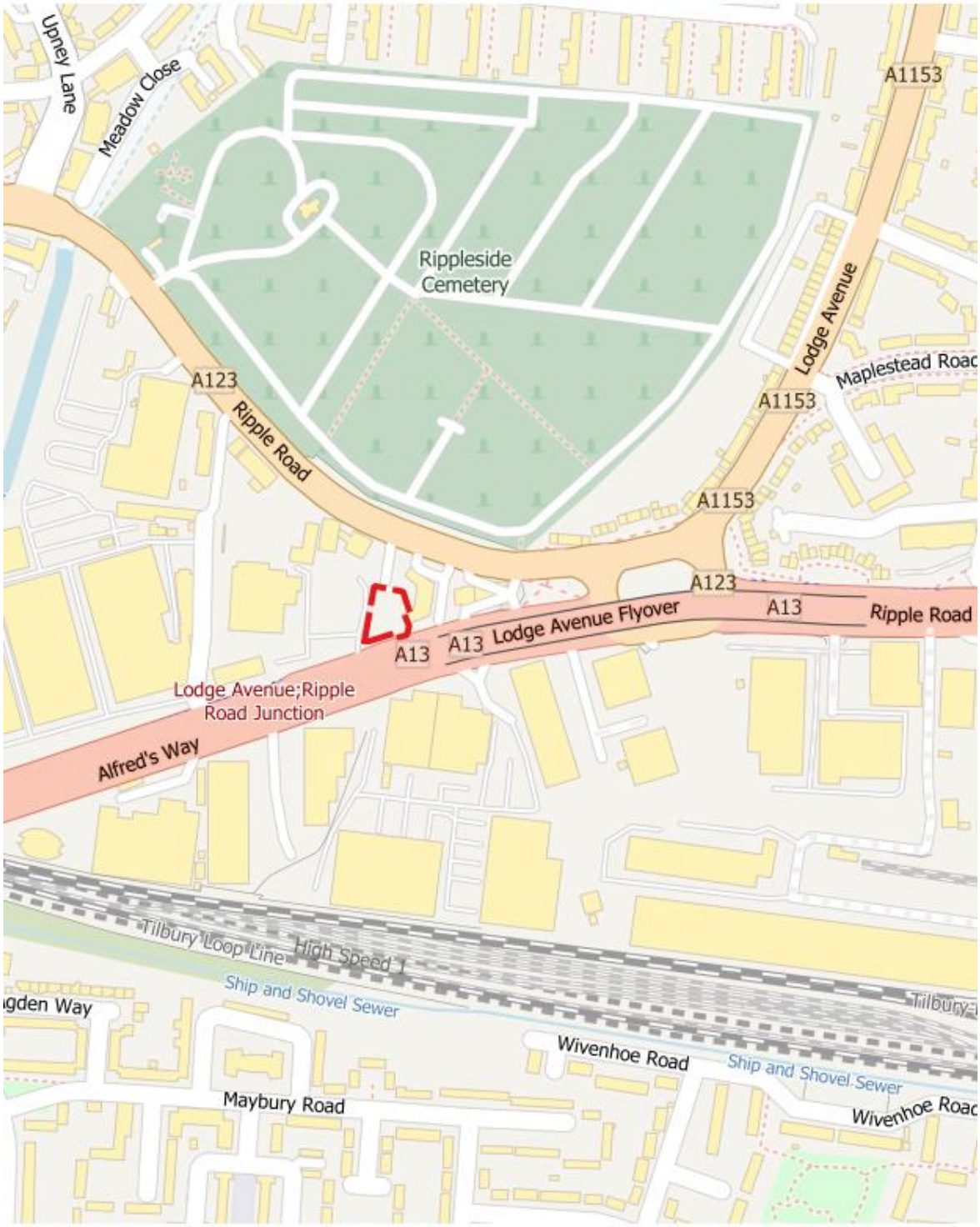


Site name: Ref: B&D 20	**Dagenham Plastics Recycling Facility**
Borough:	Barking and Dagenham
Site address:	Choats Road, Dagenham Dock, RM9 6LF
OS grid reference:	TQ 54824 18257
Site size (ha):	1.22

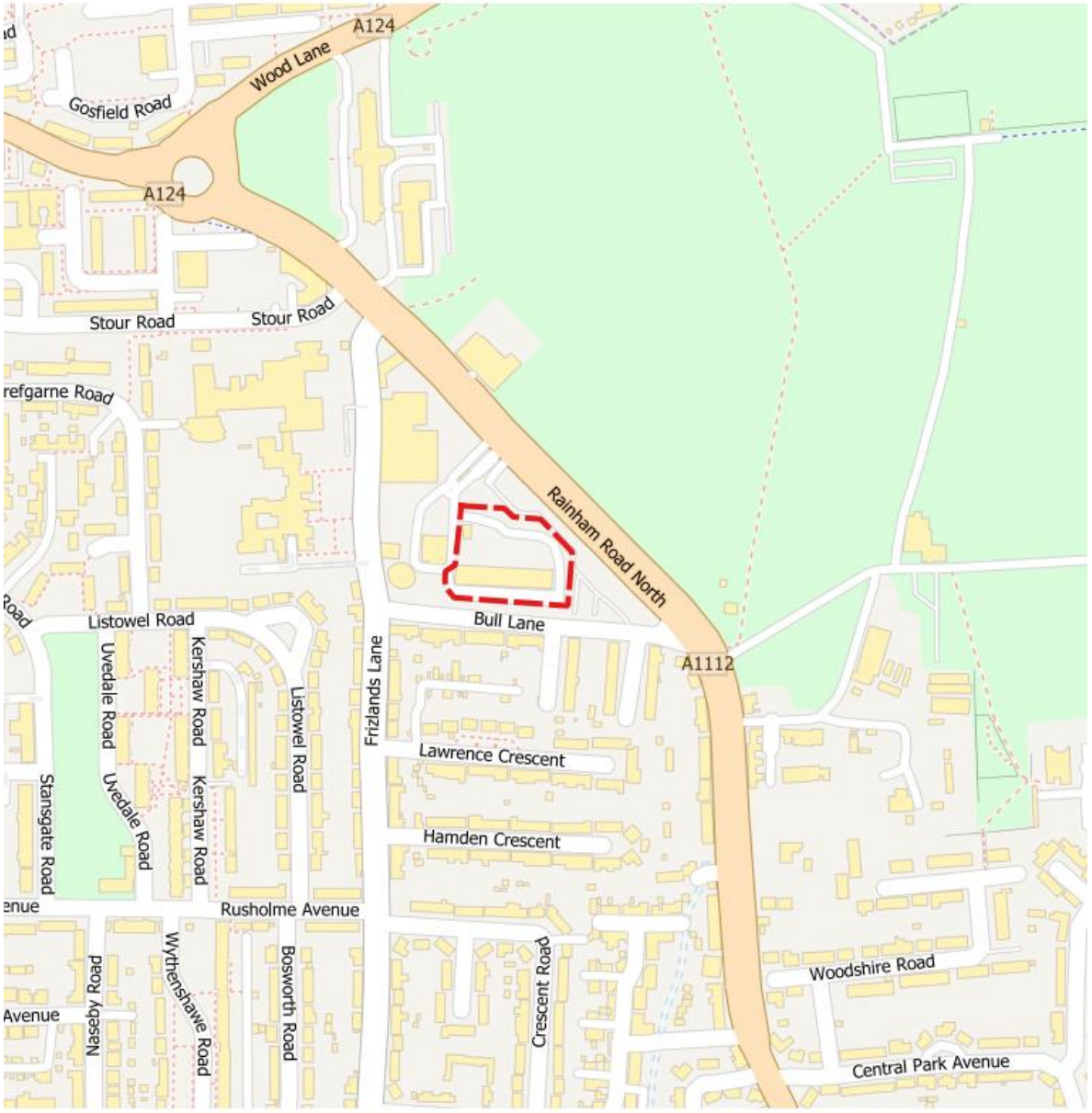
Location map:

Site name: Ref: B&D 04	**Eastern Works, Alfred's Way**
Borough:	Barking and Dagenham
Site address:	Eastern Works, Alfred's Way, Barking IG11 0AT
OS grid reference:	TQ 46177 83656
Site size (ha):	0.10

Location map:



Site name: Ref: B&D 31	**Frizlands Lane Reuse & Recycling Centre**
Borough:	Barking and Dagenham
Site address:	Frizlands Depot, Rainham Road North, Dagenham, Essex, RM10 7HX
OS grid reference:	TQ 49631 86540
Site size (ha):	0.68
Location map:	



Site name: Ref: B&D 21	**Halyard Street**
Borough:	Barking and Dagenham
Site address:	Halyard Street, Dagenham, RM9 6RJ
OS grid reference:	TQ 54812 18246
Site size (ha):	1.05

Location map:

Site name: Ref: B&D 36	**Hindmans Way (Olleco)**
Borough:	Barking and Dagenham
Site address:	Hindmans Way, Barking, RM9 6LN
OS grid reference:	TQ 54870 18225
Site size (ha):	0.53

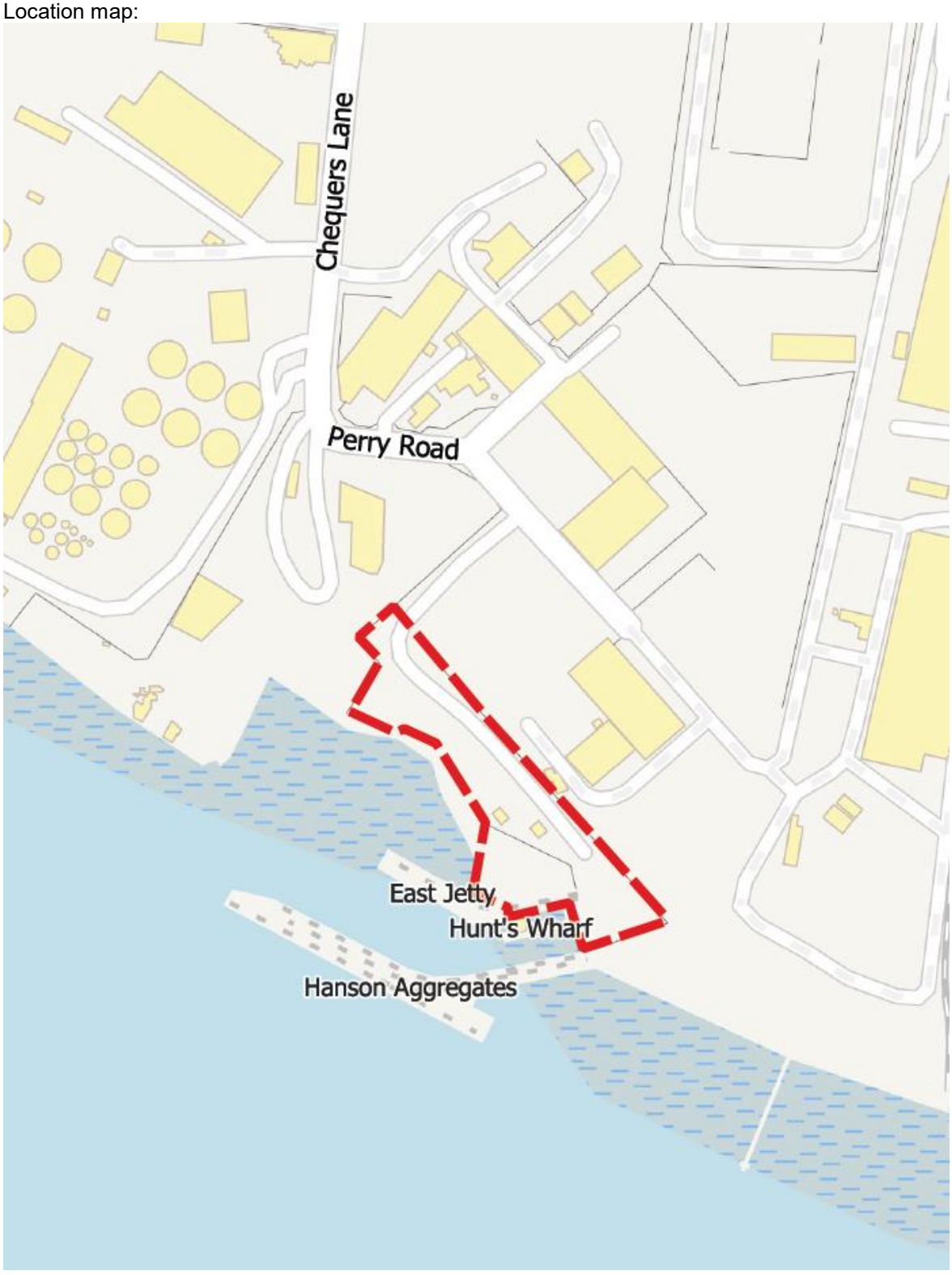
Location map:

Site name: Ref: B&D 18	**Hitch Street AD Plant**
Borough:	Barking and Dagenham
Site address:	ReFood UK, 1 Hitch Street, Dagenham, Essex, RM9 6FA
OS grid reference:	TQ 48300 82750
Site size (ha):	3.69

Location map:

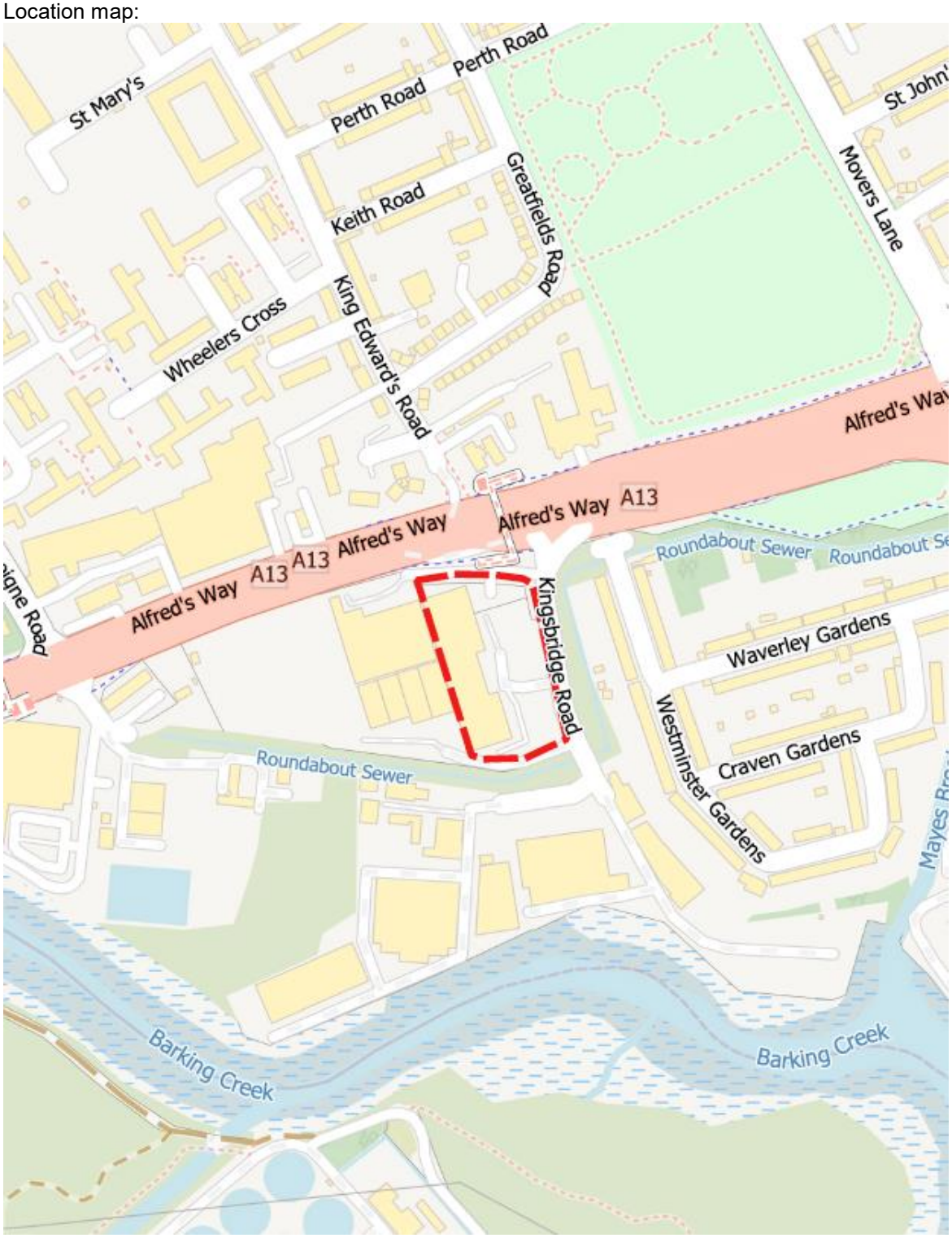
Site name: Ref: B&D 17	**Hunts Wharf**
Borough:	Barking and Dagenham
Site address:	Perry Road, RM9 6QD
OS grid reference:	TQ 54900 18174
Site size (ha):	0.877

Location map:



Site name: Ref: B&D 22	**Kingsbridge Road**
Borough:	Barking and Dagenham
Site address:	Kingsbridge Road, Barking, IG11 0BD
OS grid reference:	TQ 54494 18312
Site size (ha):	0.91

Location map:



Site name: Ref: B&D 32	**London Sustainable Industries Park North,**
Borough:	Barking and Dagenham
Site address:	Reef Street, Barking RM9 6FA
OS grid reference:	TQ 54840 18288
Site size (ha):	3.31

Location map:

Site name: Ref: B&D 19	**Organic Waste Treatment Facility, Choats Road**
Borough:	Barking and Dagenham
Site address:	Organic Waste Treatment Facility, London Sustainable Industries Park, Halyard Street, Dagenham Dock, Dagenham, RM9 6LF
OS grid reference:	TQ 48380 82410
Site size (ha):	1.88

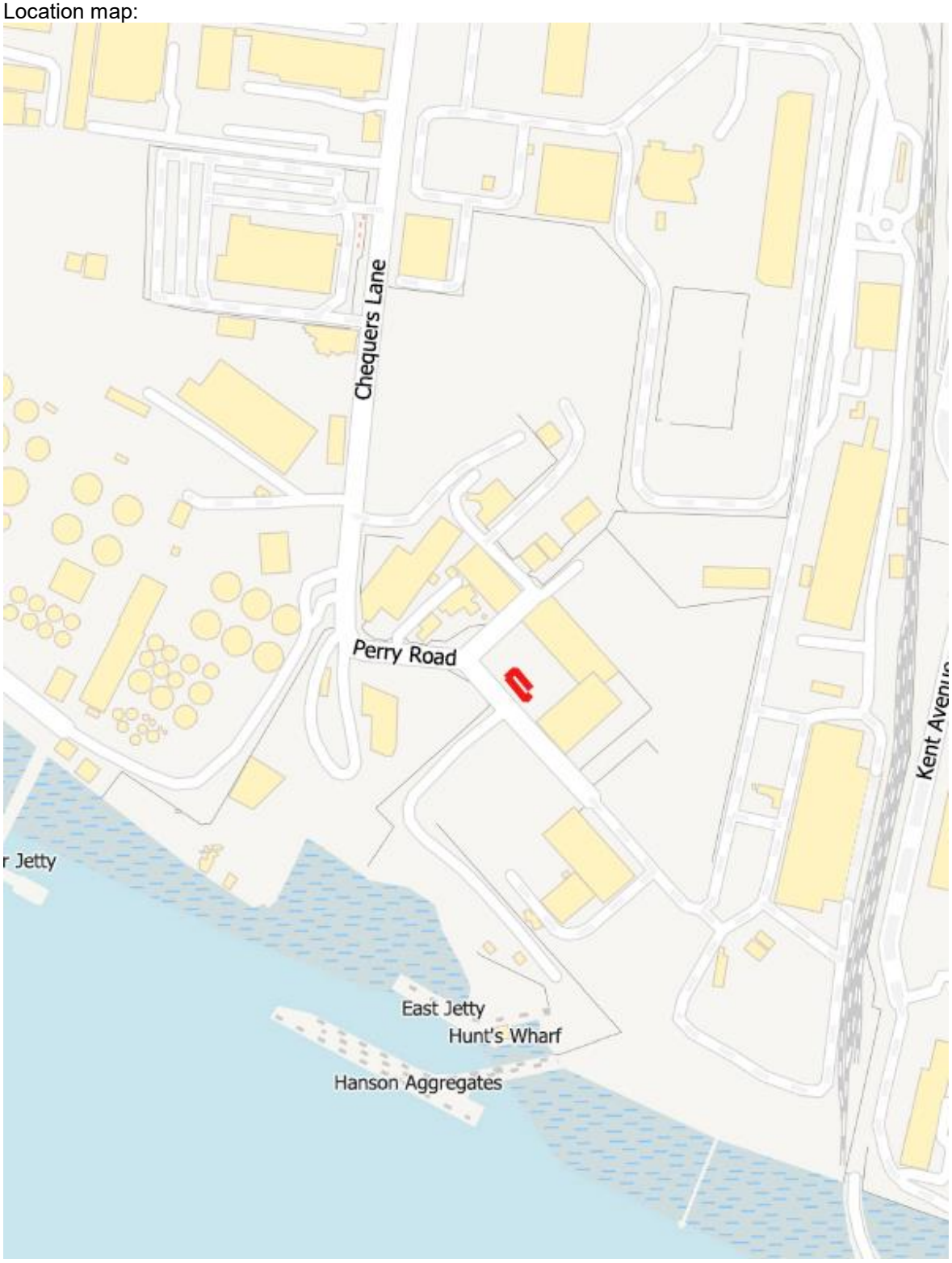
Location map:

Site name: Ref: B&D 11	**Perry Road Recycling Facility**
Borough:	Barking and Dagenham
Site address:	Perry Road, Off Chequers Lane, Dagenham, RM9 6QD
OS grid reference:	TQ 54912 18189
Site size (ha):	1.66

Location map:

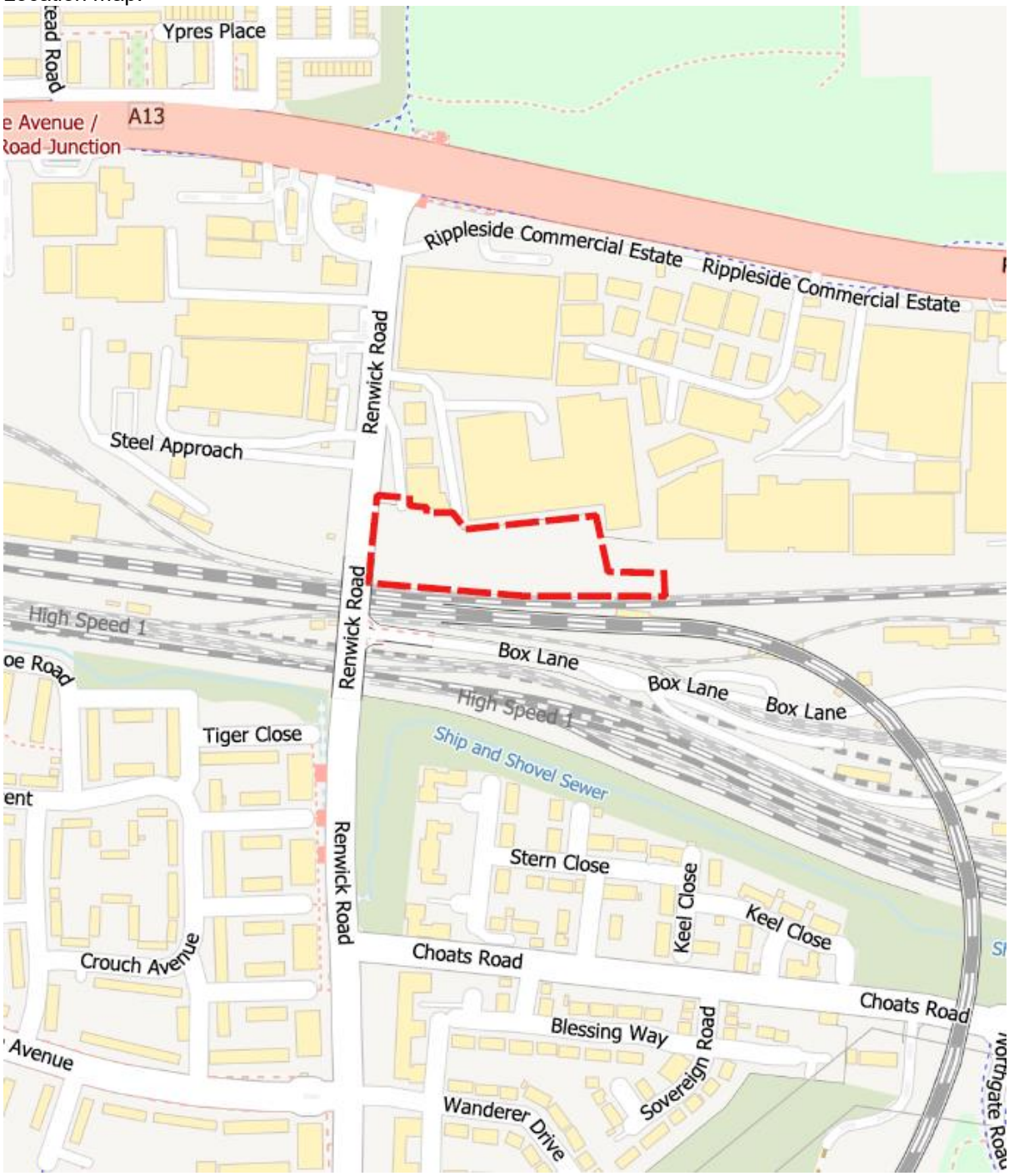
Site name: Ref: B&D 30	**Perry Road, off Chequers Lane**
Borough:	Barking and Dagenham
Site address:	Perry Road, off Chequers Lane, Dagenham, RM9 6QD
OS grid reference:	TQ 54902 18190
Site size (ha):	0.01

Location map:



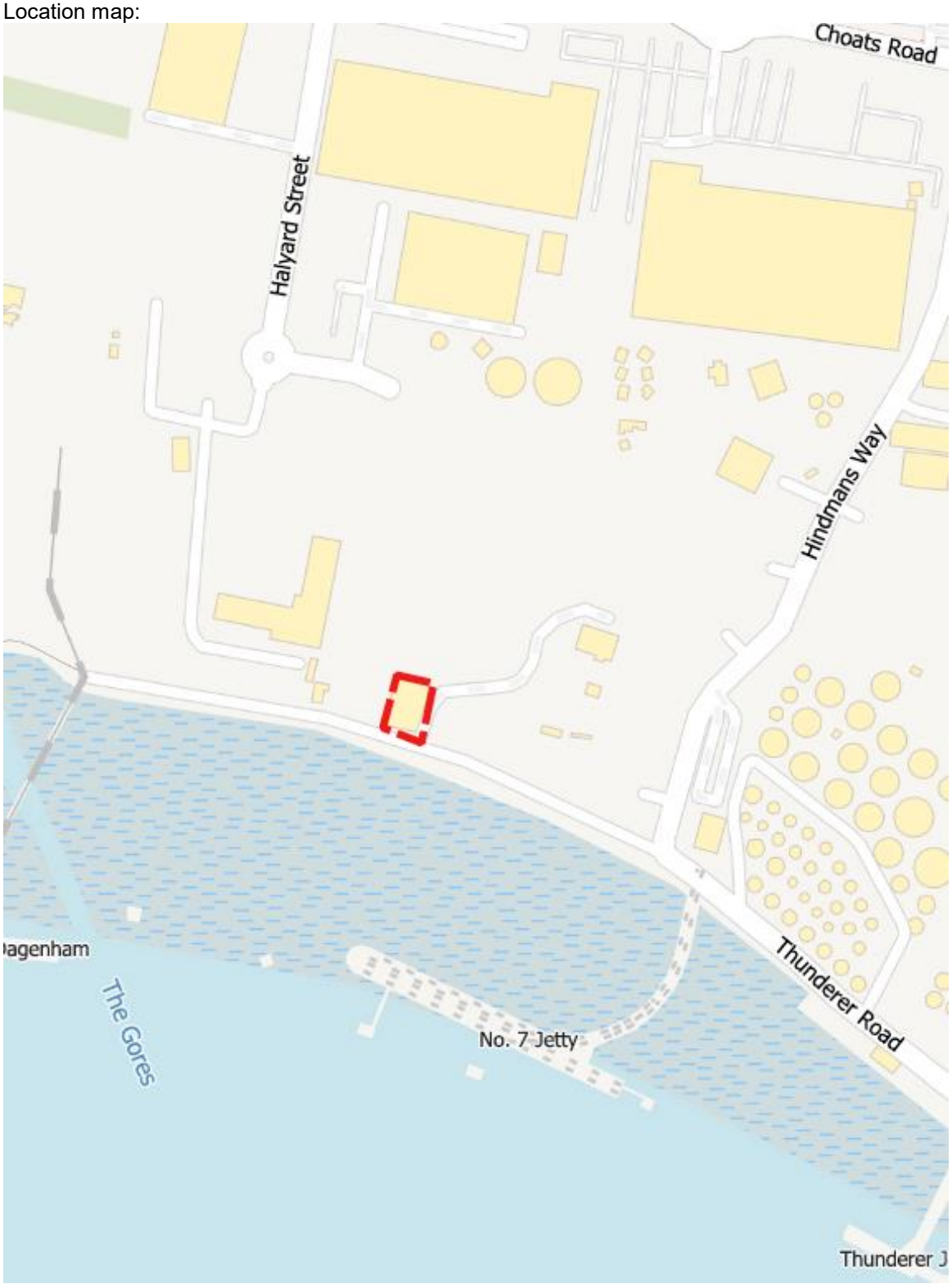
Site name: Ref: B&D 39	**Renwick Road Rail Hub**
Borough:	Barking and Dagenham
Site address:	Renwick Road Rail Hub, Renwick Road, Barking IG11 0SB
OS grid reference:	TQ 5470 1833
Site size (ha):	0.975

Location map:



Site name: Ref: B&D 09 & 10	**Thunderer Road**
Borough:	Barking and Dagenham
Site address:	Thunderer Road, Chequers Lane, Dagenham, RM9 6QD
OS grid reference:	TQ 54834 18214
Site size (ha):	0.09

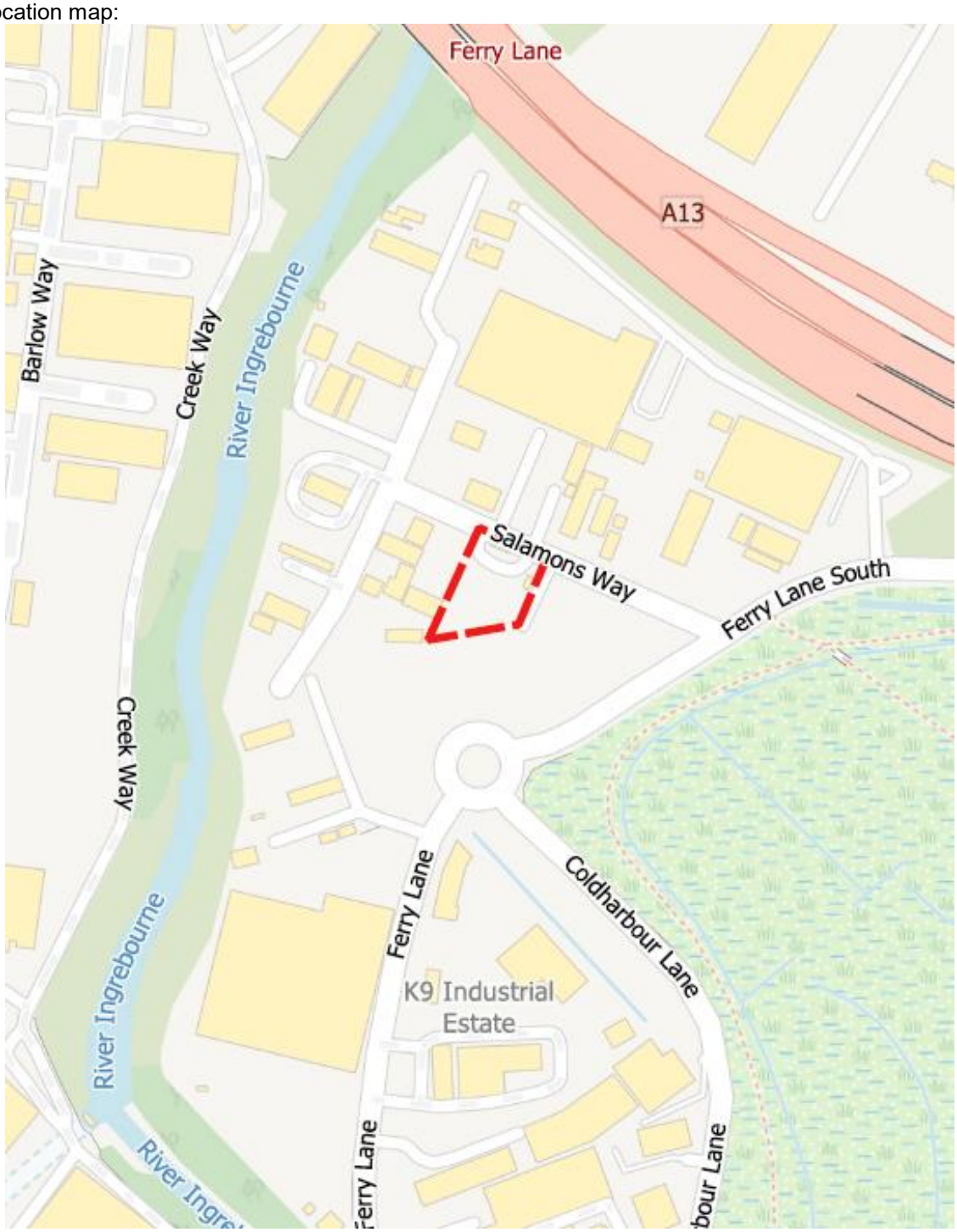
Location map:



London Borough of Havering

Site name: Ref.: HV 30	**5 Salamons Way**
Borough:	London Borough of Havering
Site address:	5 Salamons Way, Ferry Lane South, Rainham, Essex, RM13 9UL
OS grid reference:	TQ 55130 18141
Site size (ha):	0.266

Location map:

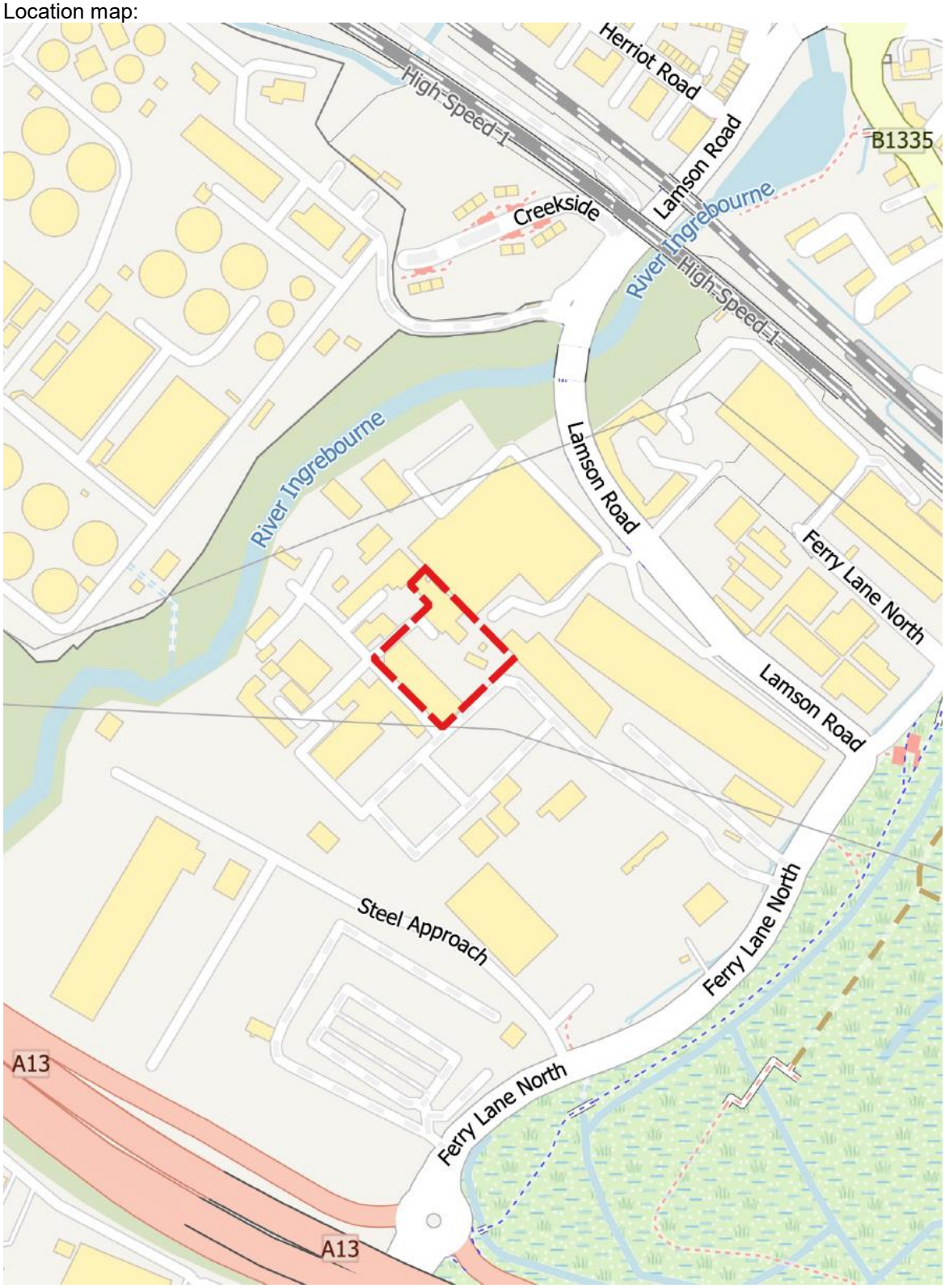


Site name: Ref: HV 31	**10 Salamons Way**
Borough:	London Borough of Havering
Site address:	10 Salamons Way, Ferry Lane South, Rainham, Essex, RM13 9UL
OS grid reference:	TQ 55133 181464
Site size (ha):	0.116

Location map:

Site name: Ref: HV 01	**Albright Industrial Estate, Units 6A, 6B & 6**
Borough:	London Borough of Havering
Site address:	Units 6A, 6B & 6, Albright Industrial Estate, RM13 9BU
OS grid reference:	TQ 5517 18192
Site size (ha):	0.48

Location map:

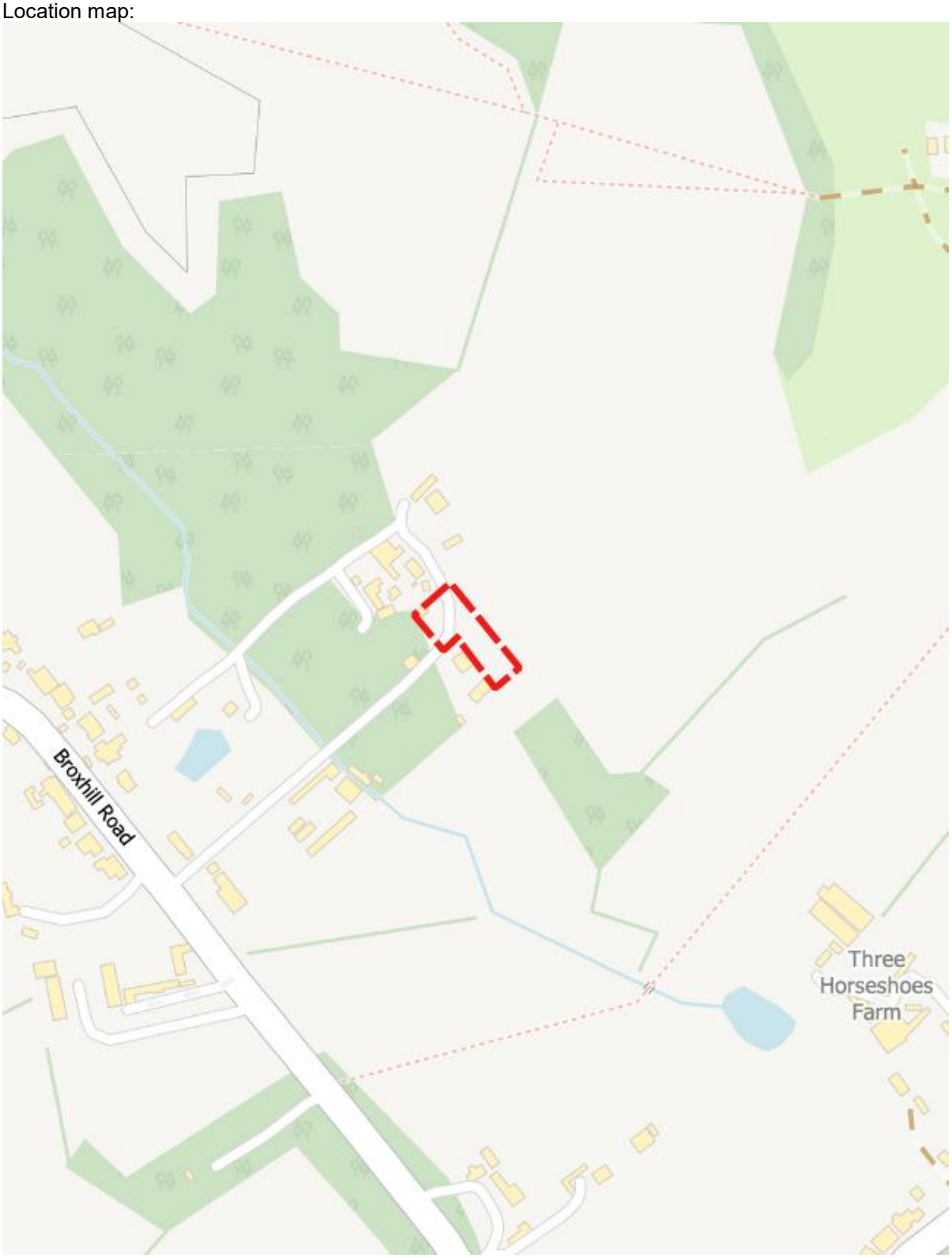


Site name: Ref: HV 17	**B & P Scrap Co. Ltd New Road**
Borough:	London Borough of Havering
Site address:	New Road, Wennington, RM13 9EB
OS grid reference:	TQ 55460 18064
Site size (ha):	0.29

Location map:

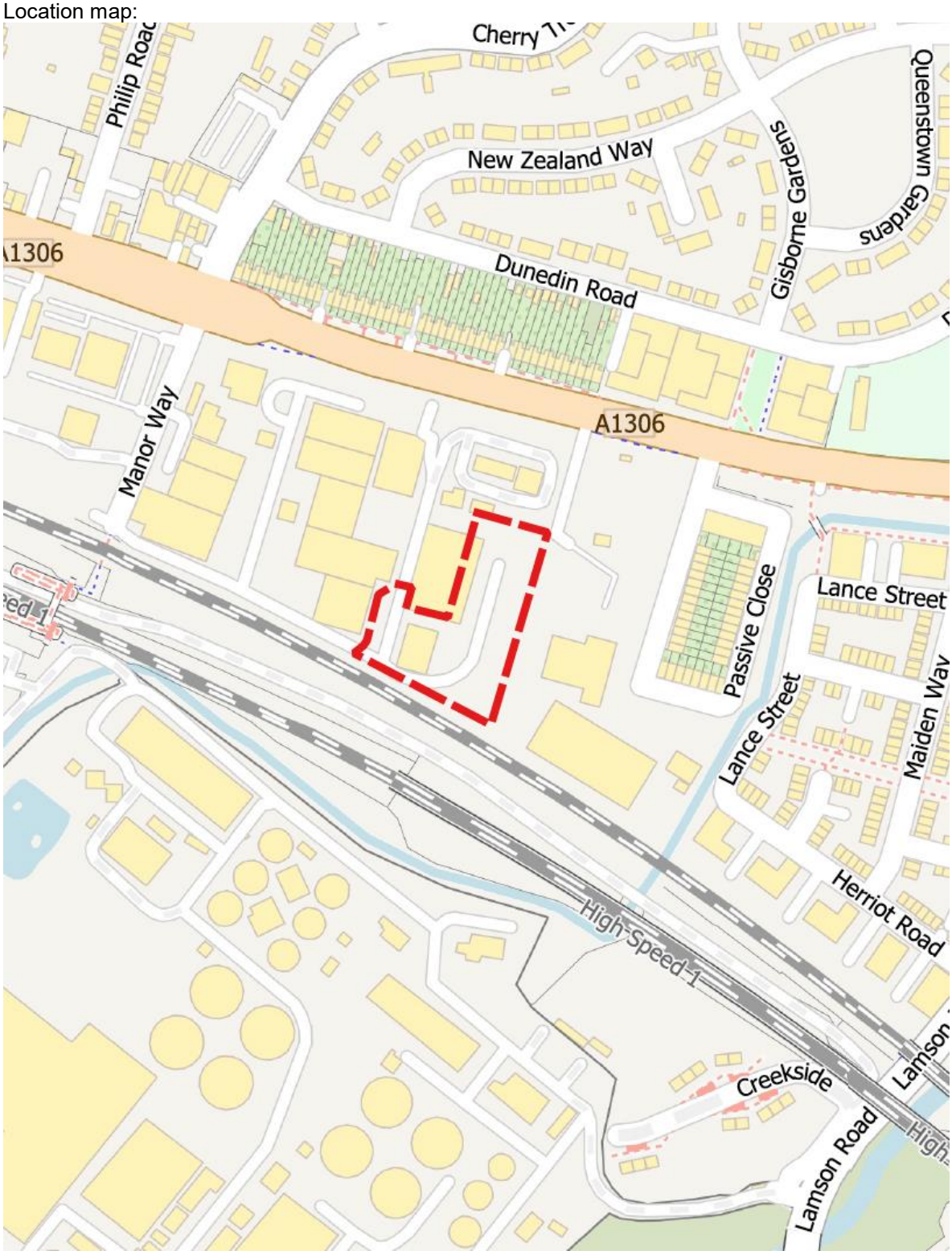
Site name: Ref: HV 07	**Car Breakers Yard, 2 Oaks**
Borough:	London Borough of Havering
Site address:	2 Oaks, Broxhill Road, RM4 1QJ
OS grid reference:	TQ 55288 19319
Site size (ha):	0.215

Location map:



Site name: Ref: HV 12	**Centenary Works**
Borough:	London Borough of Havering
Site address:	Centenary Works, Manor Way, New Road, Rainham, RM13 8RH
OS grid reference:	TQ 55158 18250
Site size (ha):	0.73

Location map:



Site name: Ref: HV 10	**Ferry Lane South Waste Transfer Facility**
Borough:	London Borough of Havering
Site address:	Ferry Lane South, RM13 9UL
OS grid reference:	TQ 55118 18141
Site size (ha):	0.19

Location map:

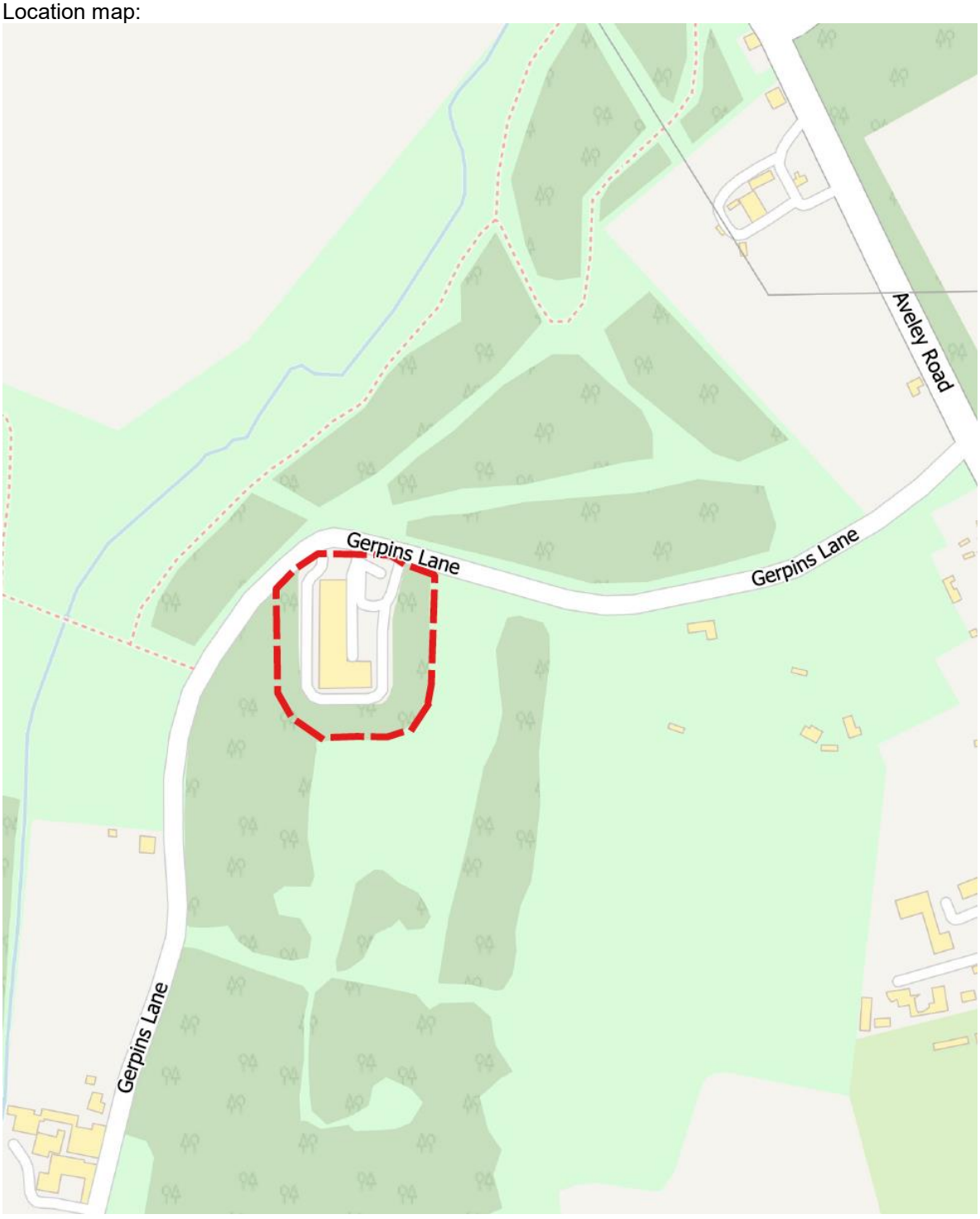
Site name: Ref.: HV 22; HV 23	**Frog Island Waste Management Facility**
Borough:	London Borough of Havering
Site address:	Frog Island Waste Management Facility, Creek Way, Rainham, Essex, RM13 8EN
OS grid reference:	TQ 50967 81092
Site size (ha):	0.39
Location map:	

Site name: Ref.: HV 13	**Frog Lane**
Borough:	London Borough of Havering
Site address:	Frog Lane, Off Marsh Way, Rainham, Essex, RM13 8UG
OS grid reference:	TQ 55068 18126
Site size (ha):	1.43

Location map:

Site name: Ref.: HV 21	**Gerpins Lane Reuse & Recycling Centre**
Borough:	London Borough of Havering
Site address:	Civic Amenity Site, Gerpins Lane, Upminster, Essex, RM14 2XR
OS grid reference:	TQ 55362 84288
Site size (ha):	0.71

Location map:



Site name: Ref.: HV 03 & HV34	**Grove Farm (RJ Skip Hire / South East Metals Ltd)**
Borough:	London Borough of Havering
Site address:	Plot 6, Grove Farm, Brook Street, Brentwood CM14 5NG
OS grid reference:	TQ 556419 192561
Site size (ha):	0.71

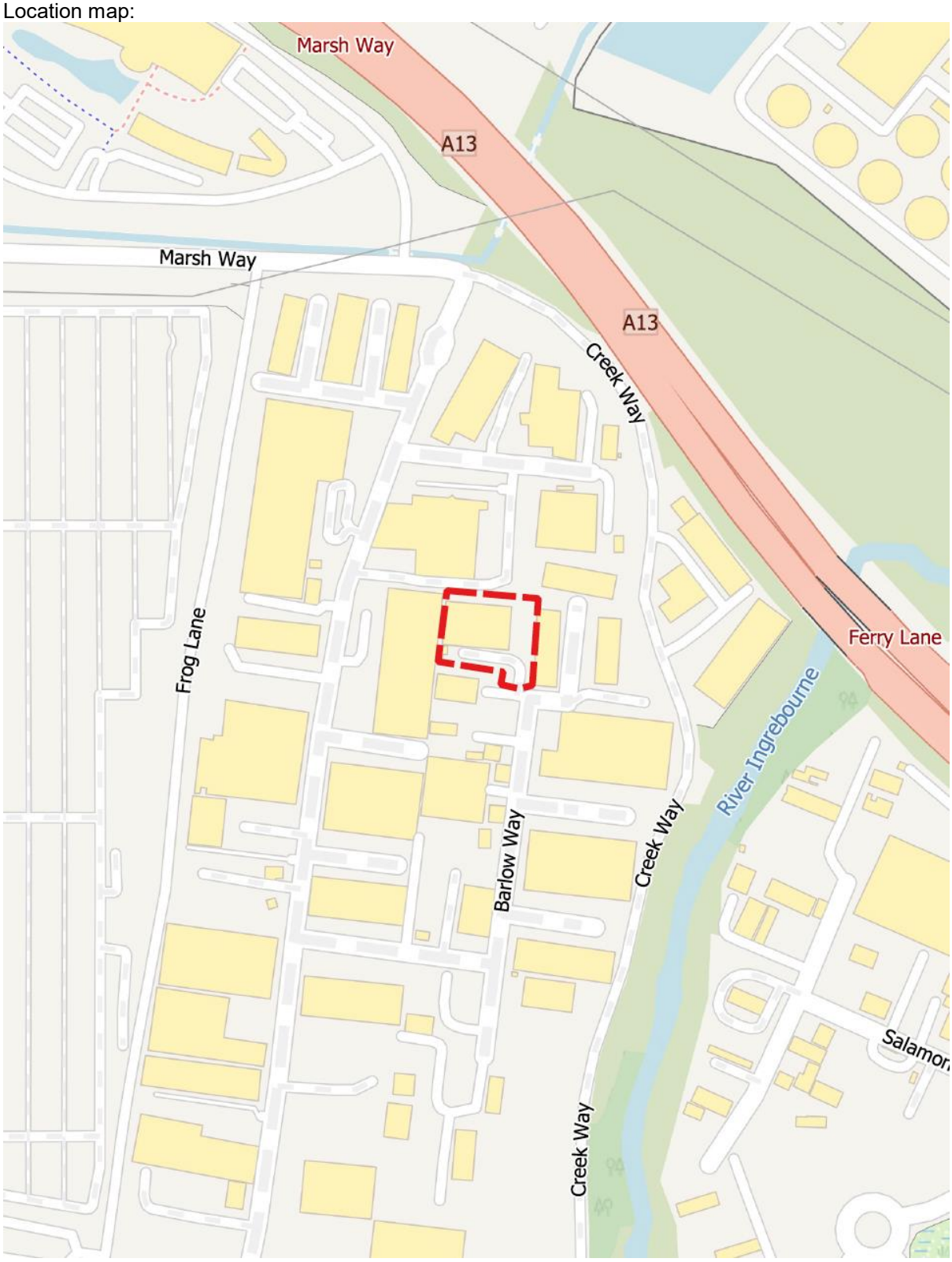
Location map:

Site name: Ref.: HV 04	**Land at York Road**
Borough:	London Borough of Havering
Site address:	York Road Waste Transfer Station, Rainham, Essex, RM13 7BW
OS grid reference:	55097 18425
Site size (ha):	0.386

Location map:

Site name: Ref.: HV 14	**Rainham Clinical Waste Treatment Centre**
Borough:	London Borough of Havering
Site address:	Off Marsh Way, Rainham, Essex, RM13 8BT
OS grid reference:	TQ 55102 18174
Site size (ha):	0.39

Location map:



Site name: Ref.: HV 15 & 26	**Rainham MRF Coldharbour Lane**
Borough:	London Borough of Havering
Site address:	Coldharbour Lane, Off Ferry Lane, Rainham RM13 9DA
OS grid reference:	TQ 52537 79313
Site size (ha):	1.26

Location map:

Site name: Ref.: HV 05	**Rainham Recycling Facility**
Borough:	London Borough of Havering
Site address:	Rainham Recycling Facility Launder's Ln, Rainham, Upminster RM13 9GJ
OS grid reference:	TQ 55491 18279
Site size (ha):	16.23

Location map:

Site name: Ref.: HV	**Riverside Sewage Treatment Works**
Borough:	London Borough of Havering
Site address:	Riverside Sewage Treatment Works, Rainham, RM13 8QS
OS grid reference:	TQ 55138 18214
Site size (ha):	25.57

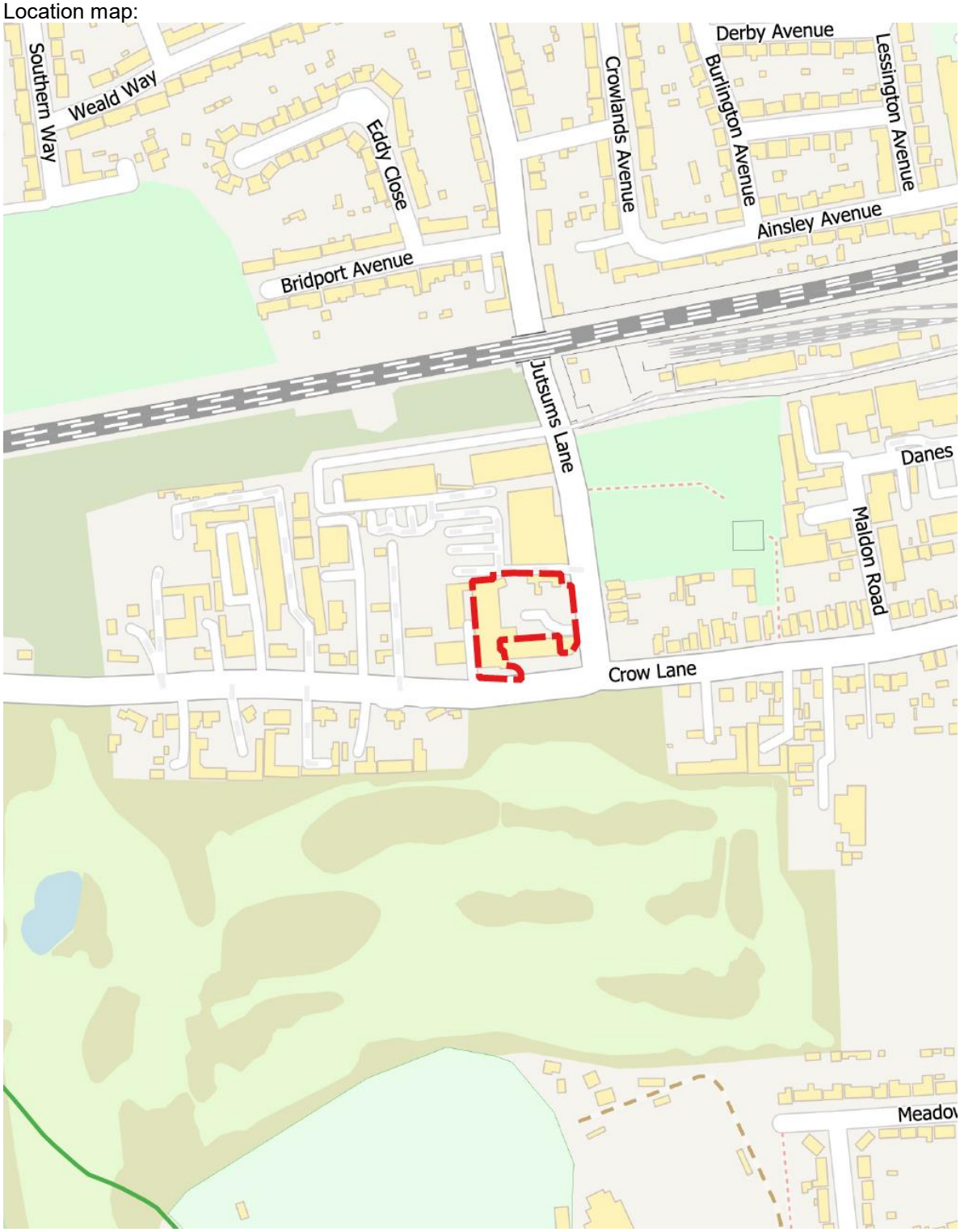
Location map:

Site name: Ref.: HV	**Silt Lagoons, Rainham and Wennington Marshes**
Borough:	London Borough of Havering
Site address:	Silt Lagoons, Rainham and Wennington Marshes, Cold Harbour Lane, Rainham, Essex, RM13 9YQ
OS grid reference:	TQ 52660 80568
Site size (ha):	15.19

Location map:

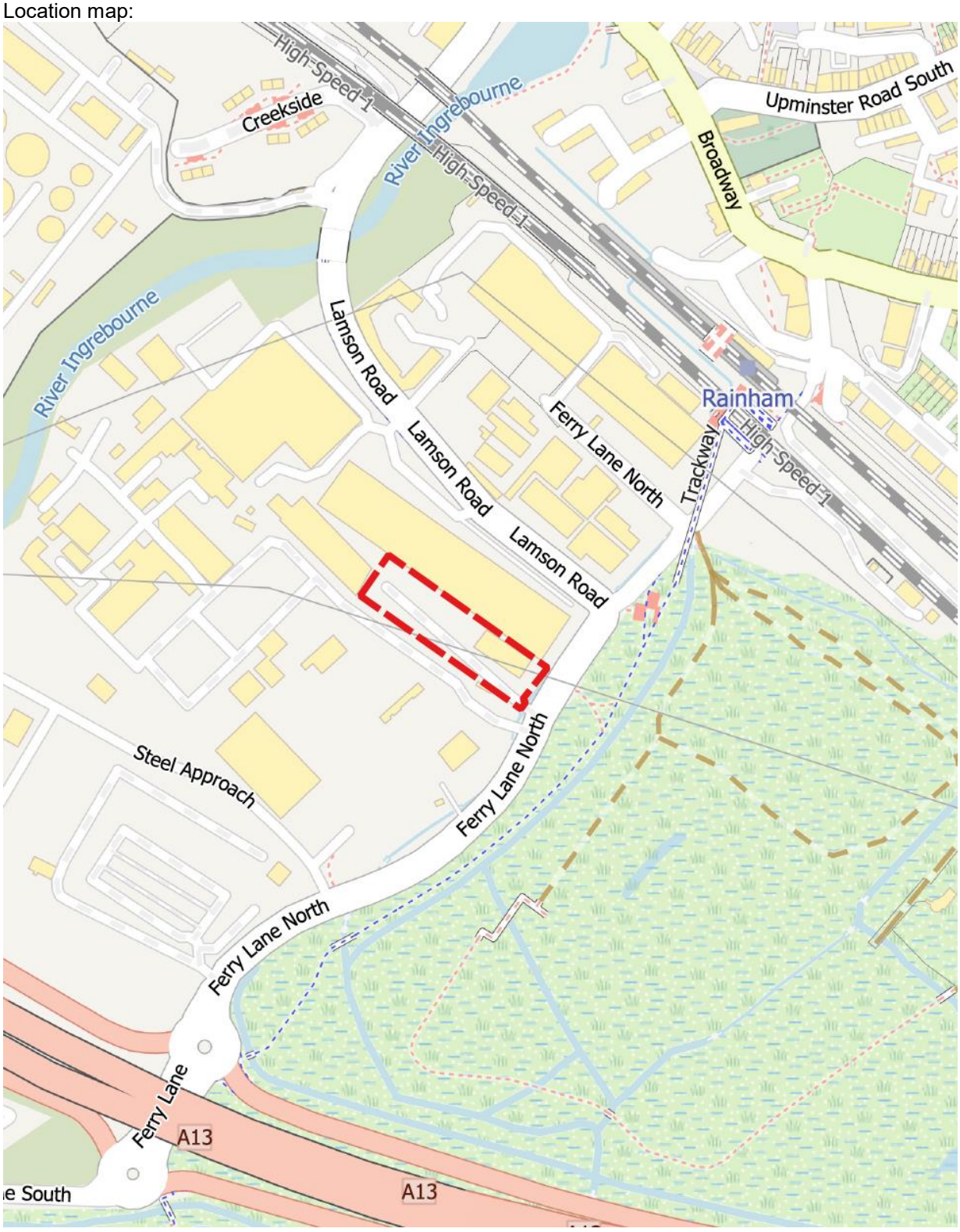
Site name: Ref.: HV 11	**Off Crow Lane**
Borough:	London Borough of Havering
Site address:	Off Crow Lane, Romford, RM7 0EE
OS grid reference:	TQ 54983 18777
Site size (ha):	0.43

Location map:



Site name: Ref.: HV 28	**Plot 22 Albright Industrial Estate**
Borough:	London Borough of Havering
Site address:	Plot 22 Albright Industrial Estate, Ferry Lane RM13 9BU
OS grid reference:	55183 18178
Site size (ha):	0.99

Location map:



Site name: Ref.: HV 09 & HV 20	**Unit 7 Albright Industrial Estate**
Borough:	London Borough of Havering
Site address:	Ferry Lane RM13 9BU
OS grid reference:	TQ 55161 18197
Site size (ha):	0.61

Location map:

Site name: Ref.: HV 19	**Unit 13 Swift Business Park**
Borough:	London Borough of Havering
Site address:	Unit 13 Swift Business Park, Creek Waye, RM13 8LE
OS grid reference:	TQ 55117 18171
Site size (ha):	0.15

Location map:

Site name: Ref.: HV	**Upminster Sewage Treatment Works**
Borough:	London Borough of Havering
Site address:	Upminster Sewage Treatment Works, Bury Farm, Upminster, RM14 3PH
OS grid reference:	TQ 56083 18657
Site size (ha):	10.51

Location map:

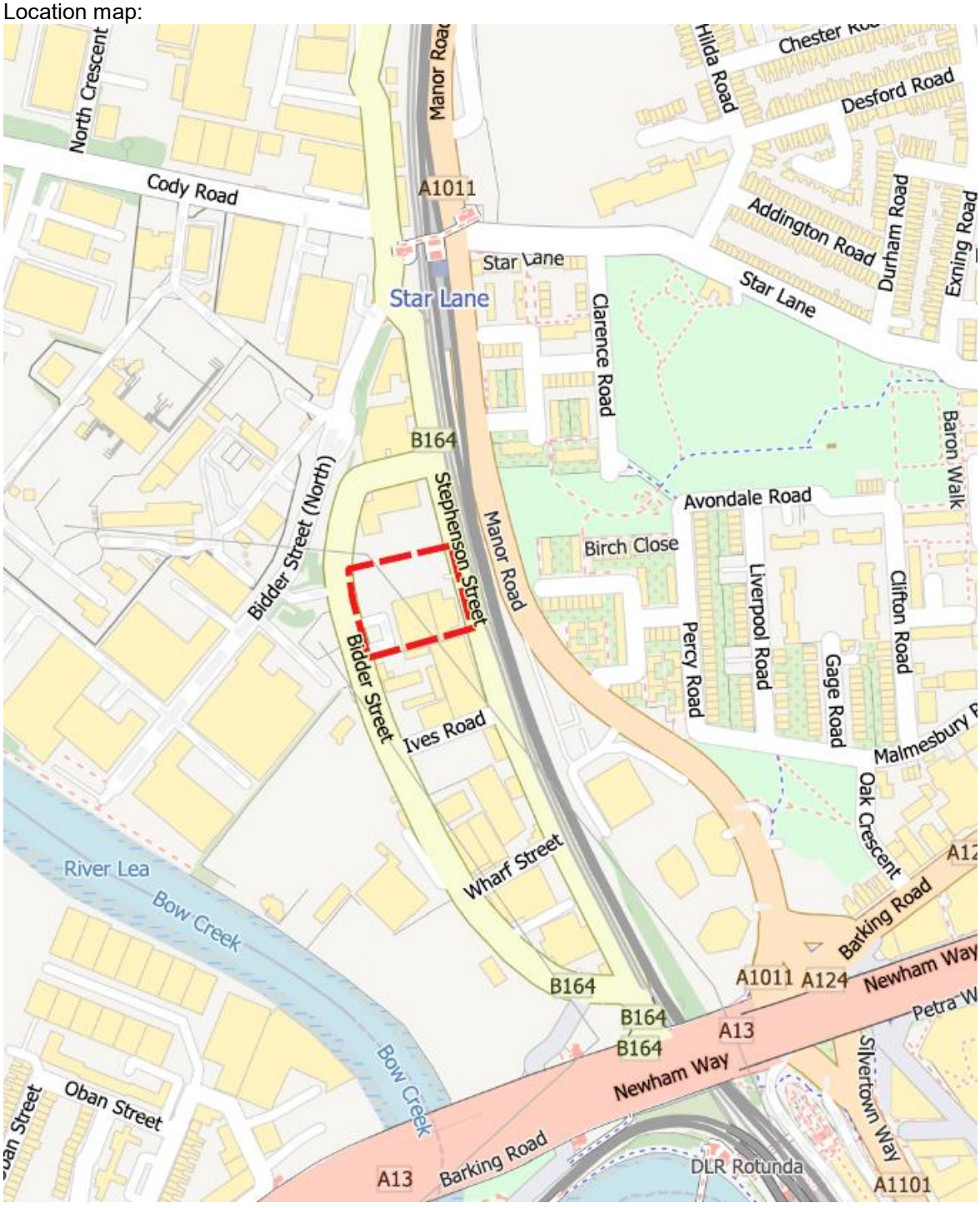
London Borough of Newham

Site name: Ref.: N 14	**5 Eastbury Road**
Borough:	London Borough of Newham
Site address:	5 Eastbury Road, Beckton E6 6LP
OS grid reference:	TQ 54335 18197
Site size (ha):	0.29

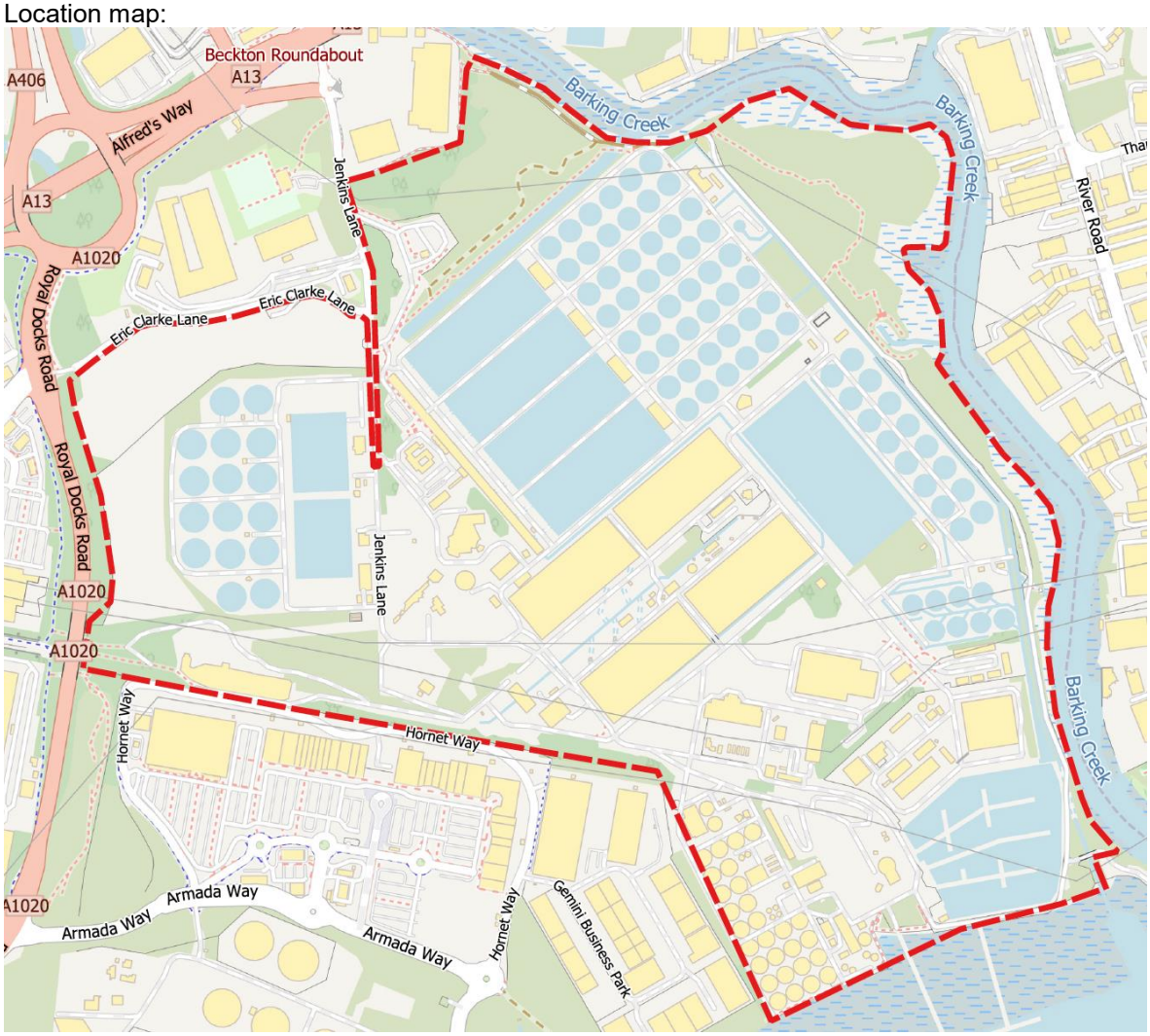
Location map:

Site name: Ref.: N 05	**Oasis Park, Stephenson Street**
Borough:	London Borough of Newham
Site address:	Oasis Park, Stephenson Street, Canning Town, London, E16 4SA
OS grid reference:	TQ 39132 81838
Site size (ha):	0.54

Location map:

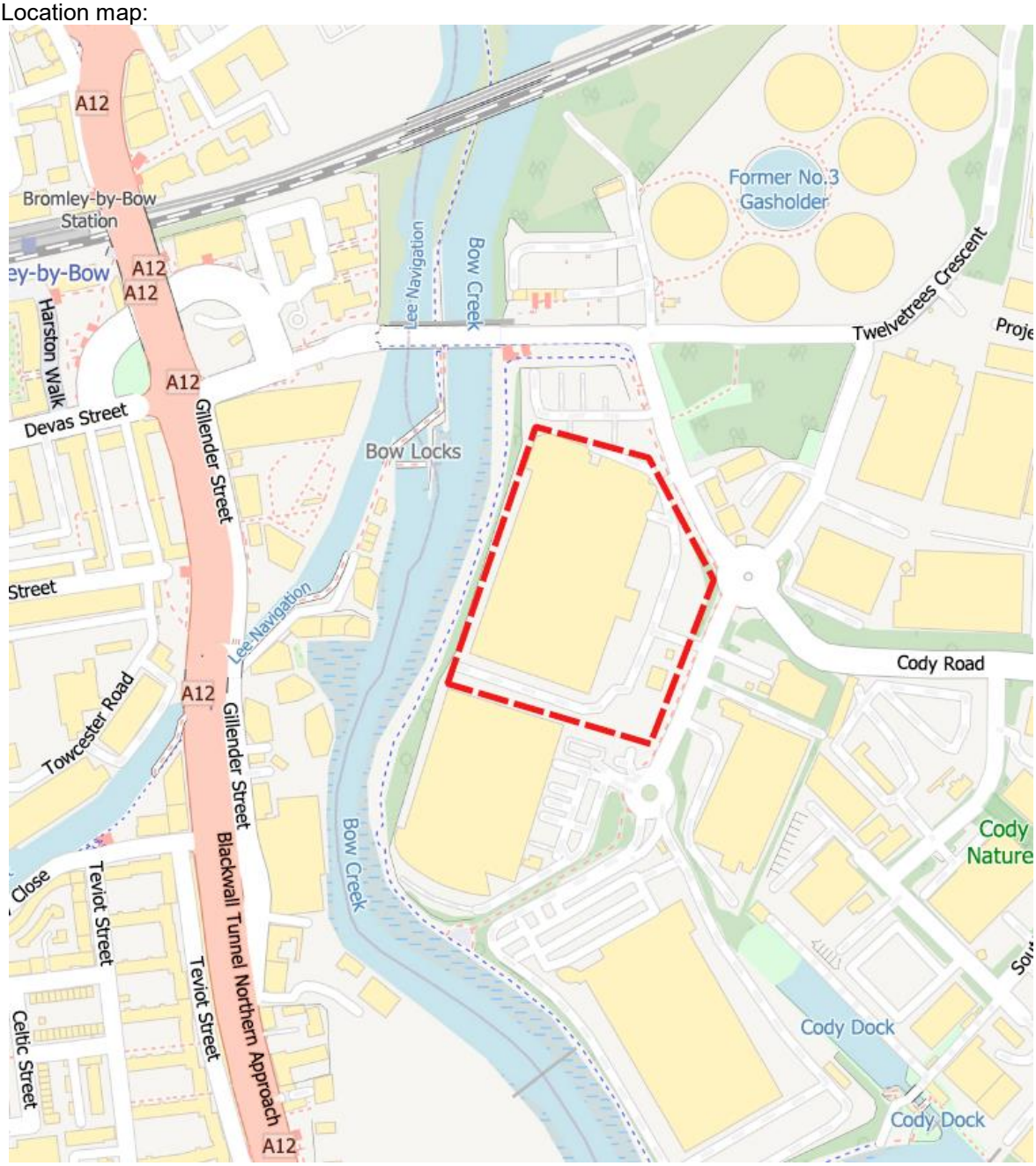


Site name: Ref.: N 18	**Beckton Sewage Treatment Works**
Borough:	London Borough of Newham
Site address:	Beckton Sewage Treatment Works, Barking, IG11 0DW
OS grid reference:	TQ 54477 18223
Site size (ha):	130.15
Location map:	



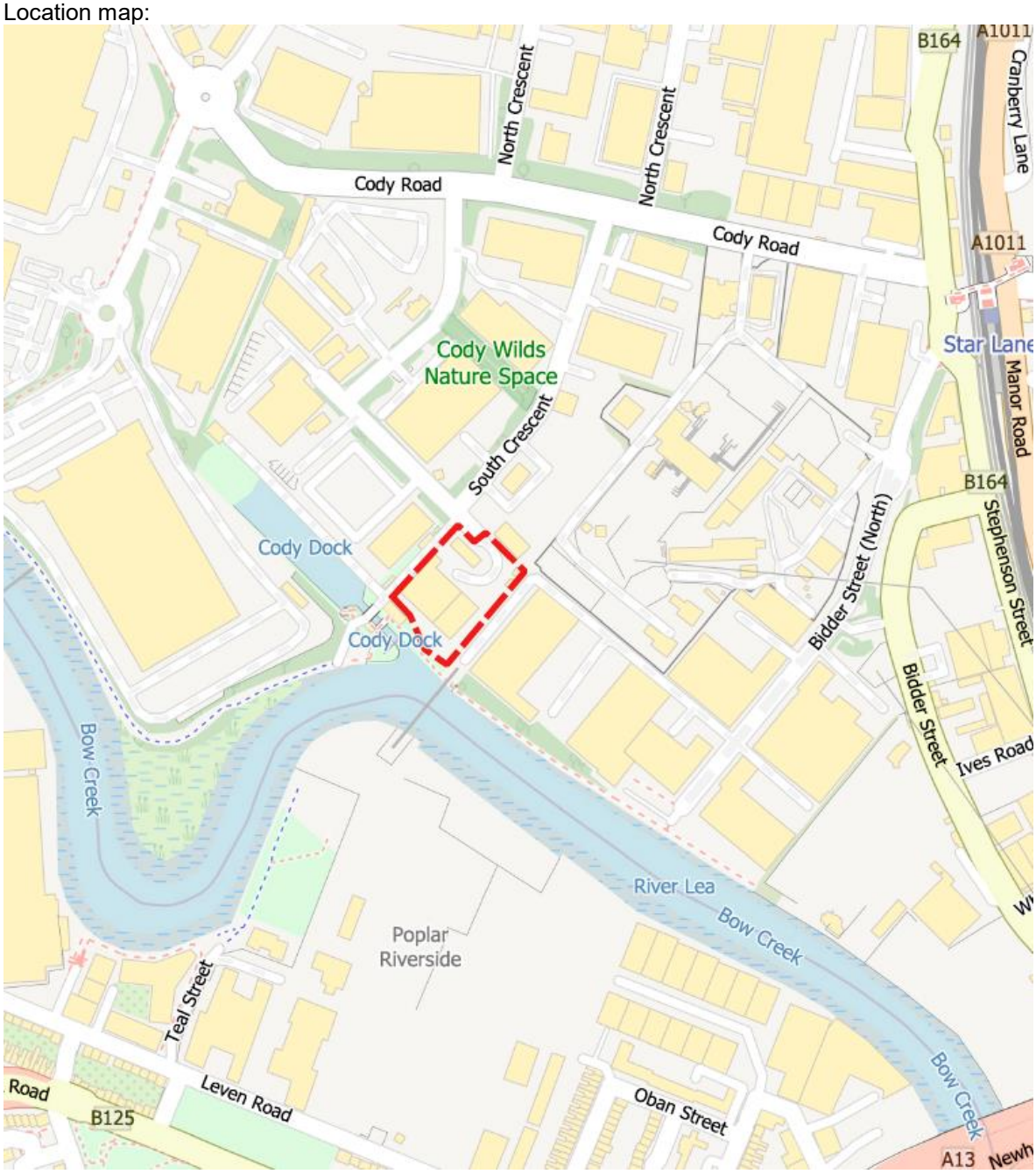
Site name: Ref.: N 11	**Bywaters Recycling & Recovery Centre, Unit J Prologis Park**
Borough:	London Borough of Newham
Site address:	Unit J Prologis Park, Twelvetrees Crescent, Bow, London, E3 3JG
OS grid reference:	TQ 38416 82253
Site size (ha):	3.25

Location map:



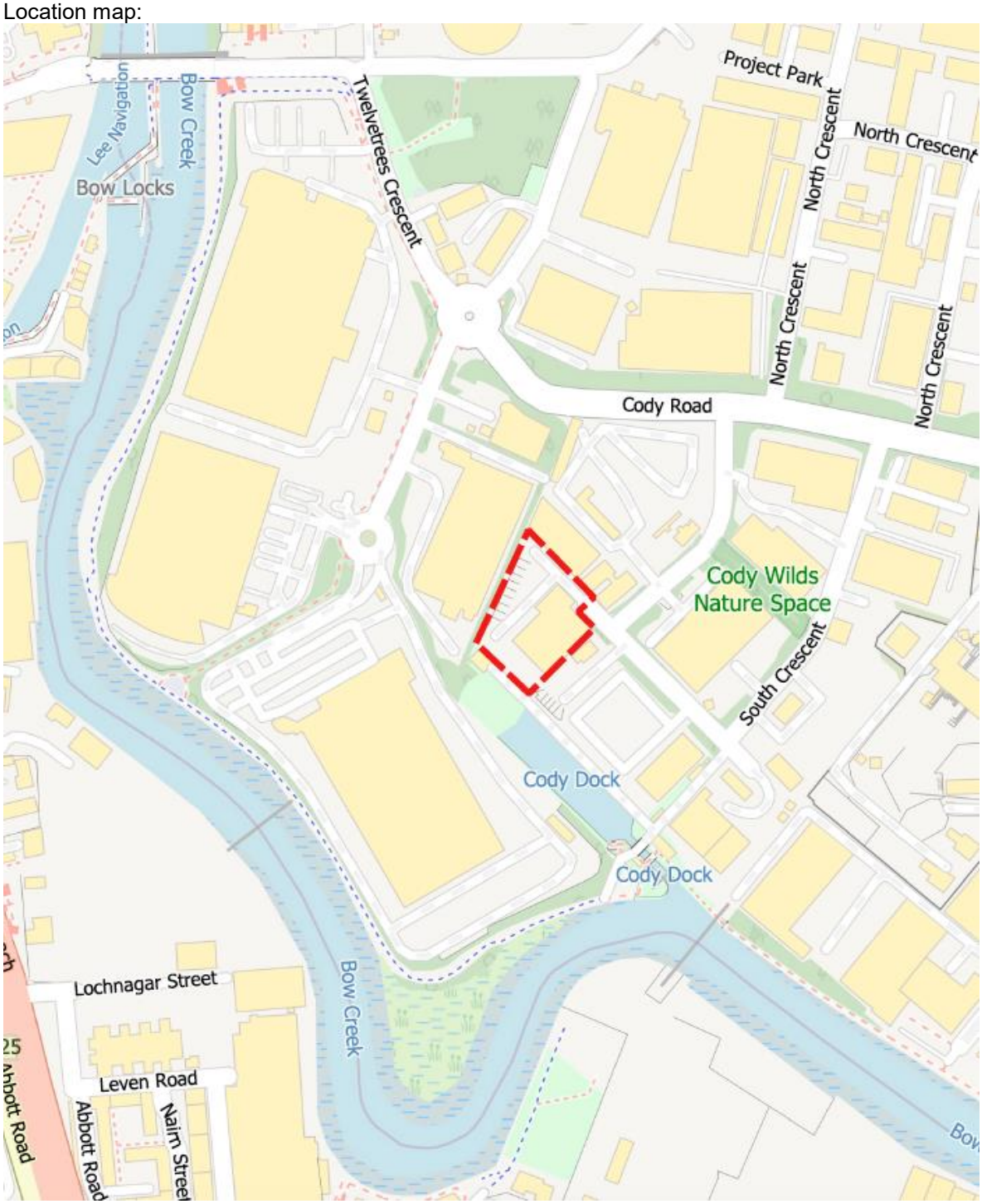
Site name: Ref.: N 01	**Canning Town Depot**
Borough:	London Borough of Newham
Site address:	11A South Crescent Canning Town, London, E16 4TL
OS grid reference:	TQ 38785 81905
Site size (ha):	0.60

Location map:



Site name: Ref.: N 08	**9a Cody Business Centre**
Borough:	London Borough of Newham
Site address:	9A South Crescent, Canning Town, London, E16 4TL,
OS grid reference:	TQ 38785 81905
Site size (ha):	0.60

Location map:

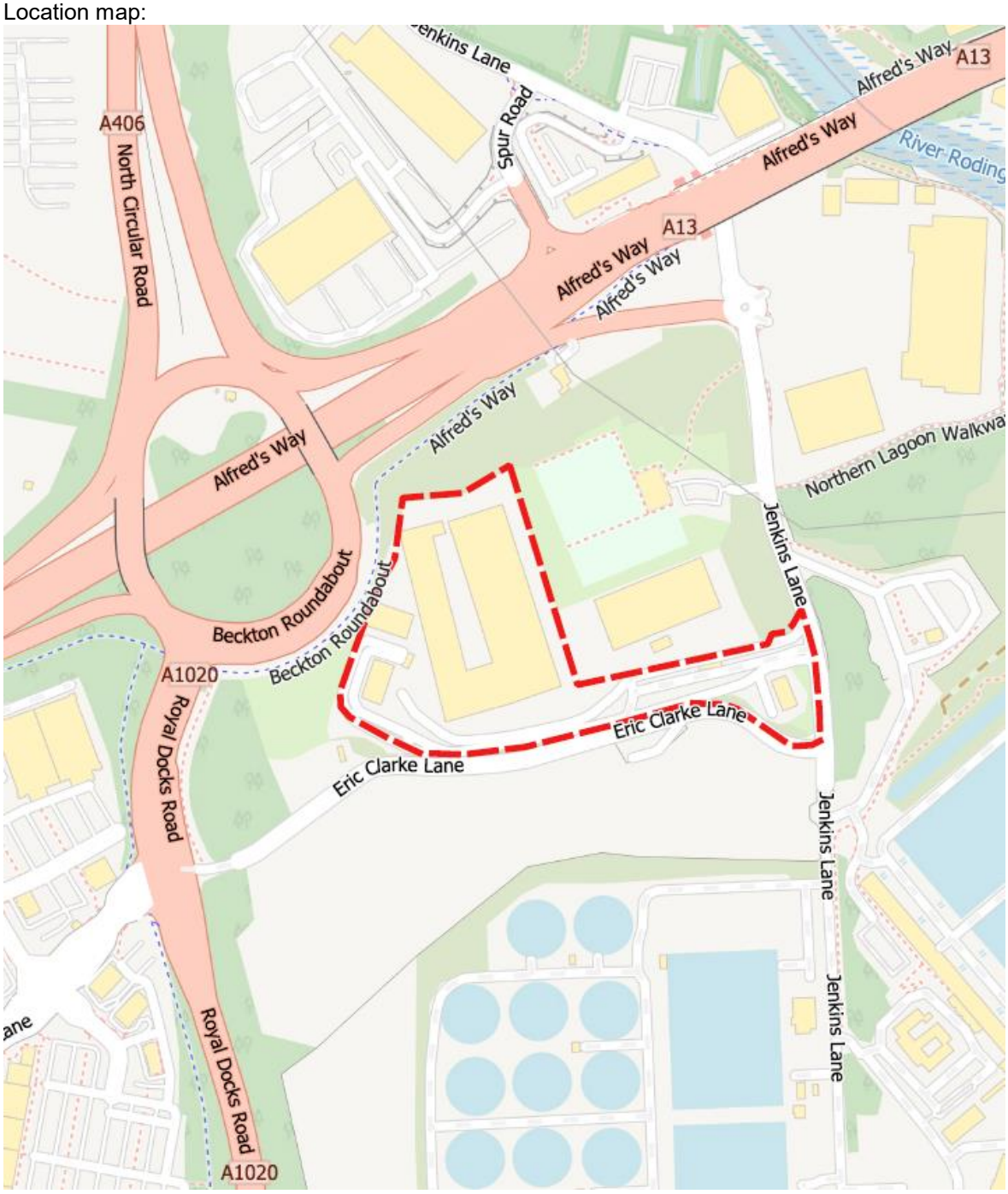


Site name: Ref.: N 09	**EMR Silvertown**
Borough:	London Borough of Newham
Site address:	EMR Silvertown, Unit 6, Standard Industrial Estate
OS grid reference:	542811 179900
Site size (ha):	1.18

Location map:

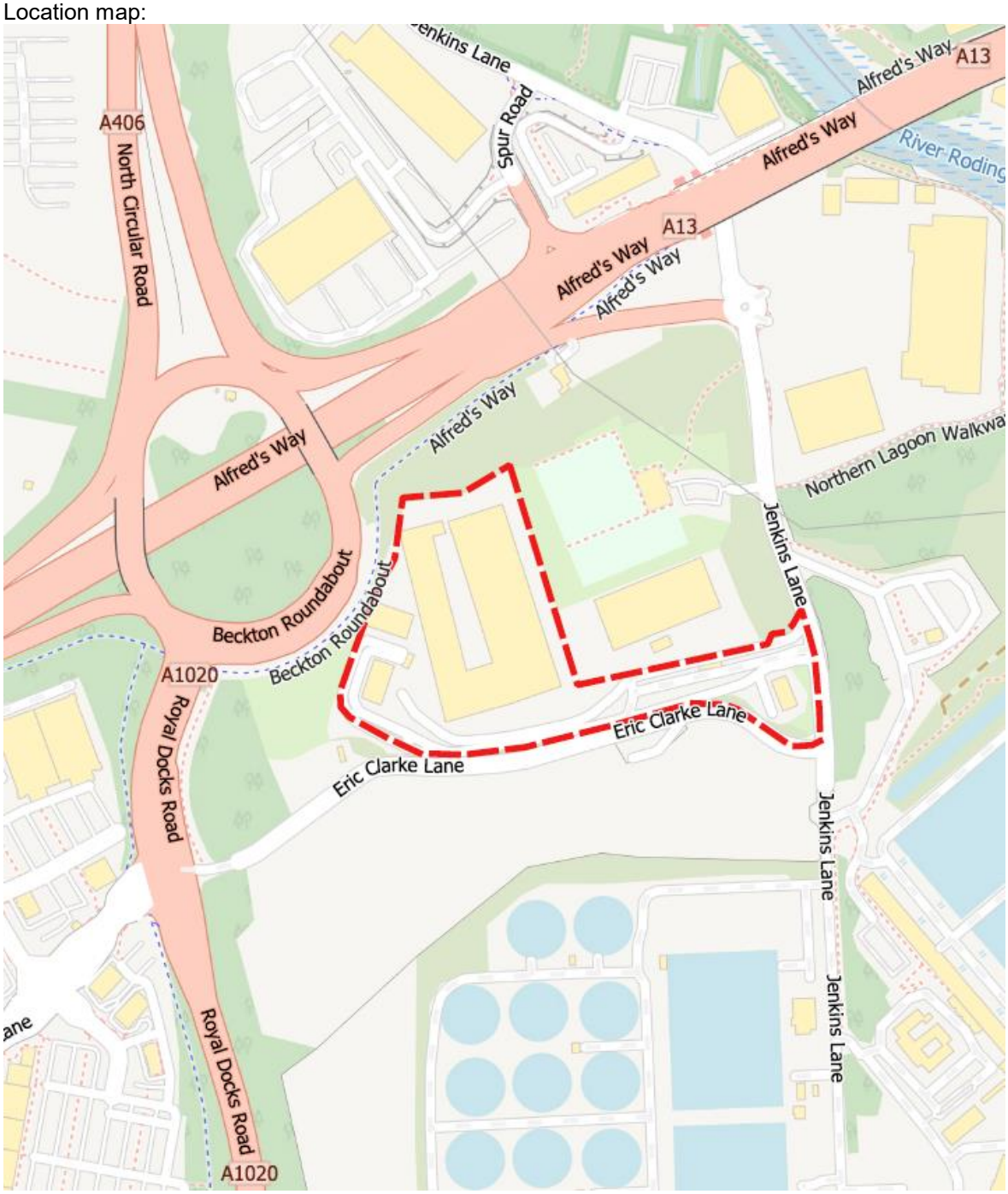
Site name: Ref.: N 15	**Jenkins Lane Reuse and Recycling Centre**
Borough:	London Borough of Newham
Site address:	Jenkins Lane Reuse and Recycling Centre, Jenkins Lane, Barking, Essex, IG11 0AD
OS grid reference:	TQ 44051 82596
Site size (ha):	3.382

Location map:



Site name: Ref.: N 16	**Jenkins Lane Waste Management Facility**
Borough:	London Borough of Newham
Site address:	Jenkins Lane, Barking, Essex, IG11 0AD
OS grid reference:	TQ 44051 82596
Site size (ha):	3.382

Location map:

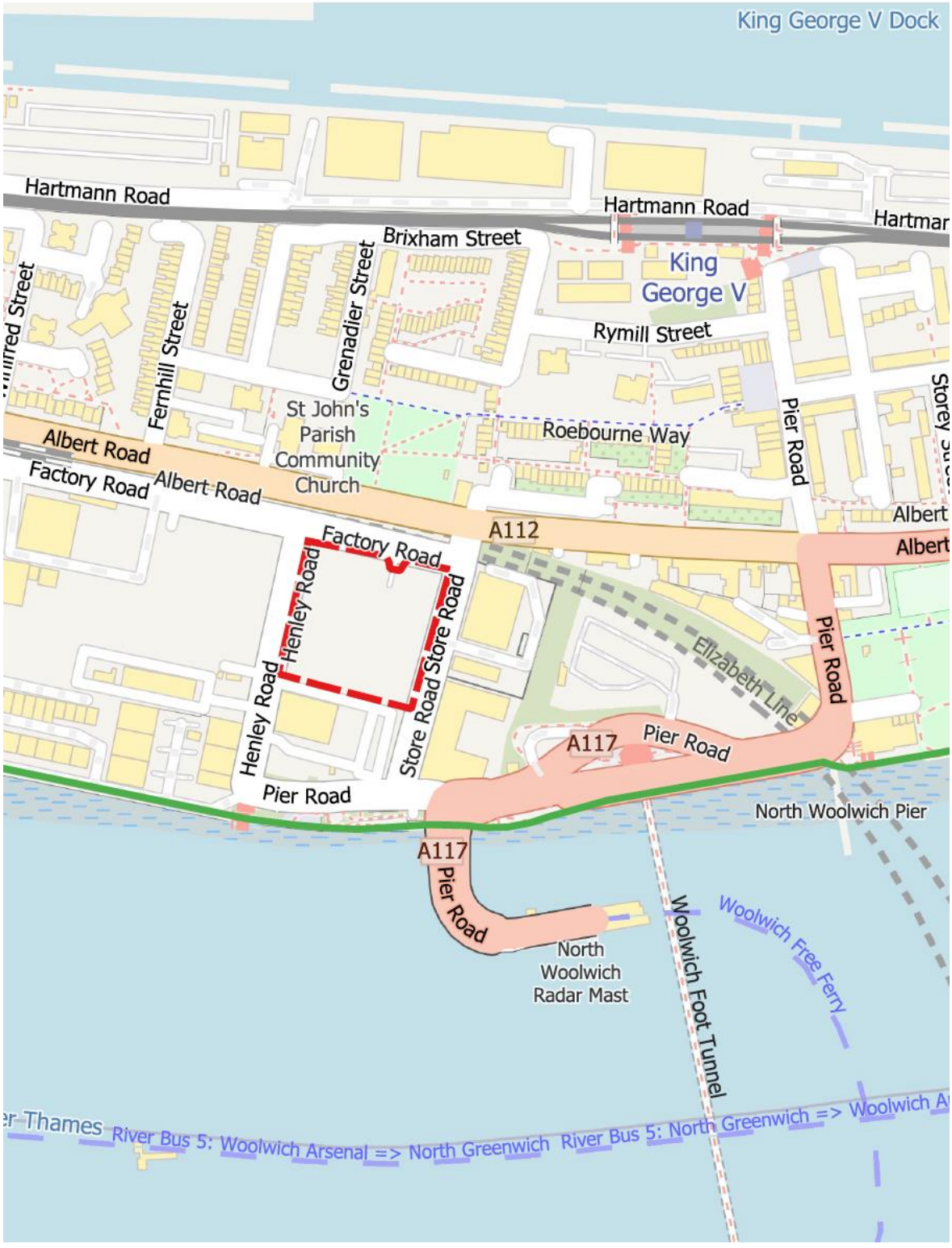


Site name: Ref.: N 02	**Knights Road**
Borough:	London Borough of Newham
Site address:	Knights Road, London E16, 2AT
OS grid reference:	TQ 540267 179895
Site size (ha):	1.35

Location map:

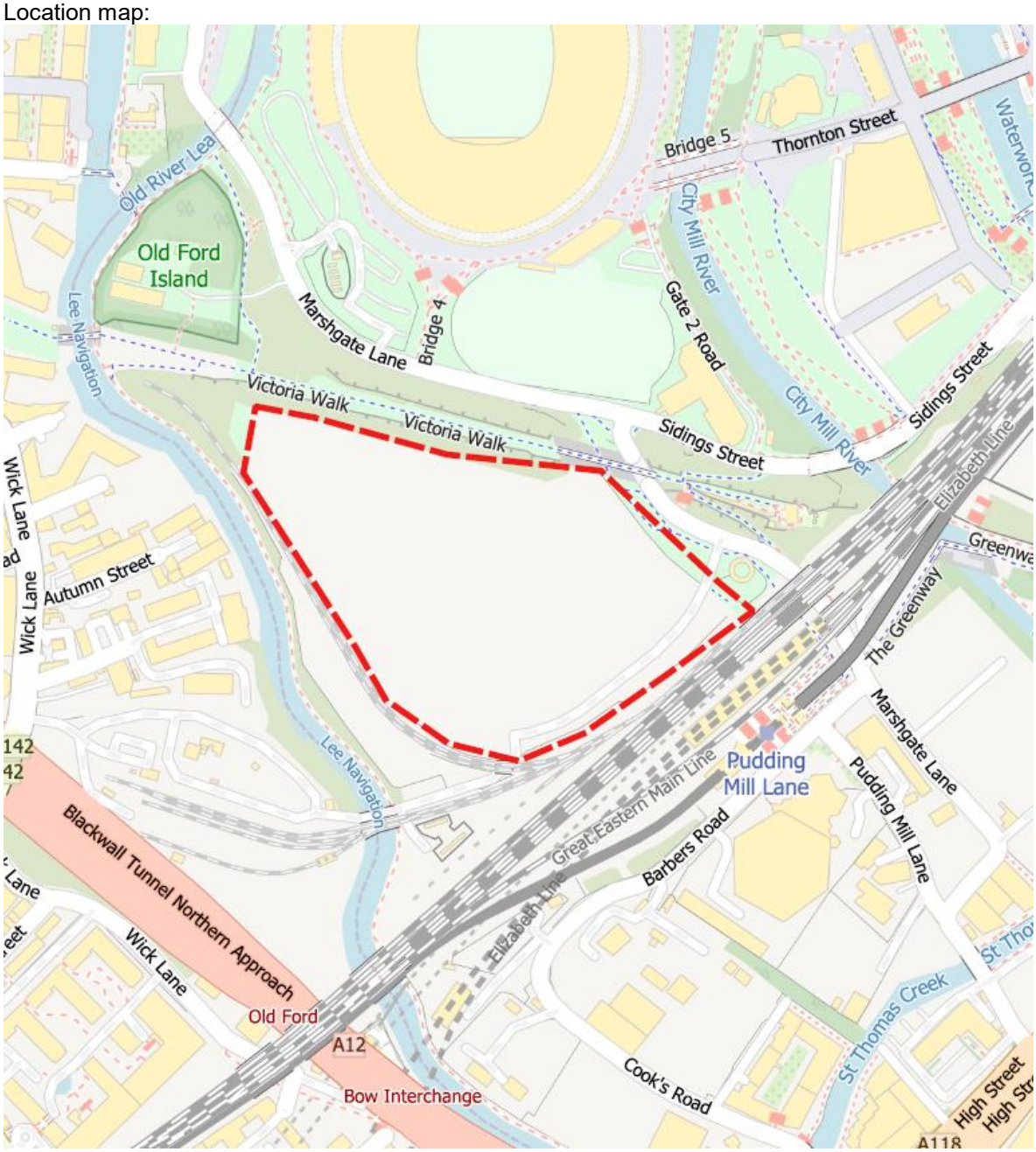
Site name: Ref.: N 17	**London Teleport Site**
Borough:	London Borough of Newham
Site address:	Pier Road, North Woolwich, London, E16 2JJ
OS grid reference:	TQ 54301 17986
Site size (ha):	0.92

Location map:



Site name: Ref.: N 03 & N 04	**Marshgate Sidings** - D B Schenker/D B Cargo - S Walsh & Son Limited
Borough:	London Borough of Newham
Site address:	Marshgate Sidings, Pudding Mill Lane, Bow, London, E15 2PJ
OS grid reference:	TQ 37611 83599 and TQ 37691 83595
Site size (ha):	6.34

Location map:



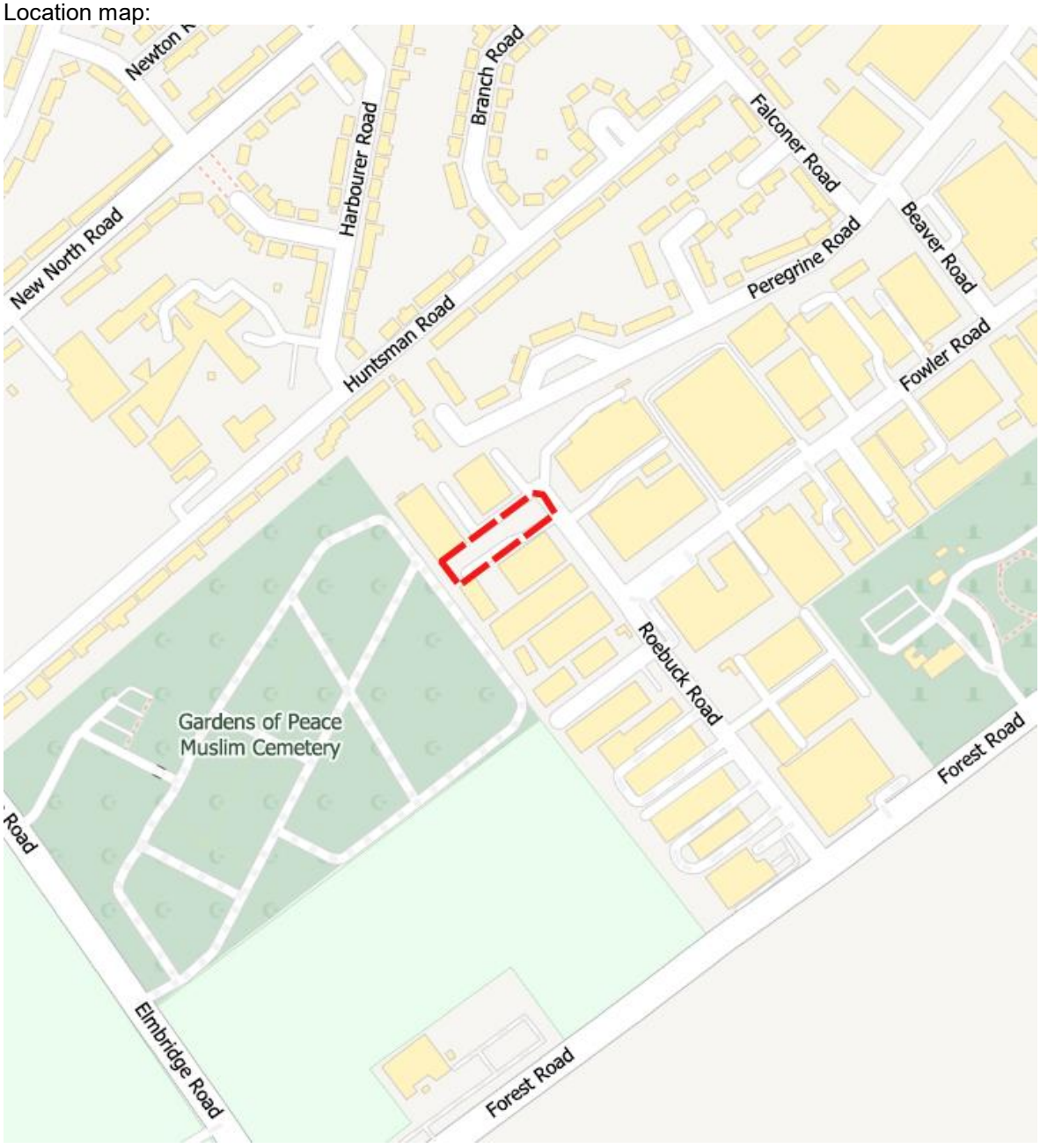
Site name: Ref.: N 06	**Plaistow Wharf**
Borough:	London Borough of Newham
Site address:	North Woolwich Road, London, Newham, E16 2AB
OS grid reference:	TQ 39791 80427
Site size (ha):	1.18

Location map:

London Borough of Redbridge

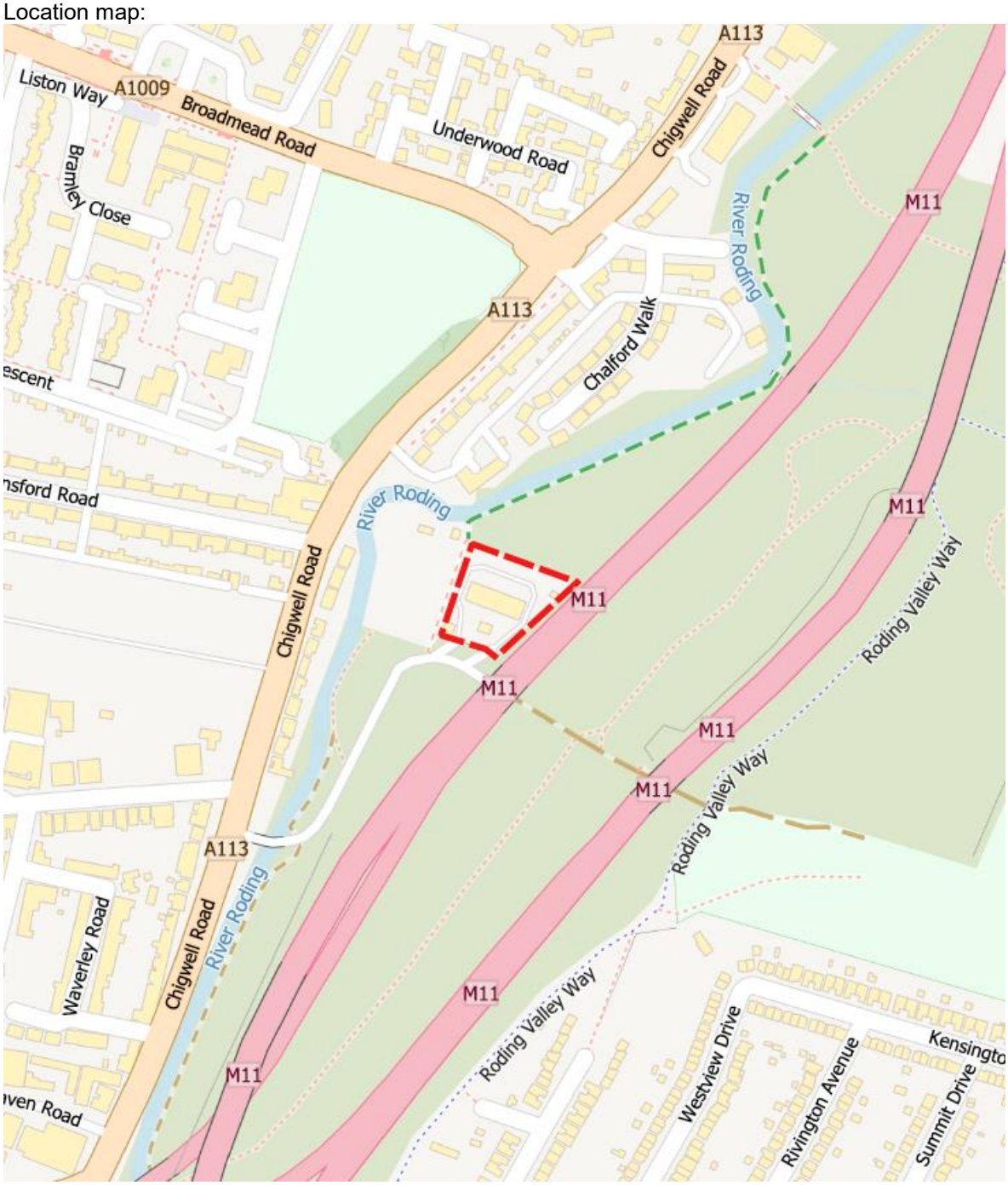
Site name: Ref.: RB 04	**45-47, Roebuck Road, Hainault Business Park**
Borough:	London Borough of Redbridge
Site address:	45-47 Roebuck Road, Hainault Ind Est, Ilford, Essex, IG6 3TU
OS grid reference:	TQ 46792 91973
Site size (ha):	0.21

Location map:

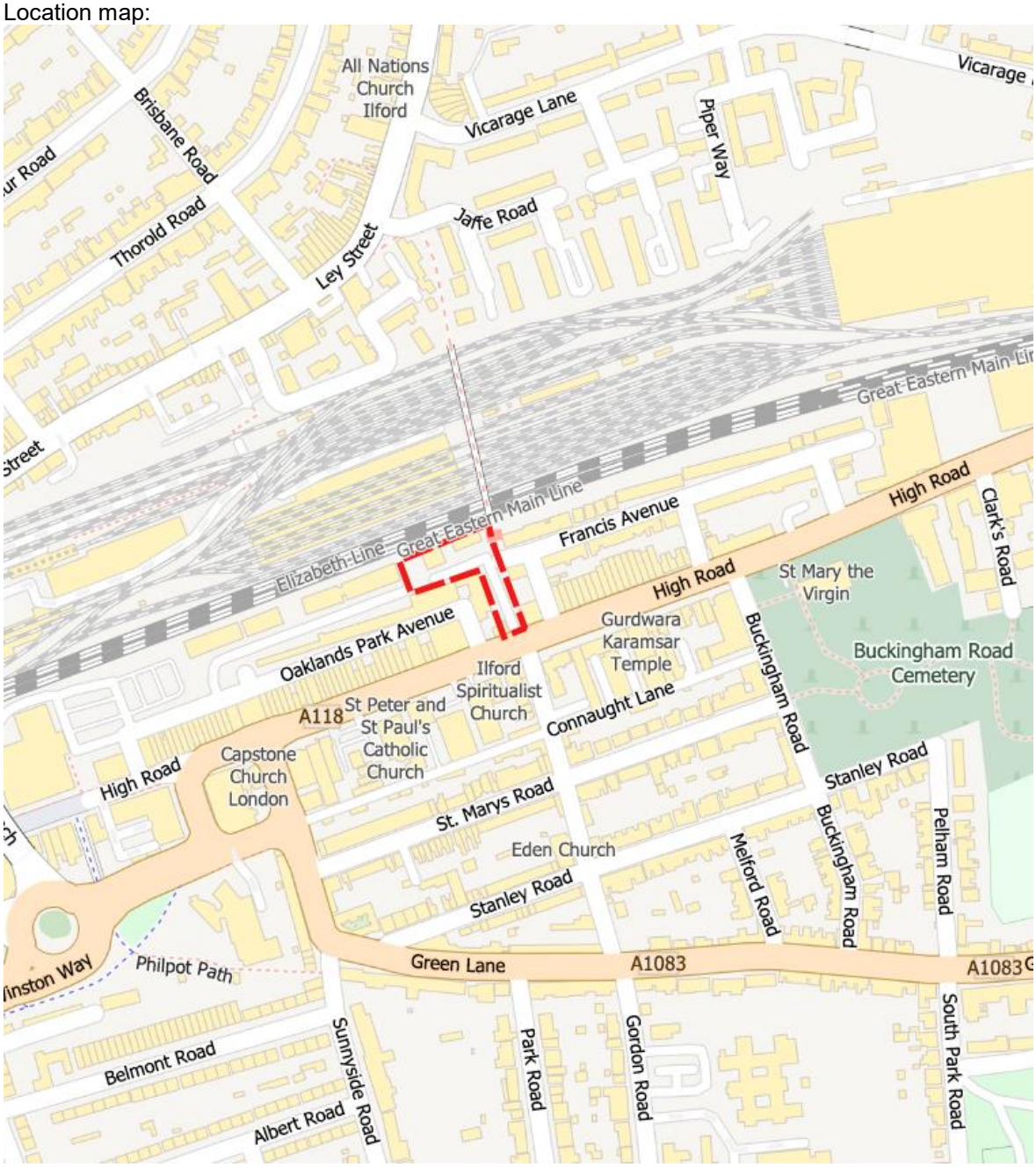


Site name: Ref.: RB 07	**Chigwell Road Reuse and Recycling Centre**
Borough:	London Borough of Redbridge
Site address:	Reuse and Recycling Centre, Chigwell Road, Woodford, Essex, IG8 8PP
OS grid reference:	TQ 41550 90810
Site size (ha):	0.49

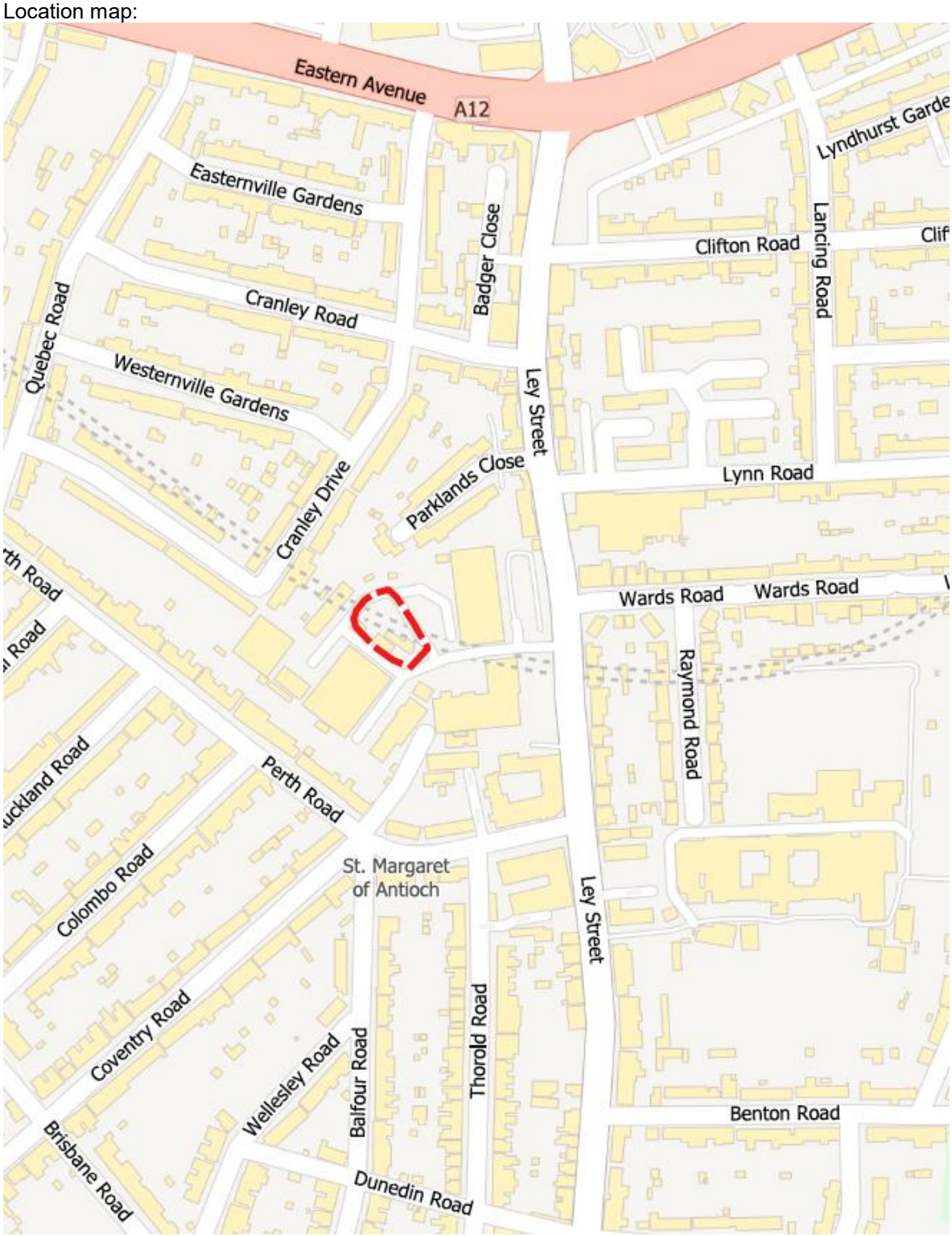
Location map:



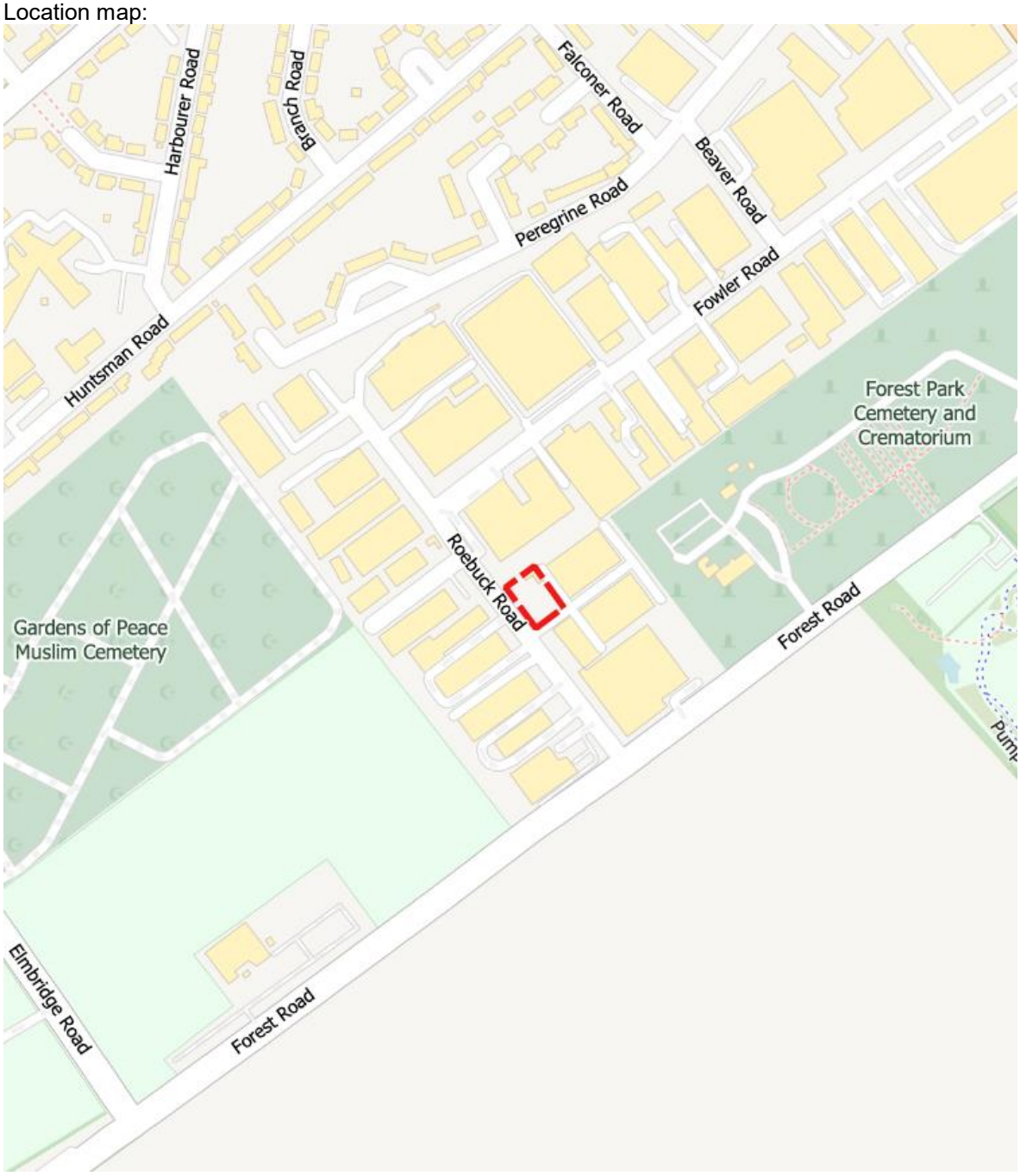
Site name: Ref.: RB 08	**Ilford Recycling Centre**
Borough:	London Borough of Redbridge
Site address:	Ilford Recycling Centre, 409 High Road, Ilford, Essex, IG1 1TH
OS grid reference:	TQ 44529 86829
Site size (ha):	0.328
Location map:	



Site name: Ref.: RB 05	**Ley Street Depot**
Borough:	London Borough of Redbridge
Site address:	Ley Street Depot, 531 Ley Street, Essex, IG2 7QZ
OS grid reference:	TQ 44385 87740
Site size (ha):	0.21
Location map:	



Site name: Ref.: RB 01	**Unit U, Pegasus Works**
Borough:	London Borough of Redbridge
Site address:	Unit U, Roebuck Road, Hainault Business Park, Pegasus Works IG6 3UF
OS grid reference:	TQ 46970 91868
Site size (ha):	0.11
Location map:	



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East London Joint Waste Plan (Regulation 19)

Integrated Impact Assessment Report

East London Waste Authorities of Barking and Dagenham, Havering, Newham and Redbridge

Final report
Prepared by LUC
February 2025

Version	Status	Prepared	Checked	Approved	Date
1	Draft for client comment	H Naylor O Price K Williamson	K Williamson	J Pearson	03.02.2025
2	Final report	K Williamson	K Williamson	J Pearson	12.02.2025

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Chapter 1
Introduction

1.1 LUC was commissioned in October 2023 to undertake an Integrated Impact Assessment, comprising Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA), and Equalities Impact Assessment (EqIA) for the new East London Joint Waste Plan (ELJWP). A separate Habitats Regulations Assessment (HRA) is also being prepared.

1.2 The ELJWP is a joint venture between the London Borough of Barking and Dagenham, London Borough of Havering, London Borough of Newham, and the London Borough of Redbridge.

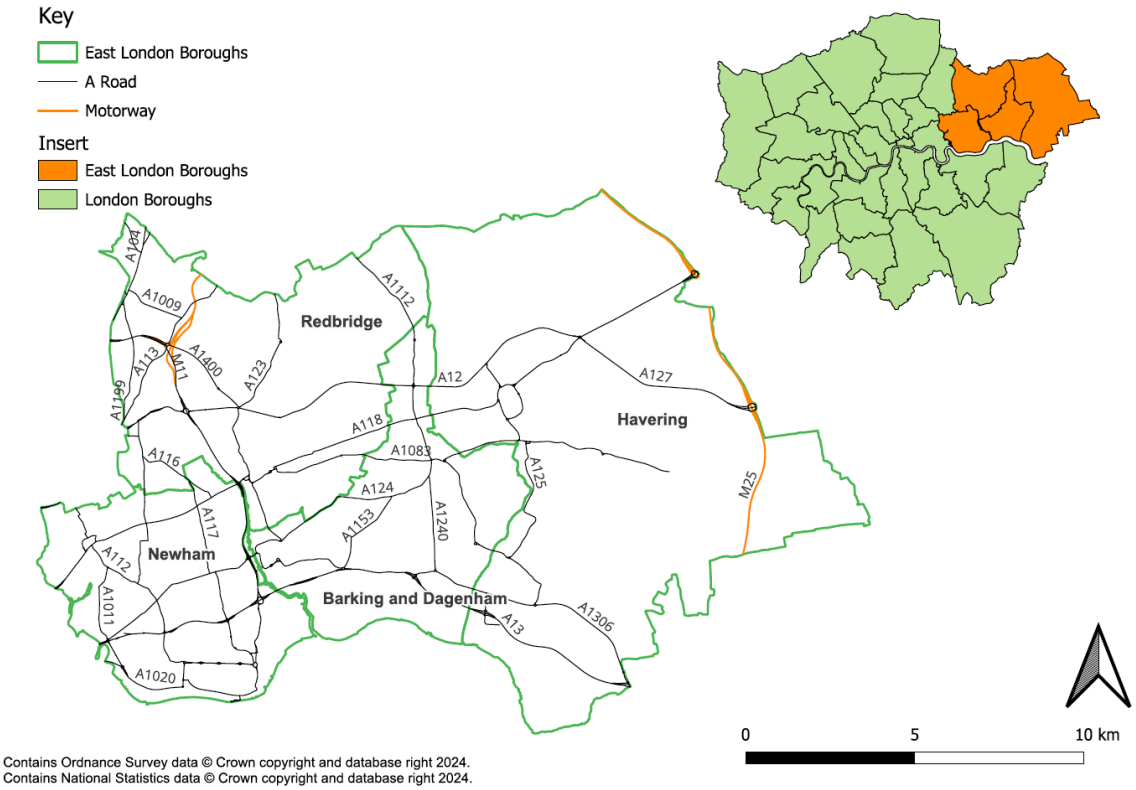
1.3 This document is the IIA of the Regulation 19 proposed submission version of the ELJWP. The IIA appraises the likely effects of the vision, objectives and policies. This document will accompany the consultation on the Regulation 19 proposed submission version of the ELJWP that will be published for consultation in relation to legal compliance and soundness in Spring 2025.

1.4 This report is in an 'Accessible format' which means it was formatted to meet the requirements of the Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations (2018), as set out in the Web Content Accessibility Guidelines (WCAG 2.1). This means it must have larger font, larger spacing between lines and headings, less information presented in tables, 'alt text' provided for all figures and it is able to be read by screen-reading software.

Geographical context

1.5 The East London Waste Authority **[See reference 1]** is formed by the four most easterly London Boroughs north of the Thames: London Borough of Barking and Dagenham, London Borough of Havering, London Borough of Newham, and the London Borough of Redbridge. The ELJWP previously included the area covered by the London Legacy Development Corporation (LLDC) within the London Borough of Newham. However, since December 2024 planning powers have returned from the LLDC to the London Borough of Newham and Newham will now determine all planning applications and applications for related consents. The LLDC did not have a separate waste apportionment within the London Plan 2021, and therefore waste has always been planned for by the London Borough of Newham. A map of the area covered by the Plan is provided in **Figure 1.1.**

Figure 1.1: The area covered by the East London Joint Waste Plan



1.6 The plan area is bordered within London by the London Borough of Waltham Forest, London Borough of Hackney and the London Borough of Tower Hamlets to the west, and the London Borough of Greenwich and the London Borough Bexley to the south of the river Thames. To the north and east, outside of the Greater London area, are the Districts of Epping Forest and Brentwood and the unitary area of Thurrock, respectively – all within the county of Essex.

1.7 The administrative geography of London is overseen at a regional level by the Greater London Authority (GLA). There are thirty-three-administrative areas within London: twelve inner boroughs, twenty outer boroughs, and the City of London. LB Newham is the only inner borough within the East London Joint Waste Local Plan area.

1.8 The population of the ELJWP Area has grown from 772,900 in the 2011 Census to 1,142,300 in the 2021 Census. The London Plan predicts that the population of London is projected to increase by 70,000 every year, reaching 10.8 million in 2041, and East London will play a large role in providing for this growth **[See reference 2]**.

1.9 The London Borough of Barking and Dagenham (LBBD) is located between the City of London to the West, and the M25 motorway which circles the capital, to the East, with the River Thames immediately to the South. Barking was designated as a Metropolitan Centre in the London Plan (2021). LBBD includes many of capital's largest stretches of undeveloped riverside frontage, and the most affordable premises for large and small businesses in London. One third of the LBBD is green open space, amounting to 463 hectares. Barking Riverside Overground station, opened in 2022, connects passengers to Barking in seven minutes, and to central London in twenty-two minutes.

1.10 The London Borough of Havering (LBH) includes Romford, identified as a Metropolitan centre within the London Plan 2021. LBH is bordered to the south by part of the London Riverside Opportunity Area, containing Rainham and Beam Park. Part of the LBH extends beyond the M25 to the east, with the A12,

A123, A1306 and A13 forming key routes across the borough. Over half the LBH is identified as Metropolitan Green Belt.

1.11 The London Borough of Newham (LBN) includes Stratford and East Ham, identified as major centres within the London Plan 2021. The borough is home to London City Airport. The newly opened Elizabeth Line on the London rail network provides direct train services to Heathrow and Reading via Paddington station. Royal Docks is within the Thames Gateway, and is identified within the London Plan as one of the largest regeneration opportunities within the greater London area. The recently adopted Royal Docks and Beckton Riverside Opportunity Area Planning Framework (OAPF) **[See reference 3]** guides emerging and ongoing development in the area, and sets the context for the proposed extension of the DLR to Thamesmead via Beckton Riverside. The OAPF identifies the potential to provide 38,300 new homes and create 55,700 new jobs. LBN includes part of the area of the London Legacy Development Corporation, which covers Queen Elizabeth Park and part of its surroundings.

1.12 The London Borough of Redbridge (LBR) sits approximately 7 miles east of the City of London, adjoining LB Waltham Forest, LB Newham, LBBD, and between two strategic growth corridors. The Thames Gateway runs to the south and east, and the London-Stansted-Cambridge growth corridor covers the western half of the Borough and beyond, extending south to the river Thames and north, through Hertfordshire, towards Cambridge. There are four Elizabeth Line stations within the borough. LBR includes the Metropolitan centre of Ilford. Just under half of the borough is green space, and around one third of the borough is designated Metropolitan Green Belt.

1.13 There are three European protected wildlife sites within 5km of the four Boroughs: Epping Forest Special Area of Conservation (SAC), Lee Valley Special Protection Area (SPA) and Lee Valley Ramsar. The south edge of Epping Forest crosses into the northern boundary of Redbridge. The River Thames forms the southern boundary of the Plan area and provides a hydrological connection to the downstream Thames Estuary & Marshes SPA and Ramsar site and the Benfleet and Southend Marshes SPA.

1.14 Due to the location of the plan area within Greater London, the four boroughs benefit from strategic transport links, including access to the M11 and M25 motorways via the A12, A13, A1020 and the A406. There is water transport connectivity for leisure and freight on the River Thames, good connectivity to rail hubs in central London, as well as good access to London City Airport and London Stansted.

East London Joint Waste Plan and its relationship to other relevant plans and programmes

1.15 The current version of the ELJWP was adopted in 2012 **[See reference 4]** and set out to meet the requirements of national policy and the London Plan at that time, to plan effectively for waste across the four London Boroughs. There have been four iterations of the London Plan since 2011: the London Plan (2016), the Revised Early Minor Alterations to the London Plan (2013) to align within the NPPF, the Further Alterations to the London Plan (2015), and the current adopted London Plan (2021).

1.16 The ELJWP (2012) predates the original National Planning Policy Framework (2012) and instead considered the requirements of Planning Policy Statement 10: Planning for Waste and Planning Policy Statement 12: Local Development Framework. The PPS system has been replaced and current national policy requirements are set out in the National Planning Policy Framework (NPPF, 2024), the National Planning Policy for Waste (NPPW, 2014) and the accompanying Planning Practice Guidance (PPG, 2014). The National Planning Policy Framework was revised in December 2024, and this EJLWP will now proceed under the new December 2024 version (as amended in February 2025).

1.17 The new ELJWP will provide the local planning policy framework for all waste planning matters across London Borough of Barking and Dagenham, London Borough of Havering, London Borough of Newham, and London

Borough of Redbridge. The LLDC transferred planning powers back to LBN in December 2024. The ELJWP will set out how and where waste will be managed and will be used to determine planning applications affecting the management of waste in the four East London boroughs that are the joint authorities preparing the plan (Barking & Dagenham, Havering, Newham and Redbridge).

1.18 The ELJWP will form part of the Development Plan for each of the boroughs, sitting alongside separate Local Plans that are concerned with other forms of development such as housing and that related other forms of employment.

1.19 The East London Waste Authority published a new Joint Strategy for East London Resources and Waste in 2023 **[See reference** 5**]**. The strategy focuses on waste prevention to meet the GLA objective of London becoming a zero-waste city by 2050.

Sustainability Appraisal and Strategic Environmental Assessment

1.20 Under the Planning and Compulsory Purchase Act 2004, SA is mandatory for Development Plan Documents. For these documents it is also necessary to conduct an environmental assessment in accordance with The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633), as amended by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232). As set out in the explanatory Memorandum accompanying the Brexit amendments **[See reference** 6**]**, they are necessary to ensure that the law functions correctly following the UK's exit from the EU. No substantive changes are being made by this instrument to the way the SEA regime operates. Therefore, the SEA Regulations remain in force and it is a legal requirement for the ELJWP to be subject to SA and SEA throughout its preparation.

1.21 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process (as advocated in the Government's Planning Practice Guidance **[See reference 7]**, whereby users can comply with the requirements of the SEA Regulations through a single integrated SA process – this is the process that is being undertaken by East London Waste Planning Authorities. This report also fulfils a number of purposes additional to SA, to more comprehensively address the topics of equalities (via an Equalities Impact Assessment – EqIA) and health (via a Health Impact Assessment – HIA), as described under the headings below. From here on, the term 'IIA' should therefore be taken to mean 'SA incorporating the requirements of the SEA Regulations, EqIA and HIA.'

1.22 The IIA process comprises a number of stages as, shown below:

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope.

Stage B: Developing and refining options and assessing effects.

Stage C: Preparing the IIA Report.

Stage D: Consulting on the Local Plan and the IIA Report.

Stage E: Monitoring the significant effects of implementing the Local Plan.

Health Impact Assessment

1.23 Although not a statutory requirement, Health Impact Assessment (HIA) aims to ensure that health-related issues are integrated into the plan-making process. Sustainability objectives that address health issues have been included as part of the IIA process and in this way the HIA of the ELJWP was

carried out as part of the SA. Recommendations will be made in relation to how the health-related impacts of the ELJWP can be optimised as the options are developed into detailed policies and site allocations.

Equalities Impact Assessment

1.24 The requirement to undertake formal Equalities Impact Assessment (EqIA) of development plans was introduced in the Equality Act 2010 but was abolished in 2012. Despite this, authorities are still required to have regard to the provisions of the Equality Act, namely the Public Sector Duty which requires public authorities to have due regard for equalities considerations when exercising their functions.

1.25 The EqIA of the ELJWP was carried out as part of the SA by ensuring that the SA objectives against which the Plan is appraised address relevant Equalities issues. Recommendations have been made in relation to how the equality-related impacts of the Plan can be optimised.

Habitats Regulations Assessment

1.26 The requirement to undertake HRA of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in 2007 **[See reference 8]**. The currently applicable version is "The Conservation of Habitats and Species Regulations 2017 (SI 2017/1012), as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579)" **[See reference 9]** (hereafter referred to as the "Habitats Regulations"). When preparing the ELJWP, the Council is therefore required by law to carry out an HRA. The Council can commission consultants to undertake HRA work on its behalf and this (the work documented in separate HRA reports) is then sent to and considered by the Council as the 'competent authority.' The Council will consider the HRA and may only progress the ELJWP if it considers that it will not adversely affect the integrity of any Habitats Sites or have a significant effect on qualifying habitats or species for which the Habitats

Sites are designated for, or if Imperative Reasons of Overriding Public Interest (IROPI) are identified. The requirement for authorities to comply with the Habitats Regulations when preparing a Plan is also noted in the Government's online Planning Practice Guidance **[See reference** 10**]**.

1.27 The HRA was undertaken separately but the findings have been taken into account in the IIA where relevant, for example to inform judgements about the likely effects of potential development locations on biodiversity.

Meeting the requirements of the SEA Regulations

1.28 The relevant sections of the IIA Report that are considered to meet the SEA Regulations requirements are signposted below. This information will be included in the IIA Report at each stage of the IIA to show how the requirements of the SEA Regulations have been met through the IIA process.

1.29 SEA Guidance recognises that data gaps will exist but suggests that where baseline information is unavailable or unsatisfactory, authorities should consider how it will affect their assessments and determine how to improve it for use in the assessment of future plans. Where there are data gaps in the baseline these are highlighted in the text. The collection and analysis of baseline data is regarded as a continual and evolving process, given that information can change or be updated on a regular basis. Relevant baseline information will be updated during the appraisal process as and when data are published. The waste baseline has been revised to reflect the evidence prepared in support of the plan.

Structure of the IIA Report

1.30 This chapter describes the background to the production of the ELJWP and the requirement to undertake IIA and other assessment processes. The remainder of this IIA Report is structured as follows:

- Chapter 2 describes the approach that is being taken to the IIA of the East London Joint Waste Plan.
- Chapter 3 describes the relationship between the East London Joint Waste Plan and other relevant plans, policies and programmes; summarises the social, economic and environmental characteristics of the District and identifies the key sustainability issues.
- Chapter 4 presents the IIA options for the safeguarding of sites considered as part of the plan making process.
- Chapter 5 presents the IIA findings for the various elements of the ELJWP, including the vision, objectives and policies.
- Chapter 6 presents the cumulative effects of the ELJWP.
- Chapter 7 presents proposed monitoring indicators for the potential effects of the ELJWP.
- Chapter 8 describes the conclusions of the IIA and the next steps to be undertaken for the ELJWP and the IIA.
- Appendix A presents a review of relevant plans, policies and programmes
- Appendix B presents the consultation comments received in relation to the IIA work completed to date and explains how they have been addressed.
- Appendix C presents baseline sustainability information for the plan area.

Requirements of the SEA Regulations and where they are met in this report

Preparation of an environmental report

1.31 Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated (Reg. 12). The information to be given is (Schedule 2):

- a) An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.
  - Covered in Chapter 1 and Appendix C of this IIA Report.
- b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.
  - Covered in Chapter 3 and Appendix C of this IIA Report.
- c) The environmental characteristics of areas likely to be significantly affected.
  - Covered in Chapter 3 and Appendix C of this IIA Report.
- d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.
  - Covered in Chapter 3 and Appendix C of this IIA Report.
- e) The environmental protection, objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.

- Covered in Chapter 3 and Appendix A of this IIA Report.

- f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.)
  - Covered in Chapter 4 to Chapter 6 of this IIA Report.
- g) The measures envisaged to prevent, reduce and as fully possible offset any significant adverse effects on the environment of implementing the plan or programme.
  - Covered in Chapter 4 to Chapter 6 of this IIA Report.
- h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of expertise) encountered in compiling the required information.
  - Information about how the assessment was undertaken and difficulties encountered is covered in Chapter 2 of this IIA Report.
- i) A description of measures envisaged concerning monitoring in accordance with Reg. 17.
  - Covered in Chapter 7 of this IIA Report.
- j) A non-technical summary of the information provided under the above headings.
  - A separate non-technical summary document was prepared to accompany the IIA Report.
- The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more

appropriately assessed at different levels in that process to avoid duplication of the assessment (Reg. 12(3)).

- Addressed throughout this IIA Report.

Consultation requirements

- Authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Reg. 12(5)).
  - Focused consultation on the scope and level of detail of the IIA was carried out with the Environment Agency, Historic England, and Natural England and other key stakeholders for 5 weeks in early 2024.
- Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Reg. 13).
  - Consultation on the Regulation 18 draft Local Plan document and the accompanying iteration of the IIA Report was undertaken in the summer of 2024. Consultation is now being undertaken on Regulation 19 Local Plan in Spring 2025. The Regulation 19 ELJWP is accompanied by this IIA Report.
- Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Reg. 14).
  - The Local Plan is not expected to have significant effects on other EU Member States.

Taking the environmental report and the results of the consultations into account in decision-making (Reg. 16)

Provision of information on the decision

1.32 When the plan or programme is adopted, the public and any countries consulted under Reg. 14 must be informed and the following made available to those so informed:

- The plan or programme as adopted;
- A statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report, the opinions expressed, and the results of consultations entered into have been taken into account, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
- The measures decided concerning monitoring.
    - Information on how the findings of the IIA have been taken into account is provided in Chapter 3 and information on the reasons for choosing the proposed approaches in light of alternatives is provided in Chapter 5. The reporting requirements will be addressed in full in the form of an SEA Adoption Statement after the ELJWP is adopted.

Monitoring

- Monitoring of the significant environmental effects of the plan's or programme's implementation (Reg. 17).
    - Suggested monitoring indicators are set out in Chapter 7. The final suggested monitoring indicators will be included in the SEA post-adoption statement.

Quality assurance

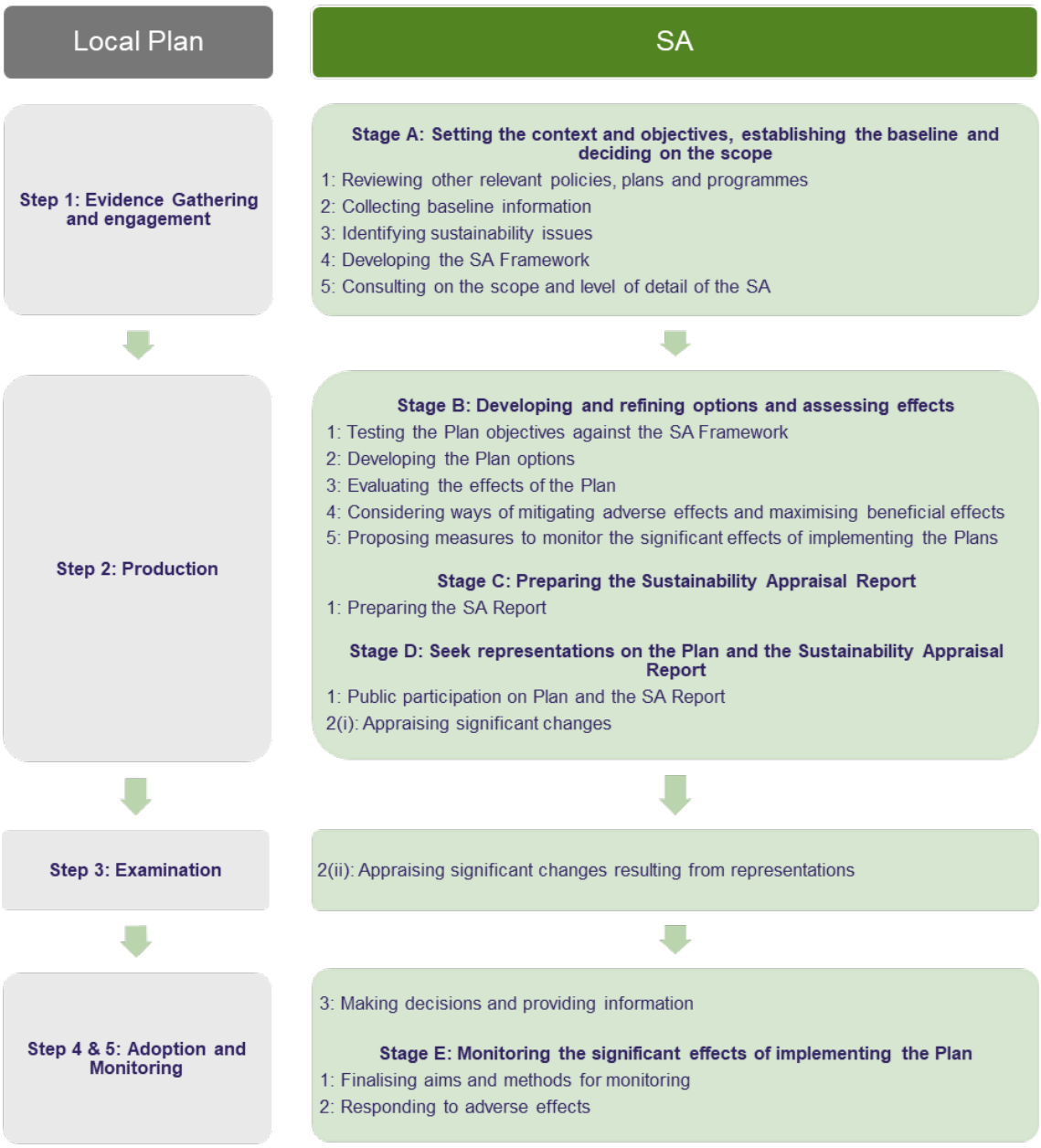
- Environmental reports should be of a sufficient standard to meet the requirements of the SEA Regulations.
  - This report was produced in line with current guidance and good practice for SEA/SA and this section demonstrates where the requirements of the SEA Regulations have been met.

Chapter 2

Methodology

2.1 In addition to complying with legal requirements, the approach being taken to the IIA of the East London Joint Waste Plan (ELJWP) is based on current good practice and the guidance on SA/SEA set out in the Government's Planning Practice Guidance. This calls for IIA to be carried out as an integral part of the plan-making process and **Figure 2.1** sets out the main stages of the plan-making process and shows how these correspond to the IIA process.

Figure 2.1: Corresponding stages in plan-making and SA



2.2 The sections below describe the approach that was taken to the IIA of the ELJWP to date and provide information on the subsequent stages of the process.

SA Stage A: Scoping

2.3 The Scoping stage of IIA involves understanding the social, economic and environmental baseline for the plan area as well as the sustainability policy context and key sustainability issues and using these to inform the appraisal framework as follows.

Review other relevant policies, plans and programmes to establish policy context

2.4 The ELJWP is not prepared in isolation; rather it is prepared within the context of other policies, plans and programmes. The SEA Regulations require the Environmental Report to describe the relationship of the plan with other relevant plans and programmes. It should also be consistent with environmental protection legislation and support attainment of sustainability objectives that have been established at the international, national, and regional/sub-regional levels.

2.5 The IIA Scoping Report contained a review of other policy documents relevant to the scope of the ELJWP and to the sustainability objectives it should seek to support. This review was updated as part of the preparation of each iteration of the IIA. The review is presented in Appendix A.

Collect baseline information to establish sustainability context

2.6 Information on existing environmental, social and economic conditions in the plan area provides the baseline against which the plan's effects can be assessed in the IIA and monitored during the plan's implementation.

2.7 Baseline information can also be combined with an understanding of drivers of change that are likely to persist regardless of the ELJWP to understand the likely future sustainability conditions in the absence of the ELJWP.

2.8 The SEA Regulations require the Environmental Report to describe relevant aspects of the current state of the environment and how they are likely to evolve without the plan. An understanding of this likely future, together with the assessed effects of the plan itself, additionally allows the IIA to report on cumulative effects, another requirement of the SEA Regulations.

2.9 The SEA Regulations require assessment of effects in relation to the following 'SEA topics': biodiversity, population, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage (including architectural and archaeological heritage), landscape, and the inter-relationship between these. Baseline information was therefore collected in relation to the SEA topics and additional sustainability topics were also addressed, covering broader socio-economic issues such as housing, access to services, crime and safety, education and employment. This reflects the integrated approach that is being taken to the IIA and SEA processes. Baseline information for the Borough was updated as part of the preparation of each iteration of the IIA and is presented in Appendix C.

Identify sustainability issues

2.10 The baseline information also allows the identification of existing sustainability issues, including problems, as required by the SEA Regulations.

2.11 Sustainability issues and their likely evolution without the ELJWP Review are detailed in Appendix C and summarised in Chapter 3.

Develop the IIA framework

2.12 The relevant sustainability objectives identified by the review of other policies, plans and programmes together with the key sustainability issues facing the Borough, identified by the collection and review of baseline information in the IIA Scoping Report, informed a set of sustainability objectives (the 'IIA framework') against which the effects of the Plan have been assessed. These objectives also take into account the types of issues that are capable of being affected by the land use planning system.

2.13 Development of the IIA framework is not a requirement of the SEA Regulations but is a recognised way in which the likely sustainability effects of a plan can be transparently and consistently described, analysed and compared. The IIA framework comprises a series of sustainability objectives and supporting criteria that are used to guide the appraisal of the policies and proposals within a plan. The IIA framework that was used in this way throughout the plan-making process is presented in Chapter 3.

Development of the site assessment criteria

2.14 The ELJWP does not allocate new waste sites. The evidence suggests that there is a sufficient surplus in waste management capacity to consider the release of waste sites that currently enjoy policy protection for waste management uses:

- Table 9 within the ELJWP sets out which sites are suitable to be released from safeguarding.
- Appendix 2 of the ELJWP sets out sites safeguarded by the ELJWP.

2.15 The IIA has not therefore appraised site allocation options. The IIA does consider the process for the removal of sites from the safeguarded list within Chapter 4 of this report.

Consult on the scope and level of detail of the SA

2.16 Public and stakeholder participation is an important element of the IIA and wider plan-making processes. It helps to ensure that the IIA Report is robust and has due regard for all appropriate information that will support the ELJWP in making a contribution to sustainable development.

2.17 The SEA Regulations require the statutory consultation bodies (the Environment Agency, Historic England, and Natural England) to be consulted "when deciding on the scope and level of detail of the information that must be included" in the IIA Report. The scope and level of detail of the IIA is governed by the IIA framework and the statutory consultees have therefore been consulted on this when it was developed as part of the scoping process for the IIA Report. The Council undertook consultation with the statutory consultees for the IIA Scoping Report in March and April 2024.

2.18 Appendix B lists the comments that were received on the IIA during the consultation on the Scoping Report. The Appendix describes how each comment was addressed. In light of the comments received, a number of amendments were made to the review of policies, plans, and programmes, the baseline information, key sustainability issues and the IIA framework.

SA Stage B: Developing and refining options and assessing effects

2.19 The consideration of reasonable alternatives was a key focus of attention within the IIA process. Developing options for a plan is an iterative process, usually involving a number of consultations with the public and stakeholders. Consultation responses and the IIA can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan.

2.20 In relation to the IIA report, Part 3 of the SEA Regulations 12 (2) requires that:

> "The report must identify, describe and evaluate the likely significant effects on the environment of—
>
> (a) implementing the plan or programme; and
>
> (b) reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme."

2.21 Schedule 2 (h) of the SEA Regulations requires that the Environmental Report includes a description of:

> "(h) an outline of the reasons for selecting the alternatives dealt with."

Developing and refining options

2.22 The SEA Regulations require that the alternative policies and site allocations considered for inclusion in a plan that must be subject to IIA are 'reasonable', therefore alternatives that are not reasonable do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that do not meet the objectives of the plan or national policy (e.g. the NPPF) or site allocation options that are unavailable or undeliverable.

Assessing the effects of the Plan and reasonable alternatives

2.23 The draft policies and sites included in the draft ELJWP as well as all reasonable alternatives were appraised against the IIA objectives in the IIA framework (see Chapter 3). This included the appraisal of a number of options for the spatial distribution of development in the plan area as well as the preferred approach to development taken forward in the draft Local Plan.

Site assessment criteria

2.24 The ELJWP does not allocate new waste sites. The evidence suggests that there is a sufficient surplus in waste management capacity to consider the release of waste sites that currently benefit from policy protection for waste management uses:

- Safeguarded existing waste management sites (Schedule 1 of the ELJWP).
- Sites in locations that are identified as suitable for strategic waste management facilities (Schedule 2 of the ELJWP).

2.25 The IIA has not therefore appraised site options. The IIA has considered if there are any reasonable alternative options for the selection of sites that the ELJWP releases from safeguarding in Chapter 4 of this report.

2.26 The IIA findings are not the only factors taken into account when determining a preferred option to take forward in a plan. Indeed, there will often be an equal number of positive or negative effects identified by the IIA for each option, such that it is not possible to rank them based on sustainability performance in order to select a preferred option. Factors such as public opinion (such as feedback on the SIP consultation), deliverability and conformity with national policy will also be taken into account by plan-makers when selecting preferred options for their plan.

SA Stage C: Preparing the Sustainability Appraisal report

2.27 This IIA report describes the process that was undertaken to date in carrying out the IIA of the Draft ELJWP. It contains an appraisal of the vision and objectives for the plan, and seven policies. The focus of the appraisal was the identification of significant effects, whether positive or negative, in accordance with the SEA Regulations.

2.28 This IIA report is intended to meet all the reporting requirements of Schedule 1 of the SEA Regulations.

SA Stage D: Consultation on the Local Plan and the IIA Report

2.29 The four Boroughs previously invited comments on the Draft ELJWP (Regulation 18 draft) and the accompanying IIA report in the summer of 2024. Appendix B lists the comments that were received on the IIA and how each comment was addressed.

2.30 The four Boroughs are now inviting comments on the Draft ELJWP (Regulation 19 draft) and this IIA report. These documents will be published on the East London Joint Waste Plan website for consultation in the spring of 2025.

SA Stage E: Monitoring implementation of the Local Plan

2.31 Recommendations for monitoring the likely significant social, environmental and economic effects of implementing the ELJWP are presented in Chapter 7.

IIA framework

2.32 The development of a set of IIA objectives (known as the IIA framework) is a recognised way in which the likely environmental and sustainability effects of a plan and reasonable alternatives can be described, analysed and compared. The IIA framework for the IIA of the ELJWP is presented in Chapter 5 and was developed by LUC from the analysis of national, regional and local policy objectives, baseline information, and key sustainability issues identified in the Plan area.

2.33 The IIA framework comprises a series of IIA objectives, each accompanied by a set of guide questions that are used to appraise the performance of the ELJWP and its reasonable alternatives against the IIA objectives. The relationship between the key sustainability issues, the IIA objectives and the SEA Topics, Equality Act 2010 protected characteristics is set out within Chapter 5.

Key to IIA effects symbols

2.34 The findings of the IIA are presented as colour coded symbols showing an effect for each option against each one of the IIA objectives along with a concise justification for the effect given, where appropriate. The colour coding is shown in **Table 2.1** below.

Table 2.1: IIA effects symbols

Symbol	Effect
++	Significant positive effect likely
++/-	Mixed significant positive and minor negative effects likely
+	Minor positive effect likely
+/-	Mixed minor effects likely
++/--	Mixed significant effects likely
-	Minor negative effect likely
--/+	Mixed significant negative and minor positive effects likely
--	Significant negative effect likely
0	Negligible effect likely
?	Likely effect uncertain
N/A	Not applicable or relevant

2.35 Where a potential positive or negative effect is uncertain, a question mark was added to the relevant symbol (e.g. +? Or -?) and the symbol was colour coded as per the potential positive, negligible or negative effect (e.g. green, white, yellow, pink, etc.). Negligible effects are recorded where a policy or site allocation is considered to have no effect in contributing to achievement of the IIA objective. This is usually the case when an objective or policy is focused on a very narrow topic and would only affect two or three IIA objectives.

2.36 The likely effects of options and policies need to be determined and their significance assessed, which inevitably requires a series of judgments to be made. The appraisal has attempted to differentiate between the most significant effects and other more minor effects through the use of the symbols shown above. The dividing line in making a decision about the significance of an effect

is often quite small. Where either (++) or (--) was used to distinguish significant effects from more minor effects (+ or -) this is because the effect of an option or policy on the IIA objective in question is considered to be of such magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective. However, effects are relative to the scale of proposals under consideration.

2.37 Mixed effects have only been presented where directly opposing effects (i.e. positive and negative) have been identified through the appraisal (e.g. +/-, ++/-, --/+ and ++/--). For some IIA objectives, it is possible that a policy might have a minor positive effect in relation to one aspect of the policy and a significant positive effect in relation to another aspect (giving a score of +/++). However, in these instances, only the significant score is shown in the appraisal tables. Similarly, if a policy could have a minor and significant negative effect (-/--) for the same IIA objective, only the significant negative score is shown in the appraisal tables. The justification text relating to the appraisal describes where the various elements of the policy or site being appraised might have potential to result in effects of differing magnitude.

2.38 The likely sustainability effects of the ELJWP and its reasonable alternatives are summarised in Chapter 6. Potential cumulative impacts are also set out within Chapter 6.

Difficulties and data limitations

2.39 The SEA Regulations, Schedule 2(8) require the Environmental Report to include:

> "…a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information."

2.40 A number of difficulties and limitations arose in the course of the assessment work carried out to date and these are outlined below:

- Many effects of development are dependent on the exact location, layout and design of development, so it may be possible to mitigate some of the effects highlighted in this IIA. However, given the inherent uncertainties about these details, the IIA focuses on identifying potential significant effects of the options considered, without making assumptions about detailed design or mitigation measures that might be implemented.
- The number of strategies, plans, programmes, policy documents, advice and guidance produced by a range of statutory and non-statutory bodies means that it has not been possible within the resources available to consider every potentially relevant document in detail (see Chapter 3 and Appendix A). Strategies, plans and programmes will be newly prepared or updated throughout the preparation of the ELJWP and each iteration of the IIA will take account of those changes, where it is appropriate.
- The IIA of any alterations to the ELJWP that follow examination of the plan will consider updated evidence and information available at the time.

2.41 All waste planners in England rely on the Environment Agency Waste Data Interrogator and it is considered the best available source of data available for waste planning purposes. It is not possible to obtain entirely accurate estimates of waste arisings, or imports and exports due to limitations of available data. It is acknowledged that not all waste arising in, or imported to, or exported from, East London may be represented in the data; and not all data may be accurately attributed. A particular issue is the tonnage of waste not attributed down to WPA level in the Waste Data Interrogator. This is due to reporting practices of some site operators and means that a tonnage of around 13 million tonnes of waste is only attributed to London as a whole rather than a specific WPA and would otherwise be ‘orphaned’ i.e. not provided for. In order to address this, an attempt was made to allocate arisings of Construction, Demolition and Excavation (C,D & E) waste attributed to London. This was done by applying London wide construction sector employment statistics. However as the arising value was arrived at partially through applying this statistical computation it is not possible to be certain what fate this reattributed waste followed. The IIA has followed the lead of the plan, and has not made any

additional assumptions in the movement of waste across the plan area, or further within or outside of London.

Chapter 3

Sustainability context

Introduction

Policy context

3.1 Schedule 2 of the SEA Regulations requires the SA Report to describe:

> (e) "the environmental protection objectives established at International, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation"

3.2 To establish a clear scope for the IIA it is necessary to review and develop an understanding of the environmental, social and economic policy objectives that the East London Joint Waste Plan (ELJWP) should seek to conform with and help to deliver against. This chapter summarises the international and national policy objectives that should be taken into consideration during preparation of the plan. These objectives have been considered when drafting the IIA Framework in Chapter 3**.**

3.3 There is an extensive range of policy documents that are of potential relevance to the Local Plan preparation and IIA process. A pragmatic and proportionate approach was taken to the review of the policy context, seeking to identify key sustainability (i.e. environmental, social or economic) objectives that have the potential to be influenced by the ELJWP. A summary of the relevant objectives of key policy documents is provided in this chapter with a wider and more detailed review provided in Appendix A.

Implications of ‘Brexit’

3.4 As of the end of January 2020 the UK has left the EU. Principally, the UK’s environmental law is derived from EU law or was directly effective EU law. As a result of Brexit, the European Union (Withdrawal) Act 2018 converts existing EU law which applied directly in the UK’s legal system (such as EU Regulations and EU Decisions) into UK law and preserves laws made in the UK to implement EU obligations (e.g., the laws which implement EU Directive). This body of law is known as retained EU law and is could be subject to future, post-Brexit amendments.

3.5 As set out in the Explanatory Memorandum accompanying the Brexit amendments to the SEA Regulations **[See reference** 11**]**, the purpose of the Brexit amendments is to ensure that the law functions correctly after the UK has left the EU.

3.6 No substantive changes have been made to the UK regulations to date; however, the Government does intend to reform the planning system, including replacing SEA and SA with a new requirement for an Environmental Outcomes Report. No further information is known at the time of writing. Any changes to the legal framework for carrying out SA/SEA will be addressed as appropriate as the ELJWP is prepared. The government has set a deadline for plans created under the current system to be submitted by June 2025 and adopted by the end of 2026.

International plans, policies and programmes

3.7 Relevant international plans and policy (including those at the EU level) are transposed into national plans, policy and legislation and these have been considered.

3.8 At the international level, Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the ‘SEA

Directive') and Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive') have been transposed into UK Regulations. They are particularly significant given that Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) are to be undertaken in relation to the emerging ELJWP. These assessment processes should be undertaken iteratively and integrated into the production of the plan in order to ensure that any potential negative environmental effects (including on nature conservation sites of international importance) are identified and can be mitigated.

3.9 Directive 2008/98/EC (Waste Framework Directive) is also of particular relevance. It has also been transposed into UK law and aims to protect the environment and human health by preventing or reducing the adverse impacts of the generation and management of waste and by reducing overall impacts of resource use and improving the efficiency of such use.

3.10 There are a wide range of other EU Directives relating to issues such as water and air quality, most of which have been transposed into UK law through national-level policy.

3.11 Furthermore, the 2030 Agenda for Sustainable Development (2015) **[See reference** 12**]**: This initiative, adopted by all United Nations Member States, provides a shared blueprint for peace and prosperity for people and the planet and includes 17 Sustainable Development Goals (SDGs), designed to achieve a better and more sustainable future for all. Relevant to this topic are:

- SDG 6: Clean Water and Sanitation
- SDG 08: Decent Work and Economic Growth
- SDG 09: Industry, Innovation and Infrastructure
- SDG 11: Sustainable Cities and Communities
- SDG 12: Responsible Consumption and Production
- SDG 13: Climate Action
- SDG 14: Life Below Water.

- SDG 15: Life on Land.

Key national plans and programmes

3.12 The National Planning Policy Framework (NPPF) **[See reference** 13**]** is the overarching planning framework which provides national planning policy and principles for the planning system in England. The East London Waste Local Plan must be consistent with the requirements of the NPPF which sets out information about the purposes of local plan-making. It states:

3.13 "Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings".

3.14 The NPPF does not contain specific waste policies. The detailed waste planning policies are contained in the National Planning Policy for Waste (2015). The policies state that when preparing Local Plans, waste planning authorities should take account of a number of criteria including:

- Driving waste management up the waste hierarchy;
- Identifying the need for waste management facilities
- Working jointly and collaboratively with other planning authorities to provide a network of facilities to deliver sustainable waste management; and,
- Identifying suitable sites and areas for waste management facilities in line with the proximity principle, giving priority to the re-use of previously developed land.

3.15 The NPPF is supported by Planning Practice Guidance which includes guidance on Waste (2015) **[See reference** 14**]**. The PPG provides guidance on implementing the waste hierarchy, the preparation of local plans and sustainability appraisals for waste local plans, and determining planning

applications for waste facilities. According to the guidance on flood risk and coastal change, waste treatment facilities are classified as less vulnerable and are suitable in all flood zones, excluding 3b (the functional floodplain). Landfills and sites used for waste management facilities for hazardous waste are considered to be more vulnerable and are suitable only in Flood Zones 1 and 2, and potentially 3a.

3.16 Also of particular relevance to the East London Waste Local Plan is the National Waste Management Plan for England (DEFRA, 2021) which provides an analysis of the current waste management situation in England and supports the implementation of the objectives and provisions of the Waste (England and Wales) Regulations 2011.

3.17 Table 3.1 lists the national plans and programmes that are of greatest relevance to the emerging ELJWP. Further national plans and programmes are included in Appendix A. It should be noted that some of the documents will be updated in the timeline of preparing the IIA for the Waste Local Plan. This list will be updated at each stage of the IIA, where appropriate.

Table 3.1: Key national plans and programmes of relevance for the ELJWP

National Legislation
HM Government (1979) Ancient Monuments and Archaeological Areas Act 1979
HM Government (1981) The Wildlife and Countryside Act 1981
HM Government (1990) Planning (Listed Building and Conservation Areas) Act
HM Government (1990) Environmental Protection Act 1990
HM Government (2000) Countryside and Rights of Way Act 2000
HM Government (2003) Sustainable Energy Act

National Legislation
HM Government (2006) The Natural Environment and Rural Communities (NERC) Act
HM Government (2016) Energy Act 2016
HM Government (2008) The Climate Change Act 2008 (as amended)
HM Government (2008) The Planning Act 2008
HM Government (2021) The Environment Act 2021
HM Government (2010) Flood and Water Management Act 2010
HM Government (2014) Water Act 2014
National Regulations
HM Government (2015) Water Framework Directive (England and Wales) (amendment) Regulations 2015
HM Government (2016) Environmental Permitting (England and Wales) Regulations 2016
HM Government (2010) The Conservation of Habitats and Species Regulations 2010
HM Government (2002) The Landfill (England and Wales) Regulations 2002
HM Government (1994) Urban Waste Water Treatment (England and Wales) Regulations 1994
HM Government (2005) The Hazardous Waste (England and Wales) Regulations 2005
HM Government (2011) The Animal By-Products (Enforcement) (England) Regulations 2011
HM Government (2005) Waste Management (England and Wales) Regulations 2005
HM Government (2012) Waste (England and Wales) (Amendment) Regulations 2012
HM Government (2002) Air Quality (England) (Amendment) Regulations 2002
HM Government Circular 1/2003: Safeguarding, Aerodromes, Technical Sites and Military Explosive Storage Areas

National Legislation
HM Government (2017) The Conservation of Habitats and Species Regulations 2017 (as amended)
HM Government (2020) The Waste (Circular Economy) (Amendment) Regulations 2020
National Policies, Plans and Strategies
DCMS (2013) Scheduled Monuments & Nationally Important but Non-Scheduled Monuments Policy Statement
HM Government (2019) Clean Air Strategy 2019 Policy Paper
DEFRA (2011) Safeguarding our Soils: A Strategy for England Policy Paper
Natural England (2021) Guide to assessing development proposals on agricultural land – National Guidance
Environment Agency (2020) National Flood and Coastal Erosion Risk Management Strategy for England Policy Paper
Environment Agency (2022) Flood risk assessments: climate change allowances – National Guidance
DEFRA (2011) Future water: The Government's Water Strategy for England Policy Paper
Environment Agency (2017) Groundwater protection guides
DfT (2021) Transitioning to zero emission cars and vans: 2035 delivery plan – National Guidance
DEFRA (2013) Hazardous Waste National Policy Statement
DECC (2011) National Policy Statement for Renewable Energy Infrastructure (EN-3)
DECC (2012) Strategy for the management of solid low level radioactive waste from the non-nuclear industry
DECC (2009) The UK Renewable Energy Strategy
HM Government (2021) Net Zero Strategy: Build Back Greener
BEIS (2021) Industrial Decarbonisation Strategy
DEFRA (2020) Rural proofing in England 2020 Policy Paper

National Legislation
DLUHC (2021) National Design Guide
MHCLG (2023) National Planning Policy Framework
DCLG (2014) National Planning Policy for Waste
DLUHC National Planning Practice Guidance (living document)
DEFRA (2021) National Waste Management Plan for England
DEFRA (2013) Waste prevention programme for England: Prevention is better than cure – The role of waste prevention in moving to a more resource efficient economy Policy Paper
DEFRA (2018) Our Waste, Our Resources: A strategy for England Policy Paper
BEIS (2022) British Energy Security Strategy Policy Paper
DfT (2022) Air quality: clean air zone framework for England Policy Paper
HM Government (2017) Litter Strategy for England Policy Paper
DfT (2022) Future of freight plan Policy Paper
DEFRA (2022) Landscapes Review (National Parks and AONBs): government response Policy Paper
DEFRA (2020) Agricultural Transition Plan 2021 to 2024 Policy Paper
DCLG (2021) National Planning Policy Framework
DCLG (2015) Planning Practice Guidance on Waste
DEFRA (2012) National Policy Statement for Waste Water
DEFRA (2013) National Policy Statement for Hazardous Waste
HM Government (2013) Waste prevention programme for England: Prevention is better than cure – The role of waste prevention in moving to a more resource efficient economy
Our Waste, Our Resources: A strategy for England (2018)
British Energy Security Strategy (2022)
DEFRA (GP3): Underground, Under threat – Groundwater Protection: Policy and Practice

National Legislation
DLHC (2022) Flood risk and coastal change guidance
Environment Agency (2022) National Flood and Coastal Erosion Risk Management Strategy for England
DEFRA (2008) Future Water: The Government's Water Strategy for England
Environment Agency (2009) Water for People and the Environment: Water Resources Strategy for England and Wales
MHCLG (2019) Clean Air Strategy
DECC (2014) Community Energy Strategy
Government policy papers
DEFRA (2021) The Water White Paper
25 Year Environment Plan (2018)
Resources and Waste Strategy for England (2018)

3.18 The ELJWP is not being prepared in isolation but is influenced by, and influences, other polices, plans and programmes. The ELJWP needs to be consistent with international and national guidance and strategic planning policies and should contribute to the goals of a wide range of other programmes and plans. It must also conform to environmental protection legislation and the sustainability objectives established at the international, national and local levels.

3.19 Schedule 2 of the SEA Regulations requires:

> (1) "an outline of the…relationship with other relevant plans or programmes"; and
>
> (5) "the environmental protection objectives established at international, Community or Member State level, which are relevant to the plan and the

way those objectives and any environmental considerations have been taken into account during its preparation"

3.20 In order to establish a clear scope for the IIA it is necessary to review and develop an understanding of the environmental, social and economic objectives contained within international and national plans and programmes that are of relevance to the emerging ELJWP. The review is not exhaustive, and an exhaustive approach would not be proportionate or be useful in understanding the policy environment that the ELJWP must be prepared within. Instead, the review focuses on a limited number of key policy documents that are of particular importance of setting the parameters of what the ELJWP should and should not do. It should be noted that the policy context within which the ELJWP and its IIA are being prepared is inherently uncertain given the following key factors:

3.21 UK economy – The UK economy contracted by 0.3% in the fourth quarter of 2023 which was the second successive fall in GDP. However, quarter four of 2023 was 1.0% above its pre-pandemic level of Q4 2019 [See reference 15] Whilst the UK is in a technical recession, the Organisation for Economic Co-operation and Development (OECD) forecasts UK GDP to grow by 0.7% in 2024 and by 1.2% in 2025 (unchanged from its previous forecast made in November). The International Monetary Fund (IMF) forecasts UK GDP to grow by 0.6% in 2024 (unchanged from its previous forecast made in October) and by 1.6% in 2025. The UK is currently experiencing a cost-of-living crisis and for the first time in four decades, the Confederation of British Industry (CBI) expects real household incomes to drop for a second consecutive year (-1.3%), before recovering in 2024 (1.1%). Brought on by high inflation and low wage growth, the economy is underperforming compared to its G7 peers. As the UK's economy continues to take a downturn, the potential implications for planning and development include Government spending cuts impacting on support available for services and facilities, and new infrastructure.

3.22 'Brexit' – Following the UK's departure from the European Union on 31st January 2020, it entered a transition period which ended on 31st December 2020. From 1st January 2021, directly applicable EU law no longer applies to

the UK and the UK is free to repeal EU law that has been transposed into UK law. Where EU law has been transposed into UK law and not repealed, the relevant EU and UK legislation is still referred to in this report.

3.23 COVID-19 – The COVID-19 pandemic has led to far-reaching changes to society in the UK and around the world. Which of these changes will continue in the long term is unknown. However, emerging evidence suggests that there has been an increase in remote working, reduced commuting and related congestion and air pollution, and increased prioritisation of walking and cycling over private transport in towns and cities.

3.24 The Levelling Up and Regeneration Act – Published on 11th May 2022, and received Royal Assent on 26th October 2023, the Act introduces several reforms to the planning system. It sets out the Government's plans to drive local growth and empower local leaders to regenerate their areas. The Act introduces a new Infrastructure Levy, new powers for councils to bring vacant properties back into use, a new approach to environmental assessments, and changes to neighbourhood planning including digitisation of the system.

Regional, sub-regional and local plans and programmes

3.25 It is not a requirement of the SEA Regulations to describe the relevance of policy objectives established at sub-national scale for the ELJWP. However, since they provide further context for the ELJWP, those considered of most relevance (e.g. relating to the economy, transport, climate change and green infrastructure) are listed below.

Table 3.2: Key GLA policies, strategies and guidance

Key Greater London Authority (GLA) policies, strategies and guidance
The London Plan (2021)

Key Greater London Authority (GLA) policies, strategies and guidance
Climate Action Strategy 2020-2027 (2020)
London Environment Strategy (2022)
Local Nature Recovery Strategy (in progress)
Accessible London SPG (2014)
Optimising Site Capacity: A Design - Led Approach LPG (2023)
Characterisation and Growth Strategy (2023)
Air quality positive LPG (2023)
Air quality neutral LPG (2023)
Be Seen energy monitoring LPG (2021)
Circular economy statements LPG (2022)
Energy Planning guidance (2022)
The control of dust and emissions in construction SPG (2014)
Whole life carbon LPG (2022)
Sustainable Transport, Walking and Cycling (2022)
Urban Green Factor LPG (2023)
London Sustainable Drainage Action Plan (2015)
Thames Estuary 2100 (TE2100) (2023)

3.26 There are also a wide range of plans and programmes at the district / local authority scale. While such local plans do not set policy objectives that the Waste Local Plan must follow, the ELJWP may nevertheless need to take into account development provided for by those local plans. This section therefore also lists local plan documents considered of greatest potential relevance to the ELJWP. The table includes plans adopted or that have reached Regulation 19 stage at the date this document was published. The table includes documents relating to the London Legacy Development Corporation. Planning powers for the area covered by the London Legacy Development Corporation will returned to Newham, Hackney, Tower Hamlets and Waltham Forest, at the end of

December 2024. Appendix B setting out the baseline of the ELJWP area, draws from these local plans, programmes and policies to highlight future trends relevant to waste management in East London, such as the scale and distribution of each London Borough's housing and employment growth.

Table 3.3: Key Local plans, programmes and policies

Key Local plans, programmes and policies
East London wide
Joint Waste Development Plan for the East London Waste Authority Boroughs (2012)
A Joint Strategy for East London's Resources and Waste 2027 – 2057 (2022)
Evidence Base for the East London Joint Waste Plan (and appendices) (2022)
East London Waste Prevention Action Plan 2023-24 (2023)
East London Integrated Waste Management Services Procurement and Contract Expiry (PACE) Outline Business Case (OBC) (2023)
London Borough of Barking and Dagenham
Local Plan 2037 (adopted September 2024)
Local Plan 2037 Policies Map (2024)
LBBD Local Plan Sustainability Appraisal (2021)
Climate Emergency Declaration (2020)
Barking and Dagenham Inclusive Growth 2022 to 2026 draft (2022)
Barking and Dagenham Authority Monitoring Report 2021-2022 (2023)
Barking and Dagenham Air Quality Action Plan 2020-2025 (2020)
Be First Waste Needs Assessment (2021)
London Borough of Barking and Dagenham Industrial Land Strategy (2021)
Barking and Dagenham Wide Transport Priorities 2021-2037 (2021)

Key Local plans, programmes and policies
Planning Advice Note (PAN3) – Waste and Recycling Provisions (updated 2021)
Barking and Dagenham Reduction and Recycling Plan April 2023 to March 2025 (2023)
London Borough of Havering
Havering Local Plan 2016 – 2031 (2021)
Havering Local Plan 2016 – 2031 – Polices Map (North & South 2021)
Sustainability Appraisal for the Havering Local Plan (2021)
Climate Change Action Plan (2021)
Havering Inclusive Growth Strategy 2020-2045 (2020)
Havering Local Implementation Plan: Transport strategy (2019)
Havering Authority Monitoring Report 2022-2023 (2023)
Havering Reduction and Recycling Plan April 2023 to March 2025 (2022)
Climate Emergency Declaration (2021)
Havering Nature Conservation and Biodiversity Strategy (2014)
Site Specific Allocations Development Plan Document (Romford) (2008)
London Borough of Newham
Newham Local Plan (2018)
Newham Local Plan Polices Map (2018)
Newham Regulaiton 19 Local Plan (2024)
Climate Emergency Action Plan Climate Emergency Statement (2020)
Newham's Climate Emergency Annual Report (2021-2022)
Newham's Climate Action Just Transition Plan (2023)
AMR: Waste, Energy and Infrastructure Delivery Monitoring Bulletin (2013-2023)
AMR: Sustainability and Climate Monitoring Bulletin (2013-2018)

Key Local plans, programmes and policies
Waste Management Guidelines for Architects and Property Developers
IIA of Regulation 19 Local Plan
Air Quality Action Plan (2019)
Air Quality Annual Status Report (2023)
London Borough of Newham Regulation 19 Local Plan
Strategic Flood Risk Assessment (2023)
London Borough of Redbridge
Redbridge Local Plan 2015-2030 (2018)
Climate Action Plan (2021)
Climate Change Annual report (2022)
Redbridge Reduction and Recycling Plan 2023-2025 (2022)
Redbridge Biodiversity Action Plan (2006)
Redbridge Third Implementation Plan (2019)
Waste Reduction Strategy (2019)
London Legacy Development Corporation
Local Plan 2020-2036 (2020)
Getting to Net Zero SPD (2022)

Key sustainability issues

3.27 Key sustainability issues for the ELJWP were originally identified through the preparation of the IIA Scoping Report in 2023. The key issues identified through the analysis of the baseline, policy context and consultations on the Regulation 18 draft plan and IIA are set out below.

3.28 It is also a requirement of the SEA Directive that consideration is given to the likely evolution of the environment in the plan area (in this case the ELJWP plan area) if the new Local Plan was not to be implemented. This analysis is also presented in relation to each of the key sustainability issues below.

3.29 The analysis below shows that, in general, the current trends in relation to the various social, economic and environmental issues affecting East London would be more likely to continue without the implementation of the new ELJWP. The effectiveness of the ELJWP will be focused on where waste development comes forward and may have a limited effect compared to wider local plans and other strategies.

Waste

3.30 Across the four boroughs, there is an increasing amount of waste that is reused, recycled, or reclaimed and reducing amounts of waste are sent to landfill. There will be further opportunities to achieve higher rates of recycling and the efficiency benefits associated with the transition to a circular economy. Furthermore, future economic and population growth across London and the South East is likely to put pressure on the existing network of waste management facilities. In addition, disposal to landfill is at present an unavoidable and least bad solution for some wastes.

3.31 The ELJWP will have limited influence on the amount of waste that is generated and needs to be managed each year. A key role of the ELJWP could be to make provision for the right waste management facilities, in the right locations for the purposes of implementing sustainable waste management practices that will meet waste targets and other ambitions set across the four Boroughs, ensuring waste is dealt with as far up the waste hierarchy as possible.

3.32 The ELJWP should ensure that where waste is unavoidable, it is managed in an efficient and sustainable manner, by employing the ‘waste hierarchy’. In addition, the ELJWP could support the evolution of the four Boroughs waste

infrastructure network to the most sustainable locations, where the opportunity arises. Policies could also support the most efficient and appropriate freight routes, and an accelerated transition to low and zero carbon alternatives to conventional fossil-fuel based road freight. Furthermore, opportunities to utilise efficient and more sustainable modes of transport could be promoted to achieve maximum diversion of waste away from road haulage.

Climate change mitigation and adaptation

3.33 There is a need to significantly reduce greenhouse gas emissions to help meet international and national greenhouse gas reduction targets. The ELJWP provides opportunities to help achieve this through:

- Encouraging energy efficiency measures in the construction and design of new buildings.
- Reducing carbon emissions from freight use by reducing the need to travel to process and dispose of waste, as well as supporting the use of low or zero emission transport modes, as discussed below in the section covering transport.
- Promoting green infrastructure within new waste sites to deliver carbon sequestration.

3.34 The effects of climate change in the ELJWP area are likely to result in extreme weather events becoming more common and more intense. Flood risk is of particular significance in this regard, alongside heatwaves and drought. Fluvial and surface water flooding poses the most significant risk to the plan area, particularly in areas in close proximity to the Thames river. The ELJWP provides an opportunity to help adapt to the unavoidable effects of climate change by:

- Locating development in locations with no or low flood risk.
- Encouraging flood and heat resilient development.

- Promoting on-site biodiversity net-gain, as well as links to green infrastructure to deliver flood retention, shading/ cooling, air quality improvements and safe havens for vulnerable species.
- The waste industry has the potential to contribute to climate change via the emission of greenhouse gases generated by the use of energy in processes and transportation involved in the industries. In 2019, the UK government set a legally binding target to achieve net zero greenhouse gas emissions (GHG) by 2050. Correspondingly, each of the four Boroughs have declared a climate emergency and have set monitored targets to reduce emissions to aid in reaching this goal.

3.35 Areas across the four Boroughs, which are at higher risk of flooding now and, in the future, (e.g. low-lying land on the floodplain) are also often attractive for development. Despite policies in the NPPF and NPPW, the ELJWP could play a key role in ensuring sufficient weight is given to the risk of flooding from all sources and over time; and that new or expanded waste management facilities are directed towards areas with the lowest risk of flooding. Furthermore, the ELJWP could demand highly resilient design to address residual risks of flooding and to tackle flood risk vulnerabilities locally and elsewhere.

Population, health and wellbeing

3.36 Across the four boroughs, population is forecast to increase, with younger (0 to 15) and older (over 65) groups seeing the largest increase. In Barking and Dagenham for example, the population is forecast to grow to 250,000 by 2031 with annual growth of households of 1,519 a year in that period. In the absence of any significant change in per capita resource consumption, the consequence of population growth will be an increase in the amount of waste being generated. The existing network of waste management facilities will need to become more efficient and may also need to expand in places to keep pace with demand for waste management services.

Economy and employment

3.37 Beneficial economic characteristics have not been equally shared across the four borough's local communities. The consequence for this has been levels of local inequality, including areas such as South Hornchurch and Harold Hill in Havering, and areas within the wards Abbey, Gascoigne, Chadwell Heath, Thames and Abbey fall in Barking and Dagenham falling within the 10% more deprived Lower Super Output Areas in England.

3.38 The Growth Strategy for Barking and Dagenham 2013-2023 sets out the key aims and areas for growth in the borough, to increase investment and create a higher skilled workforce **[See reference** 16**]**. The LBBD Local Plan 2037 (2024) **[See reference** 17**]** identifies the following areas for economic growth for the period between 2019 and 2037:

- Barking Town Centre and the River Roding
- Barking Riverside
- Thames Road
- Castle Green
- Chadwell Heath and Marks Gate
- Dagenham Dock and Freeport
- Beam Park
- Dagenham East
- Dagenham Heathway

3.39 Havering's Inclusive Growth Strategy (2020-2045) **[See reference** 18**]** provides an analysis of the local economy and identifies the types of employment growth and locations for growth over the period to 2045 **[See reference** 19**]**. The LBH Local Plan 2021 **[See reference** 20**]** focusses growth on the areas of Rainham and Beam Park, and Romford, consistent with the London Plan 2021.

3.40 Three of the London Plan (2021) Opportunity Areas are located or partly located in Newham: Royal Docks and Beckton Riverside, and the Poplar Riverside and Olympic Legacy cross boundary Opportunity Areas. The Regulation 19 Newham Local Plan (2024) incorporates these areas and also includes a number of Micro Business Opportunity Areas, to promote business use around existing town centres.

3.41 The Redbridge Local Plan (2018) **[See reference** 21**]** identifies the following areas for economic growth for the period between 2015 and 2030, noting the inclusion of the Ilford Opportunity Area within the London Plan (2021):

- Ilford Investment and Growth Area
- Crossrail Corridor Investment and Growth Area
- Kind George and Goodmayes Hospital
- Land at Billet Road
- Gants Hill Investment and Growth Area
- Barkingside Investment and Growth Area
- South Woodford Investment and Growth Area

3.42 The ELJWP could support a local policy framework that will make a small, but present, contribution towards improving the diversity and quality of local employment opportunities available in more deprived urban localities. It may also bring about training investment, where relevant skills deficits might be present within local communities.

Transport

3.43 Several of the ELJWP road links are inadequate, with several roads and junctions noted as being at or near to capacity, and many experiencing congestion at peak times. Adverse traffic conditions on these routes often have knock-on effects on local roads, leading to localised gridlock on occasion and

impacting negatively on economic productivity. In addition, with planned developments and increased housing and job provision, more pressure may be placed on the road networks.

3.44 Without the ELJWP it is anticipated that traffic congestion and air and noise pollution from transport associated with waste developments will continue to increase with the rising population and car dependency will continue to be high. The implications of air pollution for human health and the natural environment are described in subsequent sections.

3.45 The ELJWP provides an opportunity to reduce the demand on the transport network from waste development and to address potential adverse effects of travel by:

- Locating waste development where there is good access to sustainable transport modes for waste and employees
- Supporting and prioritising sustainable travel choices through workplace travel plans; and
- Supporting the uptake of electric vehicles through the provision of electric vehicle charging infrastructure at waste sites.

Historic environment

3.46 There are many designated and undesignated heritage assets and areas of historical and cultural interest in the ELJWP area that could be adversely affected by climate change and poorly located or designed development. While several of the historic assets in the plan area, for example Listed Buildings and Scheduled Monuments, will continue to be protected by statutory designations, without the ELJWP it is possible that these, and undesignated assets, will be adversely affected by inappropriate development. The ELJWP provides an opportunity to protect these assets (including their settings) from inappropriate waste development.

3.47 Although there is a high level of protection afforded historic sites within the NPPF and NPPW, more of an emphasis could be placed within the ELJWP on directing waste developments away from sensitive locations and requiring them to be designed and built so as to minimise adverse effects on the county's historic environment above and below ground

Landscape and townscape

3.48 East London's varied urban and more rural landscapes are vulnerable to adverse effects from urban intensification, increasing recreational pressures and seasonal climate change. The ELJWP provides an opportunity to help to protect and enhance such areas by directing development to the most sustainable locations and ensuring the design of new waste facilities is sympathetic to the surrounding area. The ELJWP will be best placed to do so if it is able to draw on up to date evidence on landscape character and sensitivity.

Biodiversity

3.49 The ELJWP area contains many areas of high ecological value ranging from European designated sites such as the Epping Forest SAC in Redbridge, to nationally designated Sites of Special Scientific Interest, Sites of Metropolitan Nature Conservation Importance and Sites of Importance for Nature Conservation among local green spaces and networks that provide ecological connectivity and greater biodiversity, and there is proximity to sites of national importance.

3.50 There is a need for continued preservation and long-term management of these areas within the plan area, as well as consideration of potential effects on sites outside the plan area boundary. Local Wildlife Sites in the borough are being negatively affected by actions such as inappropriate management, traffic pollution and recreational activities. If this continues, it could affect their wildlife value and contribution they make to biodiversity, landscapes and the natural environment. Biodiversity harm can occur outside of protected areas, and local

wildlife corridors should also be protected, appropriately within the hierarchy of types of designations.

3.51 Without the ELJWP, important habitats and biodiversity sites will continue to receive statutory protection. However, the ELJWP presents an opportunity to manage the sensitivities of the sites and biodiversity networks, for example by locating waste development away from the most sensitive locations, providing for biodiversity net-gain in new development. The plan should also ensure that waste development does not adversely affect the current condition of sites and where possible contributes to their improvement. Harm to biodiversity can also be avoided through the consideration of sustainable transport and the avoidance and reduction of amenity impacts.

Air, land and water quality

Soils and geology

3.52 Without the ELJWP it is possible that development could result in unnecessary sterilisation of mineral and soil resources thereby preventing their use for future generations, if there is additional need for new or relocated waste sites. There is therefore a need to minimise the amount of development located on brownfield land or on important mineral processing facilities. In the absence of the ELJWP, the NPPF would apply. This supports the reuse of brownfield land, but the ELJWP provides an opportunity to strengthen this approach to ensure these natural assets are not lost or compromised by prioritising brownfield sites and lower quality agricultural land for development.

Water

3.53 There are many factors and initiatives outside of the local planning policy framework contained within the ELJWP that may impact on water quality and the use of water resources, such as land management practices and investment

plans by utility bodies. However, the ELJWP has a role to play by ensuring new and expanded waste management developments will not adversely impact upon water quality and / or water quantity through securing efficient use of water resources. The ELJWP could also create a clear, positive and supportive investment environment in which opportunities to upgrade and improve the network of wastewater facilities across the county are taken.

3.54 Without the ELJWP, it is possible that unplanned development for waste could be in areas that could lead to further water quality issues and risks to the natural environment. However, existing safeguards, such as the Water Framework Regulations, would help to reduce the potential for this to occur. The ELJWP provides an opportunity to ensure that development is located and designed to consider the sensitivity of the water environment and water-dependent protected sites, to plan for adequate wastewater infrastructure, to incorporate sustainable drainage systems (SuDS), and to promote water efficiency and grey water recycling.

Air and noise

3.55 Air pollution associated with London's road network has exceed statutory levels and needs active monitoring and management. Whilst noise complaints in the London Boroughs are more commonly associated with domestic noise, Building Regulations aim to manage the impact of noise from new domestic and industrial developments through good design. Furthermore, the increasing prevalence of sustainability standards such as BREEAM will also have a positive contribution.

3.56 Development of an up-to-date local planning framework will ensure that ELJWP and development management policies seek to address the current sustainability issues (including noise). In the absence of the ELJWP, the policies in the NPPF and the Clean Air Strategy **[See reference 22]** would apply which support measures to improve air quality through traffic and travel management; to develop and enhance green infrastructure; and to direct new development to sustainable locations which limits the need to travel and offer a choice of transport modes.

3.57 All local authorities have an obligation to declare AQMAs, via the Environment Act 1995, and develop action plans for improvement of air quality. As set out in paragraph 3.246, each of the four boroughs has declared one AQMA that covers the whole borough. There is a risk that local air quality could be worsened by waste development, particularly through emissions from conventional fossil-fuel based transport of waste.

3.58 The ELJWP could support a spatial strategy that will facilitate an increasingly effective and efficient network of waste facilities that will reduce the frequency and miles needed to be travelled by waste. It could seek to use more sustainable alternatives to emission-generating fossil-fuel based road transport of waste. This could include switching to more sustainable modes of transport or to low and zero carbon road-based transport.

3.59 The ELJWP could also support efficient and appropriate freight routes for transporting waste by road that avoid areas with the worst rates of air pollution – namely AQMAs.

The IIA framework

3.60 As described in the Methodology chapter, the relevant objectives established via the review of plans, policies, and programmes and the key sustainability issues identified by the baseline review informed development of a framework of sustainability objectives, the IIA framework, against which the plan was assessed. For each of the sustainability objectives a number of appraisal questions are included to act as prompts when considering the potential effects of the Local Plan in relation to that objective. It should be noted that appraisal questions are not exhaustive and not all appraisal questions will be relevant to each element of the plan that is appraised. The IIA framework is presented below.

3.61 A small number of changes have been made to some of the appraisal questions in the IIA framework since it was presented in the Scoping Report, in

response to comments received during the Scoping consultation – these changes are detailed in Appendix A.

IIA Objective 1: To minimise the East London Joint Waste Plan's contribution to climate change through a reduction of greenhouse gas emissions from managing waste

Appraisal questions

- Will it reduce the East London Joint Waste Plan's contribution to climate change by reducing greenhouse gas emissions from waste management activities?
- Will it utilise the waste hierarchy to ensure less waste is being managed at the most appropriate level of the hierarchy?
- Will it support development of modern waste facilities for waste that cannot be recycled or composted?
- Will it promote energy efficiency by encouraging the use of energy efficient buildings and plant, and the use of appropriate renewable or low carbon energy sources on waste sites?

  Carbon emissions associated with waste transport are dealt with under IIA objective 7.

Relevant SEA topics and coverage of Equalities and Health Impact Assessment

- SEA topics: Climatic Factors; Air; Water; Material assets; Population; Human health.

- Equalities Impact Assessment – Equality Act 2010: all protected characteristics.
- Health Impact Assessment: Activities that generate greenhouse gas emissions often generate other pollutants that adversely affect health and wellbeing.

IIA Objective 2: Move treatment of waste up the Hierarchy within East London

Appraisal questions

- Will it contribute to the aim in the London Plan of a zero-waste city by 2050?
- Will it promote a circular low carbon economy within ELJWP area, and within London?
- Will it contribute to minimising disposal of all forms of waste, across the ELJWP area and across London?
- Will it promote the re-use, recycling and recovery of waste?

Relevant SEA topics and coverage of Equalities and Health Impact Assessment

- SEA topics: Population; Human health; Material assets;
- Equalities Impact Assessment – Equality Act 2010 all protected characteristics;
- Health Impact Assessment: Promoting the sustainable treatment of waste provides mental benefits of security and physical health benefits of having a healthy living environment.

IIA Objective 3: Support, maintain or enhance the development of the economy of East London

Appraisal questions

- Will it generate employment opportunities in the waste and resource sector for local people, especially within areas of deprivation, providing opportunities to improve local skills?
- Will it minimise harm to the existing local economy, locating waste uses away from existing sensitive receptors?

Relevant SEA topics and coverage of Equalities and Health Impact Assessment

- SEA topics: Population and human health; Material assets;
- Equalities Impact Assessment – all Equality Act 2010 protected characteristics;
- Health Impact Assessment: Security of employment is important for mental wellbeing

IIA Objective 4: Protect and improve the health of the people of the East London Joint Waste Plan area

Appraisal questions

- Will it avoid or minimise adverse effects on human health and safety, especially those with protected characteristics, including mental health, and those in more deprived areas?
- Will it provide opportunities to improve health and amenity through delivery of green infrastructure, enhanced public rights of way and improved access to recreation as part of the restoration of sites, or provision of biodiversity net-gain in new sites?
- Will it avoid or minimise adverse effects on the quality and extent of existing recreational assets?
- Will it reduce the incidence of crime associated with waste (e.g. fly-tipping and illegal dumping of large amounts of waste) by ensuring a sustainable network of waste facilities across the ELJWP area, and London?

Relevant SEA topics Covered and coverage of Equalities and Health Impact Assessment

- SEA topics: Population; Human Health
- Equalities Impact Assessment – all Equality Act 2010 protected characteristics;
- Health Impact Assessment:
  - This objective directly addresses health and wellbeing;
  - Ensuring access to green infrastructure means that people can meet their daily needs, ensuring both physical and mental wellbeing;

- Reducing crime, anti-social behaviour and fear of crime is important for physical and mental wellbeing;

IIA Objective 5: Promote sustainable modes of transport in the East London Joint Waste Plan area by reducing road traffic, congestion and pollution

Appraisal questions

- Will it support an overall reduction in the distance travelled by waste, either within the ELJWP area or across the wider London area?
- Will it contribute towards a reduction in traffic congestion, particularly in designated AQMAs?
- Will it reduce reliance on road-based freight movements and support the use of rail and water where this represents a deliverable, efficient and sustainable choice?
- Will it support the transition from low to ultra-low and then zero emission vehicles for the transportation of waste by road?

Relevant SEA topics and coverage of Equalities and Health Impact Assessment

- SEA topics: Air; Climatic factors; Population; Human Health; Biodiversity;
- Equalities Impact Assessment – Equality Act 2010 all protected characteristics.
- Health Impact Assessment: Encouraging active travel, such as walking, wheeling and cycling can have a wider range of positive implications for health, including increased physical activity and opportunities for social

interaction. In addition, an increase in active travel would be associated with a decrease in vehicular transport and an associated decrease in air pollutants that can be harmful to human health. Poor air quality can lead to and aggravate respiratory diseases.

IIA Objective 6: Protect and enhance the historic environment within East London

Appraisal questions

- Will allocated waste facilities conserve, protect and enhance designated and undesignated heritage assets and their settings?

Relevant SEA topics and coverage of Equalities and Health Impact Assessment

- SEA topics: Historic environment; Landscape.
- Equalities Impact Assessment – Equality Act 2010: all protected characteristics
- Health Impact Assessment: The historic environment can promote wellbeing by providing a sense of place, pride in the local area, and intellectual stimulation

IIA Objective 7: Protect, enhance, restore, and expand the biodiversity and geodiversity assets within the East London Joint Plan area

Appraisal questions

- Will it protect and enhance habitats of international, national, regional or local importance, particularly in relation to Epping Forrest?
- Will it protect and improve local populations of terrestrial species that are of international, national, regional or locally importance?
- Taking into account the impact of climate change, will it conserve and enhance designated and undesignated ecological assets and networks?
- Will it maintain and enhance wildlife corridors and minimise fragmentation of ecological areas and green spaces, enhancing biodiversity and securing the level of net-gain set out in local, regional and national policy?
- Will it protect and support enhanced knowledge and understanding of geological sites of national, regional or local importance?

Relevant SEA topics Covered and coverage of Equalities and Health Impact Assessment

- SEA topics: Biodiversity; Climatic Factors; Soil; Water
- Equalities Impact Assessment – Equality Act 2010 all protected characteristics
- Health Impact Assessment: Well-functioning ecosystems provide a range of ecosystem services, including clean air and water, pollination of food crops and opportunities for recreation. Connection with nature can improve mental wellbeing

IIA Objective 8: Protect, enhance, and restore open spaces and townscapes within the ELJWP area

Appraisal questions

- Will it minimise the visual intrusion of waste facilities on sensitive and/or distinct townscapes?
- Will it enhance and protect townscape features including open spaces, parks and gardens and their settings?
- Will it provide for the restoration of land to an appropriate after-use including the creation of accessible greenspaces and open spaces at former waste sites?

Relevant SEA topics and coverage of Equalities and Health Impact Assessment

- SEA topics: Historic environment; Landscape
- Equalities Impact Assessment – Equality Act 2010 all protected characteristics:
- Health Impact Assessment: The landscape and townscape can promote wellbeing by providing a sense of place, a sense of peace and beauty, interest and providing sites for recreation.

IIA Objective 9: Protect and enhance the quality and quantity of watercourses and water bodies and maximise the efficient use of water within East London

Appraisal questions

- Will it maximise the efficient use of water?
- Will it protect the quantity of ground and surface water from over abstraction?
- Will it protect and enhance the quality of watercourses and water bodies?
- Will it take appropriate account of Source Protection Zone (SPZ) designations?

Relevant SEA topics and coverage of Equalities and Health Impact Assessment

- SEA topics: Climatic factors; Water; Soil; Population; Human health; Biodiversity
- Equalities Impact Assessment – Equality Act 2010 protected characteristics:
  - Age: Children (0-4), Younger people (aged 18-24), older people (aged 60 and over);
  - Disability: Disabled people, people with physical and mental impairment; and
  - Pregnancy and maternity.
- Health Impact Assessment: Issues with water quality and availability can result in the spread of disease and impact on mental health.

IIA Objective 10: To manage and reduce flood risk from all sources within East London

Appraisal questions

- Will it promote the use of SuDS, nature-based solutions or other flood resilient design measures?
- Through the appropriate allocation of waste sites, will it ensure waste developments are not at risk of flooding both presently and in the future, taking into account climate change, and will it not result in an increase in the risk of flooding elsewhere?

Relevant SEA topics and coverage of Equalities and Health Impact Assessment

- SEA topics; Climatic factors; Water; Soil; Population; Human health; Biodiversity
- Equalities Impact Assessment – Equality Act 2010 protected characteristics:
  - Age: Children (0-4), Younger people (aged 18-24), older people (aged 60 and over);
  - Disability: Disabled people, people with physical and mental impairment; and
  - Pregnancy and maternity.
- Health Impact Assessment: Flooding can result in emotional and financial stress, as well as the spread of disease

IIA Objective 11: Minimise noise, light and air pollution relating to waste development within East London.

Appraisal questions

- Will it minimise pollution and impacts on amenity, including from noise and light, from activities associated with waste developments and minimise the potential for such pollution?
- Will it minimise air pollution and help achieve the objectives of Air Quality Management Plans, particularly within the designated AQMAs?

Relevant SEA topics and coverage of Equalities and Health Impact Assessment

- SEA topics: Air; Climatic factors; Population; Human health; Biodiversity
- Equalities Impact Assessment – Equality Act 2010 all protected characteristics.
- Health Impact Assessment: Poor air quality as well as other amenity nuisances can lead to and aggravate respiratory diseases, and impact on mental health.

IIA Objective 12: Protect and enhance mineral resources and soils within East London

Appraisal questions

- Will it ensure the safeguarding of mineral resources from sterilisation by waste management related development?

- Will it safeguard soil quality and quantity and reduce soil contamination?
- Will it avoid the loss of the best and most versatile agricultural land by prioritising the location of waste developments to appropriately located previously developed sites?

Relevant SEA topics and coverage of Equalities and Health Impact Assessment

- SEA topics: Material assets; Climatic factors; Soil; Water; Biodiversity; Landscape;
- Equalities Impact Assessment – Equality Act 2010 all protected characteristics:
- Health Impact Assessment: Sustainable use of resources ensures that resources are available for essential infrastructure, including transport, health centres and local amenities. Optimising reuse and minimising waste also benefit the wider environment and the ecosystem services it provides. Best and most versatile land is important for food growing.

Chapter 4

Safeguarding of sites within the ELJWP

Principles of safeguarding

4.1 The Councils considered a number of alternative policy approaches that the ELJWP could take in relation to the safeguarding of waste sites, as required by the London Plan. Part of this process has resulted in an additional policy within the Regulation 19 plan that solely relates to the safeguarding of wastewater treatment. This section sets out the options relating to safeguarding of all other types of waste sites, which evolved into policy JWP 2 of the Regulation 19 ELJWP. In considering the alternative policy approaches considered by the Councils for safeguarding, it should be kept in mind that

- The London Waste Plan (SI9) safeguards all waste sites that benefit from planning permission or hold an environmental permit.
- Sites that are not explicitly safeguarded by the ELJWP would still be safeguarded by the London Plan, until such time as the London Plan is updated. London Plan policy may or may not change over the lifetime of the ELJWP.
- Any option will deliver the amount of waste management capacity that the evidence base concludes is required in the plan period

Options

4.2 There are a number of options that the ELJWP has considered in coming to the criteria set out in JWP 2:

- Option 1: Safeguard all sites required by the London Plan.

- Option 2: Safeguard all sites with planning permission and not explicitly safeguard sites which hold an environmental permit and do not benefit from planning permission.
- Option 3: Set a threshold for sites to be safeguarded, and not explicitly safeguarding sites that only hold an environmental permit that have a throughput of less than 500 tonnes.
- Option 4: Safeguard temporary sites for the duration of the planning permission or environmental permit only, and not for the lifetime of the plan.

4.3 All four options are considered to be reasonable. It may also be reasonable to apply other thresholds, and the IIA considers that as a fifth option.

4.4 Option 1 is essentially the baseline position. All waste sites would be safeguarded whether they benefit from an environmental permit or planning permission (temporary or permanent). A loss of any site would require reprovision of the capacity to manage waste to ensure there was no loss of treatment capacity across the plan area, or indeed within London. This option could result in over provision of capacity over the lifetime of the plan, as well as the continuation of issues on sites that do not benefit from planning permission for good reason, and only hold an environmental permit. It is worth noting that Option 1 will apply to all sites for the lifetime of the current London Plan, whether the ELJWP makes different provision for safeguarding or not.

4.5 Option 2 would only safeguard sites with planning permission and would not explicitly safeguard sites that only hold an environmental permit (at any threshold). This would be a departure from the London Plan, but would allow the ELJWP to safeguard sites that have been considered through planning, and have addressed the relevant land use issues. This option could allow for waste sites that are currently operating under an environmental permit, but would not be considered acceptable in planning terms, to be more easily redeveloped for other uses, in accordance with the relevant local plan. As with option 1, London Plan policy would still apply to sites not explicitly safeguarded for the lifetime of the current London Plan.

4.6 Option 3 focuses safeguarding on larger sites, removing safeguarding from sites that have a throughput of less than 500 tonnes, have an environmental permit, and do not benefit from planning permission. Although some small scale facilities and capacity could be lost through the implementation of option 3, sites with a throughput of under 500 tonnes are unlikely to have a significant effect on the objectives of the ELJWP.

4.7 Option 4 would see safeguarding lapse for sites that either have a temporary planning permission, or once a site gives up its environmental permit. This option could ensure sites are not unduly safeguarded beyond their useful lifetime.

4.8 Option 5 could consider alternative thresholds for throughput of waste sites to be safeguarded. Lower thresholds would not be practicable. Higher thresholds would likely need to consider different thresholds for different types of waste management. There is little evidence to support this approach, and it would take the ELJWP further away from the principles of waste management within national policy and the London Plan.

4.9 It is likely that a combination of these options will be the most effective to ensure that land is not unduly safeguarded, resulting in negative effects, and that there is no loss of provision that is essential for the ELJWP. The assessment of the proposed policy JWP 2 and its alternatives is set out in Chapter 5.

Chapter 5

IIA of the Draft East London Joint Waste Plan and its reasonable alternatives

5.1 This chapter records the IIA findings for the Draft East London Joint Waste Plan (ELJWP) and its reasonable alternatives, originally prepared for the Regulation 18 draft plan and updated for the Regulation 19 plan. The draft plan has set out a vision and eight strategic objectives:

- Strategic Objective 1: Significantly Reduce Waste Production Overall;
- Strategic Objective 2: All Built Development Will Contribute to the Achievement of a Fully Functioning Circular Economy by 2041;
- Strategic Objective 3: Appropriately Locate Waste Management Capacity;
- Strategic Objective 4: Contribute to East London's Regeneration and Economic Growth;
- Strategic Objective 5: Achieve Net Zero Waste Management;
- Strategic Objective 6: Optimise Existing Waste Management Capacity;
- Strategic Objective 7: Minimise Transportation and Establish Alternative Infrastructure; and
- Strategic Objective 8: Restrict Landfilling to Exceptional Circumstances.

5.2 There are seven strategic policies set out in the draft ELJWP. In some cases there may be overlap between the policies of the Borough's Local Plans and the policies in this Plan; where this occurs the latest policy to have been adopted will normally take precedence.

5.3 The policies align with the strategic objectives as below:

- Strategic Objective 1: Significantly Reduce Waste Production Overall
  - Policy JWP 1: Circular Economy, Policy
- Strategic Objective 2: All Built Development Will Contribute to the Achievement of a Fully Functioning Circular Economy by 2041
  - Policy JWP 1: Circular Economy
  - Policy JWP 4: Design of Waste Management Facilities;
- Strategic Objective 3: Appropriately Locate Waste Management Capacity
  - Policy JWP2: Safeguarding and Provision of Waste Capacity
  - Policy JWP 2B: Safeguarding and Provision of Wastewater Treatment Capacity
  - Policy JWP 3 Prevention of Encroachment
  - Policy JWP 5: Energy from Waste
  - Policy JWP 6: Deposit of Waste on Land
- Strategic Objective 4: Contribute to East London's Regeneration and Economic Growth
  - Policy JWP 1: Circular Economy
  - Policy JWP 2: Safeguarding and Provision of Waste Capacity
  - Policy JWP 2B: Safeguarding and Provision of Wastewater Treatment Capacity
  - Policy JWP 4: Design of Waste Management Facilities
  - Policy JWP 5: Energy from Waste
  - Policy JWP 6: Deposit of Waste on Land
- Strategic Objective 5: Achieve Net Zero Waste Management
  - Policy JWP 1: Circular Economy
  - Policy JWP 4: Design of Waste Management Facilities
  - Policy JWP 5: Energy from Waste

- Policy JWP 6: Deposit of Waste on Land

- Strategic Objective 6: Optimise Existing Waste Management Capacity
  - Policy JWP 2: Safeguarding and Provision of Waste Capacity
  - Policy JWP 2B: Safeguarding and Provision of Wastewater Treatment Capacity
  - Policy JWP 3 Prevention of Encroachment
- Strategic Objective 7: Minimise Transportation and Establish Alternative Infrastructure
  - Policy JWP 4: Design of Waste Management Facilities
  - Policy JWP 5: Energy from Waste
- Strategic Objective 8: Restrict Landfilling to Exceptional Circumstances
  - Policy JWP 1: Circular Economy.
  - Policy JWP 6: Deposit of Waste on Land

Vision and strategic objectives

5.4 Section 3 of the ELJWP Regulation 19 document outlines the vision and strategic objectives for the emerging plan.

5.5 The overarching vision for ELJWP is:

> By 2041, the principles of the circular economy will be fully integrated into all forms of development within East London, resulting in reduced waste production and increased emphasis on repair, refurbishment and reuse including that associated with built structures
>
> A network of accessible service providers for reuse, repair, and recycling will be in place. Remaining waste will be viewed and managed as a

resource, with hazardous properties virtually eliminated in construction and demolition waste. Priority will be given to using recycled materials in construction, and development projects will prioritise waste minimisation.

Sustainable waste management in East London will contribute to the area's regeneration, positioning it as a key part of London's industrial engine and a thriving economic centre. Waste management facilities will be located to protect and enhance communities and the natural environment, and be resilient to climate change. Waste will be managed efficiently by maximising existing capacity of facilities, releasing underutilised or poorly located sites, minimising transportation and using infrastructure established for alternative means of waste movement, in particular via the River Thames.

Net zero in waste management will have been achieved in East London through an understanding, and reduction, of lifecycle carbon impacts and incorporating renewable energy in waste management and transportation.

Sending waste to landfill will be a last resort, occurring only in exceptional circumstances, and any landfill in East London will be considered a strategic resource with carefully managed capacity.

5.6 Eight draft strategic objectives have been defined to support the delivery of the overarching vision:

Strategic Objective 1: Significantly Reduce Waste Production Overall

- Encourage the integration of circular economy principles and the adoption of best practice design and construction approaches, to achieve a significant reduction in waste production by 2041.

Strategic Objective 2: All Built Development Will Contribute to the Achievement of a Fully Functioning Circular Economy by 2041

- Promote the use of circular economy principles in design, construction and development in the built environment, emphasising reduced waste production and increased reuse and repair practices.
- Encourage development to consider and minimise waste during construction and operation, following the waste hierarchy in priority order.
- Enable delivery of development which will help establish a viable and easily accessible network of re-use, repair, and recycling services.
- Foster a shift in perception such that waste materials are viewed as a valuable resource, ensuring sustainable waste management is integral to the development and use of all new development.
- Encourage development that prioritises the use of reused, reusable, recycled and recyclable materials and minimises the use hazardous materials which could result in the production of hazardous waste in construction projects in East London

Strategic Objective 3: Appropriately Locate Waste Management Capacity

- Locate, construct, and operate waste management facilities while protecting and enhancing communities, health, employment, and the natural and historic environment, and ensuring resilience to climate change.

Strategic Objective 4: Contribute to East London's Regeneration and Economic Growth

- Leverage sustainable waste management in a manner that contributes to East London's regeneration and economic growth.
- Ensure high quality restoration and aftercare of landfill sites which maximises benefits to the community and the environment.

- Ensure waste is managed using methods and in locations that contribute to measurable improvements in the natural environment, including biodiversity, of East London.

Strategic Objective 5: Achieve Net Zero Waste Management

- Attain net zero in waste management by 2041 by ensuring that whole lifecycle carbon impacts are taken into account in proposals for the management of waste.
- Provide waste management capacity that minimises greenhouse gas production and supports the development of a low carbon economy and decentralised energy.
- Promote development which allows for the exclusive use of renewable energy sources in waste management operations and transportation.

Strategic Objective 6: Optimise Existing Waste Management Capacity

- Realise the full potential of existing waste management capacity in East London, using only the minimum land necessary while ensuring the capability to manage at least the apportionment in the London Plan is maintained.
- Review and release land occupied by poorly located or under-utilised waste management facilities for other uses.

Strategic Objective 7: Minimise Transportation and Establish Alternative Infrastructure

- Minimise the transportation of waste by locating facilities as close as possible to its source
- Safeguard and establish alternative energy efficient transport infrastructure, including River Thames wharves, to allow movement without reliance on fossil fuel-powered HGVs.

Strategic Objective 8: Restrict Landfilling to Exceptional Circumstances

- Ensure the disposal of waste occurs only as a last resort and in exceptional circumstances.
- Ensure any landfill capacity is reserved solely for the disposal of waste which cannot be managed by any other means.

5.7 These two components of the ELJWP Regulation 18 document were subjected to IIA. No reasonable alternatives to the vision and objectives were identified at Regulation 18.

5.8 There are no changes to the vision in the Regulation 19 plan and changes to two of the strategic objectives:

- Strategic Objective 3 now refers to the historic environment; and
- Strategic Objective 7 now refers to energy efficient transport, and to HGVs instead of 'vehicles'.

5.9 The wording of the Regulation 19 ELJWP is considered within the appraisals below.

Likely effects of the draft vision themes, overarching vision and 8 strategic objectives

5.10 Given the clear aspirational relationship between the overarching vision and 8 strategic objectives, these two components of the ELJWP Regulation 19 document have been appraised together. Table 5.1 below sets out the likely effects of the vision and strategic objectives. The reasoning for the identification of these likely effects is set out by IIA objective below the table.

Table 5.1: Summary of IIA findings for the vision and strategic objectives

IIA Objectives	Overarching Vision	Strategic Objective 1: Significantly reduce waste production overall	Strategic Objective 2: All built development will contribute to the achievement of a fully functioning circular economy by 2041	Strategic Objective 3: Appropriately locate waste management capacity	Strategic Objective 4: Contribute to London's regeneration and economic growth	Strategic Objective 5: Achieve net zero waste management	Strategic Objective 6: Optimise existing waste management capacity	Strategic Objective 7: Minimise transportation and establish alternative infrastructure	Strategic Objective 8: Restrict landfilling to exceptional circumstances
IIA1: Climate change mitigation	++	+	+	0	0	++	0	++	+
IIA2: Treatment of waste	++	++	+	0	0	+	0	+	+
IIA3: Economy	+	0	+/-	0	++	-	0	0	0
IIA4: Health and wellbeing	+	0	0	+	+	0	0	0	0
IIA5: Sustainable transport	+	+	+	0	0	++	+	++	0
IIA6: Historic environment	+	0	0	+	0	0	0	0	0
IIA7: Biodiversity and geodiversity	+	0	0	+	+	0	0	0	0
IIA8: Open spaces and townscapes	0	0	0	0	0	0	0	0	0
IIA9: Water	+	0	0	+	+	+	0	+	0
IIA10: Flooding	+	+	0	0	0	+	0	0	0
IIA11: Noise, light and air pollution	++	+	0	0	0	0	0	+	0
IIA12: Mineral resources and Soils	+	0	0	0	0	0	+	0	+

IIA Objective 1: To minimise the East London Joint Waste Plan's contribution to climate change through a reduction of greenhouse gas emissions from managing waste

5.11 The vision is likely to have a significant positive effect against this IIA objective because it emphasises repair, refurbishment and reuse and the overall minimisation of waste across the East London area. Construction will prioritise recycled materials and the overall transportation of waste will be reviewed to use alternative infrastructure via the River Thames, thus diminishing the release of carbon emissions.

5.12 Strategic objectives 1 and 2 are likely to have minor positive effects against the IIA objective due to the emphasis on re-use, recycle and recover to minimise the amount of waste produced, resulting in fewer emissions associated with its management. Strategic objective 8 requires that landfill should only be used as an absolute last resort, positively contributing to London's reduction of greenhouse gas emissions by minimising the need to transport landfill-bound waste farther afield, as well as helping to minimise landfill gas emissions.

5.13 Strategic objectives 5 and 7 seek to prioritise the reduction of greenhouse gas production and unsustainable transportation and will therefore have a significant positive effect on this IIA objective.

5.14 The other strategic objectives are expected to have a negligible effect, as they are not connected to the themes of this IIA objective.

5.15 Minimising greenhouse gas emissions from waste within the ELJWP area is also expected to have an indirect positive effect on air, climate, water, material assets, soil and biodiversity. Improvements to the local environment.

This will, in turn, have positive benefits for the physical and mental health of local populations.

IIA Objective 2: Move treatment of waste up the Waste Hierarchy within East London

5.16 The vision and strategic objective 1 are both likely to have a significant positive effect against this IIA objective as they both promote the re-use, recycling and recovery of waste and a circular low carbon economy, driving waste up the waste hierarchy.

5.17 The following strategic objectives all have a minor positive effect against this IIA objective. Strategic objective 2 because it favours circular economy principles; 5 and 7 support the development of a low carbon economy and prioritise the use alternative fuels for transport, respectively. Finally, 8 minimises the landfilling of waste, driving the remaining proportion of landfilled waste up the waste hierarchy.

5.18 The other strategic objectives are expected to have a negligible effect, as they are not connected to the themes of this IIA objective.

5.19 Movement of waste up the waste hierarchy is expected to have an indirect positive effect on air, climate, water, material assets, soil and biodiversity. Improvements to the local environment will, in turn, have positive benefits for the physical and mental health of local populations.

IIA Objective 3: Support, maintain or enhance the development of the economy of East London

5.20 The vision is likely to have a minor positive effect against this IIA objective because it states that sustainable waste management in East London will be a contributor to London's thriving economic centre.

5.21 A significant positive effect is recorded for this IIA objective for strategic objective 4, which focusses on harnessing waste management to deliver economic regeneration and growth in East London.

5.22 Strategic objective 2 has the potential to generate a mixture of minor positive and negative effects against this IIA objective as it encourages resource efficiency such as the practice of repairing, which can also generate employment opportunities within the area. However, the promotion of circular economy principles in design, construction and development may increase costs in some areas, at least in the short term until the economies are more mature. A minor negative effect is recorded for this IIA objective for Strategic Objective 5 for similar reasons, specifically the costs associated with delivering net zero waste management.

5.23 The other strategic objectives are expected to have a negligible effect, as they are not connected to the themes of this IIA objective. Support for the economy is expected to have an indirect positive effect on population health and material assets. Improvements to the local economy will have positive benefits for the mental health of local populations, as well as physical health.

IIA Objective 4: Protect and improve the health of the people of the East London Joint Waste Plan area

5.24 The vision is likely to have a minor positive effect against this IIA objective as it promotes the protection and enhancement of communities in the area.

5.25 Similarly, strategic objective 3 emphasises the importance of protecting and enhancing the health of communities and the natural environment and 4 prioritises restoration and aftercare of landfill sites, both of which will have a minor positive effect against this IIA objective.

5.26 The other strategic objectives are expected to have a negligible effect, as they are not connected to the themes of this IIA objective.

5.27 . Improvements in the local environment will have positive benefits for the mental health of local populations, as well as physical health.

5.28 Improved health and wellbeing could indirectly have benefits in relation to other objectives (for example IIA 3 , IIA 7 and IIA 8).

IIA Objective 5: Promote sustainable modes of transport in the East London Joint Waste Plan area by reducing road traffic, congestion and pollution

5.29 The vision is likely to have a minor positive effect against this IIA objective as it supports investigating the use of alternative means of sustainable transport, especially via the River Thames.

5.30 The vision is supported by strategic objectives 1, 2, 5, 6 and 7. Strategic objectives 5 and 7 make a significant contribution through their prioritisation of net-zero and transportation efficiencies and sustainable modes.

5.31 More minor positive effects are recorded for strategic objectives 1, 2 and 6. This recognises the strategic objectives efforts to minimise waste and/or maximise the efficient siting and capacity of facilities, which reduce the scale and need to transport waste within and outside East London.

5.32 The other strategic objectives are expected to have a negligible effect, as they are not connected to the themes of this IIA objective. Support for sustainable transport is expected to have an indirect positive effect on population health, air, climate, material assets, water and biodiversity. Access to

sustainable transport, and reduction in air pollution, will have positive benefits for the mental health of local populations, as well as physical health.

IIA Objective 6: Protect and enhance the historic environment within East London

5.33 The vision is likely to have a minor positive effect on this IIA objective as it encourages the repair, refurbishment and reuse of built structures. This could help to safeguard derelict or at-risk historic buildings by restoring them for appropriate use.

5.34 The Regulation 19 plan includes a specific reference to the historic environment in strategic objective 3. This results in a minor positive effect.

5.35 The lack of focus on the historic environment within the vision and objectives is expected to have a negative outcome for material assets and population health. Negative effects on the historic environment due to waste development will have negative effects for the mental health of local populations.

Recommendation

5.36 The Regulation 18 IIA recommended that strategic objective 3 could be extended to include the historic environment, which would then have a minor positive effect on this IIA objective. This recommendation was incorporated into the Regulation 19 plan.

IIA Objective 7: Protect, enhance, restore, and expand the biodiversity and geodiversity assets within the East London Joint Plan area

5.37 The vision is likely to have a minor positive effect against this IIA objective as it states that waste management facilities will be located so that the natural environment can be protected and enhanced.

5.38 Strategic objectives 3 and 4 actively support the vision by emphasising the importance of protecting and enhancing the natural environment, including the biodiversity, within East London and are therefore recorded as having a minor positive effect against this IIA objective.

5.39 The other strategic objectives are expected to have a negligible effect, as they are not connected to the themes of this IIA objective.

5.40 The positive effects on biodiversity are also expected to have indirect positive effects on air, pollution, material assets and population health. Improvements in biodiversity will have positive benefits for the mental health of local populations, as well as physical health.

IIA Objective 8: Protect, enhance, and restore open spaces and townscapes within the ELJWP area

5.41 The vision and objectives make no specific references to open spaces or townscapes, therefore their effects in relation to this IIA objective are considered to be negligible.

5.42 The lack of protection for open space and townscapes within the vision and objectives also represents a missed opportunity to avoid indirect negative

effects or secure indirect positive effects on material assets and population health, including mental health.

Recommendation

5.43 Specific reference to the protection and enhancement of open space or townscape within the vision and strategic objectives would result in positive effects on this IIA objective.

IIA Objective 9: Protect and enhance the quality and quantity of watercourses and water bodies and maximise the efficient use of water within East London

5.44 The vision is likely to have a minor positive effect against this IIA objective as it states that waste management facilities will be located so as to protect and enhance the natural environment, which is considered to include the area's water resources.

5.45 Similarly, strategic objectives 3 and 4 emphasise the importance of protecting and enhancing the natural environment and are therefore considered to have a minor positive effect on IIA9.

5.46 The other strategic objectives are expected to have a negligible effect, as they make no reference to the themes of this IIA objective.

5.47 Protecting and enhancing the quality and quantity of watercourses and water bodies and maximising the efficient use of water, is also expected to have an indirect positive effect on material assets, soil and biodiversity. Reducing the risk of water pollution and ensuring water security will also have indirect, positive effects on the physical and mental health of local populations.

IIA Objective 10: To manage and reduce flood risk from all sources within East London

5.48 Whilst there is no direct reference to flooding or SuDS and nature-based solutions, the vision emphasises waste facilities to be located to protect and enhance the natural environment and increase climate resilience. The vision therefore has a minor positive effect against this IIA objective.

5.49 Similarly, strategic objectives 3, 4 and 5 focus on protecting and enhancing the natural environment and/or ensure resilience to climate change, resulting in minor positive effects against this IIA objective.

5.50 The other strategic objectives are expected to have a negligible effect, as they are not connected to the themes of this IIA objective.

5.51 Managing and reducing flood risk from all sources is also expected to have an indirect positive effect on material assets, soil and biodiversity. Reducing risk from flooding will have indirect, positive benefits for the physical and mental health of local populations.

IIA Objective 11: Minimise noise, light and air pollution relating to waste development within East London

5.52 Although there are no direct references to minimising pollution within East London in the vision, the vision pursues several priorities that will directly result in reductions in pollution across East London, including efficient use of waste, waste reduction, locating waste sources close to their end-use, minimising transportation and maximising sustainable travel and delivering net-zero. Therefore, a significant positive effect is recorded against this IIA objective.

5.53 A minor positive effect is recorded for strategic objective 1 against this IIA objective due to the contribution that a general reduction in waste production in East London will have on the need to process and transport it, reducing the opportunity for associated pollution. Strategic objectives 5 and 7 promote the use of low carbon technologies and sustainable transportation of waste, pursuing transport modes that do not rely on fossil fuels for power, resulting in a minor positive effect against this IIA objective.

5.54 The other strategic objectives are expected to have a negligible effect, as they make no reference to the themes of this IIA objective.

5.55 Minimising pollution and the effects of pollution from new development is also expected to have an indirect positive effect on physical and mental health, material assets, soil, water and biodiversity.

IIA Objective 12: Protect and enhance mineral resources and soils within East London

5.56 The vision references waste to be managed efficiently by maximising the existing capacity of facilities but releasing underutilised and poorly located sites, as well as prioritising the re-use of materials and the use of recycled materials in construction. There is therefore a minor positive effect against this IIA objective.

5.57 Similarly, strategic objective 6 promotes the efficient use of land, resulting in the same minor positive effect recorded against this IIA objective as the vision.

5.58 Strategic objective 8 states that the landfilling will only be used as a last resort, which saves and prevents unnecessary contamination of mineral resources and soils within East London.

5.59 The other strategic objectives are expected to have a negligible effect, as they are not connected to the themes of this IIA objective. Protecting and enhancing mineral resources and soils is also expected to have an indirect positive effect on material assets, soil, water and biodiversity. Effective and sustainable use of land also provides healthy environments for people.

Policies

5.60 There are seven policies in the ELJWP Regulation 19 document:

- Policy JWP 1: Circular Economy
- Policy JWP 2: Safeguarding and Provision of Waste Capacity
- Policy JWP 2b: Safeguarding and Provision of Wastewater Treatment Capacity
- Policy JWP 3 Prevention of Encroachment
- Policy JWP 4: Design of Waste Management Facilities
- Policy JWP 5: Energy from Waste
- Policy JWP 6: Deposit of Waste on Land

5.61 Each policy is accompanied by a paragraph setting out the purpose of the policy, and supporting text to help with the implementation of the plan. The policies within the ELJWP will be applied when making decisions on the suitability of proposals for development in East London. All the policies apply to proposals relating to waste management and Policies JWP 1 and JWP 3 will apply to all forms of development. Parts of policy JWP 2 will apply to proposals which involve the redevelopment of existing waste management facilities.

5.62 Relevant policies included in the adopted Local Plan of the Boroughs within which the proposal is located will also be applied. Such policies may relate to wider issues concerning the protection and enhancement of communities and the natural environment. Where there is overlap between the

policies of the Borough's Local Plans and the policies in this Plan, the latest policy to have been adopted will, in most instances, take precedence.

Changes to the policies from the Regulation 18 Draft ELJWP

5.63 The only policy that has not been amended in the Regulation 19 ELJWP is policy JWP 6 Deposit of Waste on Land. The main changes are to JWP 2, new policy JWP 2b and JWP 3.

5.64 Changes to JWP 1 include additional reference to development plan objectives, storage for re-use and secured by design principles. JWP 2 amends the position in the Regulation 18 ELJPW and now safeguards specific existing sites, as well as safeguarding future waste sites that benefit from planning permission, are classed as lawful development, and have a throughput of greater than 500 tonnes per annum. JWP 2b is a new policy that safeguards wastewater treatment capacity and provides criteria relating to new wastewater treatment.

5.65 Changes to JWP 3 clarify that the policy will apply to existing waste management sites and wastewater treatment facilities, and those that are committed to within local plans. The supporting text for the policy now includes distances to help prevent encroachment at wastewater treatment works.

5.66 JWP 4 now explicitly refers to wastewater treatment facilities, and includes reference to Secured by Design, and protection of the historic environment. JWP 5 now contains explicit reference to the disposal of hazardous waste and a test for whether re-use is viable.

Changes to the ELJWP in relation to recommendations in the IIA of the Regulation 18 Plan

5.67 The updates to the ELJWP reflect some of the recommendations in the Regulation 18 IIA:

- JWP 4 and JWP 6 now refer to the historic environment as recommended in relation to IIA objective 6;
- The ELJWP now includes a policy and other references to water quality as recommended in relation to IIA objective 9; and
- JWP 4 refers to flood risk within the policy criteria, as recommended in relation to IIA objective 10.

5.68 The policies within the Regulation 19 ELJWP reflect the appraisals of alternative options within the Regulation 18 IIA.

Likely effects of the policies

5.69 The likely sustainable effects of the policies are set out in **Table 5.2** and described below.

Table 5.2: Summary of IIA findings for the ELJWP policies

IIA Objectives	Policy JWP 1: Circular Economy	Policy JWP 2: Safeguarding and Provision of Waste Capacity	Policy JWP 2b: Safeguarding and Provision of Wastewater treatment works	Policy JWP 3: Prevention of Encroachment	Policy JWP 4: Design of Waste Management Facilities	Policy JWP 5: Energy from Waste	Policy JWP 6: Deposit of Waste on Land
IIA1: Climate Change	+	+	0	0	++	++	+
IIA2: Treatment of waste	++	+	+	+	+	+	+
IIA3: Economy	++	++	+?	+	+/-	0	+
IIA4: Health and wellbeing	+	+/-?	+/-?	+?	++/-?	+	+?
IIA5: Sustainable transport	+	+	0	0	+	+	0
IIA6: Historic environment	?	?	?	0	+	0	?
IIA7: Biodiversity and geodiversity	+?	+/-?	+/-?	0	+/-?	0	+/-
IIA8: Open spaces and townscapes	+?	+/-?	+/-?	0	+/-?	0	+/-
IIA9: Water	0	+/-?	+	0	+/-?	0?	+?
IIA10: Flooding	0	0	+	0	++	0	0
IIA11: Noise, light and air pollution	0	-?	-?	++?	+	+	+
IIA12: Mineral resources and soils	0	+?	+/-	0	+	0	+

5.70 The reasoning for the identification of these likely effects is set out by IIA objective below.

IIA Objective 1: To minimise the East London Joint Waste Plan's contribution to climate change through a reduction of greenhouse gas emissions from managing waste

5.71 Policy JWP 1 promotes the circular economy, minimising the production of waste, providing adequate treatment facilities, and also makes provision for education facilities within new waste development. The policy is expected to have a minor positive effect on IIA1, as it promotes the minimisation of waste, as well as the appropriate treatment of waste, thereby minimising the overall volume of emissions from waste treatment.

5.72 Policy JWP 2 safeguards waste sites and ensures there is adequate waste capacity within the plan area. The policy is expected to have a minor positive effect on IIA1, as maintaining an adequate network of waste sites within the plan area will minimise the distance waste needs to travel, minimising emissions from transport.

5.73 Policy JWP 2b safeguards wastewater treatment works and seeks to ensure there is adequate wastewater treatment capacity within the plan area. Although the policy requires the recovery of gas and solids for beneficial use, it is not clear if this will have more than a minimal effect. The policy is expected to have a negligible effect on IIA1, as maintaining an adequate network of wastewater treatment works within the plan area will require the use of additional resources, and there is unlikely to be a noticeable effect on transport.

5.74 Policy JWP 3 seeks to prevent the encroachment of development on existing waste facilities and as such will have a negligible effect on this IIA objective.

5.75 Policy JWP 4 seeks to minimise greenhouse gas as far as practicable and ensure the implementation of climate adaptation measures. As such, a significant positive effect is expected in relation to IIA1.

5.76 Policy JWP 5 Energy from Waste is expected to have a significant positive effect in relation to IIA1 as it states that any energy from waste facilities will only be permitted where the release of carbon emissions will be minimised, and that facilities will operate as combined heat and energy plants.

5.77 Policy JWP 6 seeks to minimise fugitive emissions of landfill gas whilst maximising energy recovery. These provisions will benefit a reduction of greenhouse gas emissions and as such, a minor positive is expected in relation to IIA1.

Policy recommendations

5.78 Although the ELJWP is broadly positive in terms of IIA Objective 1, the plan could consider the inclusion of specific targets in relation to reduction in carbon emissions or reuse of materials associated with waste management facilities and transfer operations.

IIA Objective 2: Move treatment of waste up the Waste Hierarchy within East London

5.79 As set out above, policy JWP 1 requires the minimisation of waste and appropriate treatment within the waste hierarchy. As such, this policy is expected to have significant positive effects against IIA2.

5.80 Policy JWP 2 requires the safeguarding of existing facilities and the provision of appropriate waste capacity within the plan area. The policy states that proposals for new facilities should be refused unless they result in waste being dealt with further up the waste hierarchy or consolidate existing facilities in order to improve their efficiency. Therefore a minor positive effect is recorded on this IIA objective.

5.81 Policy JWP 2b requires the safeguarding of existing wastewater treatment works and the provision of appropriate wastewater treatment works within the plan area. The policy criteria require the recovery of gas and solids within any new or upgraded facilities. Therefore a minor positive effect is recorded on this IIA objective.

5.82 Policy JWP 3 is expected to have a minor positive effect in relation to IIA2 as it prevents any future development from impeding on the functioning of existing waste management facilities. This will help ensure that waste is continued to be managed on site as effectively as possible in relation to the waste hierarchy. It is therefore contributing to London's goal of becoming a zero-waste city and promoting a low carbon economy through correct waste disposal at existing waste sites.

5.83 Policy JWP 4 promotes recycling as a climate adaption measure, which will minimise the disposal of waste in the plan area, ensuring waste is managed at a higher level in the waste hierarchy. As such, a minor positive effect is expected in relation to IIA2.

5.84 Policy JWP 5 is expected to have a minor positive effect in relation to IIA2 as it states that any waste to be used as fuel is waste which cannot be reused, recycled or composted (as detailed within a Waste Hierarchy Statement). This therefore promotes waste up the waste hierarchy and contributes towards London's aim of becoming a zero-waste city by minimising the disposal of all waste across the ELJWP area.

5.85 Policy JWP 6 makes provision for the re-use of waste prior to its disposal to land, including requirements for proposals for land to be used as waste to

demonstrate that waste cannot be practically managed by other means further up the waste hierarchy. As such, a minor positive effect is expected in relation to IIA2, given the proportion of waste that currently goes to landfill and the general declining trend.

Policy recommendations

5.86 Most policies are considered to have positive effects in relation to IIA2. The plan could consider the inclusion of specific targets in relation to reduction of waste to landfill.

IIA Objective 3: Support, maintain or enhance the development of the economy of East London

5.87 Policy JWP 1 supports the circular economy within East London. This provides support for existing businesses as well as for new or expanded businesses that may come forward that minimise the use of waste and maximise the prevention and re-use of materials. This policy is expected to have a significant positive effect on IIA3.

5.88 Policy JWP 2 provides support for existing waste sites and existing waste capacity within East London. As such, the policy is expected to have a significant positive effect on this IIA objective.

5.89 Policy JWP 2b provides support for existing wastewater treatment works within East London, and for the development of new facilities, if appropriate. The level of employment associated with these facilities is relatively low in the context of East London, and so although the policy is supportive, the effect is considered to be uncertain, and minor positive.

5.90 Policy JWP 3 seeks to prevent encroachment on existing waste sites from incompatible new development. This provides protection for existing waste sites and is therefore expected to have a minor positive effect on IIA3.

5.91 Policy JWP 4 seeks to ensure that employment opportunities are created for residents of the respective Borough from major development at both construction and operational stages. This will benefit the local economy, and as such, a minor positive effect is expected in relation to IIA3. Conversely, the long list of measures required in policy JWP 4 to improve the sustainable development and management of waste in East London will require considerable investment, which may influence the profitability and viability of certain waste management practices with minor adverse effects against this objective.

5.92 Policy JWP 5 is concerned with the operation of new energy from waste facilities and will have a negligible effect on this IIA objective.

5.93 Policy JWP 6 is concerned with controlling the deposit of waste to land, and promotes positive after uses on landfill sites. By ensuring that landfill is controlled appropriately, this policy will prevent negative effects on existing businesses. Beneficial after uses on landfill sites will have positive effects for the local economy. As such, this policy is expected to have a minor positive effect on IIA3.

Policy recommendations

5.94 There are no police recommendations in relation to IIA3.

IIA Objective 4: Protect and improve the health of the people of the East London Joint Waste Plan area

5.95 Policy JWP 1 requires that there is sufficient storage space for the collection and treatment of recyclable materials. This should minimise negative effects on the community, by ensuring materials are stored appropriately. This policy is considered to have a minor positive effect on this objective.

5.96 Policy JWP 2 requires that existing sites are safeguarded and there is adequate waste capacity within East London. By ensuring adequate provision for the collection and treatment of wastes within the plan area, this policy should minimise unauthorised waste treatment or fly tipping, which will have a minor positive effect on this IIA objective. However, in addition, the policy offers scope to permit waste management uses on safeguarded waste sites where they avoid undue amenity impacts, offering scope for some minor adverse effects to this objective within their immediate vicinity. Therefore an uncertain mixed minor positive and minor negative effect is recorded against this IIA objective overall.

5.97 Policy JWP 2b requires that existing wastewater treatment sites are safeguarded and there is adequate treatment capacity within East London. By ensuring adequate provision for the treatment of wastewater the policy should reduce the potential for adverse environmental outcomes, and therefore have a minor positive effect on this IIA objective. However, the policy offers potential to permit new facilities which, as with other waste uses, may have localised impacts. Therefore an uncertain mixed minor positive and minor negative effect is recorded against this IIA objective overall.

5.98 Policy JWP 3 is expected to have a minor positive effect in relation to IIA4 as the policy seeks to prohibit future incompatible development from encroaching existing waste facilities. This should diminish the consequential impacts on human health and safety as a result of residing in close proximity to waste sites, most commonly from noise or odour. This policy is therefore expected to have a minor positive effect on this IIA objective; however, in the

absence of precautionary distance buffers, this is uncertain until such time as the specific sensitivities of receptors and pathways to and from them are known.

5.99 Policy JWP 4 employs a wide range of measures to avoid adverse impacts from development, including those that compromise the health and wellbeing of local communities. However, the policy states that only 'unacceptable' adverse impacts on health and well-being should be avoided, offering scope for some minor adverse effects. As such, a significant positive effect is recorded, mixed with the potential for some uncertain minor adverse effects in relation to IIA4.

5.100 Policy JWP 5 Energy from Waste is expected to have a minor positive effect in relation to IIA4 as the burning of non-biogenic waste (e.g. oil-based plastics) will be minimised, thus reducing the potential for adverse effects on human health across the ELJWP area.

5.101 Policy JWP 6 strictly controls the circumstances in which proposals for disposal of non-inert waste or for reworking of old landfill sites will be allowed, reducing the potential for harmful emissions and leachate that can be associated with these. It also requires such proposals to ensure that restoration and aftercare of sites are of high quality with benefits to local communities. Whilst this is not directly stated in the policy, this suggests that sites will be restored so as to benefit the health and wellbeing of local communities. As such, an uncertain but minor positive effect is expected in relation to IIA4.

Policy recommendations

5.102 Most policies are considered to have positive effects in relation to IIA4. Policy JWP 6 references the restoration of sites to a high quality with benefits to local communities. The policy could be improved by describing these benefits in more detail, for example, benefits to recreation, health or the economy.

IIA Objective 5: Promote sustainable modes of transport in the East London Joint Waste Plan area by reducing road traffic, congestion and pollution

5.103 Policy JWP 1 provides for a network of sites to enable the minimisation of waste and maximisation of the circular economy. This network of sites should reduce the amount of waste on the road network and the distance that waste has to travel, with a minor positive effect on this objective. This will depend on sites coming forward within the plan period, and therefore the effect is considered to be uncertain.

5.104 Policy JWP 2 safeguards existing sites and requires the plan to provide adequate waste capacity within the plan area. Ensuring the plan area provides sufficient capacity for the treatment of waste will help minimise the distance waste has to travel. The policy is therefore expected to have a minor positive effect on this objective.

5.105 Policy JWP 2b safeguards existing wastewater treatment works and requires the plan to provide adequate waste capacity within the plan area. Due to the nature of wastewater treatment works, it is expected that any effect on IIA5 will be negligible.

5.106 Policy JWP 3 is concerned with preventing existing waste sites being affected by new incompatible development in close proximity. The policy has no direct relationship with this objective, and is therefore expected to have a negligible effect on IIA5.

5.107 Policy JWP 4 gives preference to non-road transport where practicable and additionally promotes low emission vehicles, seeks to utilise vehicle charging points, incorporates scheduling and management of vehicle routing, and supports developer contributions to community benefits including Public Rights of Way. As such, a minor positive effect is expected in relation to IIA5.

5.108 Policy JWP 5 Energy from Waste is expected to have a minor positive effect in relation to **IIA5** as the policy will be consistent with the proximity principle limiting long distance vehicle movements and therefore reducing the distance travelled and traffic congestion.

5.109 Policy JWP 6 will have a negligible effect on this IIA objective.

Policy recommendations

5.110 Policy JWP 4 references a preference towards 'non-road transport' in the design of waste management facilities. The policy should consider identifying what forms of transport this would be, including reference towards the promotion of active travel if applicable. Currently, this element of the policy is ambiguous.

IIA Objective 6: Protect and enhance the historic environment within East London

5.111 IIA6 is expected to receive an uncertain effect in relation to policies JWP 1, 2, 2b and 6 as there is no specific mention of the historic environment where waste management sites and/or activities could have an adverse effect on the historic environment.

5.112 A negligible effect is recorded for policy JWP 3 and 5, which are concerned with the evaluation of specific proposals and/or scenarios rather than their impacts on the historic environment. Policy JWP 4 contains a specific reference to protecting the historic environment and was appraised as having a minor positive effect on IIA6.

Policy recommendations

5.113 Although the plan objectives now include a specific reference to the historic environment, the plan could include provision for safeguarding and enhancing the historic environment within policies relating to new waste development.

IIA Objective 7: Protect, enhance, restore, and expand the biodiversity and geodiversity assets within the East London Joint Plan area

5.114 By providing an adequate network of waste facilities, policy JWP 1 will help to prevent fly tipping and other uncontrolled waste uses. This could have a minor positive effect on IIA7, by ensuring waste sites are protected from waste development. This effect is considered to be uncertain as the policy does not specifically address the natural environment, and the effects are dependent on the development sites that come forward in the plan area.

5.115 Policy JWP 2 and JWP 2b protect existing sites, and do not actively promote new sites for development. While there may be no negative effects of new sites on the natural environment, the policies do not address the potential negative effects of existing sites, where there may be issues with negative effects on the natural environment. The overall effect of this policy on IIA7 is considered to be mixed minor positive and minor negative, with uncertainty due to the effects being dependent on the active sites within the plan period.

5.116 Policy JWP 3 is considered to have a negligible effect on this IIA objective.

5.117 Policy JWP 4 seeks contributions to green and blue infrastructure and biodiversity enhancement where net gain is required. This will contribute towards improving local biodiversity in the plan area and as such, a minor positive effect is expected in relation to IIA7. However, the policy states that

only ‘unacceptable’ adverse impacts on the environment should be avoided, offering scope for some minor adverse effects, albeit uncertain ones.

5.118 Policy JWP 5 does not address the location of energy from waste facilities and as such, is expected to have a negligible effect on this IIA objective.

5.119 Policy JWP 6 intends to ensure that the restoration and aftercare of sites demonstrate benefits to the environment, whilst requiring a management system to demonstrate the management of leachate whilst the site is in operation. However, the initial use of land for waste may result in land degradation if not properly managed, which may lead to negative impacts on local biodiversity. As such, a mixed minor positive and minor negative effect is expected in relation to IIA7.

Policy recommendations

5.120 Consideration could be given to outlining measures for monitoring the ongoing management of potential adverse environmental effects from operational allocated waste sites.

IIA Objective 8: Protect, enhance, and restore open spaces and townscapes within the ELJWP area

5.121 Policy JWP 1 provides for a network of waste facilities within the plan area. This could ensure that waste facilities are appropriately planned for and may reduce impacts on the open space and townscapes within the plan area. This minor positive effect is considered to be uncertain, as it will depend on the locations of the sites that come forward within the plan period.

5.122 As discussed above, Policy JWP 2 and Policy JWP 2b protect existing sites, and do not actively promote new sites for development. The effects on IIA8 are similar to the effects of policy JWP 2 and JWP 2b on IIA7. There may be no negative effects of new sites on open space and townscape, however the policy does not address the potential negative effects of existing waste sites, where there may be existing negative effects. As is the case with IIA7, the overall effect of this policy on IIA8 is considered to be mixed minor positive and minor negative, with uncertainty due to the effects being dependent on the active sites within the plan period.

5.123 Policy JWP 3 is expected to have a negligible effect on IIA8.

5.124 Policy JWP 4 promotes open space design as a climate adaption measure, which will contribute towards the protection and/or enhancement of open spaces in the plan area. As such, a minor positive effect is expected in relation to IIA8. However, the policy states that only ‘unacceptable’ adverse impacts on the environment should be avoided, offering scope for some minor adverse effects, albeit uncertain ones.

5.125 As with IIA7, Policy JWP 5 does not address the location of energy from waste facilities and as such, is expected to have a negligible effect on IIA8.

5.126 As with IIA7, Policy JWP 6 intends to ensure that the restoration and aftercare of sites demonstrate benefits to the community. However, the initial use of land for waste may result in negative effects if not properly managed, which may lead to negative impacts on local communities. As such, a mixed minor positive and minor negative effect is expected in relation to IIA8.

Policy recommendations

5.127 Consideration could be given to outlining measures for monitoring and improving the ongoing management of potential adverse environmental effects from operational allocated waste sites

IIA Objective 9: Protect and enhance the quality and quantity of watercourses and water bodies and maximise the efficient use of water within East London

5.128 Policy JWP 1 will have a negligible impact on IIA9.

5.129 The overall effects of JWP 2 on IIA8 are considered to be mixed minor positive and minor negative, with uncertainty due to the effects being dependent on the active sites within the plan period. The policies protect existing sites, and do not actively promote new sites for development. The effects on IIA9 are similar to the effects of policy JWP 2 on IIA7 and IIA8. There may be no potential negative effects of new sites on waterbodies in the plan area, however the policy does not address the potential negative effects of existing waste sites, where there may be existing negative effects. Policy JWP 2b will have a minor positive effect as it directly deals with the appropriate treatment of wastewater.

5.130 Policy JWP 3 will have a negligible impact on IIA9 as it relates to the impacts of new development on existing waste sites.

5.131 Policy JWP 4 promotes the efficient use of water and drought-resistant landscaping. This will contribute towards increased water efficiency in the plan area and as such, a minor positive effect is expected in relation to IIA9. However, the policy states that only ‘unacceptable’ adverse impacts on the environment should be avoided, offering scope for some minor adverse effects, albeit uncertain ones.

5.132 Policy JWP 5 focusses on energy from waste. Although the reduction in carbon emissions could have a positive effect on water bodies within the plan area, the effect is considered to be negligible and uncertain.

5.133 Policy JWP 6 includes provision for minimising the effects of existing landfill, as well as requiring after uses that are positive for the environment and community. It is considered likely that this policy will have a minor positive effect on water bodies, however this is uncertain as it will depend on the location of the landfill and appropriate after uses coming forward within the plan period.

Policy recommendations

5.134 Only policy JWP 4 directly addresses water quality. The plan could consider additional wording in relation to water for each of the other policies unless this is judged to be adequately covered by policies within other development plan documents that will apply. This includes the London Plan and the local plans for each of the Boroughs within East London. Consideration could also be given to outlining measures for monitoring and improving the ongoing management of potential adverse environmental effects from operational allocated waste sites.

IIA Objective 10: To manage and reduce flood risk from all sources within East London

5.135 JWP Policies 1, 2, 3, 4 and 6 are considered to have a negligible impact on IIA10.

5.136 Policy JPW2b provides protection for existing wastewater treatment facilities and development of new facilities where appropriate. Although wastewater is dealt with separately to other types of water and drainage, the provision of modern wastewater treatment works to meet the needs of current and new development, will help to minimise flood risk and overflow. Policy JWP 2b is therefore considered to have a minor positive effect on this objective.

5.137 Policy JWP 4 promotes the use of sustainable drainage systems and other methods of flood resistance, including green roofs. This will contribute

towards better managed flood risk in the plan area and as such, a significant positive effect is expected in relation to IIA10.

Policy recommendations

5.138 The ELJWP could further consider the flooding implications of JWP 5: Energy from Waste and JWP 6: Landfill. The requirement for additional wording may be covered elsewhere as other policies within the development plan will apply. This includes the London Plan and the local plans for each of the Boroughs within East London.

IIA Objective 11: Minimise noise, light and air pollution relating to waste development within East London

5.139 Policy JWP 1 sets out criteria for the provision of a network of waste facilities within the plan area. This may have an effect on the impacts of waste development in relation to noise, light and air pollution, but this is considered to be negligible, given the general goal of reducing waste generation and maximising the efficiency of existing and safeguarded sites across East London.

5.140 The overall effect JWP 2 and JWP 2b on IIA11 is considered to minor negative, with uncertainty due to the effects being dependent on the active sites within the plan period. The policies protect existing sites, and do not actively promote new sites for waste development. The policies do not address the potential negative effects of existing waste sites, where there may be existing negative effects.

5.141 Policy JWP 3 Prevention of Encroachment is expected to have a significant positive effect in relation to IIA11. By restricting non-waste development close to existing waste management facilities, the policy minimises the potential impacts of pollution on new sensitive receptors. The

inclusion of precautionary distance buffers in the supporting text will further support IIA1.

5.142 Policy JWP 4 seeks to minimise adverse impacts arising from multiple sources of pollution, including those relevant to this IIA objective such as noise, light and air. As such, a minor positive effect is expected in relation to IIA11.

5.143 Policy JWP 5 Energy from Waste is expected to have a minor positive effect in relation to IIA11 as the policy states that release of non-biogenic carbon emissions will be minimised along with mechanisms in place for carbon capture.

5.144 Policy JWP 6 will control the effects of landfill and as such will have a minor positive effect on IIA11.

Policy recommendations

5.145 There are no policy recommendations in relation to IIA11.

IIA Objective 12: Protect and enhance mineral resources and soils within East London

5.146 Policies JWP 1 has a minor positive effect on IIA12 as it supports the use of recycled materials and reuse of built structures. JWP 3 and JWP 5 are considered to have a negligible effect on IIA12.

5.147 By safeguarding existing waste sites and capacity, Policy JWP 2 helps to reduce the need for new waste sites within East London. This will have a minor positive effect on IIA12, but the effect is uncertain as it depends on the sites that are active or come forward during the plan period.

5.148 The effects are similar for JWP 2a. By safeguarding existing wastewater treatment works and capacity, Policy JWP 2b also helps to reduce the need for new sites within East London. The effect is more mixed however, as there is likely to be a need for new facilities within the plan period. The effects are therefore mixed minor positive and minor negative but this is uncertain as it depends on the sites that are active or come forward during the plan period.

5.149 Policy JWP 4 seeks to protect the best and most versatile agricultural land and soil quality, which will contribute towards the protection of soil resources in the plan area. As such, a minor positive effect is expected in relation to IIA12.

5.150 Policy JWP 6 seeks to ensure that proposals for the permanent deposit of inert waste on land demonstrate the waste will be deposited for a beneficial purpose, such as restoring mineral workings. It further states that if the waste is intended for use in an engineering operation it must be demonstrated that there is no local demand for its use in mineral working restoration. These provisions will enhance mineral resources in the plan area. As such, a minor positive effect is expected in relation to IIA12.

Policy recommendations

5.151 There are no policy recommendations in relation to IIA12.

Reasonable alternatives

5.152 Given the strategic and high-level nature of the visions and objectives, it was considered that there are no reasonable alternatives to appraise within the IIA.

5.153 There are a number of reasonable alternatives to the policies within the ELJWP Regulation 19 document. These are outlined and appraised below, and

the findings discussed alongside the appraisal findings for the proposed policies.

Reasonable alternatives to Policy JWP 1

5.154 One reasonable alternative to Policy JWP 1 was identified (Alternative 1). This involves applying the London Plan threshold for the size of development required to provide Circular Economy Statements, i.e. referrable development rather than all major development. This would result in fewer applications for development preparing circular economy statements. Although this alternative could result in major development applicants providing less detail with regards to the circular economy, the other criteria within policy JWP 1 still encourage all development to follow the principles of the circular economy. Therefore, this alternative would likely reduce the sustainability of the ELJWP in relation to IIA1 and IIA2, but not significantly enough to alter the IIA scores.

5.155 The preferred policy was selected over the reasonable alternative because applying a lower threshold than the London Plan for the size of development required to provide Circular Economy Statements will result in more applications for development considering and planning for the circular economy across East London.

Table 5.3: Effects of Policy JWP 1 and its reasonable alternative

IIA objective	Policy JWP 1 (as proposed)	Alternative 1
IIA1: Climate Change	+	+
IIA2: Treatment of waste	++	++
IIA3: Economy	++	++
IIA4: Health and wellbeing	+	+
IIA5: Sustainable transport	+	+

IIA objective	Policy JWP 1 (as proposed)	Alternative 1
IIA6: Historic environment	?	?
IIA7: Biodiversity and geodiversity	+?	+?
IIA8: Open spaces and townscapes	+?	+?
IIA9: Water	+	+
IIA10: Flooding	0	0
IIA11: Noise, light and air pollution	0	0
IIA12: Mineral resources and Soils	0	0

Reasonable alternatives to Policy JWP 2

Need alternatives (JWP 2)

5.156 In terms of 'need', one reasonable alternative to Policy JWP 2 was identified (Need Alternative 1). This involves making provision for further additional waste management capacity above the London Plan apportionment. It is likely that this option would result in waste travelling further, if the sites were to deal with waste from outside of the plan area. This option could also have negative effects on all IIA objectives, where East London's environment and communities would be under additional pressure to allocate and/or identify less suitable sites for waste development to come forward.

Safeguarding alternatives (JWP 2)

5.157 JWP2 safeguards sites with permanent planning permission and sites that hold an environmental permit, lawful sites(including sites that benefit from a certificate of lawful use), due to the time a site has been operational. Where

planning permission is temporary, safeguarding will fall away at the time limit of the permission. Sites will also lose the benefit of safeguarding where a permit is given up. Sites that have a throughput of less than 500 tonnes and do not operate for a specialist use are not safeguarded.

5.158 Safeguarded wastes sites within the Appendix to the new ELJWP have only been included where they have not since been allocated for alternative uses in adopted local plans (and plans that have reached a late stage of examination), or by change of use through planning applications, since the adoption of the previous ELJWP, or they have an annual throughput of less than 500 tonnes.

5.159 In terms of safeguarding, a number of reasonable alternatives were identified:

1. Safeguarding all sites that have planning permission for waste use or an environmental permit (the London Plan position). This includes sites that hold an environmental permit but have no planning permission.

2. Safeguarding all sites above a higher permitted throughput (for example 5000 tonnes) in the future.

3. Safeguarding only sites that have valid planning permission.

5.160 A supplementary option for any of the options above is to safeguard any sites that have a lawful waste use, without express planning permission and benefit from a Certificate of Lawful Existing Use or Development (CLUED).

5.161 Safeguarding Alternative Option 1 is likely to have more negative effects than the proposed approach in JWP 2, particularly on IIA4, 7, 8, 9 and 11, as it allows the continued operation of waste sites that benefit from a waste permit but do not have planning permission.

5.162 Safeguarding Alternative Option 2 would reduce the number of sites that are safeguarded and may, over time, reduce the effects of smaller waste sites. These may have a disproportionate negative effect compared to larger sites that are more strategic in nature, as they are more likely to be dispersed through the plan area alongside other potentially more sensitive land uses. These effects are considered uncertain and at a such a low level that there is no meaningful distinction between this option and the policy within the ELJWP.

5.163 Safeguarding Alternative Option 3 would only safeguard sites with valid planning permission. This would remove negative effects (in relation to the environment and amenity) relating to sites that only benefit from an environmental permit. The level of uncertainty around the level of improvement or the nature of the improvements, which would only occur if a site was redeveloped for another use, means that there is again no difference in the significance of effects (i.e. the effects score) between this policy option and the policy within the ELJWP.

5.164 The policy within the ELJWP also includes safeguarding for sites that benefit from CLUED. With each of the alternative options, this has the potential to increase negative effects in relation to the environment and amenity, as the sites will not have been subject to the same restrictions as sites that applied for permission through the normal planning application process. Again, the level of this effect is difficult to quantify and is uncertain, therefore the appraisal scores for this option are the same as for the proposed policy.

Site allocations

5.165 There is no identified need for additional waste sites or allocations. Any sites that come forward through the plan period would be subject to criteria set out in national policy, such as land at a lower risk of flooding, or where there are negative effects on the natural environment will be avoided, minimised or mitigated. Any proposed development would need to meet these criteria, and as such, they have not been considered as reasonable alternatives within this IIA.

Reasons for choosing the proposed policy JWP 2 in light of alternatives

5.166 The preferred policy was selected over the reasonable alternatives because East London has established through its emerging evidence base that the plan area has more capacity than required for its needs and the additional needs of its neighbours. The preferred policy allows for redevelopment of sites that are now longer required to manage the identified need for waste, or the wider need for London. The preferred policy requires compensatory capacity if sites are lost. The alternative policy options could increase the likelihood of meeting the target of net-self-sufficiency within the London Plan; however, the extent to which London is already net-self-sufficient is uncertain and will be explored through future updates to the London Plan.

Table 5.4: Effects of Policy JWP 2 and its reasonable alternatives

IIA objective	Policy JWP 2 (as proposed)	Need alternative 1	Safeguarding alternative 1	Safeguarding alternative 2	Safeguarding alternative 3
IIA1: Climate Change	+	+/-?	+	+	+
IIA2: Treatment of waste	+	+	+	+	+
IIA3: Economy	++	++/-?	++	++	++
IIA4: Health and wellbeing	+/-?	+/-?	-?	+/-?	+/-?
IIA5: Sustainable transport	+	+/-?	+/-	+	+
IIA6: Historic environment	?	?	?	?	?
IIA7: Biodiversity & geodiversity	+/-?	+/-?	-?	+/-?	+/-?
IIA8: Open spaces & townscapes	+/-?	+/-?	-?	+/-?	+/-?
IIA9: Water	+/-?	+/-?	-?	+/-?	+/-?
IIA10: Flooding	0	0	0	0	0
IIA11: Noise, light & air pollution	-?	--	-?	-?	-?

IIA objective	Policy JWP 2 (as proposed)	Need alternative 1	Safeguarding alternative 1	Safeguarding alternative 2	Safeguarding alternative 3
IIA12: Mineral resources & soils	+?	+/-?	+?	+?	+?

Reasonable alternatives to Policy JWP 2b

5.167 No alternatives were considered in relation to Policy JWP2b. The policy requires the safeguarding of existing facilities, the consenting of new facilities to meet additional need, supports appropriate intensification on existing sites, and requires that new development protects and enhances local communities. The additional need will be considered in reference to new development set out in local plans, and the Asset Management Plans of the relevant water companies. There are no other reasonable options to consider need. Other options would not be consistent with national policy or the London Plan, which acknowledges the need for additional treatment in East London beyond 2041. It should be noted that expansion of wastewater treatment works is already underway within the plan area.

Reasonable alternatives to JWP Policy 3

5.168 One reasonable alternative was identified for ELJWP Policy 3 (Alternative 1). The policy within the Regulation 18 draft did not include a specified distance where the policy would apply whereas the policy within the Regulation 19 ELJWP provides guidance on buffer zones within the supporting text. Although the effects from waste development are likely to differ due to the nature of the waste activity and the proposed new use within proximity to the existing waste site, a precautionary distance buffer would remove uncertainty around the implementation of the policy. It may be appropriate to include more than one buffer dependant on the scale of development and the type of waste. This could more effectively minimise the potential for adverse effects of ELJWP Policy 3 on the IIA objectives, and improve the sustainability of the ELJWP.

5.169 The preferred policy was selected over the reasonable alternatives because specified distances have been selected within the supporting text to aid in avoiding and mitigating impacts. It is worth noting that impacts depend on pathways and the specific sensitivities of receptors and not proximity, and the

criteria would be difficult to define and manage over time, given the wide variation in waste uses and the environment across the plan area.

Table 5.5: Effects of Policy JWP 3 and its reasonable alternative

IIA Objectives	Policy JWP 3 (as proposed)	Alternative 1
IIA1: Climate Change	0	0
IIA2: Treatment of waste	+	+
IIA3: Economy	+	+
IIA4: Health and wellbeing	+	+?
IIA5: Sustainable transport	0	0
IIA6: Historic environment	0	0
IIA7: Biodiversity and geodiversity	0	0
IIA8: Open spaces and townscapes	0	0
IIA9: Water	0	0
IIA10: Flooding	0	0
IIA11: Noise, light and air pollution	++	++?
IIA12: Mineral resources and Soils	0	0

Reasonable alternatives to Policy JWP 4

5.170 The only reasonable alternative identified for this policy was to rely on the more general development management policies within the London Plan and the adopted local plans within East London instead. This would be likely to result in additional negative effects on IIA objectives 6, 7, 8 and 11 where there are gaps in policy within the development plan of particular relevance to waste

management, and reduce certainty and consistency for waste development within East London.

5.171 The preferred policy was selected over the reasonable alternatives because the policy wording within the ELJWP provides a specialist policy framework for waste development. Alternative policy options could result in additional negative effects, where existing policies within the wider development plan do not address the potential impacts of waste development.

Table 5.6: Effects of Policy JWP 4 and its reasonable alternative

IIA Objectives	Policy JWP 4 (as proposed)	Alternative 1
IIA1: Climate Change	++	++
IIA2: Treatment of waste	+	+
IIA3: Economy	+/-	+/-
IIA4: Health and wellbeing	++/-?	++/-?
IIA5: Sustainable transport	+	+
IIA6: Historic environment	+	-?
IIA7: Biodiversity and geodiversity	+/-?	--/+
IIA8: Open spaces and townscapes	+/-?	--/+
IIA9: Water	+/-?	+/-?
IIA10: Flooding	++	++
IIA11: Noise, light and air pollution	+	+/-
IIA12: Mineral resources and Soils	+	+

Reasonable alternatives to Policy JWP 5

5.172 The only reasonable alternative identified for policy JWP 5 was to rely on policies within the London Plan and the adopted local plans within East London (Alternative 1). This would be likely to result in additional negative effects on IIA objectives 2, 4, 5 and 11, and reduce certainty for development on energy from waste facilities within East London where appropriate.

5.173 The preferred policy was selected over the reasonable alternatives because, as with the preferred option of JWP 4, JWP 5 provides specialist policy criteria to address the specific effects of energy from waste facilities.

Table 5.7: Effects of Policy JWP 5 and its reasonable alternative

IIA Objectives	Policy JWP 5 (as proposed)	Alternative 1
IIA1: Climate Change	++	++?
IIA2: Treatment of waste	+	+/-?
IIA3: Economy	0	0
IIA4: Health and wellbeing	+	+/-?
IIA5: Sustainable transport	+	+/-?
IIA6: Historic environment	?	?
IIA7: Biodiversity and geodiversity	0	0
IIA8: Open spaces and townscapes	0	0
IIA9: Water	0?	0?
IIA10: Flooding	0	0
IIA11: Noise, light and air pollution	+	+/-?
IIA12: Mineral resources and Soils	0	0

Reasonable alternatives to Policy JWP 6

5.174 The only reasonable alternative identified in relation to Policy JWP 6 was to explicitly require a target of zero biodegradable waste to landfill by either 2026 or 2030 (Alternative 1). The alternative option was considered to be more ambitious than the draft policy wording, which does not contain any target for the reduction of biodegradable waste to landfill. The effect on the IIA objective 2 would be positive as it would be more likely that more waste would be diverted from landfill up the waste hierarchy. This option of zero waste by 2030 is consistent with national policy, but a less stringent requirement than the target of zero biodegradable waste to landfill by 2026 within the Mayor of London's Environment Strategy. Either the 2026 or 2030 target could be implemented within the ELJWP, and either option could increase the sustainable treatment of waste within East London.

5.175 The preferred policy was selected over the reasonable alternatives because it offers flexibility in the timescales for reducing biodegradable waste to landfill. This is considered to be less sustainable than the alternative option and the IIA recommends that a target could be included within JWP 6 to improve the sustainability of the plan.

Table 5.8: Effects of Policy JWP 6 and its reasonable alternative

IIA Objectives	Policy JWP 6 (as proposed)	Alternative 1
IIA1: Climate Change	++	++
IIA2: Treatment of waste	+	++
IIA3: Economy	0	0
IIA4: Health and wellbeing	+	+
IIA5: Sustainable transport	+	+
IIA6: Historic environment	0	0

IIA Objectives	Policy JWP 6 (as proposed)	Alternative 1
IIA7: Biodiversity and geodiversity	0	0
IIA8: Open spaces and townscapes	0	0
IIA9: Water	0?	0?
IIA10: Flooding	0	0
IIA11: Noise, light and air pollution	+	+
IIA12: Mineral resources and Soils	0	0

Equalities Impact Assessment, Health Impact Assessment and Strategic Environmental Assessment

5.176 The EqIA and HIA criteria are embedded within the IIA objectives used to appraise the ELJWP.

5.177 With regards to equality, the vision, strategic objectives and policies for the ELJWP are likely to have a negligible effect on protected characteristics given their strategic nature, their focus on waste management issues, and as the plan does not allocate land for development. However, the ELJWP does indirectly give consideration to the potential effects of waste development on specific groups, where there may be increased vulnerability to the effects of waste management facilities and processes, including air pollution, climate change, employment opportunities and social deprivation.

5.178 With regards to HIA and SEA, the following paragraphs provide commentary relevant to health outcomes and each IIA objective.

IIA Objective 1: To minimise the East London Joint Waste Plan's contribution to climate change through a reduction of greenhouse gas emissions from managing waste

5.179 Minimising emissions from waste within the ELJWP area and contributing to a reduction in greenhouse gas emissions is expected to have a positive effect on air, climate, water, material assets, soil and biodiversity.

5.180 Similar reductions will also avoid adverse effects on the physical and mental health of local populations.

IIA Objective 2: Move treatment of waste up the Waste Hierarchy within East London

5.181 Movement of waste up the waste hierarchy is expected to have a positive effect on air, climate, water, material assets, soil and biodiversity.

5.182 Reductions in the quantities of waste and the more effective and efficient management of waste will help to avoid adverse effects on the physical and mental health of local populations.

IIA Objective 3: Support, maintain or enhance the development of the economy of East London

5.183 Support for the economy is expected to have a positive effect on population health and material assets.

5.184 Investment in waste management will have benefits for the local economy, which will in turn have positive benefits for the mental health of local populations, as well as physical health.

IIA Objective 4: Protect and improve the health of the people of the East London Joint Waste Plan area

5.185 Support for the health of local communities is expected to have a positive effect on population health.

5.186 Measures to improve and protect the local environment and sensitive receptors within it will avoid adverse effects on and have positive benefits for the mental health of local populations, as well as physical health.

IIA Objective 5: Promote sustainable modes of transport in the East London Joint Waste Plan area by reducing road traffic, congestion and pollution

5.187 Support for sustainable transport is expected to have a positive effect on population health, air, climate, material assets, water and biodiversity.

5.188 Access to sustainable transport, and reduction in air pollution associated with the effective management of traffic associated with waste management, will avoid adverse effects on and have positive benefits for the mental health of local populations, as well as physical health.

IIA Objective 6: Protect and enhance the historic environment within East London

5.189 The lack of focus on the historic environment within the vision and objectives is expected to have a negligible outcome for material assets and population health.

IIA Objective 7: Protect, enhance, restore, and expand the biodiversity and geodiversity assets within the East London Joint Plan area

5.190 Support for the biodiversity is expected to have a positive effect on biodiversity, air pollution, material assets and population health.

5.191 Measures to protect, conserve and enhance the natural environment in East London will avoid adverse effects on and have positive benefits for the mental health of local populations, as well as physical health.

IIA Objective 8: Protect, enhance, and restore open spaces and townscapes within the ELJWP area

5.192 The lack of focus on open space and townscapes within the vision and objectives is expected to have a negligible effect for material assets and population health.

IIA Objective 9: Protect and enhance the quality and quantity of watercourses and water bodies and maximise the efficient use of water within East London

5.193 Protecting and enhancing the quality and quantity of watercourses and water bodies and maximising the efficient use of water, is expected to have a positive effect on water, material assets, soil and biodiversity.

5.194 Reducing risk of water pollution and ensuring water security will avoid adverse effects on and have positive benefits for the physical and mental health of local populations

IIA Objective 10: To manage and reduce flood risk from all sources within East London

5.195 Managing and reducing flood risk from all sources is expected to have a positive effect on water, material assets, soil and biodiversity.

5.196 Reducing risk from flooding will avoid adverse effects on and have positive benefits for the physical and mental health of local populations.

IIA Objective 11: Minimise noise, light and air pollution relating to waste development within East London

5.197 Minimising pollution and the effects of pollution from new development is expected to avoid adverse effects on and have a positive effect on physical and mental health, material assets, soil, water and biodiversity

IIA Objective 12: Protect and enhance mineral resources and soils within East London

5.198 Protecting and enhancing mineral resources and soils is expected to have a positive effect on material assets, soil, water and biodiversity.

5.199 Effective, efficient and sustainable use of land provides healthier environments for people.

Chapter 6

Cumulative effects

Introduction

6.1 Cumulative effects of the Plan are considered both in terms of the plan as a whole, and in relation to other plans or development in the plan area, and potentially outside of the plan area, depending on the potential impacts.

Total effects of the ELJWP

6.2 The total effects of the vision, strategic objectives and policies in the Regulation 19 East London Joint Waste Plan document in relation to each of the IIA objectives are discussed below and summarised in **Table 6.1**.

Table 6.1: Total effects of the ELJWP (Regulation 19) document

IIA objectives	Total effect
IIA1: Climate Change	++
IIA2: Treatment of waste	++
IIA3: Economy	++/-
IIA4: Health and Wellbeing	+/-?
IIA5: Sustainable Transport	++
IIA6: Historic Environment	+?
IIA7: Biodiversity and geodiversity	+/-?
IIA8: Open spaces and townscapes	+/-?
IIA9: Water	+/-?
IIA10: Flooding	+
IIA11: Noise, light and air pollution	++/-?
IIA12: Mineral resources and Soils	+

IIA Objective 1: To minimise the East London Joint Waste Plan's contribution to climate change through a reduction of greenhouse gas emissions from managing waste

6.3 Where an effect was identified, the vision, strategic objectives and policies of the ELJWP have a mixture of significant and minor positive effects on this objective. This is in recognition of the ELJWP's consistent focus on pursuing the sustainable location and management of waste in East London, minimising carbon emissions through on-site operations and the sustainable transportation

of waste within and beyond the city. Therefore, overall, a significant positive effect is recorded for this objective.

IIA Objective 2: Move treatment of waste up the Waste Hierarchy within East London

6.4 Where an effect was identified, the vision, strategic objectives and policies of the ELJWP have a mixture of significant and minor positive effects on this objective. This is in recognition of the ELJWP's consistent focus on moving waste up the waste hierarchy. Therefore, overall, a significant positive effect is recorded for this objective.

IIA Objective 3: Support, maintain or enhance the development of the economy of East London

6.5 Where effects have been identified, the effects on the ELJWP's vision, strategic objectives and policies on IIA3 range from minor negative (SO5) to significant positive (JWP 1 and JWP 2). There is a mixed minor positive and minor negative effect for SO2. On balance, the ELJWP is considered to have a mixed significant positive and minor negative effect on IIA3, in recognition of the plan's efforts to maintain and improve the efficiency of the waste management industry in East London, but also the potential for its requirements to increase the long term cost of waste management in East London, potentially affecting the viability and profitability of some facilities.

IIA Objective 4: Protect and improve the health of the people of the East London Joint Waste Plan area

6.6 The majority of the strategic objectives will have a negligible effect on IIA4. Where effects have been identified, the vision and objectives will have a minor positive effect. The majority of the policies have a minor positive effect in relation to IIA4. This effect is uncertain in relation to JWP 3 and JWP 6. The effects in relation to JWP 4 are considered to be mixed significant positive and minor negative, although this effect is uncertain. The effects recognise the Plan's focus on avoiding and minimising adverse effects on East Londoners. On balance, an uncertain mixed minor positive and minor negative effect is recognised overall in acknowledgement of safeguards put in place, but also acknowledging that some adverse effects may arise in some circumstances.

IIA Objective 5: Promote sustainable modes of transport in the East London Joint Waste Plan area by reducing road traffic, congestion and pollution

6.7 Where effects have been identified, the majority of the policies and strategic objectives have minor positive effects on IIA5. SO5 and SO7 have significant positive effects on this objective. This is in recognition of the ELJWP's consistent focus on pursuing the sustainable location and management of waste in East London, minimising travel through the consistent implementation of the proximity principle and encouraging the transportation of waste via sustainable modes within and beyond the city. Therefore, overall, a significant positive effect is recorded for this objective.

IIA Objective 6: Protect and enhance the historic environment within East London

6.8 The vision will have a minor positive effect on IIA6. Most of the objectives will have a negligible effect on the historic environment. The policies are generally considered to have an uncertain effect on IIA6 as any effects will depend on the location of any development that comes forward. However, strategic objective 3 and JWP 4 refer to the historic environment. Consequently, overall, the ELJWP is considered to have an uncertain minor positive on IIA6.

IIA Objective 7: Protect, enhance, restore, and expand the biodiversity and geodiversity assets within the East London Joint Plan area

6.9 The vision and strategic objectives SO3 and SO4 have minor positive effects on IIA7. Three of the seven policies have uncertain mixed minor positive and minor negative effects, and one policy has an uncertain minor positive effect. These effects recognise the efforts of the ELJWP to protect East London's natural environment; however, the nature of waste management means that all adverse effects on biodiversity cannot be ruled out. Consequently, on balance, the ELJWP is considered to have an uncertain mixed minor positive and minor negative effect.

IIA Objective 8: Protect, enhance, and restore open spaces and townscapes within the ELJWP area

6.10 The vision and objectives have a negligible effect on IIA8. JWP 1 has a minor positive effect, and JWP 2, JWP 2b, JWP 4 and JWP 6 have an uncertain

mixed minor positive and minor negative effect. These effects acknowledge the measures put in place within the policies to simultaneously maximise the efficient use of land within East London and conserve the city's character; however, the nature of waste management means that all adverse effects on open spaces and the city's character cannot be ruled out. Consequently, on balance, the ELJWP is considered to have an uncertain mixed minor positive and minor negative effect.

IIA Objective 9: Protect and enhance the quality and quantity of watercourses and water bodies and maximise the efficient use of water within East London

6.11 Where an effect was identified, the vision and objectives have a minor positive effect on IIA9. Where effects are identified in relation to the policies, the effects are generally minor positive, although policy JWP 2 is considered to have the potential for more uncertain and mixed minor positive and minor negative effects. Policy JWP 2b will have a minor positive effect on wastewater. These effects recognise the efforts of the ELJWP to maximise the efficient use of water in waste management and protect the quality of East London's water resources; however, the nature of waste management means that all adverse effects on water quality cannot be ruled out. Consequently, on balance, the ELJWP is considered to have an uncertain and mixed minor positive and minor negative effect.

IIA Objective 10: To manage and reduce flood risk from all sources within East London

6.12 The vision and strategic objectives SO1 and SO5 have minor positive effects on this objective. Most policies have a negligible effect on this objective, with the exception of JWP 4, which has a significant positive effect in isolation.

Policy JWP 2b will have a minor positive effect. These effects recognise the appropriate efforts of the ELJWP to reduce flood risk through flood resilience in design as well as promoting reductions in the extent of impermeable surfaces on waste sites across East London. On balance, given the scale and density of London, and the relatively small footprint of East London's waste management facilities, the ELJWP is considered to have a minor positive effect on this objective.

IIA Objective 11: Minimise noise, light and air pollution relating to waste development within East London

6.13 The vision has a significant positive effect in relation to IIA11. The strategic objectives generally have a negligible effect on IIA11, with the exception of SO1 and SO7, which are expected to have a minor positive effect. Three policies are considered to have minor positive effects, and policy JWP 2 is recorded as having the potential for uncertain minor negative effects, as is policy JWP 2b. Conversely, policy JWP 4 is recorded as having the potential for uncertain significant positive effects on this objective. The effects recognise the focus on avoiding and minimising pollution generated by waste management in East London, particularly through policy JWP 4. However, on balance, an uncertain mixed significant positive and minor negative effect is recognised overall in acknowledgement of safeguards put in place. It is also acknowledged that some pollution may arise, which may have a minor adverse effect in some circumstances.

IIA Objective 12: Protect and enhance mineral resources and soils within East London

6.14 The vision, SO6 and SO8 are considered to have minor positive effects on IIA12. Two policies have minor positive effects on the objective, with these

positive effects being recorded as more uncertain for policy JWP 2 and JWP 2b. These effects acknowledge the measures put in place within the policies to maximise the efficient use of land within East London and use waste as a resource wherever possible. Consequently, the ELJWP is considered to have a minor positive effect overall.

Cumulative effects of the ELJWP with other plans

6.15 Development proposed in the ELJWP will not be delivered in isolation from development proposals in other plans and projects covering East London and the surrounding area. This section outlines the development proposed by nationally significant infrastructure projects, plans covering London as a whole, and the Local Plans of the neighbouring authorities which may combine with the ELJWP to produce additional cumulative effects.

Nationally significant infrastructure projects

6.16 At the time of writing eight NSIP projects within London were identified on the National Infrastructure Planning website:

- Expansion of Heathrow (third runway)
- Heathrow West
- North London (Electricity Line) Reinforcement
- North London Heat and Power Project
- Riverside Energy Park
- Silvertown Tunnel
- Teddington Direct River Abstraction
- Thames Tideway Tunnel

Potential for cumulative effects with Nationally Significant Infrastructure Projects

6.17 There is uncertainty around the potential cumulative effects of NSIP projects across London in relation to the ELJWP, given the lack of proximity and the relatively small-scale nature of the development being managed within the ELJWP. There are potential cumulative effects in relation to NSIPs such as flood risk and water quality in the Thames; air quality, including from increased road traffic on the major arterial roads, or roads within impact zones for Epping Forest; noise and vibration; biodiversity; and landscape and visual amenity.

The London Plan and other London strategies

6.18 The London Plan 2021 provides the regional planning framework for London. The relevant plans and strategies in relation to the ELJWP are set out in Chapter 3 and an expanded list is contained in Appendix A.

Potential for cumulative effects with the London Plan

6.19 The ELJWP could result in in-combination effects with the London Plan where the specific location and type of development proposed in the ELJWP, although at a relatively small scale, could combine to result in more significant effects. Given that many of the development growth areas within London are large scale, and there are no proposals for additional waste allocations within the ELJWP, it is likely that any in-combination effects will be minimal.

6.20 The London Transport Plan is designed to deliver the transport solutions required to support development delivered through Borough Local Plans in London, while also addressing existing transport challenges and issues, including improving the public transport network, to improve use of public

transport and to reduce air pollution. The small level of development likely to arise from the ELJWP is likely to result in a negligible effect when combined with the large-scale projects within the London Transport Plan.

East London Local Plans and neighbouring Local Plans

6.21 Each of the boroughs within the ELJWP area has an adopted local plan. The main development proposed by their respective Local Plans is summarised in Appendix C (Baseline).

- Barking and Dagenham aim to deliver more than 40,000 dwellings between 2024 and 2037.
- Havering aim to deliver a minimum of 18,930 dwellings between 2016 to 2031.
- Newham aim to deliver 43,000 dwelling across the plan area between 2017 and 2033 The Regulation 19 Local Plan sets out a stepped trajectory to deliver between 51,425 and 53,784 additional new homes between 2023/24 and 2037/38.
- Redbridge aims to deliver a minimum of 16,845 new dwellings between 2015 and 2030.

6.22 The ELJWP area is adjoined by the neighbouring local authorities of Tower Hamlets, Hackney, and Waltham Forest within London. Epping Forest, Brentwood and Thurrock form the boundaries to the East of the plan area. Although parts of the areas within Essex are more rural, all of these local plan areas are expected to see high levels of housing growth, employment growth and to benefit from strategic transport infrastructure improvements.

6.23 The Boroughs within the ELJWP area and the authorities surrounding the ELJWP area range from the densely urban areas of central London to the rural areas in Essex.

6.24 All of the local plans identified above whether adopted or in the process of preparation, provide for both increases in housing supply as well as job creation. The increased level of development in East London and neighbouring authorities will, in combination with the ELJWP, lead to increased traffic, which in turn has the potential to increase air pollution and carbon emissions. To mitigate this, the Local Plans aim to support sustainable transport modes and energy efficiency in built development. Many of the in combination effects at a sub-regional scale are likely to be concentrated within and around major development areas and along the strategic transport corridors. In addition, a number of the locations targeted for large-scale growth by neighbouring plans are close to the border of the plan area, increasing the potential for more localised in combination effects. There may be localised impacts in relation to health, noise, air quality, water resources and flooding, and transport.

6.25 Although there may be increased negative cumulative effects when the ELJWP is considered alongside other plans and projects, the policies within the ELJWP that seek to protect the environment and local amenity could result in increased positive effects, when taken alongside similar policies in the wider development plan.

6.26 However, given the lack of allocations within the ELJWP for new or improved waste facilities over the plan period, and the lack of need for additional waste management capacity, it is likely that the cumulative effect of the ELJWP with other local plans will be relatively minor.

Habitats Regulations Assessment

6.27 The HRA was undertaken separately but the findings have been taken into account in the IIA where relevant (for example to inform judgements about the likely effects of potential development locations on biodiversity).

6.28 The first stage of HRA was to screen for likely significant effects. Following the HRA screening, likely significant effects could not be ruled out in relation to:

- Physical damage and loss of habitat: Epping Forest (directly or via functionally linked habitats) – ELJWP alone.
- Air pollution - dust: Epping Forest SAC (direct impacts only) – ELJWP alone.
- Air pollution – industrial emissions: Epping Forest SAC (direct impacts only), Lee Valley SPA and Ramsar site (direct impacts only), and Thames Estuary & Marshes SPA and Ramsar site (direct impacts only) – ELJWP alone or in-combination with other plans / projects.
- Air pollution – vehicle emissions: Epping Forest SAC (direct impacts only) and Lee Valley SPA and Ramsar site (direct impacts only) – ELJWP alone or in-combination with other plans / projects.
- Pests and vermin: Epping Forest (directly or via functionally linked habitats) – ELJWP alone.
- Water quality and quantity – abstraction: Lee Valley SPA/Ramsar (direct impacts only) – ELJWP alone or in-combination with other plans / projects.

6.29 Non-physical disturbance and wastewater were screened out as there are no impact pathways.

6.30 These impacts would arise from three of the ELJWP's policies: JWP 2, JWP 5 and JWP 6. However, the Appropriate Assessment concluded that, with safeguards provided by policy JWP4 along with environmental permitting requirements for industrial emissions and water abstraction, adverse effects on the integrity of Habitats Sites will be avoided.

6.31 The HRA will be published alongside the ELJWP Regulation 18 consultation. Following the consultation, the plan will be updated as necessary and will include confirmation of the existing waste sites to be removed from safeguarding. The HRA will then be updated to reflect any changes to the ELJWP and in response to any relevant Regulation 18 consultations, for example if received from Natural England.

Chapter 7

Monitoring and other reporting requirements

7.1 This section sets out recommendations for indicators to monitor the effects of implementing the East London Joint Waste Plan (ELJWP), taking into account monitoring indicators included within the Regulation 19 draft plan.

7.2 The SEA Regulations require that the appraisal sets out how environmental report has been taken into account in plan making.

7.3 The ELJWP utilised the baseline and issues identified in the IIA Scoping Report in the preparation of the Regulation 18 ELJWP. In preparing the local plan, the Boroughs identified alternative policy approaches to addressing each issue, prior to drafting the policies within the Regulation 18 plan. Those alternatives were considered as part of defining the reasonable alternatives within the IIA.

7.4 The IIA provided recommendations in relation to the objectives and policies within the Regulation 18 ELJWP, within a ‘Recommendations’ section at the end of each policy that were considered by the Boroughs in the preparation of the Regulation 19 ELJWP. More detail is set out in the recommendations sections within Chapter 5.

7.5 The SEA Regulations require that "the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action" and that the environmental report should provide information on "a description of the measures envisaged concerning monitoring". Monitoring proposals should be designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision-making.

7.6 Although national Planning Practice Guidance states that monitoring should be focused on the significant environmental effects of implementing the Local Plan, the reason for this is to enable local planning authorities to identify unforeseen adverse effects at an early stage and to enable appropriate remedial actions. Since effects which the IIA expects to be minor may become significant and vice versa, monitoring measures have been proposed in this IIA Report in relation to all of the IIA objectives in the IIA Framework. As the ELJWP is implemented and the likely significant effects become more certain, the Councils may wish to narrow down the monitoring framework to focus on those effects of the ELJWP that are likely to be significantly adverse.

7.7 The remainder of this chapter sets out a number of suggested indicators for monitoring the potential sustainability effects of implementing the ELJWP. The data used for monitoring in many cases will be provided by outside bodies, for example the Environment Agency. It is therefore recommended that the Boroughs remain in dialogue with statutory environmental consultees and other stakeholders and work with them to agree the relevant sustainability effects to be monitored and to obtain information that is appropriate, up to date and reliable.

IIA Objective 1: To minimise the East London Joint Waste Plan's contribution to climate change through a reduction of greenhouse gas emissions from managing waste

- CO2 emissions per capita
- Total energy consumption of waste facilities
- Total energy generation from renewable and low carbon sources linked to waste facilities
- Climate change assessments submitted with applications/applications permitted
- Reduction in carbon emissions from existing/re-configurated waste sites committed to in climate change assessments
- Landfill gas production and related energy production

IIA Objective 2: Move treatment of waste up the Waste Hierarchy within East London

- Waste stream quantities
- Landfill rates
- Recycling rates
- Number of re-use facilities within the plan area

IIA Objective 3: Support, maintain or enhance the development of the economy of East London

- Unemployment rate, compared to rest of London.
- Jobs generated through waste development

IIA Objective 4: Protect and improve the health of the people of the East London Joint Waste Plan area

- Percentage change in life expectancy and levels of deprivation (Indices of Multiple Deprivation)
- Air quality exceedances and number of new Air Quality Management Areas declared

IIA Objective 5: Promote sustainable modes of transport in the East London Joint Waste Plan area by reducing road traffic, congestion and pollution

- Percentage of trips to work, school, leisure using public transport, walking and cycling
- Peak traffic flow
- Travel times

- Investment in road infrastructure
- Number of electric vehicle charging devices

IIA Objective 6: Protect and enhance the historic environment within East London

- Number of entries on the Heritage at Risk Register
- Number of entries removed from the Heritage at Risk Register
- Number of waste planning applications approved contrary to Historic England and/or Conservation Officer advice
- Number of designated and non-designated heritage assets

IIA Objective 7: Protect, enhance, restore, and expand the biodiversity and geodiversity assets within the East London Joint Plan area

- Net loss/gain of designated wildlife habitats
- Number and hectares of SSSIs
- Percentage of District's SSSI in a favourable and unfavourable condition
- Hectares of Local Nature Reserves, Local Wildlife Sites/Sites of Nature Conservation Importance, Ancient Woodland and Priority Habitats

IIA Objective 8: Protect, enhance, and restore open spaces and townscapes within the ELJWP area

- Hectares of brownfield/previously developed land
- Loss and gains of public open space and Local Green Space
- Green Infrastructure secured through development of waste sites

IIA Objective 9: Protect and enhance the quality and quantity of watercourses and water bodies and maximise the efficient use of water within East London

- Water availability/consumption ratios
- Ecological/chemical status of water bodies
- Average commercial water consumption
- Water pollution incidents recorded by the Environment Agency

IIA Objective 10: To manage and reduce flood risk from all sources within East London

- Waste development permitted contrary to advice by the Environment Agency on flood risk
- Waste sites delivered within Flood Zones 2 and 3

IIA Objective 11: Minimise noise, light and air pollution relating to waste development within East London

- Air quality exceedances and number of new Air Quality Management Areas declared
- Complaints received relating to the operations of existing waste sites

IIA Objective 12: Protect and enhance mineral resources and soils within East London

- Number of waste planning applications approved within Minerals Consultation Areas
- Percentage of new waste development on brownfield/previously developed land

Chapter 8

Conclusions and next steps

8.1 This document has considered the sustainability implications of the policies in the Regulation 19 East London Joint Waste Plan (ELJWP). These have been subject to assessment against the IIA objectives developed at the scoping stage of the IIA process.

8.2 In total, the Plan was found to have a range of minor positive and significant positive effects in relation to all of the IIA objectives, although a number of potential minor negative effects were also identified. Many of the effects are mixed, reflecting that the plan does not actively allocate sites for development and the effects will depend on when and where development comes forward. In considering the total effects of all of the draft ELJWP policies, the IIA found that:

- Significant positive effects are expected in relation to IIA objective 1: Climate Change, IIA objective 2: Treatment of waste, IIA objective 5: Sustainable transport.
- Mixed significant positive and minor negative effects are expected in relation to IIA objective 3: Economy and IIA objective 11: Noise, light and air pollution.
- Minor positive effects are expected in relation to IIA objective 6: Historic Environment, IIA objective 10: Flooding and IIA objective 12: Mineral resources and Soils. These effects are considered uncertain in relation to IIA objective 6: Historic Environment as they will depend on the location of development.
- Uncertain mixed minor positive and minor negative effects are expected in relation to IIA objective 4: Health and Wellbeing, IIA objective 7: Biodiversity and geodiversity, IIA objective 8: Open space and townscapes and IIA objective 9: Water, again primarily due to the uncertainty around locations for development.

8.3 No significant negative effects were identified for the Regulation 19 ELJWP as a whole.

8.4 A number of recommendations were made that could strengthen the positive effects or reduce the negative effects of the ELJWP, as set out in Chapter 5.

Next steps

8.5 This IIA Report will be available for consultation alongside the ELJWP (Regulation 19) draft plan document in Spring 2025. This consultation is on the version of the ELJWP that the Boroughs proposes to submit to the Secretary of State for examination.

8.6 Following the above periods of public consultation, the ELJWP will be independently examined by a Planning Inspector appointed by the Secretary of State, who will consider its content and any objections to it, and reach a decision on its overall ‘soundness’ before it can proceed to be adopted.

8.7 Once the plan is adopted it will form part of the development plan for East London.

LUC

January 2025

Appendix A

Review of relevant plans, policies and programmes

International

IPCC AR6 Synthesis Report on Climate Change 2023

Key objectives

- To limit/or reduce all greenhouse gas emissions which contribute to climate change.

Key targets/indicators

- None
- Implications for Waste local Plan
- Plan should support reduction in emissions of greenhouse gases.

Implications for IIA

- Include sustainability objectives to support reduction in emissions of greenhouse gases.

Johannesburg Declaration on Sustainable Development 2002

Key objectives relevant to the Waste Local Plan

- Commitment to building a humane, equitable and caring global society aware of the need for human dignity for all.

Areas of focus include:

- Sustainable consumption and production patterns.
- Accelerate shift towards sustainable consumption and production – 10-year framework of programmed of action.
- Reverse trend in loss of natural resources.
- Renewable energy and energy efficiency.
- Urgently and substantially increase Global share of renewable energy.
- Significantly reduce the rate of biodiversity loss by 2010.

Key targets and indicators relevant to the Waste Local Plan

- To promote greater resource efficiency, increase energy efficiency and develop new technology for renewable energy.

Implications for the Waste Local Plan

- Allocate sites and develop policies that take account of the Declaration.

Implications for the IIA

- Include sustainability objectives to enhance the natural environment and promote renewable energy and energy/resource efficiency

Aarhus Convention 1998

Key objectives relevant to the Waste Local Plan

- Established a number of rights of the public with regard to the environment.

Local authorities should provide for:

- The right of everyone to receive environmental information.
- The right to participate from an early stage in environmental decision making.
- The right to challenge in a court of law public decisions that have been made without respecting the two rights above or environmental law in general.

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Allocate sites and develop policies that take account of the Convention.

Implications for the IIA

- Ensure that the public are involved and consulted at all relevant stages of IIA production.

Bern Convention 1979

Key objectives relevant to the Waste Local Plan

- The Convention on the Conservation of European Wildlife and Natural Habitats (the Bern Convention) was adopted in Bern, Switzerland in 1979, and came into force in 1982.
- The principal aims of the Convention are to ensure conservation and protection of wild plant and animal species and their natural habitats (listed in Appendices I and II of the Convention), to increase cooperation between contracting parties, and to regulate the exploitation of those species (including migratory species) listed in Appendix III.
- To this end the Convention imposes legal obligations on contracting parties, protecting over 500 wild plant species and more than 1,000 wild animal species.

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Allocate sites and develop policies that take account of the Convention.

Implications for the IIA

- Include sustainability objectives to protect and enhance biodiversity.

Ramsar Convention 1971

Key objectives relevant to the Waste Local Plan

- To promote the conservation and wise use of all wetlands through local, regional and national actions and international co-operation, as a contribution towards achieving sustainable development throughout the world.

Key targets and indicators relevant to the Waste Local Plan

- The number of Ramsar sites being designated in the UK.

Implications for the Waste Local Plan

- Plan should promote the conservation and make wise use of all wetland areas.

Implications for the IIA

- Consider inclusion of objectives which aim to promote conservation and wise use of wetland areas.

UN Paris Climate Change Agreement (2015)

Key objectives relevant to the Waste Local Plan

- International agreement to keep global temperature rise this century well below 2 degrees Celsius above pre-industrial levels.

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Allocate sites and develop policies that take account of the Agreement.

Implications for the IIA

- Consider climate change.

National

NPPF (2023)

Key objectives relevant to the Waste Local Plan

Economic objective

- To help build a strong, responsive and competitive economy
- By ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity
- By identifying and coordinating the provision of infrastructure.

Social objective

- To support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations
- By fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.

Environmental objective

- To protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution
- Mitigating and adapting to climate change, including moving to a low carbon economy.

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

Economic objective

- Plan should make adequate provision for waste management infrastructure to ensure the growth of the waste economy.

Social objective

- Plan should include policies and objectives to promote a circular economy and the delivery of green infrastructure, enhanced public rights of way or improved access to recreation as part of the development and restoration of waste sites.

Environmental objective

- Plan should include policies and objectives to address the causes and impacts of climate change relating to waste development activity, including using opportunities arising from waste operations and reclamation activity to mitigate and adapt to climate change and to leave a positive legacy.

Implications for the IIA

Economic objective

- Include a sustainability objective relating to strengthening the economy.

Social objective

- Include a sustainability objective relating to health and well-being.

Environmental objective

- Include a sustainability objective relating to climate change mitigation and adaptation, conservation of historic features, conservation and enhancement of the natural environment.

NPPW (2015)

Key objectives relevant to the Waste Local Plan

- The National Planning Policy for Waste was adopted in October 2014 and sets out the need for local authorities to:
  - Prepare local plans using a robust proportionate evidence base
  - Identify need for waste management facilities
  - Identify suitable sites and areas
  - Determine planning applications
  - Monitor and report
  - Take up in allocated sites and areas
  - Existing stock and changes in the stock of waste management facilities.
  - The amount of waste recycled, recovered or going for disposal

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Allocate sites and develop policies that take account of the National Planning Policy for Waste.

Implications for the IIA

- Include a sustainability objective relating to sustainable waste management.

DEFRA (2021): National Waste Management Plan for England

Key objectives relevant to the Waste Local Plan

- Provides an analysis of the current waste management situation in England and evaluates how it will support implementation of the objectives and provisions of the revised Waste Framework Directive.
- At the local authority level, the Waste Management Plan notes that waste planning authorities (county and unitary authorities in England) are responsible for producing local waste management plans that cover the land use planning aspect of waste management for their areas.

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Allocate sites and develop policies that take account of the National Waste Management Plan.

Implications for the IIA

- Include a sustainability objective relating to sustainable waste management.

Resources and Waste Strategy for England (2018)

Key objectives relevant to the Waste Local Plan

- Sets out how to preserve material resources by minimising waste, promoting resource efficiency and moving towards a circular economy in England.
- It identifies five strategic ambitions:
  - To work towards all plastic packaging placed on the market being recyclable, reusable or compostable by 2025;
  - To work towards eliminating food waste to landfill by 2030;
  - To eliminate avoidable plastic waste over the lifetime of the 25 Year Environment Plan;
  - To double resource productivity by 2050; and

- To eliminate avoidable waste of all kinds by 2050.

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Allocate sites and develop policies in line with the Resources and Waste Strategy.

Implications for the IIA

- Include a sustainability objective relating to sustainable waste management.

DCLG (2015): Planning Practice Guidance on Waste

Key objectives relevant to the Waste Local Plan

- Provides further information in support of the implementation of waste planning policy.
- At the local authority level, the Guidance outlines who is responsible for waste developments and which matters come within the scope of 'waste development'.

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Allocate sites and develop policies that take account of the Planning Practice Guidance on Waste.

Implications for the IIA

- Include a sustainability objective relating to sustainable waste management.

MHCLG Planning Practice Guidance (2021)

Key objectives relevant to the Waste Local Plan

- The PPG documents provide guidance on the interpretation and implementation of the NPPF.
- Of particular relevance are:
  - Planning Practice Guidance on air quality
  - Planning Practice Guidance on climate change
  - Planning Practice Guidance on conserving and enhancing the historic environment
  - Planning Practice Guidance on ensuring the vitality of town centre
  - Planning Practice Guidance on flood risk and coastal change
  - Planning Practice Guidance on health and wellbeing

- Planning Practice Guidance on local plans
- Planning Practice Guidance on the natural environment
- Planning Practice Guidance on noise
- Planning Practice Guidance on light pollution
- Planning Practice Guidance on open space, sports and recreation facilities, public rights of way and local green space
- Planning Practice Guidance on rural housing
- DCLG Planning Practice Guidance on renewable and low carbon energy
- Planning Practice Guidance on water supply, wastewater and water quality
- Planning Practice Guidance on Waste

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Plan needs to be produced in accordance with the guidance outline in the NPPG.

Implications for the IIA

- The SA should be prepared in line with the NPPG.

DEFRA (2012): National Policy Statement for Waste Water

Key objectives relevant to the Waste Local Plan

- Sets out the proposed policy framework to inform planning decisions on applications for large waste water infrastructure projects.

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Allocate sites and develop policies that take account of the National Policy Statement for Waste Water.

Implications for the IIA

- Include IIA objectives that relate to sustainable waste management and the protection of water quality.

DEFRA (2013): National Policy Statement for Hazardous Waste

Key objectives relevant to the Waste Local Plan

- Sets out the strategic need and justification of Government policy for the provision of national significant infrastructure for the management of hazardous waste.

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Allocate sites and develop policies that take account of the National Policy Statement for Hazardous Waste.

Implications for the IIA

- Include IIA objectives that relate to sustainable waste management which will include hazardous waste.

HM Government (2013) Waste prevention programme for England: Prevention is better than cure – The role of waste prevention in moving to a more resource efficient economy

Key objectives relevant to the Waste Local Plan

- The aim of the Programme is to:
  - Improve the environment and protect human health by supporting a resource efficient economy, reducing the quantity and impact of waste produced whilst promoting sustainable economic growth.
  - Encourage businesses to contribute to a more sustainable economy by building waste reduction into design, offering alternative business models and delivering new and improved products and services.
  - Encourage a culture of valuing resources by making it easier for people and businesses to find out how to reduce their waste, to use products for longer, repair broken items, and enable reuse of items by others.
  - Help businesses recognise and act upon potential savings through better resource efficiency and preventing waste, to realise opportunities for growth.
  - Support action by central and local government, businesses and civil society to capitalise on these opportunities.

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Policies should take account of the strategic measures in the Programme.

Implications for the IIA

- Include IIA objectives which seek to promote waste prevention.

HM Government (2009): The UK Low Carbon Transition Plan

Key objectives relevant to the Waste Local Plan

- The Plan plots how the UK will meet the 34 percent cut in emissions on 1990 levels by 2020.
- The Plan shows how reductions in the power sector and heavy industry; transport; homes and communities; workplaces and jobs; and farming, land and waste sectors could enable carbon budgets to 2022 to be met.

Key targets and indicators relevant to the Waste Local Plan

- The plan includes a 5-point Action Plan covering the following areas:
  - Protecting the public from immediate risk;
  - Preparing for the future;
  - Limiting the severity of future climate change through a new international climate agreement;
  - Building a low carbon UK;
  - Supporting individuals, communities and businesses to play their part.

Implications for the Waste Local Plan

- Plan should include policies that contribute towards achieving lower carbon emissions.

Implications for the IIA

- Objectives should reflect the aims set in the UK Low Carbon Transition Plan to reduce carbon emissions.

HM Government (2011): The Carbon Plan: Delivering our low carbon future

Key objectives relevant to the Waste Local Plan

- The Carbon Plan is a Government wide plan of action on climate change, including domestic and international activity.

Key targets and indicators relevant to the Waste Local Plan

- The plan includes a range of sectorial plans and targets including low carbon industry.

Implications for the Waste Local Plan

- Plan should include policies that contribute towards achieving lower carbon emissions such as:
  - Diverting waste from landfill by driving it up the waste hierarchy.
  - Using alternate or low emission transport options where viable.

Implications for the IIA

- Include a sustainability objective relating to reducing carbon emissions.

DECC (2009): The UK Renewable Energy Strategy

Key objectives relevant to the Waste Local Plan

- Increase our use of renewable electricity, heat and transport, and help tackle climate change.
- Build the UK low-carbon economy, promote energy security and take action against climate change.

Key targets and indicators relevant to the Waste Local Plan

- 15% of energy from renewable sources by 2020.
- Reducing UK CO2 emissions by 750 million tonnes by 2030.

Implications for the Waste Local Plan

- Ensure that site allocations and policies will support renewable energy provision including electricity, heat and transport.

Implications for the IIA

- Include a sustainability objective relating to increasing energy provided from renewable sources.

HM Government (2017) The Clean Growth Strategy

Key objectives relevant to the Waste Local Plan

- Under the Climate Change Act, the Government is required to publish a set of policies and proposals that will enable the legally binding carbon budgets, on track to the 2050 target, to be met.
- The Clean Growth Strategy sets out a range of policies and proposals, as well as possible long-term pathways for UK emissions in two ways – by decreasing emissions and by increasing economic growth.

Key targets and indicators relevant to the Waste Local Plan

- The strategy covers the fourth and fifth carbon budgets, spanning 2023-2027 and 2028-2032, by when the UK must cut its greenhouse gas emissions to 57% below 1990 levels.

Implications for the Waste Local Plan

- Plan should support renewable energy provision including electricity, heat and transport.

Implications for the IIA

- Include a sustainability objective relating to promoting energy efficiency and the use of appropriate renewable or lower carbon energy sources on site.

Environment Agency (2022): The National Flood and Coastal Erosion Risk Management Strategy for England

Key objectives relevant to the Waste Local Plan

- This Strategy sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities.
- The strategic aims and objectives of the Strategy are to:
  - "Manage the risk to people and their property;
  - Facilitate decision-making and action at the appropriate level – individual, community or local authority, river catchment, coastal cell or national;
  - Achieve environmental, social and economic benefits, consistent with the principles of sustainable development".

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Policies should seek to reduce and manage the risk of all types of flooding.

Implications for the IIA

- The IIA framework should include objectives which seek to reduce the risk and manage flooding sustainably.

DEFRA (2008) Future Water: The Government's Water Strategy for England

Key objectives relevant to the Waste Local Plan

- Sets out how the Government want the water sector to look by 2030 and an outline of the steps which need to be taken to get there.
- The vision for 2030 is one where we, as a country have:
  - "improved the quality of our water environment and the ecology it supports, and continue to maintain high standards of drinking water quality from taps;
  - Sustainably managed risks from flooding and coastal erosion, with greater understanding and more effective management of surface water;
  - Ensure a sustainable use of water resources, and implement fair, affordable and cost-reflective water charges;
  - Cut greenhouse gas emissions; and
  - Embed continuous adaptation to climate change and other pressures across the water industry and water users".

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Policies should aim to contribute to the vision set out in this Strategy.

Implications for the IIA

- Include IIA objectives which seek to protect, manage and enhance the water environment and promote water management and efficiency.

Environment Agency (2009): Water for People and the Environment: Water Resources Strategy for England and Wales

Key objectives relevant to the Waste Local Plan

- The Strategy vision for water resource “is for there to be enough water for people and the environment, meeting legitimate needs”.
- Its aims include:
  - To manage water resource and protect the water environment from climate change.
  - Restore, protect, improve and value species and habitats that depend on water.
  - To contribute to sustainable development through good water management.
  - People to understand how water and the water environment contribute to their quality of life.

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Policies should reflect the aims of the strategy where relevant.

Implications for the IIA

- Include IIA objective which seeks to promote water management and efficiency.

DEFRA (2009) Safeguarding our Soils: A Strategy for England

Key objectives relevant to the Waste Local Plan

- The vision is “by 2030, all England’s soils will be managed sustainability and degradation threats tackled successfully. This will improve the quality of England’s soils and safeguard their ability to provide essential services for future generations”.
- The Strategy highlights the areas for priority including:
  - Better protection for agricultural soils.
  - Protecting and enhancing stores of soil carbon.
  - Building the resilience of soils to a changing climate.
  - Preventing soil pollution.
  - Effective soil protection during construction and development.
  - Dealing with our legacy of contaminated land.

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Ensure that site allocations and policies will help protect and enhance the quality of soils and seek to sustainably manage their quality for future generations.

Implications for the IIA

- Include IIA objective which seeks to safeguard and enhance the quality of soil.

DEFRA (2007): The Air Quality Strategy for England, Scotland, Wales and Northern Ireland

Key objectives relevant to the Waste Local Plan

- Make sure that everyone can enjoy a level of ambient air quality in public spaces, which poses no significant risk to health or quality of life.
- Render polluting emissions harmless.

Key targets and indicators relevant to the Waste Local Plan

- Sets air quality standards for 13 air pollutants.

Implications for the Waste Local Plan

- Develop policies that aim to meet the standards.

Implications for the IIA

- Include sustainability objectives to reduce pollution and protect and improve air quality.

DEFRA Clean Air Strategy 2019

Key objectives relevant to the Waste Local Plan

- The Clean Air Strategy 2019 sets out actions to improve air quality by reducing pollution from a wide range of sources. The Clean Air Strategy informs the detailed National Air Pollution Control Programme.

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Ensure that site allocations and policies will contribute to maintaining and improving air quality.

Implications for the IIA

- Include sustainability objectives to protect and improve air quality.

DEFRA and DfT (2017): UK plan for tackling roadside nitrogen dioxide concentrations

Key objectives relevant to the Waste Local Plan

- The strategy aims to help local authorities by setting up a £225 million implementation fund, establishing a clear air fund and £100 million for retrofitting and new low emission buses.

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Ensure that site allocations and policies will contribute to maintaining and improving air quality.

Implications for the IIA

- Include sustainability objectives to protect and improve air quality.

DEFRA (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem services

Key objectives relevant to the Waste Local Plan

- The strategy aims to guide conservation efforts in England up to 2020 and move from a net biodiversity loss to gain. The strategy includes 22 priorities which include actions for the following sectors:
  - Agriculture;
  - Forestry;
  - Planning and Development;
  - Water Management;
  - Marine Management;
  - Fisheries;
  - Air Pollution; and
  - Invasive Non-Native Species.

Key targets and indicators relevant to the Waste Local Plan

- The strategy develops ambitious yet achievable goals for 2020 and 2050, based on Aichi Targets set at the Nagoya UN Biodiversity Summit in October 2010.

Implications for the Waste Local Plan

- Develop policies that promote conservation and enhancements of biodiversity and ensure that site allocations take account of the aims of the strategy.

Implications for the IIA

- Include sustainability objective that relates to biodiversity.

DoH (2010): Healthy Lives, Healthy People: our Strategy for public health in England

Key objectives relevant to the Waste Local Plan

- Protect the population from serious health threats; helping people live longer, healthier and more fulfilling lives; and improving the health of the poorest, fastest.
- Prioritise public health funding from within the overall NHS budget.

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Ensure that site allocations and policies reflect the objectives of the strategy.

Implications for the IIA

- Include a sustainability objective relating to health and well-being.

DECC (2014): Community Energy Strategy

Key objectives relevant to the Waste Local Plan

- Sets out plans to promote and facilitate the planning and development of decentralised community energy initiatives in four main types of energy activity:
  - Generating energy (electricity or heat)
  - Reducing energy use (saving energy through energy efficiency and behaviour change)
  - Managing energy (balancing supply and demand)
  - Purchasing energy (collective purchasing or switching to save money on energy)

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Ensure that site allocations and policies will support community low carbon and renewable energy provision including electricity, heat and transport.

Implications for the IIA

- Include a sustainability objective relating to increasing energy provided from decentralised low carbon and renewable sources.

HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment

Key objectives relevant to the Waste Local Plan

- The 25 Year Environment Plan sets out government action to tackle a wide range of environmental pressures.
- The 25 Year Environment Plan identifies six areas around which action will be focused. These include:
  - Using and managing land sustainably.
  - Recovering nature and enhancing the beauty of landscapes.
  - Connecting people with the environment to improve health and wellbeing.
  - Increasing resource efficiency and reducing pollution and waste.
  - Securing clean, productive and biologically diverse seas and oceans.
  - Protecting and improving the global environment.

Key targets and indicators relevant to the Waste Local Plan

- The 25 Year Environment sets out ambitious goals to manage pressures on the environment in the UK, based on England's 159 National Character Areas and monitoring indicators.

Implications for the Waste Local Plan

- Develop policies that promote conservation and enhancements of the natural environment and ensure that site allocations take account of the goals of the Environment Plan.

Implications for the IIA

- Include sustainability objective that relates to the protection of the natural environment.

HM Government (2018) Our Waste, Our Resources: A strategy for England

Key objectives relevant to the Waste Local Plan

- The Strategy sets out how the Government will preserve stocks of material resources by minimising waste, promoting resource efficiency and moving towards a circular economy.
- The strategy is framed by natural capital thinking and guided by two overarching objectives:
  - To maximise the value of resource use; and;
  - To minimise waste and its impact on the environment.

Key targets and indicators relevant to the Waste Local Plan

- The Strategy seeks to contribute to the delivery of five strategic ambitions:
  - To work towards all plastic packaging placed on the market being recyclable, reusable or compostable by 2025;
  - To work towards eliminating food waste to landfill by 2030;
  - To eliminate avoidable15 plastic waste over the lifetime of the 25 Year Environment Plan;
  - To double resource productivity by 2050; and
  - To eliminate avoidable waste of all kinds by 2050.

Implications for the Waste Local Plan

- Develop policies that promote conservation and enhancements of the natural environment and ensure that site allocations take account of the goals of the Strategy.

Implications for the IIA

- Include sustainability objective that relates to the efficient use of resources.

British Energy Security Strategy (2022)

Key objectives relevant to the Waste Local Plan

- The Strategy sets out long-term targets for offshore wind, solar, hydrogen, and nuclear energy following the onset of conflict in Ukraine.

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Ensure that site allocations and policies will support community low carbon and renewable energy provision.

Implications for the IIA

- Include sustainability objective that relates to renewable energy.

DLHC (2022) Flood risk and coastal change

Key objectives relevant to the Waste Local Plan

- This report advises how to take account of and address the risks associated with flooding and coastal change in the planning process.

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Ensure that site allocations and policies will mitigate against flood risk.

Implications for the IIA

- Include sustainability objective that relates to mitigating and managing flood risk.

Environment Agency (2022) National Flood and Coastal Erosion Risk Management Strategy for England

Key objectives relevant to the Waste Local Plan

- The strategy outlines a series of measures risk management authorities must undertake to manage flood and coastal erosion risk.

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Ensure that site allocations and policies will mitigate against flood risk.

Implications for the IIA

- Include a sustainability objective that relates to mitigating and managing flood risk.

London

The London Plan (2021)

Key objectives relevant to the Waste Local Plan

- This spatial development strategy for London sets out an integrated economic, environmental, transport and social framework for London's development. As such it has a number of key objectives (policies) it seeks to achieve on waste:
  - To reduce waste as part of establishing a circular economy.
  - To achieve and maintain sufficient waste capacity such that London achieves self-sufficiency on waste management.
  - To safeguard and retain waste sites for wate management.

Key targets and indicators relevant to the Waste Local Plan

- The three objectives (representing three distinct policies within the London Plan) contain a number of commitments for the Mayor, Mayoral Development Corporations and Local Authorities. Key targets amongst these are:
  - Ensure that there is zero biodegradable or recyclable waste to landfill by 2026.
  - Meet or exceed the municipal waste recycling target of 65 per cent by 2030.
  - Meet or exceed the targets for each of the following waste and material streams:

    a) construction and demolition – 95 per cent reuse/recycling/recovery

    b) excavation – 95 per cent beneficial use
  - The equivalent of 100 per cent of London's waste should be managed within London (i.e. net self-sufficiency) by 2026.

Implications for the Waste Local Plan

- Include objectives for new and existing waste sites to promote circular economy practices as well as for circular economy practices to be supported through other activities that support resource conservation, re-use and recycling and reductions in waste going for disposal.
- Include objectives for full net self-sufficiency for waste management for the affected area.
- Include objectives to identify compensatory waste capacity where the loss of waste sites is possible

Implications for the IIA

- The London Plan sets out a series of intentions for waste management policy, the design and operation of waste sites and the design and operation of all built developments in London. As such, it has a number of implications for the IIA on environmental, social and economic factors to be assessed. In particular, key implications from policies specifically aimed at waste policy and waste sites are to:
  - Include objectives and site assessment criteria for waste facilities to be integrated with non-waste related development and provide other local benefits.
  - Include objectives for achieving circular economy principles.
  - Include objectives for renewable energy generation.
  - Include objectives for greenhouse gas savings.
  - Include objectives for reducing impact on amenity in surrounding areas to waste sites.
  - Include objectives that support waste minimisation
  - Include objectives and site assessment criteria to ensure waste sites are developed in accessible locations.

London Environment Strategy (2022)

Key objectives relevant to the Waste Local Plan

- This strategy of the Greater London Authority has a range of environmental objectives including for London to become a ‘zero waste city’. This means that by 2026 no biodegradable or recyclable waste will be sent to landfill, and by 2030 65 per cent of London’s municipal waste will be recycled. It also aims for London boroughs, businesses and the waste industry to increase the availability of recycling facilities and services.

Key targets and indicators relevant to the Waste Local Plan

- By 2026 no biodegradable or recyclable waste will be sent to landfill.
- By 2030 65 per cent of London's municipal waste will be recycled.
- By 2030 75 per cent minimum target for business waste recycling.

Implications for the Waste Local Plan

- Ensure a net zero waste capacity.
- Develop policies that support the creation of recycling facilities.
- Develop policies in relation to waste sites that support households and commercial entities to recycle (including reuse, repair, and remanufacturing services).

Implications for the IIA

- Include objectives and sites criteria that prioritise the movement of waste up the waste hierarchy and away from landfill

Climate Action Strategy 2020-2027 (2020)

Key objectives relevant to the Waste Local Plan

- The main objective of the Climate Action Strategy is for London to become a zero-carbon city by 2050. This requires zero emissions from all transport and buildings, and any residual emissions in London to be offset.

Key targets and indicators relevant to the Waste Local Plan

- The London wide actions are:
  - 40% reduction in CO2 between 2018 and 2022
  - 50% reduction in CO2 between 2023 and 2027
  - Zero waste to landfill in 2026
  - 15% of demand for energy will be met by renewable and district heating sources
  - 60% reduction in CO2 between 2028 and 2032

Implications for the Waste Local Plan

- Consideration of policy to meet the requirement of zero waste to landfill across London by 2026.
- Consideration of policy to reduce emissions across the plan period.

Implications for the IIA

- Inclusion of a sustainability objective and site assessment criteria in relation to the reduction of CO2 and the complete diversion of waste from landfill by 2026

Local Nature Recovery Strategy (Upcoming)

8.8 The Greater London Authority is currently preparing a Local Nature Recovery Strategy for London. This is a new system of spatial biodiversity strategies that will involve all 33 of the London boroughs as well as its six neighbouring counties, including Essex. It will provide a statement of London's

strategic biodiversity priorities and a fully updated and comprehensive spatial habitat map.

8.9 The strategy is intended to be completed in 2025.

Accessible London: Achieving an Inclusive Environment Supplementary Planning Guidance (2014)

Key objectives relevant to the Waste Local Plan

- The document makes reference to the separate Housing SPG for London which requires new housing developments to make communal facilities and any storage facilities for waste and recycling to be accessible to all residents, including children and wheelchair users.

Key targets and indicators relevant to the Waste Local Plan

- No indicators or targets above those in the London Plan.

Implications for the Waste Local Plan

- Consider the inclusion of policy in relation to accessible spaces

Implications for the IIA

- Inclusion of a sustainability objective and site assessment criteria for waste sites and their accessibility.

Optimising Site Capacity: A Design-led Approach LPG (2023)

Key objectives relevant to the Waste Local Plan

- The LPG provides guidance on delivering the requirements of London Plan policies:
  - Policy D1 London's form, character and capacity for growth – Part (B3)
  - Policy D3 Optimising site capacity through the design-led approach Policy
  - D4 Delivering good design
- The design capacity approach applies to all existing site allocations as well as any new sites that come forward for development.

Key targets and indicators relevant to the Waste Local Plan

- Use of the 'Indicative Capacity Toolkit'
- Indicators within the toolkit provide additional detail in relation to the London Plan, and do not set further targets.

Implications for the Waste Local Plan

- Consideration of policy and site allocations through use of the toolkit to determine suitable capacity of development on allocated waste sites and other new waste development.

Implications for the IIA

- Inclusion of objectives relating to site capacity, green infrastructure, SuDS, accessibility and heritage

Characterisation and Growth Strategy (2023)

Key objectives relevant to the Waste Local Plan

- The Characterisation and Growth Strategy guidance provides information on how to carry out a borough or neighbourhood-wide character assessment (or study). This assessment should be used to inform a borough or neighbourhoods growth strategy, setting out how an area will change in the future. This includes identifying if and where there are locations where tall buildings may be appropriate.

Key targets and indicators relevant to the Waste Local Plan

- The Characterisation and Growth Strategy guidance relates to the implementation of London Plan polices:
  - Policy D1 London's form, character and capacity for growth
  - Policy D2 Infrastructure requirements for sustainable densities
  - Policy D3 Optimising site capacity through the design-led approach
  - Policy D9 Tall buildings
  - Policy HC1 Heritage conservation and growth
  - Policy SD9 (Part B) Town centres: Local partnerships and implementation

Implications for the Waste Local Plan

- Consideration of the location of waste sites in relation to the relevant Characterisation and Growth Study for each borough or neighbourhood.

Implications for the IIA

- Inclusion of objectives and site assessment criteria in relation to local characterisation and growth studies

Mayor of London, Air Quality Positive (2023)

Key objectives relevant to the Waste Local Plan

- The Air Quality Positive approach is a process of identifying and implementing ways to push development beyond compliance with both the Air Quality Neutral benchmarks and the minimum requirements of an air quality assessment.

Key targets and indicators relevant to the Waste Local Plan

- Maximising improvements to air quality through consideration of design and layout, transport and energy.

Implications for the Waste Local Plan

- Consideration of policy to demonstrate a holistic approach to the improvement of air quality.

Implications for the IIA

- Inclusion of objectives and site assessment criteria to minimise effects on air quality.
- Inclusion of 'in combination' assessment in relation to effects on air quality.

Greater London Authority, Air Quality Neutral (2023)

Key objectives relevant to the Waste Local Plan

- To improve air quality by a reduction in emissions from the built environment.

Key targets and indicators relevant to the Waste Local Plan

- The document sets out a range of targets in relation to the emissions from heating or cooling buildings, and the effects of any trip rates associated with an individual development proposal.

Implications for the Waste Local Plan

- Consideration of site allocations in locations where trip rates will be reduced
- Consideration of policy in relation to energy from waste

Implications for the IIA

- Inclusion of objectives and site assessment criteria in relation to the reduction of emissions from waste facilities.

- Inclusion of objectives and site assessment criteria in relation to sustainable transport.

Mayor of London, ‘Be Seen’ energy monitoring guidance (2023)

Key objectives relevant to the Waste Local Plan

- The Be Seen energy monitoring guidance sets out a process of monitoring energy performance in development from planning through to 'as built' stages.

Key targets and indicators relevant to the Waste Local Plan

- Policy SI 2 of the London Plan.

Implications for the Waste Local Plan

- Consideration of policy to implement the requirement of new waste facilities to demonstrate energy performance.

Implications for the IIA

- Inclusion of objectives in relation to energy use and reduction in emissions

Circular Economy Statements (2022)

Key objectives relevant to the Waste Local Plan

- This document provides guidance for developers on producing Circular Economy Statements for new developments in London. Developers must produce statements on waste management from development and operational waste management plans should be produced as part of the Circular Economy Statements, satisfying the London Plan and London Environment Strategy (see above)

Key targets and indicators relevant to the Waste Local Plan

- As a guidance document for producing statements that show conformity with the London Plan Policy SI7 on Circular Economy and the London Plan and London Environment Strategy (see above) more broadly, it does not contain new targets or indicators to meet.

Implications for the Waste Local Plan

- Consideration of policy in relation to the requirements and outputs of Circular Economy Statements.
- Consider the requirements of new types of waste facilities to meet demands in relation to the circular economy.

Implications for the IIA

- Inclusion of objectives in relation to the circular economy and waste minimisation.
- Inclusion of site assessment criteria in relation to waste sites needed to support the circular economy.

Energy Planning Guidance (2022)

Key objectives relevant to the Waste Local Plan

- This document provides Greater London Authority guidance on preparing energy assessments as part of planning applications. It provides some guidance for waste facilities that intend to produce fuel on maximising heat and power opportunities. The updated guidance confirms that all major developments in London must continue to meet the London Plan net zero carbon target by following the energy hierarchy (Policy SI 2), the heating hierarchy (Policy SI 3) and by maximising on-site carbon reductions.

Key targets and indicators relevant to the Waste Local Plan

- As a guidance document for producing statements that show conformity with the London Plan Policy SI7 on Circular Economy and the London Plan and London Environment Strategy (see above) more broadly, it does not contain new targets or indicators to meet.

Implications for the Waste Local Plan

- Major non-residential development is included within the scope of the guidance, including the requirement for non-carbon heating.
- Possible opportunities and demand for energy from waste facilities

Implications for the IIA

- Inclusion of objectives that take account of the requirement for carbon reduction within new waste developments

The Control of Dust and Emissions During Construction and Demolition (2014)

Key objectives relevant to the Waste Local Plan

- This document provides guidance on the control of dust and emissions during construction and demolition, responding to the requirements of the London Plan 2011. As such it does not provide new objectives relevant to the Waste Local Plan.

Key targets and indicators relevant to the Waste Local Plan

- This document provides guidance on the control of dust and emissions during construction and demolition, responding to the requirements of the London Plan 2011. As such it does not provide additional objectives relevant to the Waste Local Plan.

Implications for the Waste Local Plan

- Implications for all sites producing construction and demolitions wastes which may have an impact on waste streams

Implications for the IIA

- Include objectives for new or existing waste sites in relation to dust suppression and reduction of emissions

Whole Life-Cycle Carbon Assessments (2022)

Key objectives relevant to the Waste Local Plan

- This document provides guidance for explains how to prepare a Whole Life-Cycle Carbon (WLC) assessment in line with Policy SI2F of the London Plan 2021. As such it does not provide new objectives relevant to the Waste Local Plan.

Key targets and indicators relevant to the Waste Local Plan

- This document provides guidance for explains how to prepare a WLC assessment in line with Policy SI2F of the London Plan 2021. As such it does not provide new targets relevant to the Waste Local Plan.

Implications for the Waste Local Plan

- Consideration of WLC in relation to new or expanded waste sites.

Implications for the IIA

- Inclusion of WLC in objectives relating to climate change.

Sustainable Transport, Walking and Cycling LPG (2022)

Key objectives relevant to the Waste Local Plan

- This document provides guidance for plan-makers and developers on transport, walking and cycling in London, including the protection of planned schemes.

Key targets and indicators relevant to the Waste Local Plan

- None above the requirements of the London Plan.

Implications for the Waste Local Plan

- Consideration of the location new or expanded waste sites in relation to the effects on sustainable transport networks.

Implications for the IIA

- Inclusion of objectives and site assessment criteria relating to the impacts of waste sites on sustainable transport networks.

Urban Greening Factor (2023)

Key objectives relevant to the Waste Local Plan

- The Urban Greening Factor is a tool used to evaluate the quality and quantity of natural features proposed as part of a development application,

such as planting, waterbodies, and green roofs, collectively referred to as urban greening. This document advises developers on how to meet these requirements under London Plan Policy G5 Urban Greening.

Key targets and indicators relevant to the Waste Local Plan

- The Urban Greening Factor tool sets out design considerations in relation to the natural and built environment and provides a score in terms of meeting the aims of policy G5 of the London Plan.

Implications for the Waste Local Plan

- Consideration of the location of waste sites in relation to Sites of Importance for Nature Conservation (SINC), the Public Realm and Sustainable Drainage Systems (SuDS), as well as the potential opportunities for biodiversity in relation to roofs and facades of buildings.

Implications for the IIA

- Inclusion of objectives and site assessment criteria relating to SINCs, SuDS, and biodiversity gain.

London Sustainable Drainage Action Plan (2015)

Key objectives relevant to the Waste Local Plan

- This document is a long-term plan to coordinate the development of ‘sustainable drainage’ systems across London. The plan was developed by the Drain London Programme, a partnership of the Mayor of Londin, Environment Agency, London Councils and Thames Water. It sets out a

range of actions for each major land-use sector including major utilities. As such, it makes very brief mention of some waste management sites likely being able to deliver SuDS cost-effectively.

Key targets and indicators relevant to the Waste Local Plan

- To achieve a 1% reduction in surface water flows in the sewer network each year for 25 years, resulting in a 25% reduction in flows by 2040.

Implications for the Waste Local Plan

- Consideration of policy and site allocations in relation to sustainable drainage within a London wide context.

Implications for the IIA

- Inclusion of objectives and site assessment criteria in relation to urban drainage

Thames Estuary 2100 Plan

Key objectives relevant to the Waste Local Plan

- This document is a long-term plan to ensure the management of flood risk from the Thames. The plan was developed by the Environment Agency in partnership with others. It sets out a range of actions for landowners, regulators, developers and policy makers.

Key targets and indicators relevant to the Waste Local Plan

- Ensuring there is no inappropriate development in tidal flood risk areas

Implications for the Waste Local Plan

- Consideration of policy and site allocations in relation to minimising flood risk and contributing to flood defences along the Thames. Ensuring landowners or developers to raise or adapt flood defences as part of any planned development.

Implications for the IIA

Inclusion of objectives and site assessment criteria in relation to flood risk

River Thames Scheme (2021)

Key objectives relevant to the Waste Local Plan

- This document is a long-term plan to ensure the management of flood risk from the Thames, in Surrey and West London. The plan was developed by the Environment Agency in partnership with others. It sets out a range of actions for landowners, regulators, developers and policy makers.

Key targets and indicators relevant to the Waste Local Plan

- Ensuring there is no inappropriate development in tidal flood risk areas within East London.

Implications for the Waste Local Plan

- Consideration of policy and site allocations in relation to minimising flood risk and contributing to flood defences along the Thames. Ensuring landowners or developers to raise or adapt flood defences as part of any planned development.

Implications for the IIA

- Inclusion of objectives and site assessment criteria in relation to flood risk

Appendix B

Responses related to the IIA received in response to previous consultations

B.1 The following tables summarise the comments received in relation to the Regulation 18 IIA Report and the earlier consultation on the IIA Scoping Report. Any comments made on the Regulation 19 IIA will be considered as part of the examination of the ELJWP.

Responses to comments received in relation to the Regulation 18 ELJWP IIA Report

B.2 Only one comment was directly attributed to the IIA. Other comments that did not directly refer to the IIA but may have implications for the appraisal were e reviewed and considered in the preparation of the Regulation 19 IIA report.

Table B.1: Responses and actions to comments received on the ELJWP Regulation 18 IIA

Subject	Comment detail	LUC response
IIA Objective 10 and the Thames Estuary 2100 strategy	IIA objective 10 is too vague in considering flood risk from 'all sources' and there is no reference to the TE2100 strategy	The IIA objectives are strategic in nature. The TE2100 strategy was included as part of the Plans, Policies and Programmes review in Appendix A and was considered as part of

Subject	Comment detail	LUC response
		the formulation of the IIA objectives.

Responses from Statutory Consultees to the ELJWP Scoping Report

B.3 The following table summarises the comments received from the Environment Agency and Natural England. No responses were received from Historic England within the consultation period.

Table B.2: Responses and actions to comments received on the ELJWP Scoping Report – Natural England

Subject	Comment detail	LUC response
Epping Forest	Paragraph 3.225 mentions the Epping Forest Strategic Solution and an interim position – a finalised Governance Agreement was signed by the LPAs in January 2024 which secures a package of SAMM measures for the site moving away from the previous interim tariff.	The Scoping report has been updated to refer to and take account of the Epping Forest Governance Agreement.
Site Assessment	We agree with the comments that the potential impacts on designated sites should be considered as part of a site evaluation process	The ELJWP does not make any site allocations. More generally, the IIA has taken account of the findings of the Habitats Regulations

Appendix B Responses related to the IIA received in response to previous consultations

Subject	Comment detail	LUC response
		Assessment as appropriate.

Table B.3: Responses and actions to comments received on the ELJWP Scoping Report - Environment Agency

Subject	Comment details	LUC response
Lower Thames Flood Risk Management Strategy (LTFRMS).	The document does not mention the LTFRMS.	The LTFRMS (now the River Thames Scheme) has been reviewed and included in Appendix A.
Outdated Strategic Flood Risk Assessments (SFRAs).	SRFAs cited in the document are from 2017 and do not account for the changes in the National Planning Policy Guidance (NPPG).	The ELJWP will be prepared in accordance with the NPPF, including the latest changes in relation to flood risk. The IIA will be updated to include the most recent SFRA documents as the plan progresses.
Classification of waste treatment facilities.	The plan correctly identifies waste treatment facilities as less vulnerable and suitable for all flood zones except 3b (functional floodplain).	No action required.
Differentiation between waste treatment and hazardous waste facilities.	The document distinguishes between waste treatment and hazardous waste facilities, with the latter considered more vulnerable and suitable for Flood Zones 1 and 2, possibly 3a, subject to the exception test per NPPF.	No action required.

Appendix B Responses related to the IIA received in response to previous consultations

Subject	Comment details	LUC response
Definition of functional floodplain.	The EA suggest defining the functional floodplain as the 1 in 30-year floodplain, aligning with the Planning Policy Guidance (PPG) issued in 2022.	The IIA will refer to the latest national guidance as appropriate.
Lack of mention of Source Protection Zones (SPZs).	The document does not address SPZs for groundwater protection. It's emphasised that considering SPZs is crucial, particularly for opposing waste activities in SPZ1, such as landfills.	IIA objective 9 has been amended to refer to SPZs.
Consideration of waste transport impacts.	It's noted that the East London Waste Disposal Authority (ELWA) will soon replace its long-term waste management contract. Emphasis is placed on the importance of considering impacts from waste transport in shaping future waste management systems.	The Boroughs are communicating with ELWA in relation to changes to the contract. The IIA considers the impacts of waste transport within the baseline, IIA objectives and appraisals.
Sharing of surplus waste management capacity.	The document suggests that the sharing of surplus waste management capacity under the GLA's apportionment system could play a significant role in waste plans in other parts of London. Early dialogue with other Boroughs and involvement of relevant authorities are encouraged in	The Boroughs are undertaking a series of Duty to Cooperate activities to ensure there is appropriate communication with the GLA, other waste planning authorities and other relevant stakeholders.

Appendix B Responses related to the IIA received in response to previous consultations

Subject	Comment details	LUC response
	managing and recording this sharing.	
Minimising health risks from waste management facilities.	The focus is on reducing health risks from waste facilities through adherence to the 'agents of change' principle outlined in the London Plan. Concerns arise about the document's failure to integrate waste site considerations with nearby housing developments. Encouragement is given for engagement with housing developers and early collaboration with waste facility operators to implement mitigative measures.	The ELJWP primarily deals with new waste development, or new waste activity. The Agent of Change principle is one mechanism to help in minimising the effects of waste development on housing development. The ELJWP does not currently propose any new waste sites, and there are criteria within the policies to guide development towards suitable locations, such as industrial sites identified within local plans. JWP 4 provides additional criteria to mitigate impacts on amenity.
Incorporation of Sustainable Urban Drainage Systems (SuDS.).	SuDS are mandated in schemes to prevent development from increasing flood risk elsewhere, as outlined in paragraph 173 of the National Planning Policy Framework (NPPF). However, caution is advised regarding contamination mobilisation, requiring a risk assessment before SuDS implementation if previous site use has led to pollution of controlled waters.	The comment is noted.

Appendix B Responses related to the IIA received in response to previous consultations

Subject	Comment details	LUC response
Reference to Thames Tidal Defence system.	Uncertainty exists regarding the reference to the Thames Tidal Defence system, necessitating clarification whether it pertains to the Thames Barrier and Tidal Walls or other elements (we presume Thames Barrier). Additionally, new waste sites must maintain setbacks from tidal and fluvial flood defences, with provisions for accessing and raising defences as per the Thames Estuary 2100 plan.	The reference to the Thames Tidal Defence system has been updated. A reference to the Thames Estuary 2100 plan has been included and the document has been reviewed in Appendix A.
Identification of main flood risks.	The document appropriately identifies the primary flooding risks for each borough, encompassing surface water flooding.	No action required.
Utilisation of ELJWP to address climate change effects.	Acknowledgment is made of the ELJWP's potential to mitigate climate change effects by locating developments in low flood risk areas, aligning with the requirements of the Planning Policy Guidance (PPG) and National Planning Policy Framework (NPPF).	No action required.
Consideration of residual risk and facility safety.	The plan acknowledges residual risk and emphasises the necessity of ensuring facility safety without exacerbating flood risk	Noted.

Appendix B Responses related to the IIA received in response to previous consultations

Subject	Comment details	LUC response
	elsewhere. However, it's suggested that this aspect should be explicitly addressed beyond being an objective in the Integrated Impact Assessment (IIA) framework.	
Assessment of additional sustainability issues.	Inquiry is raised regarding the inclusion of other pertinent sustainability issues in Chapter 3 of the ELJWP – no comments raised from the Environment Agency.	No action required.
Appropriateness of the Integrated Impact Assessment (IIA) framework and objectives.	Evaluation is needed on whether the IIA framework in Chapter 4 adequately covers relevant objectives within the Waste Plan's scope.	The IIA framework aligns with the London Plan, and the scope of the ELJWP.
Lack of mention of mitigation or resilience for developments in Flood Zone 3.	Although IIA Objective 10 implies ensuring safety throughout the facilities' lifetime amid climate change considerations, there's no explicit mention of mitigation or resilience strategies for developments in Flood Zone 3, contingent upon the Exception test and permissible development.	Any sites that come forward for development would be subject to the sequential tests within national policy for flood risk.

Appendix C

Baseline

C.1 Baseline information provides the basis for predicting and monitoring the likely sustainability effects of a plan and helps to identify key sustainability issues.

C.2 Schedule 2 of the SEA Regulations requires information to be provided on:

- The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.
- The environmental characteristics of areas likely to be significantly affected.
- Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds and the Habitats Directive [92/43/EEC].

C.3 The environmental, social and economic baseline for the East London Joint Waste Plan (ELJWP) is organised under the following topic headers:

- Waste
- Climate change, adaptation and mitigation
- Population, health and wellbeing
- Economy
- Transport
- Historic environment
- Landscape and townscape
- Biodiversity

- Air, land and water quality

C.4 Analysis of baseline information and the policy context has informed identification of sustainability issues facing Barking and Dagenham, Havering, Newham and Redbridge Boroughs that are of relevance to the ELJWP, in line with the requirements of Schedule 2 of the SEA Regulations. The key sustainability issues that have been identified are set out underneath each baseline topic section, along with an outline of their relevance, i.e. how the Plan could avoid exacerbating these issues or help to solve them.

C.5 Maps illustrating the spatial dimension of some of the baseline conditions are described below are presented at the end of this chapter.

Waste

Policy Context

The London Plan

C.6 The London Plan 2021 states that London should manage the equivalent of London's waste within its boundaries, aiming to achieve waste net self-sufficiency by 2026 in all waste streams except for excavation waste. To meet this aim, the Plan requires boroughs to:

- Plan for identified waste needs;
- Identify how waste will be reduced, in line with the principles of the Circular Economy and how remaining quantum's of waste will be managed; and,
- Allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste, and tonnages of waste not apportioned by the London Plan.

C.7 The London Plan also sets out management targets for waste generated in London in Policy SI 7 Reducing waste and supporting the circular economy as follows:

- Ensure that there is zero biodegradable or recyclable waste to landfill by 2026;
- Meet or exceed the municipal waste recycling target of 65 per cent by 2030 **[See reference** 23**]**;
- Meet or exceed the targets for each of the following waste and material streams:
  - Construction and demolition – 95 per cent reuse/recycling/recovery; and,
  - Excavation – 95 per cent beneficial use **[See reference** 24**]**.

C.8 In addition, in connection with hazardous waste management capacity Paragraph 9.8.18 of the London Plan identifies "...a need to continue to identify hazardous waste capacity for London."

Waste Streams

Current baseline information

C.9 Information within this section is taken from the ELJWP evidence base 2024/5 **[See reference** 25**]**. Future iterations of the IIA will be updated in line with the emerging evidence for the new ELJWP.

C.10 The exercise has not been applied to Household, Industrial and Commercial (HIC) **[See reference** 26**]** waste tonnages because the London Plan apportionments already determine the minimum tonnage of this waste type for which the ELJWP is to provide management capacity. The types of capacity considered to count towards the management of apportioned waste (hereinafter

referred to as "qualifying capacity") is defined in Paragraph 9.8.4 of the London Plan **[See reference 27]** as follows:

- Energy recovery in London;
- Production of solid recovered fuel (SRF) and refuse derived fuel (RDF) in London;
- Sorting or bulking for re-use or recycling including anaerobic digestion. The reuse or recycling may take place within or outside London providing the sorting and bulking capacity is located within London; and
- Reuse or recycling including anaerobic digestion within London.

Waste arisings

C.11 The London Plan sets out both waste arising forecasts and apportionments for the management of HIC waste for each borough. The combined apportionment for East London is significantly higher than the area's projected arisings of HIC waste, so the London Plan envisages that East London would be a major contributor to London's target of net self-sufficiency by 2026. The estimated arisings and forecasts of HIC waste for the East London Boroughs are set out below.

Table C.1: Comparison of estimated arisings and apportionments for the East London Boroughs (thousand tonnes)

London Borough	Waste Arising 2021	Waste Arising 2041	Apportionment 2021	Apportionment 2041
Barking and Dagenham	214	230	505	537
Havering	229	249	370	393
Newham	244	260	383	407

London Borough	Waste Arising 2021	Waste Arising 2041	Apportionment 2021	Apportionment 2041
Redbridge	196	216	151	160
Total	883	955	1,409	1,497

Net Self Sufficiency Balance

C.12 Table C.2 shows the tonnages of waste attributed to East London in the Environment Agency WDI 2022 and managed at permitted facilities within East London.

Table C.2: Tonnages of East London arisings managed inside and outside East London

East London Waste	Tonnes
Waste managed inside East London	931,768
Waste managed outside of East London	859,030
Total	1,790,798

C.13 Table C.3 shows the amount of waste managed within East London and the split between East London waste and waste imported from outside of the plan area to be managed in East London

Table C.3: Amount of waste managed within East London by origin

Origin of waste	Tonnes
East London waste managed in East London	931,768

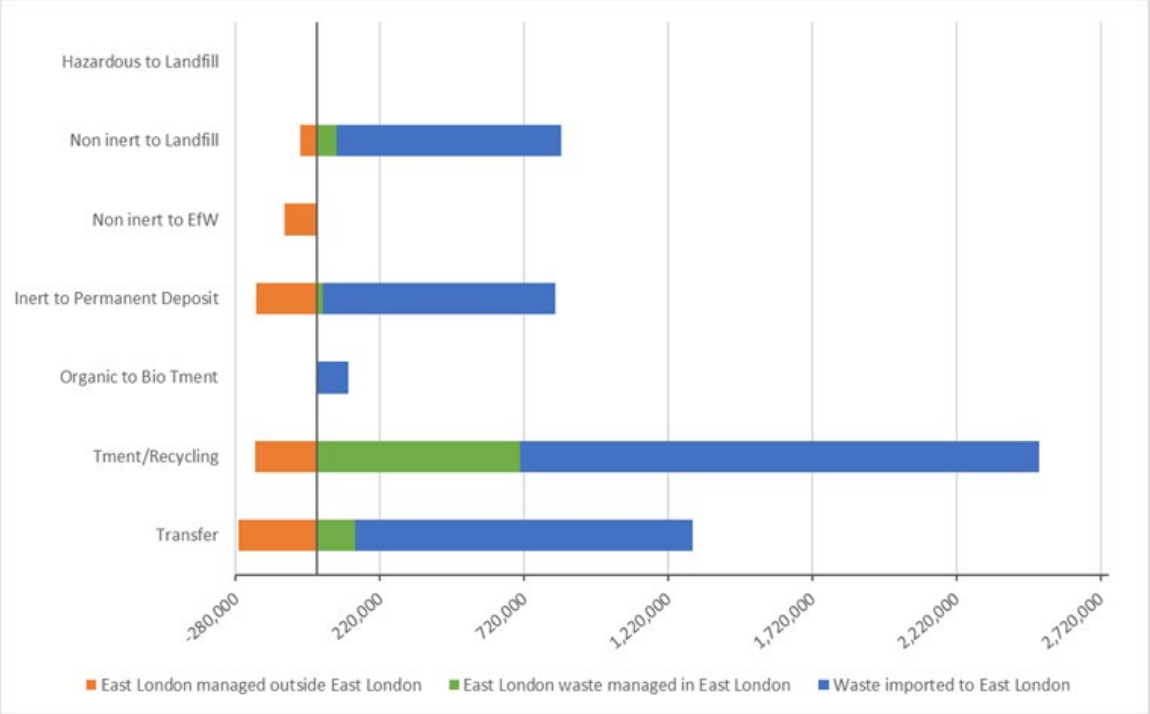
Origin of waste	Tonnes
Waste imported to East London	4,671,537
Total managed within East London	5,603,305

C.14 As set out in the table above, it is estimated that of the c1.79 million tonnes of waste produced in East London in 2022:

- 0.93 million tonnes was managed at permitted facilities located within East London;
- 0.86 M tonnes was managed outside of East London; and
- 4.67 million tonnes of waste was imported into East London permitted facilities.

C.15 From this snapshot, it is clear that East London provides for the management of greater imports of waste than it exports to other areas. **Figure C.1** displays the balance between imports and exports by waste management method and waste type. It should be noted that the data is a snapshot of a single year (2022). It only includes waste managed at permitted sites in England and does not include any waste exported to Wales, Scotland or further afield as this is not reported in the WDI. It is not necessarily a true representation of net - self-sufficiency as actual inputs to facilities in 2022 may not be reflective of potential capacity of sites operating in East London (as in most cases inputs will be lower than actual site capacity).

Figure C.1: Imports and exports in East London by waste type



Construction, demolition and excavation waste current baseline

C.16 C, D & E waste comprises waste arising from the construction and demolition industries, including excavation during construction activities, and is made up of mainly inert materials such as soils, stone, concrete, brick and tile. However, there are also non-inert elements in this waste stream such as wood, metals, plastics, cardboard, and residual household-like wastes. Hazardous waste are also present particularly when development takes place on brownfield sites that have been affected by historical contamination. Due to their weight, the inert elements make up the majority of the total tonnage.

C.17 Different types of C, D & E waste require different forms of management. For example, hard inert materials (such as concrete, brick and road planings arising from demolition and road maintenance) can be recycled for use as an aggregate, while soft materials such as soils and sub-soils can be deposited on

land for beneficial purposes such as the restoration of minerals workings and in other engineering projects. The non-inert component includes timber, plasterboard and plastics may be recycled if separated. Ultimately there is very little C, D & E waste that cannot be recycled or recovered in some other way.

C.18 Soft inert excavation material may be deposited on land for beneficial purposes which may be consented as non-waste development and, either subject to an Environmental Permit as a recovery to land operation or managed under the CL:AIRE definition of waste protocol. If the latter case applies, the material managed through this route is not classed as waste.

C.19 The London Plan does not apportion quantities of C, D & E waste for management, but boroughs are still required to plan for this waste stream.

C.20 The production of C, D & E waste is influenced by large-scale infrastructure projects, as well as commercial and residential developments, which means that peaks and troughs in its production are often observed with arisings not following a regular pattern. Given it is a bulky and heavy waste type it does not tend to travel significant distances from source for management.

Table C.4: Estimated Non-Hazardous C,D&E waste baseline arisings in East London

Waste Stream	Inert	Non-inert	Total
C&D	345,495	449,507	795,002
Excavation	1,397,953	10,627	1,408,589
Total	1,743,448	460,134	2,203,591

Waste management routes

Table C.5: East London's Non-hazardous C&D waste management routes (2023)

Waste Type	Recycling	Recovery	Landfill	Transfer	Mobile Plant
Inert	41%	1%	<1%	4%	0%
Non-inert	28%	2%	<1%	23%	0%
Sub-total	69%	3%	1%	27%	0%

Table C.6: East London Non-Hazardous Excavation Waste Management Routes (2023)

Waste Type	Recycling	Recovery	Landfill	Transfer	Mobile Plant
Inert	30%	44%	0%	25%	1%
Non-inert	<1%	0%	<1%	0%	0%
Sub-total	30%	44%	<1%	25%	1%

C.21 To summarise the management profile for non-hazardous C& D waste is as set out below:

- 69% was managed at recycling facilities;
- 3% was recovered (either through incineration or recovery to land);
- 1% was disposed at permitted landfills;
- 27% was managed at intermediate sites and transferred on for recovery or disposal; and
- 0% was managed via mobile plant (normally for recycling or reuse).

C.22 The management profile for non-hazardous excavation waste is as set out below:

- 30% was managed at recycling facilities;
- 44% was recovered (either through incineration or recovery to land and use in restoration/ backfilling on permitted landfills);
- <1% was managed at permitted landfills;
- 25% was managed at intermediate sites and transferred on for recovery or disposal); and
- 1% was managed via mobile plant (normally for recycling or reuse).

C.23 This compares with the following targets set in the London Plan for C, D & E waste generated in London in Policy SI 7 Reducing waste and supporting the circular economy:

- Meet or exceed the targets for each of the following waste and material streams:
  - Construction and demolition – 95% reuse/recycling/recovery;
  - Excavation – 95% beneficial use overall and 100% of inert excavation beneficially used.

C.24 The management profile for non-hazardous C& D waste managed at permitted facilities reporting through the WDI is as set out below:

- At least 72% was managed through recycling or recovery;
- With less than 1% disposed at permitted landfills; and
- 27% transferred on for recovery or disposal.

C.25 It should be noted that waste going for reuse may not be managed through permitted sites, plus a substantial amount of the fraction of C&D waste that constitutes hardcore may be managed on the site of production and converted into recycled aggregate either used on site or sold offsite. Therefor the recycled value is taken to be a minimum.

C.26 The management profile for non-hazardous excavation waste is as set out below:

- At least 74% was managed through recycling or recovery (inc mobile plant);
- With <1% disposed at permitted landfills; and
- 25% transferred on for recovery or disposal. Given that disposal would only be to landfill, and backfilling of mineral workings and other uses would be classed as recovery, it is considered highly unlikely that the inert fraction of this stream would actually end up being disposed of.

C.27 The updated East London Capacity Assessment shows that there is more than sufficient consented/permitted management capacity within East London for the London Plan targets for C & D waste to be met. The above management profile is simply a function of the market at the time data was analysed.

C.28 With regards to excavation waste, the capacity assessment found there was a predicted shortfall in management capacity as currently consented. However the London Plan does not expect this waste to be managed within the confines of London.

C.29 The updated East London Capacity Assessment shows that there is more than sufficient consented/permitted capacity within East London for the total tonnage of apportioned HIC waste within the London Plan to be managed in accordance with the qualifying capacity stipulation.

Duty to Cooperate

C.30 Waste is a strategic cross-boundary issue and is subject to the duty to co-operate. In the case of waste, the duty to cooperate is a mechanism for waste planning authorities (WPAs) to engage with each other on waste movements between their plan areas so that waste streams are provided for.

C.31 The following guideline tonnages in relation to the Duty to Cooperate have been agreed by the London Waste Planning Forum (LWPF), South East Waste Planning Advisory Group (SEWPAG) and the East of England Waste Technical Advisory Board (EoEWTAB). The guideline tonnages per annum (tpa) are:

- 5,000 tpa non-hazardous waste (LACW and C&I).
- 10,000 tpa inert waste (C,D&E).
- 100 tpa hazardous waste.

Projected baseline information

C.32 The London Plan sets out both waste arising forecasts and apportionments for each borough. The combined apportionments for East London are significantly higher than the area's projected arisings. The London Plan anticipates that East London could be a major contributor to London's target of net self-sufficiency by 2026, for the HIC waste stream in particular.

Waste sites

Current baseline information

C.33 There are a range of waste management facilities distributed throughout the four boroughs within the ELJWP area that support the movement of waste up the waste hierarchy. Facilities are shown in Figure 4 of the Regulation 19 ELJWP.

C.34 Waste has historically been transported by road and river into, out of and across London and this is likely to continue based on the established network of waste management facilities. However, this activity risks contributing to amenity impacts such as noise and dust; exacerbating levels of air pollution; and increasing traffic congestion, highway maintenance and safety concerns. The haulage of waste by way of conventional, fossil-fuel powered vehicles is also a

significant contributor to the local waste management sector's greenhouse gas emissions.

Projected baseline information

C.35 There is currently a surplus of supply of capacity across the ELJWP area to meet the Plan area's identified need and the apportionment of HIC waste from the London Plan, as set out in the updated evidence prepared in support of the update to the ELJWP **[See reference** 28**]**. This may provide additional capacity to meet the needs of other areas of London in the future, or there may enable release of certain existing waste sites over the plan period.

Implications for health

C.36 The provision of a network of well managed waste management facilities can ensure that impacts on health (through noise, odour, pollution and transport movements) are minimised and appropriately distributed.

Key sustainability issues and opportunities for the ELWJP to address them

C.37 Other than through policy relating to new development (and associated C,D&E waste production) the ELJWP will have limited influence on the amount of waste that is generated and needs to be managed each year. A key role of the ELJWP could be to ensure that where waste is unavoidable, it is managed in an efficient and sustainable manner, by employing the 'waste hierarchy'. In addition, the ELJWP could support the further evolution of the four Boroughs waste infrastructure network to the most sustainable locations, where the opportunity arises. Policies could also support the most efficient and appropriate freight routes, and an accelerated transition to low and zero carbon alternatives to conventional fossil-fuel based road freight. Furthermore, opportunities to

utilise efficient and more sustainable modes of transport could be promoted to achieve maximum diversion of waste away from road haulage.

Climate change adaptation and mitigation

Climate change predictions

Current baseline information

C.38 Climate change presents a global risk, with a range of different social, economic and environmental impacts that are likely to be felt within the plan area across numerous receptors. A key challenge in protecting the environment will be to tackle the causes and consequences of climate change: warmer, drier summers and wetter winters with more severe weather events all year, higher sea levels and increased river flooding. A strong reaction is required from planning to ensure appropriate action can be taken to help species and habitats adapt and to enable the agricultural sector to continue to deliver diverse, affordable and good quality produce.

C.39 There has been a general trend towards warmer average temperatures in recent years with the most recent decade (2012–2021) being on average 0.2°C warmer than the 1991–2020 average and 1.0°C warmer than 1961–1990. All the top ten warmest years for the UK in the series from 1884 have occurred this century **[See reference** 29**]**.

C.40 Heavy rainfall and flooding events have been demonstrated to have increased potential to occur in the UK as the climate has generally become wetter. For example, for the most recent decade (2012–2021) UK summers

have been on average 6% wetter than 1991–2020 and 15% wetter than 1961–1990 **[See reference** 30**]**.

C.41 The Intergovernmental Panel on Climate Change (IPCC) special report on global warming outlines that, under emissions in line with current pledges under the Paris Agreement, global warming is expected to surpass 1.5ºC, even if these pledges are supplemented with very challenging increases in the scale and ambition of mitigation after 2030. This increased action would need to achieve net zero CO2 emissions in less than 15 years **[See reference** 31**]**.

C.42 In December 2018, the London Assembly declared a climate emergency, and called on the Mayor of London to do likewise and put in place specific emergency plans so that London is carbon neutral by 2030 **[See reference** 32**]**. The Mayor declared a climate emergency shortly after the Assembly and set a target for London to be net zero-carbon by 2030.

C.43 London Borough Barking and Dagenham declared a climate emergency in 2019 **[See reference** 33**]**. London Borough of Havering declared a climate and ecological emergency in 2023 **[See reference** 34**]**. London Borough of Newham declared a climate emergency in 2019 **[See reference** 35**]**. London Borough of Redbridge have an action plan to be carbon neutral by 2030 and carbon zero by 2050 **[See reference** 36**]**.

Projected baseline information

C.44 UK Climate Projections 18 (UKCP18) for London identify the following main changes (relative to 1981-2000) to the climate by the end of the plan period (2038) **[See reference** 37**]**:

- Increase in mean winter temperature by 0.9°C;
- Increase in mean summer temperature by 1.3°C;
- Increase in mean winter precipitation by 8%; and
- Decrease in mean summer precipitation by -9%.

C.45 The UK Climate Risk Independent Assessment (CCEA3) identifies likely trends from climate change and sets out 61 specific risks and opportunities to the UK from climate change, including the following **[See reference** 38**]**:

Risks

- The number of incidents of food poisoning, heat stress and heat related deaths may increase in summer.
- Domestic energy use may increase during summer months as refrigeration and air conditioning demand increases.
- Wetter winters and more intense rainfall events throughout the year may result in a higher risk of flooding from rivers.
- More intense rainstorms may in some locations result in the amount of surface water runoff exceeding the capacity of drainage systems, consequently leading to more frequent and severe localised flash flooding.
- More frequent storms and floods may cause increased damage to property and infrastructure, resulting in significant economic costs.
- Periods of drought in summer could lead to soil shrinking and subsidence, causing damage to buildings and transport networks. Drought may also impact negatively on agriculture, industry and biodiversity.
- Warmer and drier summers are likely to affect the quantity and quality of water supply, which will need careful management.
- The changing climate will impact on the behaviour and distribution of species and may encourage the spread of invasive species.

Opportunities

- Milder winters should reduce the costs of heating homes and other buildings, helping to alleviate fuel poverty and reducing the number of winter deaths from cold.

- Domestic energy use may decrease in winter due to higher temperatures.
- Warmer and drier summers may benefit the recreation and tourism economy.

Emissions and energy

Current baseline information

C.46 Carbon Dioxide (CO2) is the main greenhouse gas, accounting for about 80% of the UK greenhouse gas emissions. Emissions are produced when fossil fuels such as coal or gas are burnt or processed. In recent years, increasing emphasis has been placed on the role of regional bodies and local government in contributing to energy efficiency improvements, and hence reductions in carbon dioxide emissions. In line with the wider UK, London has seen a decrease in CO2 emissions in recent years. One of the main drivers for reduced levels of emissions has been a decrease in the use of coal for electricity generation, accounting for a decrease in emissions for domestic electricity.

C.47 The Government regularly publishes local authority and regional carbon dioxide emissions national statistics **[See reference** 39**]**. The statistics are largely consistent with the UK national Greenhouse Gas Inventory and with the Devolved Administration Greenhouse Gas Inventories. In London, CO2 emissions have fallen from 6.2 tonnes (t) per capita to 3.2t per capita (equivalent to a 52% reduction) from 2005 to 2019. Emissions in each of the four London Boroughs are like those of London, falling steadily over the same period as demonstrated in **Table C.7** (Total Emissions) and **Table C.8** (Per Capita Emissions). It should be noted the figures in **Table C.7 [See reference** 40**]** and **Table C**.8 **[See reference** 41**]** do not account for Land Use, Land Use Change and Forestry (LULUCF) figures. In 2020, LULUCF accounted for -60.8 kilotons (Kt) CO2 emissions in London.

Table C.7: CO2 emissions estimates in the ELJWP area 2005-2019 (Kt)

Year	Barking and Dagenham	Havering	Newham	Redbridge
2005	935.7	1,320.9	1,471.7	1,147.4
2006	943.1	1,334.8	1,576.2	1,141.5
2007	931.5	1,276.9	1,554.4	1,117.2
2008	907.6	1,258.3	1,561.2	1,091.2
2009	825.1	1,164.4	1,495.4	1,018.6
2010	895.3	1,245.0	1,574.7	1,080.8
2011	811.5	1,125.2	1,464.8	1,008.5
2012	848.0	1,178.2	1,499.1	1,061.2
2013	816.0	1,158.2	1,481.9	1,025.0
2014	715.5	1,046.3	1,299.9	918.8
2015	685.8	1,025.5	1,242.1	889.4
2016	633.3	992.6	1,163.1	859.2
2017	605.2	958.8	1,091.6	820.7
2018	590.3	963.6	1,066.3	823.6
2019	563.6	926.6	1,021.0	790.4

Table C.8: CO2 emissions estimates in the ELJWP area (Kt per capita)

Year	Barking and Dagenham	Havering	Newham	Redbridge
2005	5.6	5.8	5.8	4.6

Year	Barking and Dagenham	Havering	Newham	Redbridge
2006	5.6	5.8	6.1	4.5
2007	5.5	5.6	5.8	4.3
2008	5.3	5.4	5.6	4.1
2009	4.6	5.0	5.2	3.8
2010	4.9	5.3	5.3	3.9
2011	4.3	4.7	4.7	3.6
2012	4.4	4.9	4.7	3.7
2013	4.2	4.8	4.6	3.5
2014	3.6	4.3	4.0	3.1
2015	3.4	4.1	3.7	3.0
2016	3.0	3.9	3.4	2.9
2017	2.9	3.7	3.1	2.7
2018	2.8	3.7	3.0	2.7
2019	2.6	3.6	2.9	2.6

C.48 The Department for Business, Energy & Industrial Strategy (now split into Department for Business and Trade, the Department for Energy Security and Net Zero, and the Department for Science, Innovation and Technology) produced the following consumption figures for the East London Joint Waste Plan area in 2020 **[See reference** 42**]**

- **Coal** – a total of 3.3 kilo tonnes of oil equivalent (ktoe) predominantly through domestic use;
- **Manufactured fuels** – a total of 4.3ktoe predominantly through domestic use;
- **Petroleum** – a total of 2,639.3ktoe predominantly through road transport;
- **Gas** – a total of 5,302.5ktoe predominantly through domestic use;

- **Electricity** – a total of 2,940.2ktoe predominantly through industrial and commercial use; and,
- **Bioenergy and wastes** – a total of 156.2ktoe, predominantly through road transport.

C.49 Between 2005 and 2020 the total reported energy consumption for London fell from 338.7 to 291.3ktoe. The changes in consumption by energy type are shown in **Table C.9**.

Table C.9: Energy Consumption in London by type 2005-2020

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2020)
Coal	4.5	3.3
Manufactured fuels	5.6	4.3
Petroleum	3,225.1	2,639.3
Gas	6,865.8	5,302.5
Electricity	3,562.8	2,940.2
Bioenergy and wastes	18.2	156.2
Total	13,682	11,385.8

Table C.10: Energy Consumption in Barking and Dagenham 2005-2020

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2020)
Coal	0.2	0.1
Manufactured fuels	0.1	0.1
Petroleum	72.1	65.3

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2020)
Gas	113.2	87.4
Electricity	67.4	48.5
Bioenergy and wastes	0.4	3.4
Total	253.4	204.8

Table C.11: Energy Consumption in Havering by type 2005-2020

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2020)
Coal	0.1	0.1
Manufactured fuels	0.2	0.2
Petroleum	132.0	128.7
Gas	183.4	143.0
Electricity	75.9	64.7
Bioenergy and wastes	0.4	7.6
Total	392.0	344.3

Table C.12: Energy Consumption in Newham by type 2005-2020

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2020)
Coal	0.1	0.1
Manufactured fuels	0.2	0.1
Petroleum	100.4	86.2
Gas	242.8	176.8

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2020)
Electricity	92.9	108.2
Bioenergy and wastes	0.3	4.7
Total	436.7	376.1

Table C.13: Energy Consumption in Redbridge by type 2005-2020

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2020)
Coal	0.1	0.1
Manufactured fuels	0.1	0.1
Petroleum	105.1	96.2
Gas	187.9	151.1
Electricity	64.5	53.9
Bioenergy and wastes	0.3	5.3
Total	358.0	306.7

Projected baseline information

C.50 The Tyndall Centre for Climate Change Research has undertaken work to calculate the 'fair' contribution of local authorities towards the Paris Climate Change Agreement. Based on the analysis undertaken the following recommendations have been made for London **[See reference** 43**]**:

- Stay within a maximum cumulative carbon dioxide emissions budget of 203.5 million tonnes ($MtCO_2$) for the period of 2020 to 2100. At 2017 CO2 emission levels, London would use this entire budget within 7 years from 2020.

- Initiate an immediate programme of CO2 mitigation to deliver cuts in emissions averaging a minimum of -12.2% per year to deliver a Paris aligned carbon budget. These annual reductions in emissions require national and local action, and could be part of a wider collaboration with other local authorities.
- Reach zero or near zero carbon no later than 2043. This report provides an indicative CO2 reduction pathway that stays within the recommended maximum carbon budget of 203.5 MtCO2. At 2043 5% of the budget remains. This represents very low levels of residual CO2 emissions by this time, or the Authority may opt to forgo these residual emissions and cut emissions to zero at this point. Earlier years for reaching zero CO2 emissions are also within the recommended budget, provided that interim budgets with lower cumulative CO2 emissions are also adopted.

C.51 Given the trends in carbon emissions and energy consumption at both national and local level, carbon emissions in London, and each of the four London Boroughs within the ELJWP area, are likely to continue declining.

Road travel and associated energy consumption

Current baseline information

C.52 CO2 emissions in the UK are provisionally estimated to have increased by 6.3% in 2021 from 2020, to 341.5 million tonnes (Mt), however compared to 2019, the most recent pre-pandemic year, 2021 CO2 emissions are down 5.0% **[See reference** 44**]**. This increase in 2021 is primarily due to the increase in the use of road transport as nationwide lockdowns were eased, along with increases in emissions from power stations and the residential sector. CO2 emissions from transport rose 10.0% in 2021, accounting for almost half of the overall increase from 2020 **[See reference** 45**]**.

C.53 Road transport accounts for more than half of oil demand in the UK and relies on petrol and diesel to meet around 98% cent of its energy needs. This has implications for carbon emissions considering the regular need to travel for both residents and those undertaking business.

C.54 The overall road energy consumption in Inner London decreased between 2005 and 2021 from 999t of equivalent oil (ktoe) to 683.2ktoe. This change was most influenced by the decreasing energy consumption for personal road travel which fell during this period from 765.9ktoe to 487.3ktoe. During this period energy consumption recorded in Inner London for freight uses declined from 233.2ktoe to 195.9ktoe **[See reference** 46**]**.

C.55 The overall road energy consumption in Outer London decreased between 2005 and 2021 from 1,798.1t of equivalent oil (ktoe) to 1621.6ktoe. This change was most influenced by the decreasing energy consumption for personal road travel which fell during this period from 1,374.4ktoe to 1,147.1ktoe. During this period energy consumption recorded in Inner London for freight uses rose slightly from 423.6ktoe to 474.5ktoe **[See reference** 47**]**.

C.56 Recent trends across the UK indicate that diesel consumption excluding biodiesel fell in 2018 for the first time since 2009. The trend is due in part to a slowing of growth in the diesel vehicle fleet following sharp drops in new registrations as well as increased efficiencies. It is expected that the UK will diversify in road transport to include more electric and ultra-low emissions vehicles in the coming years **[See reference** 48**]**. The Ultra Low Emission Zones (ULEZ) in London and across the UK are expected to continue to drive down emissions from the most polluting vehicles.

C.57 The ELJWP area benefits from good transport and connectivity to the central and Greater London, Essex, Thurrock, further afield to Hertfordshire and Cambridgeshire to the north. There is a significant road transport network across the area, including the A12, A13, A1020 and the A406, with easy access to the M25 and M11.

Projected baseline information

C.58 Growth in traffic levels may occur in London because of projected population growth and associated development needs. The UK Government aims to ban the sale of new petrol and diesel cars by 2030 **[See reference** 49**]** which will significantly cut carbon emissions across the UK. While the full effect of this will not be seen immediately as people continue to use their existing vehicles, the market share of electric cars in the UK is already significant and likely to continue growing rapidly**.**

Renewable and low carbon energy constraints and opportunities

Current baseline information

C.59 Published as part of the National Statistics publication Energy Trends produced by the Department for Business, Energy and Industrial Strategy (now by Department for Energy Security and Net Zero, Department for Science, Innovation and Technology, and Department for Business and Trade), data concerning renewable electricity generation, capacity and number of sites is available at Borough level between 2014 and 2021 **[See reference** 50**]**.

- In Barking and Dagenham capacity increased from 2.6 MW in 2014 to 11.9 MW in 2022, providing 6,668 MWh of electricity generation in 2022.
- In Havering capacity increased from 41.4 MW in 2014 to 49.7 MW in 2022, providing 129,870 MWh of electricity generation in 2022.
- In Newham capacity increased from 21.4 MW in 2014 to 44.0 MW in 2022, providing 41,824 MWh of electricity generation in 2022.
- In Redbridge capacity increased from 1.6 MW in 2014 to 6.0 MW in 2022, providing 4,730 MWh of electricity generation in 2022.

Projected baseline information

C.60 It is clear from existing trends that East London is significantly increasing its capacity to generate renewable and low carbon sources of energy, with scope to increase capacity further across of a range of technology types. If capacity continues to increase over the medium to long term, energy generation is also likely to significantly increase. Further renewable energy development may be constrained by lack of capacity in the national grid, currently affecting West London, and constraints on development within urban areas.

Flood risk

Current baseline information

C.61 The UK Climate Projections (UKCP18) predicts that by 2070, under a high emission scenario, average winter precipitation is projected to increase, whilst average summer rainfall is projected to decrease. Although summer rainfall is projected to decrease, there will be an increased frequency of short-lived high intensity showers **[See reference** 51**]**.

C.62 All areas within the ELJWP will become more vulnerable to fluvial flooding, water supply deficiencies, as the local climate continues to change. The Thames Tidal Defences provides some protection to the ELJWP area. A network of tidal flood defences provides a very high standard of protection in the Thames Estuary. The network includes:

- 330 kilometres (km) of walls and embankments;
- 9 major barriers and gates, including the Thames Barrier; and
- over 400 other structures (including flood gates, outfalls and pumps).

C.63 Figure C.2 at the end of this chapter illustrates the main areas of flood risk across the ELJWP area.

C.64 Local flood risk assessments are summarised for each borough below:

- Barking and Dagenham: Following the 2007 nation-wide flood events, more consideration is being given to potential risks from surface water, groundwater and sewerage, however the key source of flood risk is fluvial and tidal flooding from the River Thames. The local flood management strategy seeks to manage those risks, working with other statutory and non-statutory partners, and raising awareness in local communities **[See reference** 52**]**.
- Havering: Within Havering, the main areas of flood risk are tidal and fluvial, and generally limited to the southern part of the borough. Flood risk is concentrated around the River Thames, the River Beam and the Ingrebourne and their tributaries **[See reference** 53**]**.
- Newham: Historic flooding within Newham has related to the Thames, the River Lea and the River Roding. Newham shares a boundary with the Thames to the south, and the greatest risk is from tidal surges occurring at high tides, or fluvial flooding in the upper catchment. **[See reference** 54**]**
- Redbridge: Within Redbridge, the main sources of flood risk are surface water flooding and fluvial flooding from the River Roding, the Cran Brook and Seven Kings water. The River Thames has a tidal effect on the River Roding **[See reference** 55**]**.

Projected baseline information

C.65 As previously outlined in the ‘climate change predictions’ section of this chapter, the climate in London is expected to change, presenting a series of risks. These include wetter winters, more intense rainfall events and more frequent storms and floods, leading to increased damage to property and infrastructure and significant economic costs. The Environment Agency has provided ‘local flood risk assessments: climate change allowances’ **[See reference** 56**]** indicating climate change impacts on peak rainfall intensity and peak river flows.

C.66 Due to the geography of London and the proximity to the River Thames, flooding (including flash, fluvial and tidal flooding) is one of the greatest risks to the East London Boroughs from climate change. Climate change will likely result in sea level rise which could lead to more frequent flooding in the ELJWP area and impact communities, businesses and local authority services. Additionally, incidences of heavy rainfall are expected to continue to rise and will present challenges in terms of drainage and flood risk.

Implications for health

C.67 Climate change has potential for substantial implications on human health, including:

- Disruption to health, social care and emergency management services and schools provision, from flooding, heatwaves and storms.
- Flooding poses multiple risks to people's health, such as heart attacks, trauma, an increase in waterborne infectious diseases, and common mental and post-traumatic stress disorders. Damp housing and damage to water and sanitation infrastructure can further reinforce the adverse effects on health.
- Climate change may bring increases in both cold weather excess mortality and heat-related deaths and illness occurring in the summer. Excess heat represents a serious threat for the entire population, but the elderly and small children, and people with pre-existing cardiovascular, respiratory and renal diseases, diabetes and neurological disorders, are more susceptible. Urban areas tend to be at greater risk due to the "urban heat island" effect. The number of excess deaths in England resulting from heatwaves (excluding COVID-19) in 2022 was 2,803 for those aged 65 and over. Cumulative excess deaths resulting from heatwaves in summer 2022 was the highest recorded on record since the heatwave plan for England was introduced in 2004 **[See reference** 57**]**.
- Cases of food poisoning in the UK that are linked to warm weather have been increasing rapidly.
- Wildfire likelihood and severity set to increase due to climate change.

- The likely increase in occurrence of severe winter gales is a cause for concern. Deaths during severe gales are commonplace, as are severe injuries. The likely loss of electrical power supplies during severe storms adds very significantly to these problems. Better forecasting of gales and better design and more frequent exercising of disaster plans may well help to mitigate the worst effects.

Key sustainability issues and opportunities for the ELJWP to address them

C.68 There is a need to significantly reduce greenhouse gas emissions to help meet international and national greenhouse gas reduction targets. The ELJWP provides opportunities to help achieve this through:

- Encouraging energy efficiency measures in the construction and design of new buildings.
- Reducing carbon emissions from freight use by reducing the need to travel to process and dispose of waste, as well as supporting the use of low or zero emission transport modes, as discussed below in the section covering transport.
- Promoting green infrastructure within new waste sites to deliver carbon sequestration.

C.69 The effects of climate change in the ELJWP area are likely to result in extreme weather events becoming more common and more intense. Flood risk is of particular significance in this regard, alongside heatwaves and drought. Fluvial and surface water flooding poses the most significant risk to the plan area, particularly in areas in close proximity to the Thames river. The ELJWP provides an opportunity to help adapt to the unavoidable effects of climate change by:

- Locating development in locations with no or low flood risk.
- Encouraging flood and heat resilient development.

- Promoting on-site biodiversity net-gain, as well as links to green infrastructure to deliver flood retention, shading/ cooling, air quality improvements and safe havens for vulnerable species.
- The waste industry has the potential to contribute to climate change via the emission of greenhouse gases generated by the use of energy in processes and transportation involved in the industries. In 2019, the UK government set a legally binding target to achieve net zero greenhouse gas emissions (GHG) by 2050. Correspondingly, each of the four Boroughs have declared a climate emergency and have set monitored targets to reduce emissions to aid in reaching this goal.

C.70 Areas across the four Boroughs, which are at higher risk of flooding now and, in the future, (e.g. low-lying land on the floodplain) are also often attractive for development. Despite policies in the NPPF and NPPW, the ELJWP could play a key role in ensuring sufficient weight is given to the risk of flooding from all sources and over time; and that new or expanded waste management facilities are directed towards areas with the lowest risk of flooding. Furthermore, the ELJWP could demand highly resilient design to address residual risks of flooding and to tackle flood risk vulnerabilities locally and elsewhere.

Population, health and wellbeing

Population

Current baseline information

C.71 In England, the population has continued to age. More than one in six people (18.4%) were aged 65 years and over on Census Day in 2021. This is an increase of 20.1% since 2011. This is a higher percentage than ever before. On average in London, the largest age group in 2011 was those aged 25 to 29

years. More recently, in 2021, the largest age group in London was those aged 30 to 34 years **[See reference** 58**]**.

C.72 Within the East London area, Newham has seen the largest increase in people aged 65 years and over with an increase of 21.9%, followed by Redbridge with 13.5% and Havering with 9.3%. The only exception is Barking and Dagenham, which whilst it saw the second largest increase in population between 2011 and 2021 in London, saw a decrease of 1.7% in people aged 65 years and over **[See reference** 59**]**. Barking and Dagenham has the highest birthrate in London, the highest percentage of children under 4 years old, and the highest number of under 15-year-olds in England **[See reference** 60**]**

C.73 In Barking and Dagenham, the population size has increased by 17.7% since the 2011 census, the second largest increase out of the London Boroughs. Similarly, Newham's population has grown by 14% (fourth largest), Redbridge by 11.2% (sixth largest) and Havering's population has increased by 10.4%, (eighth largest). These population increases are higher than the overall increase for London (7.7%). **Table C.14** presents the most recent (2021) population changes by Borough in Barking and Dagenham, Havering, Newham and Redbridge **[See reference** 61**]**.

C.74 As of 2021, Havering is the second least densely populated of London's 33 local authority areas with 2,332 people per km2, Newham is the eighth, Redbridge is the 14th, and Barking and Dagenham is the 16th least densely populated.

Table C.14: Population change in the ELJWP area from 2011-2021

Area	2011 Census	2021 Census
Barking and Dagenham	185,900	218,900
Newham	308,000	351,100

Area	2011 Census	2021 Census
Havering	237, 200	262,000
Redbridge	279,000	310,300
Total	772,900	1,142,300

Projected baseline information

C.75 Each of the borough's populations have continued to grow over the last decade, and it is predicted that each of the Borough's populations will continue to grow. The London Plan predicts that the population of London is projected to increase by 70,000 every year, reaching 10.8 million in 2041, and East London will play a large role in providing for this growth **[See reference** 62**]**. The London Plan also states that over a fifth of London's population is under 16, but over the coming decades the number of Londoners aged 65 or over is projected to increase by 90%. This is reflected in the high growth of those that are over 65 in each Borough (excluding Barking and Dagenham) over the past decade, and it is predicted that this trend will continue.

C.76 As the population grows so do the Borough's respective population densities. On average, the four Boroughs of East London have a slightly higher population density of 58.96 population per hectare than the London average of 55.96 population per hectare **[See reference** 63**]**. The greater the population density the greater the challenge to ensure that each Borough's communities have the quality of life, facilities and services and infrastructure they need, including public and private open space. However, increased population density can have both positive and negative effects in sustainable development terms, depending upon how it is designed and delivered (indeed, some of the most attractive and desirable parts of cities and towns in the UK and abroad are often those areas that are most densely developed).

Housing

Current baseline information

C.77 London's average house prices remain the most expensive of any region in the UK, with an average price of £537,000 in September 2023 and an annual inflation rate of negative 1.1% in the 12 months to September 2023. London's annual inflation slowed in September 2023 because London prices decreased (negative 0.3%) between August and September 2023, while prices increased between the same months last year **[See reference** 64**]**.

C.78 As of August 2023, Redbridge has the highest average house prices out of the four Boroughs (£467,406) and Barking and Dagenham has the lowest average house prices (£351,021) out of the four Boroughs and London as a whole. The average for the East London area is £411,487, which is lower than the London average **[See reference** 65**]**.

C.79 The London Plan contains 10-year targets for net housing completions from 2019/20 up to 2028/29. This includes a total of approximately 52,000 homes per year over ten years. In 2017, the Strategic Housing Market Assessment identified that London needs around 66,000 net new homes a year to meet its housing need. This includes a target of 19,440 for Barking and Dagenham, 12,850 for Havering, 47,600 for Newham (including the area currently administered by the LLDC) and 14,090 for Redbridge. According to the GLA's residential completions dashboard to date, Barking and Dagenham has achieved 4,636 completions since 2019/20, Havering has achieved 3,430, Newham has achieved 6,655 (not including the area of the borough administered by the LLDC) **[See reference** 66**]** and Redbridge has achieved 2,156. None of the four Boroughs have achieved the London Plan target housing delivery goal for over five years. Most recently, Newham surpassed their target of 1,994 dwellings by 38 in 2016/17. The average percentage across each East London Borough since 2019/20 is 66%. Havering has achieved the highest rate of delivery by achieving 79% of its housing delivery target whilst Redbridge has achieved the lowest with 45% **[See reference** 67**]**.

C.80 The GLA's residential completions dashboard demonstrates that London is falling behind its housing completion targets. As a whole, London has failed to reach its housing delivery targets for the last seven years, although delivery did reach 103% in 2017/18. Since then, the average percentage of completions of target across London has been 76.8%. London was the worst-performing region in the Housing Delivery Test 2022. Fewer than half of London boroughs delivered more than 95% of their appropriate housing requirement for the test over the three-year monitoring period.

C.81 London's housing affordability challenge is the worst in the country, facing almost double the house price to earnings ratio compared to the rest of England, and a significantly more unaffordable private rented sector. Over the last 20 years, affordability has worsened in London more than anywhere else in the country, driven largely by house prices increasing faster than earnings **[See reference** 68**]**.

C.82 From 2015 to the end of March 2023, there have been 55,027 affordable housing completions, relating to the 116,782 homes that were started under the AHP 2016-23. This leaves 61,755, out of the 116,782 starts, to complete. There were 1,261 homes started and also completed in 2015-16. In 2022-23, 13,949 homes were completed; this represents the highest number of completions in one year. There is no target set for when all 116,782 homes started under the AHP 2016-23 will be completed **[See reference** 69**]**.

C.83 Between 2016-17 to 2022-23, Newham had the second highest number of affordable housing completions in London, with 4,709. The remaining East London Boroughs achieved significantly less, with Barking and Dagenham completing 2013 new affordable homes, Havering achieved 914 and Redbridge just 709 **[See reference** 70**]**.

C.84 The London Plan suggests that the boroughs are best placed to assess the needs and make provision for Gypsy and Travellers through new pitch provision, protection or enhancement of existing pitches, or by other means. The London Plan 2021 requires each London Borough to provide for a set amount of gypsy and traveller accommodations, based on the midpoint

projections of the 2007 assessment. The London Plan provisions are to be used as a starting point dependant on whether or not a more up-to-date assessment has been carried out at the Borough level.

C.85 Following the judgment in the Court of Appeal in the case of Smith v SSLUHC & Ors **[See reference** 71**]**, the government has reverted to the definition of Gypsies and Travellers used in the Planning Policy for Travellers Sites to that adopted in 2012, with this change applying from 19 December 2023, for plan and decision making. The Gypsy and Traveller Accommodation Assessment (GTAA) for each borough, considers the definition of Gypsies and Travellers that was in place at the time the assessment was prepared. .

C.86 The Havering GTAA (2018) provides a robust assessment of current and future need for Gypsy, Traveller and Travelling Showperson accommodation in the borough up to 2031. The Assessment identifies a need for 70 additional pitches for the Gypsy and Traveller households who meet the planning definition as set out in the National Planning Policy for Traveller Sites. Of the 70 pitches needed, 57 pitches are required within the first 5-year period of the Plan (2016 – 2021), and the remaining 13 pitches in the latter part of the plan period. No additional need has been identified for plots for Travelling Showpeople over the 15-year plan period (2016-2031) **[See reference** 72**]**. In Barking and Dagenham there is a need for 24 pitches over the period to 2034 for Gypsy and Traveller households **[See reference** 73**]**. In Newham, the borough has identified a need for 23 pitches **[See reference** 74**]**. In Redbridge, there is no need for additional pitches **[See reference** 75**]**.

Projected baseline information

C.87 The joint interim report by the London Housing Directors' Group and G15 **[See reference** 76**]** examines the barriers to housing delivery in London, particularly for affordable housing. The report highlights the extent of market failure in London's housing sector and the affordability challenge that has been created because of housing undersupply. The key findings are:

- Housing completions will average 43,000 per year over the period 2021-2025, compared to the London Plan target of 52,000 homes per year, with around 30% expected to be affordable or intermediate housing. Analysis suggests the actual need may be nearer 100,000 new homes per year, including 42,500 affordable homes.
- London requires 90,000-100,000 homes with at least 42,500 affordable homes required in London per year, compared to the London Plan target of 52,000 homes per year. This compares to an average of 7,900 affordable homes delivered annually since 2015/16.
- A forecast of future supply against demand shows that the largest supply shortfall over the next five years will be in the lower mainstream market segment below £450 pound per square foot (psf) and in the sub-market rent segment, demonstrating the market's failure to deliver an adequate supply of homes that are affordable to low and middle-income households.
- London's affordability challenge is much starker than elsewhere in the country and the need for affordable housing greater. Average house prices in the capital are 93% higher than the UK average compared to wages that are just 49% higher, with a house price to earnings ratio in London of 12.5, compared to the national average of 7.7. Based on affordability alone, the annual need for additional affordable housing in London is 7.6 times greater than supply, compared to 2.6 in England.
- The boroughs have seen significant increases in homelessness, in part as a consequence of increasing costs resulting from under-supply, with 24,630 households owed a homelessness relief duty by a London borough in 2019/20 compared to 10,180 homelessness acceptances in 2010/11.

C.88 The four borough's strategies for housing growth are set out below.

- Barking and Dagenham aim to deliver more than 40,000 dwellings between 2024 and 2037 **[See reference** 77**]**. Growth is focussed in:
  - Barking and the River Roding;
  - Thames Riverside;
  - Dagenham Dock, Freeport;

- Becontree and Heathway;
- Chadwell and Marks Gate;
- Becontree Heath and Rush Green; and
- Dagenham East and Village.

- Havering aim to deliver a minimum of 18,930 dwellings over the adopted plan period (2016 to 2031) to meet an increased population of over 293,000 people. Growth will be focussed in Romford town centre and the Rainham and Beam Park area, in conformity with the London Plan **[See reference** 78**]**.
- Newham aim to deliver between 51,425 and 53,784 additional new homes between 2023/24 and 2037/38 **[See reference** 79**]**. Growth is focussed in community neighbourhoods, and strategic sites in the following areas:
  - Stratford and West Ham;
  - Royal Docks;
  - Custom House and Canning Town;
  - Beckton;
  - Urban Newham – Forest Gate;
  - Urban Newham – East Ham: and
  - Urban Newham – Green Street.
- Redbridge aims to deliver a minimum of 16,845 new dwellings between 2015 and 2030 by prioritising housing delivery in:
  - Investment and Growth Areas of Ilford;
  - Crossrail Corridor;
  - Gants Hill;
  - South Woodford; and
  - Barkingside [See reference 80].

Health

Current baseline information

C.89 Health is a cross-cutting topic and as such many topic areas explored in this Scoping Report influence health either directly or indirectly.

C.90 The Office of National Statistics (ONS) have created an index that gives every local area in England an overall health score for each of the past six years. This overall score is made up of measures in different categories, called domains and subdomains. These measures include physical and mental health conditions like diabetes or anxiety, local unemployment, road safety, and behaviours like healthy eating **[See reference** 81**]**.

C.91 This score can show whether health in a local area is improving. The Health Index score has a baseline of 100, which represents England's health in 2015. A score higher than 100 means that an area has better health for that measure than was average in 2015, lower than 100 means worse health than the 2015 average. In 2021, the four East London Boroughs scores were as follows:

- Barking and Dagenham – 93.8
- Havering – 104.2
- Newham – 93.6
- Redbridge – 100.1

General health trends in Barking and Dagenham

C.92 Barking and Dagenham has an overall Health Index score of 93.8, which is up 1.5 points compared with the previous year, however, Barking and Dagenham ranked in the bottom 20 percent of local authority areas in England for health in 2021.

C.93 Barking and Dagenham's best score across all subdomains is 132.2 for health relating to "physical health conditions". "Physical health conditions" looks at cancer, cardiovascular conditions, dementia, diabetes, kidney and liver disease, musculoskeletal conditions, and respiratory conditions.

C.94 The second highest scoring subdomain is "mental health”; while Barking and Dagenham's worst score is for "protective measures".

General health trends in Havering

C.95 Havering has an overall Health Index score of 104.2, which is down 2.7 points compared with the previous year. Havering ranked around average among local authority areas in England for health in 2021.

C.96 Havering's best score across all subdomains is 114.6 for "mental health". "Mental health" looks at children's social, emotional and mental health, mental health conditions, self-harm, and suicides. Self-harm figures are counted through hospital admissions and so not all cases are recorded. During the coronavirus pandemic, people may have been less likely to seek help at hospital because of fears of infection or overwhelming services. Suicides per area are based on a three-year period, so these figures show longer-term trends rather than a change year to year. Suicide registrations were also affected by inquest delays in 2020.

C.97 The second highest scoring subdomain is "physical health conditions", while Havering's worst score is for "physiological risk factors".

C.98 Havering's score for "physical health conditions" fell from 116.8 in 2020 to 108.2 in 2021. This means Havering went from being among the best 10% of local authority areas to being among the best 30% across England for this subdomain.

C.99 The change was largely because of an increase in diabetes (the index worsened by 15.9 points) and an increase in cardiovascular conditions (the index worsened by 9.6 points).

General health trends in Newham

C.100 Newham has an overall Health Index score of 93.6, which is up 0.3 points compared with the previous year. Newham ranked in the bottom 20 percent of local authority areas in England for health in 2021.

C.101 Newham's best score across all subdomains is 123.0 for health relating to "difficulties in daily life".

C.102 "Difficulties in daily life" looks at disability and frailty. "Frailty" measures hospital admissions as a result of a hip fracture in those aged 65 years and over. Figures may have been affected by higher mortality rates in frailer people during the pandemic, or people being less exposed to injury while less active and staying at home.

C.103 The second highest scoring subdomain is "mental health", while Newham's worst score is for "physiological risk factors" declining from 72 in 2015 to 60 in 2021.

General health trends in Redbridge

C.104 Redbridge has an overall Health Index score of 100.1, which is down 1.4 points compared with the previous year. Redbridge ranked around average among local authority areas in England for health in 2021.

C.105 Redbridge's best score across all subdomains is 119.4 for "mental health". "Mental health" looks at children's social, emotional and mental health, mental health conditions, self-harm, and suicides.

C.106 Self-harm figures are counted through hospital admissions and so not all cases are recorded. During the coronavirus pandemic, people may have been less likely to seek help at hospital because of fears of infection or overwhelming services. Suicides per area are based on a three-year period, so these figures show longer-term trends rather than a change year to year. Suicide registrations were also affected by inquest delays in 2020.

C.107 The second highest scoring subdomain is "physical health conditions", while Redbridge's worst score is for "protective measures".

Life expectancy

C.108 In the UK, there has been a steady increase in life expectancy for both men and women for the first decade of the 2000s. However, in the last 10 years the trend has levelled off. **Table C.15** sets out the average life expectancy across the four East London Boroughs, for 2021, and the average across 2018 to 2020.

Table C.15: Life expectancy by London Borough

Borough	Male 2018 to 2020	Male 2021	Female 2018 to 2020	Female 2021
Barking and Dagenham	77.0	75.6	81.7	80.3
Havering	79.7	79.0	83.5	82.9
Newham	79.0	75.8	83.1	80.7
Redbridge	80.5	78.9	84.6	83.2

C.109 Across East London, the lowest life expectancy at birth in 2021 was 75.6 for males and 80.3 for females. The highest life expectancy at birth in 2021 was 79.0 for males and 83.2 for females. Life expectancy for women is almost 3

years lower in London Borough of Barking and Dagenham than in London Borough of Redbridge, and almost 4.5 years lower for men.

Obesity

C.110 Being overweight or obese carries numerous health risks, including increased likelihood of type 2 diabetes, cancer, heart and liver disease, stroke and related mental health conditions. It is estimated this health issue places a cost of at least £5.1 billion on the NHS and tens of billions on wider UK society every year. Obesity in adults in London is slightly lower than England as a whole, although over half of adults in London are classified as overweight or obese.

C.111 There is also a high level of obesity amongst children in the London. In 2021/22 by Year 6 25.8% of children are classified as overweight or obese. This is worse than England average of 22.7%. Within East London, Barking and Dagenham has the highest level of obesity amongst Year 6 children at 33.2% in 2021.

- Havering: 24.6%
- Newham 32.0%
- Redbridge: 27.9% **[See reference** 82**]**.

Mental health and perception of wellbeing

C.112 National research highlights that good emotional and mental health is fundamental to the quality of life. As set out in **Table C.16**, residents in East London had broadly similar responses in comparison to England on a national scale out of ten (7.55, 7,78, and 7.45 respectively) during the 2021/22 period **[See reference** 83**]**.

Table C.16: Perception of Wellbeing 2021/22 by Borough

Borough	Life Satisfaction	Happiness	Sense that life is worthwhile
Barking and Dagenham	7.6	7.8	7.8
Havering	7.6	7.8	7.4
Newham	7.7	7.8	7.7
Redbridge	7.6	7.5	7.3

Social isolation/loneliness

C.113 The ONS mapped loneliness rates by local authorities between October 2020 to February 2021 during the COVID-19 pandemic. Areas with higher concentrations of younger people and higher rates of unemployment tended to have higher rates of loneliness during the study period. Across the UK, local authorities in more urban areas had a higher loneliness rate than rural, industrial, or other types of areas. In the London, 7.3% of the adult population reported they 'often or always' felt lonely. This was slightly higher than the British average of 7.2% **[See reference** 84**]**. Within the East London Boroughs, Newham and Redbridge had relatively low levels of the adult population reporting they 'often or always' felt lonely at 4.53% and 4.73% respectively. This contrasts with the reported levels within Barking and Dagenham (11.25) and Havering (8.8%).

COVID-19

C.114 The COVID-19 pandemic highlighted health inequalities nationally, including the differences in people's health and well-being that result from the conditions in which they are born, grow, live, work and age. For example, the pandemic has impacted social and community networks, showing that lack of social contact has a detrimental impact on mental health (causing or facilitating

anxiety and depression). It also had a negative impact on individual lifestyle factors such as lack of exercise and unhealthy diet, causing other health issues.

Projected baseline information

C.115 Given that London has performed poorly for some health indicators against regional and national averages, it is likely it will continue to do so without substantial intervention. There are a range of potential changes in determinants that will affect health in the UK and London in the future including climate change. Summers are expected to become hotter, and overheating may increase the excess mortality rate for vulnerable groups.

Access to services and facilities

Current baseline information

C.116 Services and facilities include hospitals and GPs, recreational resources, food retailers, employment and education centres, and other aspects of social infrastructure such as community centres and places of worship. Good and equitable accessibility and the provision of sufficient community facilities is a vital part of development's role in improving the health and well-being of a community.

C.117 The London Borough of Newham produced a Community Facilities Needs Assessment in 2021 **[See reference** 85**]**. The study covers the whole of the borough, including the area currently covered by the London Legacy Development Corporation (LLDC), to form an evidence base and set of recommendations to inform the Local Plan review, specifically Policy INF8: Community Facilities. In addition, the evidence will enable LBN to make informed decisions about the spatial approach and location of community facilities as well as the detail in the borough's Site-Specific Allocations (SSA).

C.118 The most recent Department for Transport 'journey time statistics' **[See reference** 86**]** demonstrates the average journey time taken to reach the nearest key services (employment centres, primary and secondary schools, further education, GPs, hospitals, food stores and town centres) across local authorities. The average times taken to reach the nearest key services in each of the ELJWP London Boroughs are broadly the same or slightly higher than their regional and comparisons **[See reference** 87**]** as set out in **Table C.17** below.

Table C.17: Average journey times to key services (minutes)

Location	Public Transport/ walking	Cycle	Car	Walking
Inner London	10.0	9.1	8.0	11.6
Outer London	13.2	10.9	8.9	17.1
Barking and Dagenham	12.7	10.8	8.8	16.6
Havering	15.1	12.0	9.5	20.5
Newham	10.7	9.4	7.8	12.5
LB Redbridge	12.6	10.6	8.7	15.6

C.119 Along with being physically available, support services need to provide people with a positive experience to promote uptake and engagement for early intervention and reducing or delaying development of additional health and care needs in the longer term. In London, fewer patients have a good experience in making a GP appointment overall. The rate had been falling over recent years, to the lowest in 2020 which likely had been impacted by changes resulting from the pandemic as improvements have been seen in reported experience lately and have surpassed levels seen in most recent years.

Projected baseline information

C.120 Access to key services and facilities could become more challenging as the population in the four London Boroughs continues to grow, if this results in insufficient capacity in the nearest services. As the population ages, this may result in a larger proportion of the plan area's population not having access to key services that are only readily accessible by car.

Open spaces

Current baseline information

C.121 In 2012, the NPPF introduced a new concept of a Local Green Space designation. The Local Green Space designation provides communities with a way to place special protection against the development of green areas of particular importance to them.

C.122 Barking and Dagenham has ambitions to be the 'Green Capital of the Capital' as set out in the Regulation 19 submission Local Plan **[See reference 88]**. One third of the borough is green open space (463 hectares) and the borough is in close proximity to Epping Forest.

C.123 More than 50% of Havering is classed as Metropolitan Green Belt, and the borough has some of the most green space in London. The town centre in Romford has a lack of green space although it is within walking distance of a number of local parks. This mirrors other areas of the borough where, if there is a lack of one type of open space it is often met by another type of open space. There is generally a good coverage of parks, gardens, natural and semi natural spaces and amenity greenspaces across the borough.

C.124 Newham has an extensive network of natural and open areas, encompassing not only nature reserves, parks, and rivers but also playgrounds,

playing fields, allotments, gardens, hedges, green walls, green/brown roofs, cycle and footpaths, street trees, docks, lakes, and ponds. Specifically, Newham has 101 parks and gardens, and amenity greenspace which, along with natural and semi-natural greenspaces and sports facilities total approximately 254.72 ha of publicly accessible green space. However, the Borough has 16% tree cover which is the second lowest in London **[See reference** 89**]**. There are deficiencies in local and district park access, the former in Urban Newham, and the latter particularly in the east and west of the borough.

C.125 Redbridge, one of London's greenest boroughs, comprises extensive Green Belt land (37% of total area) to the north-east. About 48% of the borough comprises open spaces, including notable locations like Hainault Forest Country Park, Roding Valley Park, Fairlop Waters Country Park, Valentines Park, and around 120 hectares of countryside. These open spaces, including country parks and formal parks, contribute to the borough's character, biodiversity, and climate change mitigation efforts.

Projected baseline information

C.126 Development pressure could lead to the loss of some existing open space and sports/recreation facilities while projected population increases are likely to increase demand for such facilities.

Crime

Current baseline information

C.127 In the year ending July 2022, there was an average of 20 to 25 police recorded crimes per 1,000 population in London **[See reference** 90**]**.

C.128 According to Police UK **[See reference** 91**]**, crime in the each of the four Boroughs is lower than the London average (except for in Havering) although crime rates are increasing across the ELJWP area.

Projected baseline information

C.129 Crime rates are influenced by so many variables that it is very difficult to anticipate future trends. Spatial variation that currently exists in relative crime deprivation across the plan area is likely to remain for the foreseeable future, and for the most part will likely mirror overall deprivation trends.

Deprivation

Current baseline information

C.130 Poverty impacts upon entire families and has significant impacts on health, education, skills and life chances. Efforts to lift people out of poverty is a challenge, especially as it is linked to so many other factors such as income levels, cost of living and family size. The Indices of Multiple Deprivation (IMD) 2019 **[See reference** 92**]** provide comparison data down to the postcode level. **Figure C.2** at the end of this chapter shows the IMD across the ELJWP area.

Barking and Dagenham

C.131 In Barking and Dagenham, 19.4% of the population was income-deprived in 2019, making the area the 20th most income-deprived local authority in England, excluding the Isles of Scilly. There are 110 neighbourhood areas within LBBD, and 49 of those are within the 20% most deprived in England. No neighbourhoods within LBBD are within the 20% least deprived in England.

Havering

C.132 In Havering, 10.8% of the population was income-deprived in 2019, making the area the 160th most income-deprived local authority in England, excluding the Isles of Scilly. There are 150 neighbourhood areas within LBH, and 14 of those are within the 20% most deprived in England. Thirty-two neighbourhoods within LBH are within the 20% least deprived in England.

Newham

C.133 In Newham, 16% of the population was income-deprived in 2019, making the area the 43rd most income-deprived local authority in England, excluding the Isles of Scilly. There are 164 neighbourhood areas within LBN, and 38 of those are within the 20% most deprived in England. Four neighbourhoods within LN are within the 20% least deprived in England.

Redbridge

C.134 In Redbridge, 12.1% of the population was income-deprived in 2019, making the area the 131st most income-deprived local authority in England, excluding the Isles of Scilly. There are 161 neighbourhood areas within LBR, and 11 of those are within the 20% most deprived in England. Fifteen neighbourhoods within LBR are within the 20% least deprived in England.

C.135 Figure C.2 at the end of this Chapter illustrates the range and distribution of deprivation across the Borough.

Projected baseline information

C.136 There are disparities in the level of deprivation across all four boroughs and within each borough. The GLA and each of the boroughs have strategies to

address inequalities over time but there are uncertainties if current trends will continue over time.

Equalities

Current baseline information

C.137 The Equality Act 2010 identifies nine 'protected characteristics' and seeks to protect people from discrimination based on these characteristics. It presents three main duties: to eliminate discrimination, harassment, victimisation and other conduct that is prohibited under the Act; to advance equality of opportunity between persons who share relevant protected characteristics and persons who do not share it; and to foster good relations between persons who share a relevant protected characteristic and persons who do not share it. The nine protected characteristics identified through the Act are:

- Age: Children (0-4), Younger people (aged 16-24), older people (aged 65 and over);
- Disability: Disabled people, people with physical and mental impairment;
- Gender reassignment;
- Marriage and civil partnership;
- Pregnancy and maternity;
- Race;
- Religion or belief;
- Sex; and
- Sexual orientation.

C.138 The data referred to below was collected in the 2021 UK Census.

Age

C.139 The latest dataset relates to the 2021 UK Census **[See reference** 93**]**. The 2021 Census suggests that across London, the age profile has changed very little since 2011 and remains younger than the broader national average. In relation to the four London Boroughs, the Boroughs of Barking and Dagenham, Newham, and Redbridge have all seen minimal increases in their median age, whilst Havering has seen a decrease by one year, from 40 to 39 years of age.

C.140 The age protected characteristic is split into three. For children up to four years old, the following applies to each of the four London boroughs:

- In Barking and Dagenham, the percentage of children aged 4 and below showed a decrease from 10.0% in 2011, to 7.9% in 2021.
- In Havering, the percentage of children aged 4 and below rose from 5.8% in 2011 to 6.3% in 2021.
- In Newham, the percentage of children aged 4 and below showed a decrease of 1.4%, between 2011 and 2021, from 8.2% to 6.8%.
- In Redbridge, the percentage of children aged 4 and below decreased from 7.8% in 2011 to 6.8% in 2021.

C.141 For younger people aged from 16 to 24 years old:

- In Barking and Dagenham, the percentage of younger people aged 16 – 24 displayed a slight decrease from 12.4% in 2011 to 11.4% in 2021.
- In Havering, the proportion of younger people aged 16 – 24 also showed a decrease of from 11.5% in 2011 to 9.7% in 2021, signifying a 1.8% decrease.
- In Newham, the percentage of younger people aged 16 – 24 displayed a decrease from 15.9% in 2011, to 13.2% in 2021.
- In Redbridge, the percentage of younger people aged 16 – 24 displayed a decrease from 23.9% in 2011, to 21.1%.

C.142 Older people (65 and over):

- In Barking and Dagenham, the percentage of older people, aged 65 above displayed a decrease of 1.7% between 2011 and 2021, from 10.4% in 2011 to 8.7% in 2021.
- In Havering, the percentage of older people aged 65 and above presented a slight decrease between 2011 and 2021, from 17.9% in 2011 to 17.7% in 2021.
- In Newham, the percentage of older people aged 65 and above showed a small increase of 0.4%, between 2011 and 2021, from 6.7% in 2011 to 7.1 in 2021.
- In Redbridge, the percentage of older people aged 65 and above displayed a slight increase from 11.9% in 2011, to 12.2%.

Disability

C.143 Disabled people and people with physical and mental impairment:

- In Barking and Dagenham, in 2021 17.9% of the population identified as having a disability. Of this, 9% of the population reported significant limitations due to disability, whilst 8.9% reported minor limitations. This marks a 5.2% decrease from 2011, when 23.1% of the population identified as having a disability.
- In Havering, 15.3% of the population identified as having a disability in 2021. Of this, 6.6% of the population reported significant limitations due to disability, whilst 8.7% reported minor limitations. This marks a 2.6% decrease from 2011, when 17.9% of the population identified as disabled, with 8.5% reported significant limitations due to disability, and 9.4% of the population reported minor limitations.
- In Newham, 9.1% of the population identified as disabled and limited a lot in 2021. This represents a 4.4% decrease from 13.5% in 2011. In 2021, 8.4% identified as disabled and limited a little, representing an increase from 11.2% in 2011.

- In Redbridge, 14.6% of the population identified as having a disability in 2021. Of this, 6.7% of the population reported significant limitations due to disability, whilst 7.9% reported minor limitations. This marks a 4.8% decrease from 2011, when 19.4% of the population identified as disabled, with 9.3% reported significant limitations due to disability, and 10.1% of the population reported minor limitations.

C.144 Concerning mental health, the London Boroughs of Barking and Dagenham, Havering, and Redbridge have a relatively small percentage of the adult population experiencing severe mental illnesses (SMI), including schizophrenia, bipolar affective disorder and other psychoses. Rates of SMI are lower than the national average in all three boroughs – nevertheless more than 6,800 people have a SMI **[See reference** 94**]**. In Newham **[See reference** 95**]**, the rate of mental health issues are higher in lower age groups than in older people.

Marriage and civil partnership

C.145 From the 2021 census data, the percentage of people married or in a civil partnership across England fell from 46.8% to 44.7%. During the same period, the London percentage fell from 40.2% to 40.0%.**[See reference** 96**]**.

- In Barking and Dagenham, the percentage of people married (or in a civil partnership) rose from 42.1% in 2011 to 42.8% in 2021. The percentage of adults who had never married or registered a civil increased from 38.8% to 41.8%, while the percentage of adults who had divorced or dissolved a civil partnership decreased from 8.7% to 8.1%.
- In Havering, the percentage of people married (or in a civil partnership) declined slightly from 48.6% in 2011 to 47.0% in 2021. The proportion of people aged 16 years and over who had never been married or in a civil partnership rose from 33.0% in 2011 to 36.9% in 2021, and the percentage of adults who had divorced or dissolved a civil partnership declined from 8% to 7.8%.
- In Newham, the percentage of people married or in a civil partnership, was almost the same in 2021 as 2011, at 40.8% and 40.7% respectively. The

percentage of adults in Newham that had divorced or dissolved a civil partnership was 6.2% in 2011 and 2021. The proportion of people aged 16 years or over who had never been married or in a civil partnership rose from 45.2% in 2011 to 47.1% in 2021.

- In Redbridge, the percentage of people married (or in a civil partnership) rose slightly from 50.5% in 2011 to 51.1% in 2021. The proportion of people aged 16 years or over who had never been married or in a civil partnership rose from 34.6% in 2011 to 35.9% in 2021. the percentage of adults who had divorced or dissolved a civil partnership decreased slightly from 6.2% in 2011 to 6.1% in 2021.

Pregnancy and maternity

C.146 The total fertility rate (TFR) for England was 1.62 children per woman in 2021, increasing from 1.59 in 2020, an increase of 1.9%. In London, the TFR was 1.52 children per women in 2021, a small decrease from 1.54 in 2020 **[See reference** 97**]**.

- In Barking and Dagenham, there were a total of 3,255 births in 2021, with a TFR of 2.04 children per woman, decreasing from 2.16 in 2020
- In Havering, the TFR rate was 1.66 in 2021, with a total of 3,057 births. This is a minimal decrease from 1.71 2020.
- In Newham, there were a total of 5, 346 births in 2021, with a TFR of 1.8 children per woman. This represents a small decrease from a TFR of 1.85 children per woman in 2020.
- In Redbridge, the TFR was 1.99 in 2021, with a total of 4,275 births. This is a minimal decrease from the TFR of 2.01 in 2020.

Ethnicity

C.147 Across London, the percentage of people from the "Asian, Asian British or Asian Welsh" ethnic group increased from 18.5% in 2011 to 20.7% in 2021,

while across England the percentage increased from 7.5% to 9.3% **[See reference** 98**]**.

- Barking and Dagenham:
  - 25.9% of Barking and Dagenham residents identified their ethnic group within the "Asian, Asian British or Asian Welsh" category in 2021, compared with 15.9% in 2011.
  - 44.9% of people in Barking and Dagenham identified their ethnic group within the "White" category in 2021, compared with 58.3% in 2011.
  - 21.4% identified their ethnic group within the "Black, Black British, Black Welsh, Caribbean or African" category in 2021, compared with 20.0% the previous decade
  - 4.3% identified their ethnic group within the "Mixed or Multiple" category in 2021, increased from 4.2% in 2011.
- Havering:
  - 10.7% of Havering residents identified their ethnic group within the "Asian, Asian British or Asian Welsh" category in 2021, up from 4.9% in 2011.
  - 75.3% of people in Havering identified their ethnic group within the "White" category, in 2021, compared with 87.7% in 2011.
  - 8.2% of Havering residents identified their ethnic group within the "Black, Black British, Black Welsh, Caribbean or African" category in 2021, compared with 4.8% in 2011.
  - 3.7% identified their ethnic group within the "Mixed or Multiple" category in 2011, increased from to 2.1% in 2021.
- Newham:
  - 42.2% of people in Newham identified their ethnic group within the "Asian, Asian British or Asian Welsh" category in 2021, compared with 43.5% in 2011.
  - 30.8% of Newham residents identified their ethnic group within the "White" category, in 2021 up from 29.0% in 2011.

- 17.5% identified their ethnic group within the "Black, Black British, Black Welsh, Caribbean or African" category in 2021, compared with 19.6% in 2011.
- The percentage of residents that % identified their ethnic group within the "Mixed or Multiple" category has remained reasonably constant, from 4.5% in 2011 to 4.7% in 2021.

- Redbridge
  - 47.3% of Redbridge residents identified their ethnic group within the "Asian, Asian British or Asian Welsh" category in 2021, compared with 41.8% in 2011, representing a 5.5% change which was the largest increase among high-level ethnic groups in this area.
  - 34.8% of people in Redbridge identified their ethnic group within the "White" category in 2021, compared with 42.5% in 2011.
  - The percentage of residents that identified their ethnic group within the "Black, Black British, Black Welsh, Caribbean or African" category in Redbridge has remained largely constant, from 8.4% in 2021, compared with 8.9% the previous decade
  - The percentage of residents that identified their ethnic group within the “Mixed or Multiple" category has remained the same from 2011 to 2021, standing at 4.1%.

Religion and belief

C.148 As religion is self-reported in the census, caution is needed when comparing data across areas and between each census. In London, the percentage of residents who described themselves as Muslim increased from 12.6% to 15.0% between 2011 and 2021, while across England the percentage increased from 5.0% to 6.7% **[See reference** 99**]**.

- Barking and Dagenham:
  - 24.4% of residents described themselves as Muslim in 2021, up from 13.7% in 2011.

- 45.4% of residents described themselves as Christian in 2021, down from 56.0% in 2011.
- 18.8% of residents reported having "No religion" in 2021, down from 18.9% in 2011.

- Havering:
  - 6.2% of residents described themselves as Muslim in 2021, up from 2.0% in 2011.
  - 52.2% of residents described themselves as Christian in 2021, down from 65.6% in 2011.
  - 30.6% of residents reported having "No religion" in 2021, up from 22.6% in 2011.
- Newham:
  - 34.8% described themselves as Muslim in 2021, up from 32.0% in 2011.
  - 35.3% of people in Newham described themselves as Christian in 2021, down from 40.0% in 2011.
  - 14.5% of Newham residents reported having "No religion" in 2021, up from 9.5% in 2011
- Redbridge
  - In 2021, 31.3% of Redbridge residents described themselves as Muslim, making it the most common response in this local authority area. This marks an 8% increase from 23.3% in 2011.
  - 30.4% of people in Redbridge described themselves as Christian in 2021, down from 36.8% in 2011.
  - 12.6% of Redbridge residents reported having “No religion” in 2021, up from 11% in 2011.

Sex

C.149 In 2020, across London, there were 4.51 million males, constituting 50.1% of the population, and 4.48 million females, making up 49.9%. This distribution remained consistent despite a smaller overall population. According to mid-year population estimates from the ONS, in 2019, there were 4.51 million males, constituting 50.1% of the population, and 4.49 million females, making up 49.9% **[See reference** 100**]**. Looking broadly at England, in 2020, males comprised 49.5% of the population whilst females comprised 50.5%. This remains largely consistent to 2019 estimates, in which males made up 49.4% of the population, and females 50.6%.

- Barking and Dagenham: In 2020 the borough had a total population of 214,107, of which 49.9% were male and 50.1% were female.
- Havering: In 2020 the borough had a total population of 260,651, of which 48.2% were male and 51.8% were female.
- Newham: In 2020 the borough had a total population of 355,266, of which 53.2% were male and 46.8% were female.
- Redbridge: In 2020 the borough had a total population of 305,658, of which 50.8% were male and 49.2% were female.

Sexual orientation and gender identity

C.150 Sexual orientation **[See reference** 101**]**:

- Barking and Dagenham: 2.3% of the population identified as LGB+ (those who described their sexual orientation as something other than heterosexual)
- Havering: From the 2021 census data, 91.1% of the population identified as straight or heterosexual, whilst 1.95% identified as LGB+ orientation.
- Newham: 4% of the population identified as LGB+. The vast majority of the population identified as heterosexual, at 83.3%.

- Redbridge: The 2021 Census data shows that in Redbridge, approximately 2.5% of residents ages 16 and over identify as part of the LGBT+ community, whilst 88.1% of the population identified as heterosexual.

C.151 Gender identity **[See reference** 102**]**:

- Barking and Dagenham: Barking and Dagenham has the highest proportion of trans women (0.25%) and 3rd highest proportion of trans men (0.24%) in England and Wales.
- Havering: As of 2021, within London, Havering has the 5th lowest proportion of residents aged 16 and over reporting that the gender that they identify with now is different to their sex registered at birth, at 0.25%. Of this figure, 0.11% identified as a trans woman, and 0.10% identified as a trans man. 5.82% of Havering residents did not answer the question.
- Newham: Newham has the second highest percentage who identified as a trans men (0.25%). Furthermore, in Newham, 1.51% of people aged 16 and over said their gender identity was different from their sex at birth. Of them, 692 people were trans men and 645 were trans women. A further 168 said they were non-binary.
- Redbridge: 1% of residents aged 16 and over stated that they did not identify with the gender assigned to them at birth. Of them, 465 people were trans men and 401 were trans women. A further 61 said they were non-binary. About 20,300 people did not answer the voluntary question.

Projected baseline information

C.152 A review of the baseline information suggests that London has a younger than average population, greater ethnic and religious diversity, and a low mortality rate, although mortality rate and life expectancy differs across the four boroughs in the ELJWP area.

Implications for health

C.153 Some areas of the four London boroughs within the plan area experience health challenges, with high levels of obesity and risk of associated health problems. The UK Chief Medical Officers advise that for good physical and mental health, adults should aim to be physically active every day. Over the course of a week adults should accumulate at least 150 minutes of moderate intensity activity; or 75 minutes of vigorous intensity activity day; or even shorter durations of very vigorous intensity activity; or a combination of moderate, vigorous and very vigorous intensity activity **[See reference** 103**]**.

C.154 Similarly, open spaces and recreational facilities provide residents space in which they can undertake physical activity to the benefit of public health, including lowering the risk of specific health conditions such as depression, anxiety, cortisol, blood pressure, pre-term birth, low birthweight, and type 2 diabetes. There is generally positive evidence relating to the impacts of activities in natural environments on children's mental health and their cognitive, emotional and behavioural functioning. These health benefits are thought to arise through a range of pathways, including providing opportunities and safe spaces for physical activity, for restoration and relaxation, and for socialising with friends and family. Exposure to green and blue space is also associated with higher levels of life satisfaction. Impacts appear to differ according to socio-economic status and other demographic factors such as age or gender.

C.155 Encouraging active travel, such as walking, wheeling and cycling can have a wider range of positive implications for health, including increased physical activity and opportunities for social interaction. In addition, an increase in active travel would be associated with a decrease in vehicular transport and an associated decrease in air pollutants that can be harmful to human health.

Key sustainability issues and opportunities for the ELJWP to address them

C.156 Across the four boroughs, population is forecast to increase, with younger (0 to 15) and older (over 65) groups seeing the largest increase. In Barking and Dagenham for example, the population is forecast to grow to 250,000 by 2031 with annual growth of households of 1,519 a year in that period. In the absence of any significant change in per capita resource consumption, the consequence of population growth will be an increase in the amount of waste being generated. The existing network of waste management facilities will need to become more efficient and may also need to expand in places to keep pace with demand for waste management services.

Economy

Economy and employment

Current baseline information

C.157 London is an international city which has established itself as a major centre of economic activity. As measured by Gross Value Added (GVA), London's total economic output was worth around £364 billion in 2014, 6.8% higher than in 2013. In 2014, London accounted for 22.5% of the UK's total GVA, up from 18.9% in 1997 **[See reference** 104**]**.

C.158 Between 1971 and 2015, the total number of jobs in London has increased by almost one million. The professional, scientific and technical activities sector accounts for the largest number of jobs, at 755,000 (or 14%). Compared to the wider UK, London is specialised (in terms of jobs) in both the information and communications sector and the financial and insurance

activities sector. This sector is the largest in London, generating £68.7 billion of GVA and accounting for 18.9% of London's total economic output. Within these broad sectors there are a large number of significant subsectors of particular specialisation within London. In addition to this specialisation, there are significant levels of employment in a number of broad sectors – making for quite a diverse economic structure. The spatial make-up of London's economy shows that different sectors are important to different boroughs. The Financial and insurance activities sector accounts for 66.6% of total output in the City of London; whereas in Havering has the greatest proportional share of, the Distribution, transport, accommodation and food sector, accounting for accounts for 24.2% of output. Barking and Dagenham has the greatest proportional share of the Production industries, accounting for 21.2% of total output. Newham has the greatest proportional share of local authority output, public administration, education and health, accounting for 18.9% within London **[See reference** 105**]**.

C.159 In Havering, Barking and Dagenham and Redbridge, the largest percentage of residents aged 16 and over (27.8%, 23% and 26.7% respectively) are employed in the public administration, education and health sector. In Newham, the largest employment sector is banking, finance and insurance, employing 29.8% **[See reference** 106**]**.

C.160 Of people aged 16 to 64 years living in Havering, 82.6% were employed in the year ending June 2023. This is the highest employment rate when compared to the other three borough's. Consequently, it also has the lowest rate of unemployment (those without jobs who are actively seeking work and available to take up a job) at 3.5%. Newham has the second highest rate of employment (75.5%), and an unemployment rate of 4.7%. Barking and Dagenham has an employment rate of 73.1% and an unemployment rate of 5.5%. Redbridge has the lowest employment rate (72.5%) and an unemployment rate of 5.1%.

C.161 Across London in the year ending June 2023, 75.1% of people aged 16 to 64 years were employed. This means that Barking and Dagenham and Redbridge are below the London average. Across London in the year ending June 2023, 4.6% of people aged 16 to 64 years were unemployed. This means

that Newham, Barking and Dagenham and Redbridge have a higher unemployment rate than the London average. Newham has the fifth highest unemployment rate out of all London boroughs **[See reference** 107**]**.

C.162 GLA analysis of the departure from the European Union **[See reference** 108**]** notes that the economy in London will be most impacted by changes to the provision of financial services, the loss of low skilled labour from the European Economic Area, with less impact to trade in comparison with the wider UK.

Growth Areas

C.163 The Growth Strategy for Barking and Dagenham 2013-2023 sets out the key aims and areas for growth in the borough, to increase investment and create a higher skilled workforce **[See reference** 109**]**. The LBBD Regulation 19 Submission Local Plan (2021) **[See reference** 110**]** identifies the following areas for economic growth for the period between 2019 and 2037:

- Barking Town Centre and the River Roding
- Barking River side
- Thames Road
- Castle Green
- Chadwell Heath and Marks Gate
- Dagenham Dock and Beam Park
- Dagenham East
- Dagenham Heathway

C.164 Havering's Inclusive Growth Strategy (2020-2045) **[See reference** 111**]** provides an analysis of the local economy and identifies the types of employment growth and locations for growth over the period to 2045 **[See reference** 112**]**. The LBH Local Plan 2021 **[See reference** 113**]** focusses growth on the areas of Rainham and Beam Park, and Romford, consistent with the London Plan 2021.

C.165 Three of the London Plan (2021) Opportunity Areas are located or partly located in Newham: Royal Dock and Beckton Riverside, and the Poplar Riverside and Olympic Legacy cross boundary Opportunity Areas. The Regulation 19 Newham Local Plan (2024) incorporates these areas and also includes a number of Micro Business Opportunity Areas, to promote business use around existing town centres.

C.166 The Redbridge Local Plan (2018) **[See reference** 114**]** identifies the following areas for economic growth for the period between 2015 and 2030, noting the inclusion of the Ilford Opportunity Area within the London Plan (2021):

- Ilford Investment and Growth Area
- Crossrail Corridor Investment and Growth Area
- Kind George and Goodmayes Hospital
- Land at Billet Road
- Gants Hill Investment and Growth Area
- Barkingside Investment and Growth Area
- South Woodford Investment and Growth Area

Strategic Industrial Land

C.167 Strategic Industrial Locations (SIL) are protected through Policy E5 of the London Plan. The London Plan notes the importance of these locations in east London, and the role the Thames Gateway will play in a " strategically co-ordinated plan-led consolidation of SILs in order to manage down overall vacancy rates, particularly in the boroughs of Newham and Barking and Dagenham" Plan **[See reference** 115**]**.

Projected baseline information

C.168 The full economic impact of the COVID-19 pandemic will not be known for some time. However, anecdotal evidence suggests that office-based staff will work remotely/at home more frequently; consequently, businesses are likely to reduce their office space. Rising heating costs have the potential to encourage people back into the office however it is uncertain whether attendance will return to pre-pandemic levels. The full impacts of Brexit are still to be felt, and the continued impacts on London's economy will be different to the impacts on the UK as a whole, as set out above.

Implications for health

C.169 Employment and job security influence mental health and levels of stress. Income can also influence physical health, in terms of the quality and location of housing that people can afford. A strong local economy will help create more job opportunities, contribute to greater job stability and raise the quality of life for local people, resulting in improved health outcomes.

Key sustainability issues and opportunities for the ELJWP to address them

C.170 Beneficial economic characteristics have not been equally shared across the four borough's local communities. The consequence for this has been levels of local inequality, including areas such as South Hornchurch and Harold Hill in Havering, and areas within the wards Abbey, Gascoigne, Chadwell Heath, Thames and Abbey fall in Barking and Dagenham falling within the 10% more deprived Lower Super Output Areas in England.

C.171 The ELJWP could support a local policy framework that will make a small, but present, contribution towards improving the diversity and quality of local employment opportunities available in more deprived urban localities. It

may also bring about training investment, where relevant skills deficits might be present within local communities.

Transport

Current baseline information

C.172 London Infrastructure Plan 2050: Transport Supporting Paper **[See reference** 116**]** notes that across London, trip rates are expected to remain constant on a per person basis, but that expected growth in population will require significant additional capacity across London's transport networks by 2050.

- Barking and Dagenham: The Barking Borough Wide Transport Strategy (2021) **[See reference** 117**]** considers the key concerns are around the capacity and air quality in the vicinity of the A12 and A13, the lack of access to public transport, fragmented cycling and walking links, and the continued high rates of accidents.
- Havering: The Local Implementation Plan 3 **[See reference** 118**]** sets out how the borough will aim to achieve the target of 65% of all trips being made on foot, cycle or public transport by 2041, as well as improving casualty reduction and air quality.
- Newham**:** The Local Implementation Plan **[See reference** 119**]** focusses on the aim of 83% of all trips in Newham to be made by foot, by cycle or using public transport by 2041 as well as the Borough's corporate aims regarding air quality, sustainable and active travel and public health.
- Redbridge: The third Local Implementation Plan (2019) **[See reference** 120**]** focusses on transport improvements aligned to areas of growth, reducing car use to meet climate change targets, and improving access to sustainable transport across the borough and in new growth locations.

C.173 Figure C.2 at the end of this chapter illustrates the main road, rail and cycling routes in the ELJWP Area.

C.174 The Lower Thames Crossing is a proposed new motorway connecting Kent, Thurrock and Essex through a tunnel beneath the river Thames. If permission is granted, the project will provide over 90% additional road capacity across the Thames east of London. The new motorway will have three lanes in each direction, with a speed limit of 70mph. It will connect the tunnel to the A2 and M2 in Kent on the southern side and A13 and junction 29 of the M25 in the London Borough of Havering on the northern side. The crossing will also feature a 4km-long twin-tube tunnel under the Thames River, for southbound and northbound traffic. With a diameter of 16m, the tunnel will be one of the largest bored-tunnels in the world **[See reference** 121**]**. A decision is expected later in 2024.

C.175 At the time of Census 2021, UK government guidance and lockdown restrictions resulted in unprecedented changes to travel behaviour and patterns **[See reference** 122**]**. As seen in **Table C.18**, between one fifth and just over one third of residents were working from home in 2021. The prevalence of car use over public transport in all boroughs other than Newham reflects the location of LBN within inner London.

Table C.18: Method of travel to work 2021

Method of travel to work	Barking and Dagenham	Havering	Newham	Redbridge
Total surveyed	94,586	124,781	163,446	141,627
Work mainly at or from home (%)	20.7	33.4	29.2	34.9
Underground, metro, light rail, tram (%)	16.2	6.7	23.5	14.6

Method of travel to work	Barking and Dagenham	Havering	Newham	Redbridge
Train (%)	9.2	7.0	8.6	6.0
Bus, minibus or coach (%)	10.2	5.6	9.1	5.8
Taxi (%)	0.6	0.6	0.5	0.6
Motorcycle, scooter or moped (%)	0.6	0.5	0.7	0.5
Driving a car or van (%)	32.5	36.8	17.3	28.4
Passenger in a car or van (%)	2.5	2.7	1.5	2.1
Bicycle (%)	1.3	0.7	2.3	1.1
On foot (%)	4.7	4.9	6.0	4.8
Other method of travel to work (%)	1.5	1.2	1.4	1.3

Projected baseline information

C.176 Sustainable public transport, including active travel investment is essential alongside direct road congestion interventions if each borough is to continue to reduce the reliance on car travel, and support the use of more sustainable alternatives.

Implications for health

C.177 A lack of sustainable and active travel options can have negative impacts on public health whilst also increasing reliance on relatively expensive private

motorised transit and exacerbating existing inequalities. Encouraging active travel, such as walking, wheeling and cycling can have a wide range of positive implications for health, including increased physical activity and opportunities for social interaction. In addition, an increase in active travel could be associated with a decrease in reliance on often expensive vehicular transport, and an associated decrease in air pollutants that can be harmful to human health.

Key sustainability issues and opportunities for the ELJWP to address them

C.178 Several of the ELJWP road links are inadequate, with several roads and junctions noted as being at or near to capacity, and many experiencing congestion at peak times. Adverse traffic conditions on these routes often have knock-on effects on local roads, leading to localised gridlock on occasion and impacting negatively on economic productivity. In addition, with planned developments and increased housing and job provision, more pressure may be placed on the road networks.

C.179 Without the ELJWP it is anticipated that traffic congestion and air and noise pollution from transport associated with waste developments will continue to increase with the rising population and car dependency will continue to be high. The implications of air pollution for human health and the natural environment are described in subsequent sections.

C.180 The ELJWP provides an opportunity to reduce the demand on the transport network from waste development and to address potential adverse effects of travel by:

- Locating waste development where there is good access to sustainable transport modes for waste and employees
- Supporting and prioritising sustainable travel choices through workplace travel plans; and

- Supporting the uptake of electric vehicles through the provision of electric vehicle charging infrastructure at waste sites.

Historic environment

Current baseline information

Barking and Dagenham

C.181 The adopted Local Plan for Barking and Dagenham **[See reference** 123**]** notes the importance of conserving and enhancing heritage and cultural assets as the borough continues to grow.

C.182 The borough has 45 statutory listed buildings, 123 locally listed buildings, 1 scheduled ancient monument and four conservation areas **[See reference** 124**]**.

C.183 The greatest concentration of listed buildings is in Barking **[See reference** 125**]**. The site of Barking Abbey is Barking and Dagenham's only Scheduled Ancient Monument. It includes the ruins of the Abbey and most of Abbey Green.

C.184 There are four conservation areas:

- Abbey and Barking Town Centre Conservation Area;
- Abbey Road Riverside Conservation Area;
- Chadwell Heath Anti-aircraft Gun Site Conservation Area; and,
- Dagenham Village Conservation Area.

C.185 London Borough of Barking and Dagenham Archaeological Priority Areas Appraisal **[See reference** 126**]** found a total of 20 Archaeological Priority Areas are recommended for Barking and Dagenham.

Havering

C.186 The adopted 2021 Havering London Borough Local Plan 2016-2031 **[See reference** 127**]** highlights the importance of the plan in protecting the boroughs most valued historic assets by conserving and enhancing Havering's rich heritage and historic environment.

C.187 The borough contains a wealth of designated heritage assets, including 140 listed buildings. There are 3 Scheduled Monuments and 11 Conservation Areas **[See reference** 128**]**.

- Corbets Tey Conservation Area;
- Cranham Conservation Area;
- Gidea Park Conservation Area;
- Havering-atte-Bower Conservation Area;
- Langtons Conservation Area;
- North Ockendon Conservation Area;
- RAF Hornchurch Conservation Area;
- Rainham Conservation Area;
- Romford Conservation Area;
- St Andrews Conservation Area; and
- St Leonards Hornchurch Conservation Area.

C.188 Special townscape or landscape character areas are areas that have a special and unique character which adds to the townscape and landscape quality of Havering, of which Havering currently has two: Emerson Park, which

is typified by large and varied dwellings set in spacious, mature, well landscaped grounds, and the Hall Lane Policy Area typified by large detached and semi-detached dwellings set in large gardens with considerable tree and shrub planting. All of the areas have unique characters which add considerable value to the borough's environment.

C.189 There is just one listed garden in Havering - Upminster Court Gardens, and just one scheduled monument which can be found within the Romford conservation area.

Newham

C.190 The Newham Local plan 2018-2033 **[See reference** 129**]** looks to tackle the legacy of Newham's historic position in London and integrate the area with local historic context. This position is taken forward in the Regulation 19 Local Plan (2024).

C.191 Newham has over 100 listed buildings, ranging from the 15th century Spotted Dog pub to the 19th century Abbey Mills Pumping Station. Eleven percent of listed buildings and monuments were considered to be 'At Risk' in 2017 **[See reference** 130**]**.

C.192 Newham's local list identifies historic buildings, spaces and features that are valued by the local community and that help give Newham its distinctive identity. The list identifies parts of the historic environment that are not already designated in another way (such as a listed building), but which nonetheless contribute to a sense of place, local distinctiveness and civic pride.

C.193 There are nine conservation areas in Newham:

- Durham Road Conservation Area, Manor Park, E12;
- East Ham Conservation Area, E6;
- Forest Gate Town Centre Conservation Area, E7;

- Romford Road Conservation Area, Forest Gate, E7;
- Stratford St John's Conservation Area, E15;
- Sugar House Lane Conservation Area, Stratford, E15;
- Three Mills Conservation Area, E3;
- University Conservation Area, Stratford, E15; and,
- Woodgrange Estate Conservation Area, Forest Gate, E7.

C.194 Two of Newham's conservation Areas: The Three Mills and Sugar House Lane are located in the London Legacy Development Corporation area.

C.195 The Local plan identifies Archaeological Priority Areas: five tier 1, sixteen tier 2, six tier 3 and one tier 4.

Redbridge

C.196 The Redbridge Local Plan 2015-2030 **[See reference** 131**]** looks to celebrate open spaces and enhance Redbridge's historic assets. The Council is also committed to the positive conservation and use of heritage assets as they make an important contribution to the identity, distinctiveness and character of Redbridge.

C.197 There are a range of heritage assets within the borough including over 200 statutorily listed buildings or structures of special architectural or historic interest and over 200 locally listed buildings.

C.198 There is also two Registered Historic Parks and Gardens, which are designed landscapes with special historic interest, no Archaeological sites and areas and eight Residential Precincts.

C.199 Redbridge has 16 Conservation Areas, which are statutory local designations covering areas of special architectural or historic interest:

- Aldersbrook and Lakehouse Conservation Area;
- Barnado's Village Homes Conservation Area;
- The Bungalow Estate Conservation Area;
- Claybury Conservation Area;
- George Lane Conservation Area;
- Little Heath Conservation Area;
- Snaresbrook Conservation Area;
- South Woodford Conservation Area;
- Valentines Mansion Conservation Area;
- Wanstead Park Conservation Area;
- Wanstead Grove Conservation Area;
- Wanstead Village Conservation Area;
- Woodford Bridge Conservation Area;
- Woodford Broadway Conservation Area;
- Woodford Green Conservation Area; and,
- Woodford Wells Conservation Area.

C.200 The 2016 London Borough of Redbridge Archaeological Priority Areas (APA) appraisal **[See reference** 132**]** finds a total of 36 Archaeological Priority Areas are recommended for Redbridge of which four are Tier 1 APAs, 28 are Tier 2 APAs and four are Tier 3 APAs.

Projected baseline information

C.201 The historic environment can be considered a finite resource. It cannot be replaced and is susceptible to decline over time as historic features experience degradation and decay. However, cultural heritage can evolve and

change, and features which are not currently considered a valued part of the historic environment may become so in the future, either due to their uniqueness, past use, or historic or cultural significance.

C.202 At local level, new developments, infrastructure and environmental pressures, such as extreme weather and flooding, present the greatest risk to cultural heritage assets.

C.203 Historic England has a Heritage at Risk Register **[See reference** 133**]** which includes historic buildings, listed buildings, sites and Conservation Areas at risk of being lost through neglect, deterioration or decay. The register aims to highlight those places and buildings in greatest need of repair. As of 2023, there are eighty-one heritage assets registered as at risk within wider London. There are six heritage assets registered at risk within Barking and Dagenham, twelve within Havering, thirteen within Newham and nine within Redbridge.

Implications for health

C.204 Historic England explored the links between the historic environment and health in Wellbeing and the Historic Environment **[See reference** 134**]**. This identified mental and social wellbeing benefits of the historic environment, including opportunities to meet people and expand knowledge through volunteering or visiting historic sites and giving people a sense of place, community and belonging.

Key sustainability issues and opportunities for the ELJWP to address them

C.205 There are many designated and undesignated heritage assets and areas of historical and cultural interest in the ELJWP area that could be adversely affected by climate change and poorly located or designed development. While several of the historic assets in the plan area, for example Listed Buildings and

Scheduled Monuments, will continue to be protected by statutory designations, without the ELJWP it is possible that these, and undesignated assets, will be adversely affected by inappropriate development. The ELJWP provides an opportunity to protect these assets (including their settings) from inappropriate waste development.

C.206 Although there is a high level of protection afforded historic sites within the NPPF and NPPW, more of an emphasis could be placed within the ELJWP on directing waste developments away from sensitive locations and requiring them to be designed and built so as to minimise adverse effects on the county's historic environment above and below ground.

Landscape and townscape

Current baseline information

C.207 The National Character Map defines the ELJWP area as lying within National Character Areas 111 - Northern Thames Basin and Area 112 – Inner London **[See reference** 135**]**.

C.208 The Northern Thames Basin area is more diverse mix of urban and rural landscapes. The rural and dispersed landscape adjacent to Essex becomes increasingly urban towards the centre of London. There is a mix of historic settlement patterns, with remnants of historical orchards and other communal green and farmed spaces. Urban areas have low levels of tranquillity with pockets of perceived tranquillity, as with the Inner London area. Moving eastwards in the ELJWP area, tranquillity increases as green space and Green Belt areas increase.

C.209 Within the Inner London area, there is a strong sense of place along the Thames and particularly in the wharfs and creeks of East London as well as the parks and gardens, green spaces, rivers and other natural habitats. There are strong settlement patterns, and industrial features, with good public access to

heritage assets. The whole NCA scores negatively for tranquillity, but there are good pockets of perceived tranquillity in public parks and other small spaces.

Projected baseline information

C.210 Within the **Inner London NCA**, there are several drivers for change that will put pressure on landscape. These include:

- Overheating, flooding and drought cause by hotter, drier summers; warmer, wetter winters; and more frequent incidences of extreme weather;
- Change in species composition and reduction in the connectivity of habitats;
- Reduced water availability and lower oxygen levels in water bodies;
- Regeneration and development: As well as ongoing commercial and housing development pressure, Inner London will be affected by major infrastructure projects such as the Thames Tideway Tunnel and Cross Rail. Changes to the London skyline and iconic views will be affected by new building developments in the centre; and
- Development on brownfield land and urban greening have reduced pressure on London's green spaces and can bring land back into beneficial use.

C.211 Within the **Northern Thames Basin NCA**, drivers for change include:

- Continued urban expansion of settlements putting pressure on their landscape setting;
- Provision of new open space to improve health and wellbeing, which could lead to habitat fragmentation and an altered landscape character;
- Increased development of infrastructure (transport, logistics and industrial);
- Continued demand for minerals;

- Climate change will lead to increased wind erosion in hotter and drier periods and water erosion in the wetter, colder periods;
- Loss of brownfield sites in developed areas putting pressure on invertebrate habitats; and
- Decreased water availability with potential loss of specific drought intolerant species and water quality of water bodies.

C.212 The urban landscapes can be conserved by maintaining green spaces, landscaping and trees and implementing good design practices in new developments. Maintaining the rural landscape and natural landforms will be dependent on being able to preserve and conserve ancient woodlands, unimproved grasslands, protected lanes, commons and hedge-rowed field patterns, as well as the ridges and hilltops from inappropriately located or designed development, changing agricultural practices and seasonal climate change.

Implications for health

C.213 The landscape can benefit mental health and wellbeing in providing a pleasant setting and identifying and enhancing local landscape contributes to sense of place and belonging. Sensitive landscape management can also improve social and physical health by encouraging physical recreation, including providing a pleasant environment for activities such as walking and cycling, providing good public access links and helping people to feel safe and confident in navigating landscapes.

Key sustainability issues and opportunities for the ELJWP to address them

C.214 East London's varied urban and more rural landscapes are vulnerable to adverse effects from urban intensification, increasing recreational pressures

and seasonal climate change. The ELJWP provides an opportunity to help to protect and enhance such areas by directing development to the most sustainable locations and ensuring the design of new waste facilities is sympathetic to the surrounding area. The ELJWP will be best placed to do so if it is able to draw on up to date evidence on landscape character and sensitivity.

Biodiversity

Current baseline information

C.215 Biodiversity net gain (BNG) is mandatory in England from 12 February 2024 **[See reference** 136**]**. The NPPF emphasises that plans should identify and pursue opportunities for securing measurable net gains for biodiversity, and plans and decisions should minimise impacts and provide net gains for biodiversity. The statutory framework aims to ensure that developments will achieve at least a 10% gain in biodiversity value. The requirement will apply to most new planning applications within each borough, whether or not the requirement is captured within their adopted local plan.

C.216 The London Environment Strategy **[See reference** 137**]** includes policies and proposals that aim to ensure that more than half of London will be green by 2050 and the city's tree canopy cover increases by 10%. The Strategy aims to achieve this by:

- Making it the first National Park City (achieved in 2019 **[See reference** 138**]**);
- Working with others to expand and improve London's urban forest;
- Highlighting the economic value of London’s natural capital, and finding new ways to fund London’s green infrastructure that recognise this value;
- Providing guidance and support to help people manage and create habitats for wildlife and enhance London’s biodiversity;

- Making maps, data and research available to help others to make a case for and identify priorities for green infrastructure in their local area;
- Including policies in the new London Plan to protect the green belt and our best wildlife habitats, and to ensure that new developments include enough urban greening; and,
- Supporting communities and others to improve London's greenspaces and opportunities to enjoy nature through funding programmes.

C.217 The Strategy recognises that in the past, green spaces and biodiversity in London has deteriorated in size and quality and now faces many environmental challenges. One of the challenges identified is waste. The Strategy states that waste has a big impact on the biodiversity and the environment both locally and globally. Less than half of the 7m tonnes of waste that London's homes and businesses produce each year is currently recycled, and landfill capacity is set to run out by 2026. Plastic packaging not only litters London streets, but often finds its way into waterways and oceans, releasing toxic chemicals before breaking down – a process that can take centuries. London needs to reduce, reuse and recycle more, to see waste as the valuable resource that it is, and to reduce London's increasing waste bill as the city grows.

C.218 There are three European protected wildlife sites within 5km of the four boroughs; Epping Forest Special Area of Conservation (SAC), Lee Valley Special Protection Area (SPA) and Lee Valley Ramsar. The south edge of Epping Forest crosses into the northern boundary of Redbridge. Downstream from the river Thames, which forms the southern boundary of the Plan area are Thames Estuary & Marshes Ramsar and SPA, which is within 10km of the plan area, and the Benfleet and Southend Marshes SPA.

C.219 Epping Forest is a former royal forest and one of the few remaining large-scale examples of ancient wood-pasture in lowland Britain. It is long (~19km) but relatively narrow, covering a series of semi-natural woodland and grassland blocks between Wanstead in London (near the A12) and the M25 at Epping. Approximately two-thirds of the forest is designated as an SAC.

C.220 The site supports a mosaic of high-value habitats including ancient semi-natural beech woodlands (which dominate the site), unimproved acid grasslands, wet and dry heath, as well as small rivers, streams and bogs. The woodlands primarily correspond to the NVC communities W14 (Fagus sylvatica – Rubus fruticosus woodland), W15 (Fagus sylvatica – Deschampsia flexuosa woodland) and W10 (Quercus robur – Pteridium aquilinum – Rubus fruticosus woodland); the heathland habitats are primarily NVC communities M16 (Erica tetralix - Sphagnum compactum wet heath and H1 (Calluna vulgaris - Festuca ovina) heathland. The long history of grazing (formerly) and management has produced habitats (including large numbers of veteran trees) that are important for a range of associated species and species groups, including rare epiphyte communities, fungi, and saproxylic invertebrates.

C.221 The forest is London's largest open space and so is a significant resource for recreation, being used for a range of activities including walking, dog walking, running, cycling, wildlife watching and horse-riding. Indeed, the Epping Forest Act 1878 stipulates that it "shall at all times [be kept] .as an open space for the recreation and enjoyment of the people".

C.222 The SSSI underpinning the SAC is mostly in ‘favourable’ or ‘unfavourable recovering’ condition. The primary reasons for SSSI units being in ‘unfavourable no change’ or ‘unfavourable recovering’ condition are air pollution and public access / disturbance, although management and invasive aquatic species are also issues for some units. Accordingly, the improvement plan identifies the following pressures affecting site integrity:

- Air pollution (impact of atmospheric nitrogen (N) deposition);
- Undergrazing;
- Public access / disturbance; and
- Invasive species. Changes in species distributions (relates to tree recruitment), water level management (principally relating to groundwater levels in wet heath areas), water pollution (primarily from local road run-off), disease (principally tree diseases) and invasive species (spread of heather beetle; impact of grey squirrel on woodland regeneration; Crassula dominance in Speakman’s Pond) are all identified as threats.

C.223 The London Borough of Redbridge and the London Borough of Newham along with Natural England, City of London, and neighbouring Planning Authorities (Responsible Bodies) have developed a joint Strategic Access Management and Monitoring Strategy for Epping Forest SAC to manage the impact of visitor pressure, identified as a likely significant effect during Plan Making for neighbouring authorities **[See reference** 139**]**. Each impacted authority is also leading individually on work to secure Suitable Alternative Natural Greenspace and to understand and mitigate any air quality impacts on the Forest.

C.224 The Lee Valley SPA and Lee Valley Ramsar site (hereafter the 'SPA/Ramsar' unless considering specific site features) comprise a series of man-made and semi-natural waterbodies (reservoirs, lagoons and gravel pits) along the River Lea in North London. The closest units to the Newham borough area are a group of reservoirs around Walthamstow constructed in the late 19th century; the remainder of the SPA/Ramsar is located north of the M25 and substantially beyond the zone of influence of the ELJWP. Parts of the sites are managed as nature reserves.

C.225 The Walthamstow reservoirs are operated by Thames Water and are used for fishing and birdwatching, but water sports are not permitted. There are however a number of well used public paths around the reservoir margins. Other units of the SPA are used for recreational water sports.

C.226 The SSSI units underpinning the SPA and Ramsar site are currently in 'favourable' or 'unfavourable recovering' condition, and the SIP does not identify any pressures currently affecting site integrity. The improvement plan **[See reference** 140**]** identifies several threats, principally:

- Water pollution (principally related to the need for clear open water and moderately eutrophic conditions);
- Water level management (principally relating to the operation of the reservoirs for water abstraction);
- Public access / disturbance (recreational water sports (not within Walthamstow reservoirs), angling and dog-walking);

- Inappropriate scrub control (relating to reedbed management and marginal habitats);
- Fish stocking (relating to recreational angling and the need to balance this against the interest feature requirements);
- Invasive species (the wetlands are periodically colonised by Azolla);
- Inappropriate cutting / mowing (rotational management of reedbed for bittern)
- Air pollution (principally relating to potential effects on reedbeds supporting bittern, although it should be noted that for most wetland habitats eutrophication via run-off and flood water is overwhelmingly more significant than air pollution, and available Nitrogen is rarely a limiting factor in these ecosystems).

C.227 The boroughs are also important locations for various nationally and locally important habitats and species. A total of eight sites are currently designated as Sites of Special Scientific Interest (SSSI's) in Redbridge, whilst Havering contains three SSSIs.

C.228 There are 42 Sites of Importance for Nature Conservation (SINCs) within the London Borough of Newham **[See reference** 141**]**. In Barking and Dagenham, a total of 25 sites are currently designated as SINCs. These comprise three Sites of Metropolitan Importance, seven Sites of Borough Importance Grade 1, eight Sites of Borough Importance Grade 2 and seven Sites of Local Importance **[See reference** 142**]**. A total of 35 sites are currently designated as SINCs in Redbridge (five Sites of Metropolitan Importance, seven Sites of Borough Importance (Grade 1), 13 Site of Borough Importance (Grade 2) and 10 Sites of Local Importance) **[See reference** 143**]**. In Havering, there are 101 designated Sites of Importance for Nature Conservation, of which 11 are Metropolitan SINCS as well as a number of wildlife corridors. There are seven Local Nature Reserves and a number of areas of ancient woodland.

C.229 The London Borough of Barking and Dagenham does not have extensive natural assets, due to its industrial past and heritage. The borough does not

have any Areas of Outstanding Natural Beauty (AONB), Ramsar sites, Special Areas of Conservation or SSSI's **[See reference** 144**]**.

C.230 Endangered species and habitats are protected through the compilation and delivery of Biodiversity Action Plans (BAPs) at national, regional and local levels. Priority Habitats and Species are regarded as the most important habitats and species that need to be conserved across the country.

Projected baseline information

C.231 At UK level, the publication of the State of Nature Report **[See reference** 145**]** provides an overview of the health of the country's wildlife and how human impacts are driving sweeping changes in the UK. It looks back over 50 years of monitoring to see how nature has changed since the 1970s, averaging a 13% decline in the average abundance of wildlife in the UK since the 1970s, with key drivers for change being agricultural productivity, climate change and increasing average temperatures, urbanisation and hydrological changes. The report finds that on average, metrics suggest that decline in species abundance and distribution of species has continued in the UK throughout the most recent decade. These trends are likely to continue in the absence of concerted action.

Implications for health

C.232 A strong link exists between access to nature and biodiversity and associated health and societal benefits. Considering the COVID-19 pandemic, the importance of safe, accessible and well-connected green and blue spaces for improving quality of life has also never been more pertinent.

C.233 According to the recently published World Health Organisation report 'Nature, Biodiversity and Health: An Overview of Interconnections' **[See reference** 146**]** increased exposure to nature has been associated with a lower risk of specific health conditions including depression, anxiety, cortisol, blood pressure, pre-term birth, low birthweight, type 2 diabetes, and reduced risk of

death from all causes. There is generally positive evidence relating to the impacts of activities in natural environments on children's mental health and their cognitive, emotional and behavioural functioning. These health benefits are thought to arise through a range of pathways, including providing opportunities and safe spaces for physical activity, for restoration and relaxation, and for socialising with friends and family. Exposure to green and blue space is also associated with higher levels of life satisfaction. Impacts appear to differ according to socio-economic status and other demographic factors such as age or gender.

Key sustainability issues and opportunities for the ELJWP to address them

C.234 The ELJWP area contains many areas of high ecological value ranging from European designated sites such as the Epping Forest SAC in Redbridge, to nationally designated Sites of Special Scientific Interest, Sites of Metropolitan Nature Conservation Importance and Sites of Importance for Nature Conservation among local green spaces and networks that provide ecological connectivity and greater biodiversity, and there is proximity to sites of national importance.

C.235 There is a need for continued preservation and long-term management of these areas within the plan area, as well as consideration of potential effects on sites outside the plan area boundary. Local Wildlife Sites in the borough are being negatively affected by actions such as inappropriate management, traffic pollution and recreational activities. If this continues, it could affect their wildlife value and contribution they make to biodiversity, landscapes and the natural environment. Biodiversity harm can occur outside of protected areas, and local wildlife corridors should also be protected, appropriately within the hierarchy of types of designations.

C.236 Without the ELJWP, important habitats and biodiversity sites will continue to receive statutory protection. However, the ELJWP presents an opportunity to manage the sensitivities of the sites and biodiversity networks, for example by

locating waste development away from the most sensitive locations, providing for biodiversity net-gain in new development. The plan should also ensure that waste development does not adversely affect the current condition of sites and where possible contributes to their improvement. Harm to biodiversity can also be avoided through the consideration of sustainable transport and the avoidance and reduction of amenity impacts.

Air, land and water quality

Soils and geology

Current baseline information

C.237 Although all four boroughs are within the large urban expanse of Greater London, there are still large areas of green space, although these are mostly in non-agricultural use. Natural England land classification maps for London and the South East **[See reference** 147**]** show that although most land is classified as 'Land predominantly in urban use' there are pockets of Good to Moderate and potentially 'Excellent' land within the ELJWP area.

C.238 Most of the ELJWP area is considered brownfield or Previously Developed Land (PDL). All four boroughs have a history of industrial land use and potential for the discovery of contaminated land requiring mediation in tandem with new development.

C.239 There are limited minerals deposits or mineral processing facilities within the ELJWP area. National policy requires that mineral resources are safeguarded for future use **[See reference** 148**]**. The recycling of soils and construction wastes on development sites is one of the main ways that use of these resources is minimised in the ELJWP area.

Projected baseline information

C.240 Soil is a finite natural resource which regenerates only over extremely long geological timescales and provides many essential services including food production, water management and support for valuable biodiversity and ecosystems. It also plays a role in preventing climate change as a larger storer of carbon.

C.241 Soils in England have degraded significantly over the last two decades due to intensive agricultural production and industrial pollution and continue to face the following threats:

- Soil erosion by wind and rain, affects the productivity of soils as well as water quality and aquatic ecosystems;
- Compaction of soil, reduces agricultural productivity and water infiltration, and increased flood risk through higher levels of runoff; and
- Organic matter decline affects the supply of nutrients in soil moisture (particularly during summer and autumn months) in the future, which is likely to affect the natural environment and landscape.

Water

Current baseline information

C.242 Water consumption rates per household are still mainly composed of flushing toilets, washing clothes or taking a bath or shower. The London Plan 2021 **[See reference** 149**]** sets water efficiency standards for new development of 105 litres or less per person per day.

C.243 Several water bodies across the four boroughs do not meet the required ‘good' status, and a number of water bodies and watercourses are protected sites and sensitive to changes in water quality. In Newham, the Thames, Lea

and Roding rivers have not improved in water quality over the past few years, whilst the River Beam (from Ravensbourne to the Thames) is classified as Bad and the Lower Roding, Mayesbrook River and the Goresbrook in Barking and Dagenham all fail on Chemical quality **[See reference** 150**]**.

Projected baseline information

C.244 Under predicted climate change scenarios, more frequent drought conditions are expected in London and the South East of England, along with increased demands on water resources. Future developments will create additional demand for water abstraction from surface and groundwater sources in London. At a high level, it is broadly assumed that the quality of water bodies will improve in line with national objectives. However, water quality is influenced by a wide range of internal and external factors, including climate change, geology and soils, human consumption and population change, and pollution from human activities such as industry, agriculture, contaminated runoff from roads and other built surfaces, combined sewer overflows, and nutrient enrichment from treated wastewater. Future development, particularly in areas close to water bodies, may therefore hamper efforts to improve water quality.

Air and noise pollution

Current baseline information

C.245 Air pollution associated with London's road network has exceed statutory nitrogen dioxide levels and needs active monitoring and management. Whilst noise complaints in the London Boroughs are more commonly associated with domestic noise, Building Regulations aim to manage the impact of noise from new domestic and industrial developments through good design. Furthermore, the increasing prevalence of sustainability standards such as BREEAM will also have a positive contribution.

C.246 Development of an up-to-date local planning framework will ensure that ELJWP and development management policies seek to address the current sustainability issues (including noise). In the absence of the ELJWP, the policies in the NPPF and the Clean Air Strategy **[See reference** 151**]** would apply which support measures to improve air quality through traffic and travel management; to develop and enhance green infrastructure; and to direct new development to sustainable locations which limits the need to travel and offer a choice of transport modes.

C.247 All local authorities have an obligation to declare AQMAs, via the Environment Act 1995, and develop action plans for improvement of air quality. As set out in paragraph 3.246, each of the four boroughs has declared one AQMA that covers the whole borough.

C.248 The London Plan defines Air Quality Focus Areas (AQFA) as locations that not only exceed the EU annual mean limit value for nitrogen dioxide but are also locations with high human exposure. AQFAs are not the only areas with poor air quality but they have been defined to identify areas where currently planned national, regional and local measures to reduce air pollution may not fully resolve poor air quality issues **[See reference** 152**]**. There are currently 187 total designated AQFAs across London.

C.249 In the London Borough of Barking and Dagenham, there are three:

- Barking Town Centre;
- A13 Ripple Road; and,
- Whalebone Lane North.

C.250 In Havering there is one (Romford Town Centre).

C.251 In Newham there are five:

- Barking Road A124 from Canning Town to Wallend/Barking;
- Newham Way A13 and Prince Regent Lane;

- Canning Town Silvertown Way;
- Stratford Town Centre and Romford Road; and,
- A118 Romford Road at Manor Park between Green St and Little Ilford Lane).

C.252 In Redbridge there is one designated AQFA (Ilford A123 Ilford Road and Telford Hill) **[See reference** 153**]**.

C.253 There is a risk that local air quality could be worsened by waste development, particularly through emissions from conventional fossil-fuel based transport of waste.

C.254 The London Borough of Redbridge produced an Air Quality Action Plan (AQAP) in 2020, which outlines the action the Council is taking to improve air quality in the Borough from 2020-2025 **[See reference** 154**]**. Furthermore, We Care For Our Air is a community focused project in Redbridge aiming to improve air quality in the borough and to raise awareness about the issues of air pollution. The project runs from March 2023 to March 2025, focussing on schools and GP surgeries in three areas: Loxford, Goodmayes and Newbury. Residents are encouraged to get involved in monitoring air pollution levels in their neighbourhoods. The data gathered will be used to drive action towards improving local health outcomes **[See reference** 155**]**.

C.255 The ELJWP could support a spatial strategy that will facilitate an increasingly effective and efficient network of waste facilities that will reduce the frequency and miles needed to be travelled by waste. It could seek to use more sustainable alternatives to emission-generating fossil-fuel based road transport of waste. This could include switching to more sustainable modes of transport or to low and zero carbon road-based transport.

C.256 The ELJWP could also support efficient and appropriate freight routes for transporting waste by road that avoid areas with the worst rates of air pollution – namely AQMAs.

Projected baseline information

C.257 Each of the London Boroughs has declared an AQMA:

- Barking and Dagenham AQMA declared in 2008 for Nitrogen dioxide and Particulate Matter PM10.
- Havering AQMA 2006 for Nitrogen dioxide and Particulate Matter PM10.
- Newham AQMA (No.2) 2019 for Nitrogen dioxide and Particulate Matter PM10.
- Redbridge AQMA 2003 for Nitrogen dioxide and Particulate Matter PM10.

C.258 There is a possibility that air quality may worsen in the long-term because of climate change, due to a greater likelihood of prolonged periods of still, dry days, and to-date this relationship has been difficult to predict. This will need to be considered in the potential development of air quality action plans and monitoring regimes, as will the effects of major infrastructure developments.

C.259 The Mayor of London has designated a Low Emission Zone (LEZ), and an Ultra Low Emission Zone (ULEZ), in addition to the Congestion Charge zone. The LEZ covers all roads within Greater London, those at Heathrow and parts of the M1 and M4 are included, except the M25 (even where it passes within the GLA boundary). The LEZ is designed to target pollution from the heaviest polluting heavy diesel vehicles.

C.260 The ULEZ covers all London boroughs, except for the area of the M25, and applies to all cars, motorcycles, vans and specialist vehicles (up to and including 3.5 tonnes) and minibuses (up to and including 5 tonnes).

C.261 The congestion charge zone covers part of central London, outside of the ELJWP area, and is designed to discourage driving in the centre of London.

Implications for health

C.262 Air pollution is associated with several adverse health impacts and is recognised as a contributing factor in the onset of heart disease and cancer. Pollution particularly affects the most vulnerable in society such as children, the elderly, and those with existing heart and lung conditions. There is also often a strong correlation between poor air quality areas and less affluent areas.

C.263 London and the South East of England is one of the driest areas of the country and thus faces ongoing water resource challenges, growing demand, and uncertainty from climate change. In addition, poor water quality can increase the risk of water-borne disease.

Key sustainability issues and opportunities for the ELJWP to address them

Soils and geology

C.264 Without the ELJWP it is possible that development could result in unnecessary sterilisation of mineral and soil resources thereby preventing their use for future generations, if there is additional need for new or relocated waste sites. There is therefore a need to minimise the amount of development located on brownfield land or on important mineral processing facilities. In the absence of the ELJWP, the NPPF would apply. This supports the reuse of brownfield land, but the ELJWP provides an opportunity to strengthen this approach to ensure these natural assets are not lost or compromised by prioritising brownfield sites and lower quality agricultural land for development.

- Provide adequate space in new developments for waste facilities capable of accommodating general waste, recyclable waste and compostable waste;

- Ensure site allocations do not compromise the operation of nearby waste management facilities; and
- Ensure sufficient land is available in appropriate locations for new waste management facilities.

Water

C.265 There are many factors and initiatives outside of the local planning policy framework contained within the ELJWP that may impact on water quality and the use of water resources, such as land management practices and investment plans by utility bodies. However, the ELJWP has a role to play by ensuring new and expanded waste management developments will not adversely impact upon water quality and / or water quantity through securing efficient use of water resources. The ELJWP could also create a clear, positive and supportive investment environment in which opportunities to upgrade and improve the network of waste water facilities across the county are taken.

C.266 Without the ELJWP, it is possible that unplanned development for waste could be in areas that could lead to further water quality issues and risks to the natural environment. However, existing safeguards, such as the Water Framework Regulations, would help to reduce the potential for this to occur. The ELJWP provides an opportunity to ensure that development is located and designed to consider the sensitivity of the water environment and water-dependent protected sites, to plan for adequate wastewater infrastructure, to incorporate sustainable drainage systems (SuDS), and to promote water efficiency and grey water recycling.

Air and noise

C.267 Air pollution associated with London's road network has exceed statutory levels and needs active monitoring and management. Whilst noise complaints in the London Boroughs are more commonly associated with domestic noise, Building Regulations aim to manage the impact of noise from new domestic and

industrial developments through good design. Furthermore, the increasing prevalence of sustainability standards such as BREEAM will also have a positive contribution.

C.268 Development of an up-to-date local planning framework will ensure that ELJWP and development management policies seek to address the current sustainability issues (including noise). In the absence of the ELJWP, the policies in the NPPF and the Clean Air Strategy **[See reference** 156**]** would apply which support measures to improve air quality through traffic and travel management; to develop and enhance green infrastructure; and to direct new development to sustainable locations which limits the need to travel and offer a choice of transport modes.

C.269 All local authorities have an obligation to declare AQMAs, via the Environment Act 1995, and develop action plans for improvement of air quality. As set out in paragraph 3.246, each of the four boroughs has declared one AQMA that covers the whole borough. There is a risk that local air quality could be worsened by waste development, particularly through emissions from conventional fossil-fuel based transport of waste.

C.270 The ELJWP could support a spatial strategy that will facilitate an increasingly effective and efficient network of waste facilities that will reduce the frequency and miles needed to be travelled by waste. It could seek to use more sustainable alternatives to emission-generating fossil-fuel based road transport of waste. This could include switching to more sustainable modes of transport or to low and zero carbon road-based transport.

C.271 The ELJWP could also support efficient and appropriate freight routes for transporting waste by road that avoid areas with the worst rates of air pollution – namely AQMAs.

Figure C.2: Transport Network within the EJLWP Area

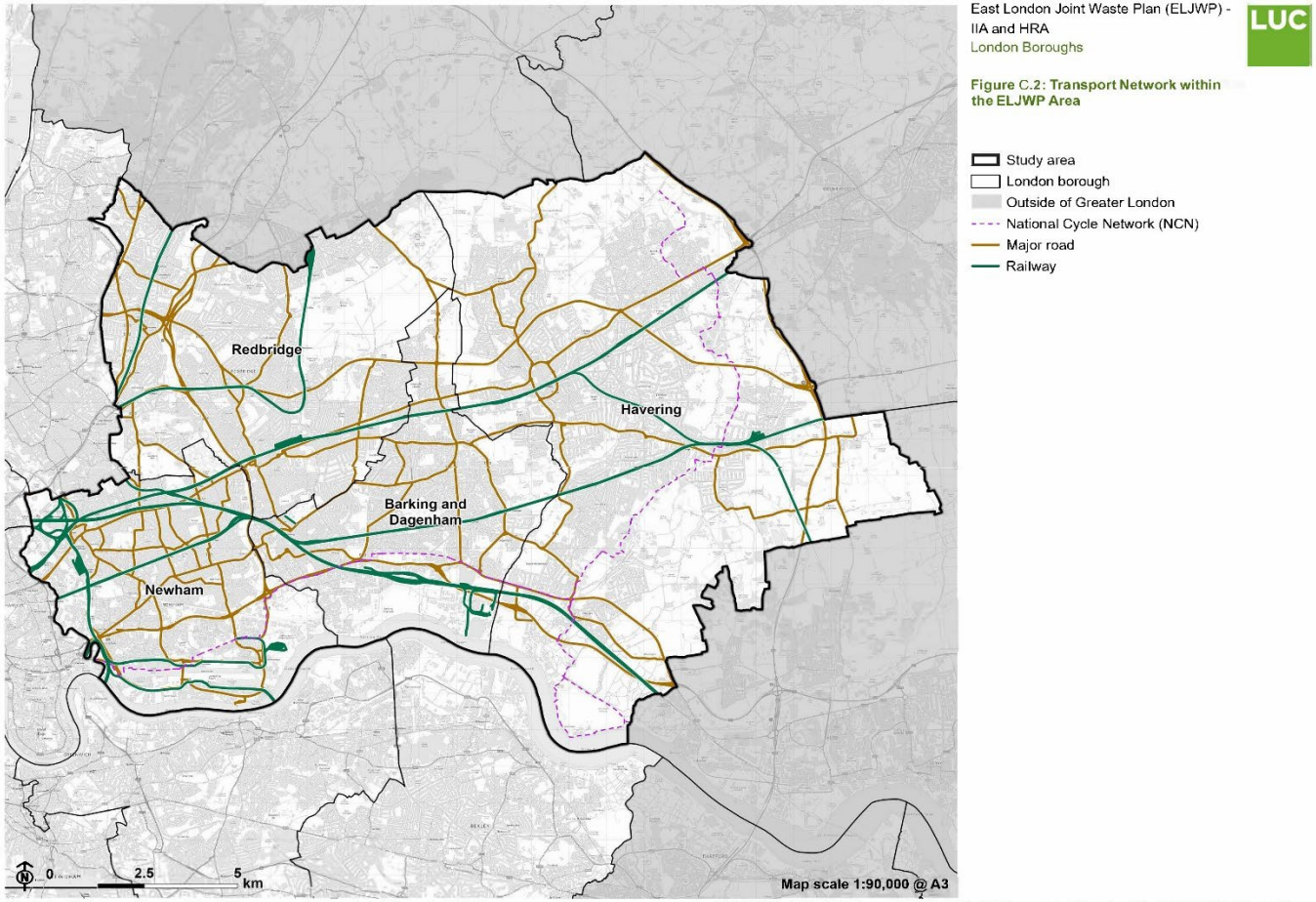


Figure C.3: Indices of deprivation within the EJLWP Area

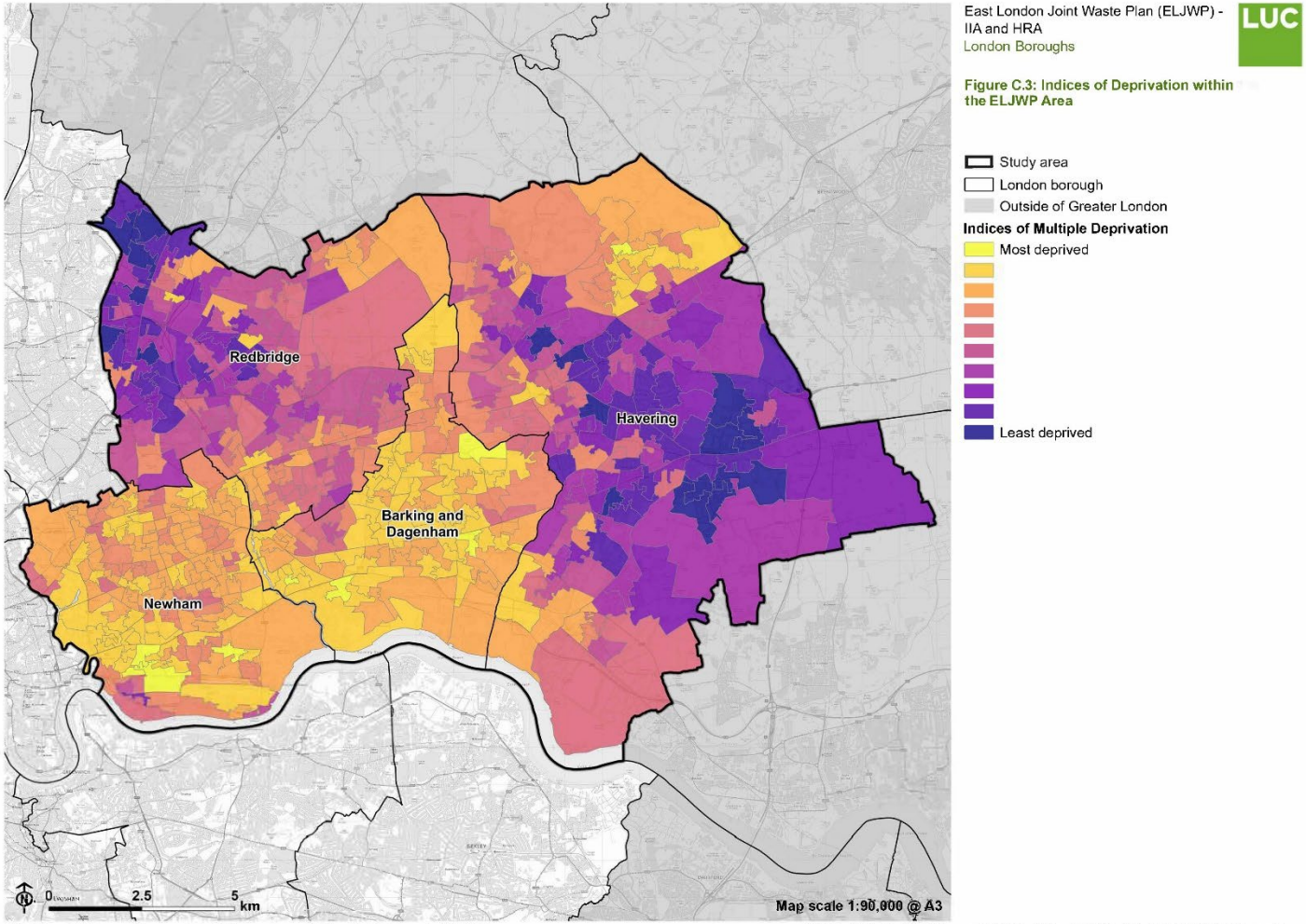


Figure C.4: Historic Environment within the ELJWP Area

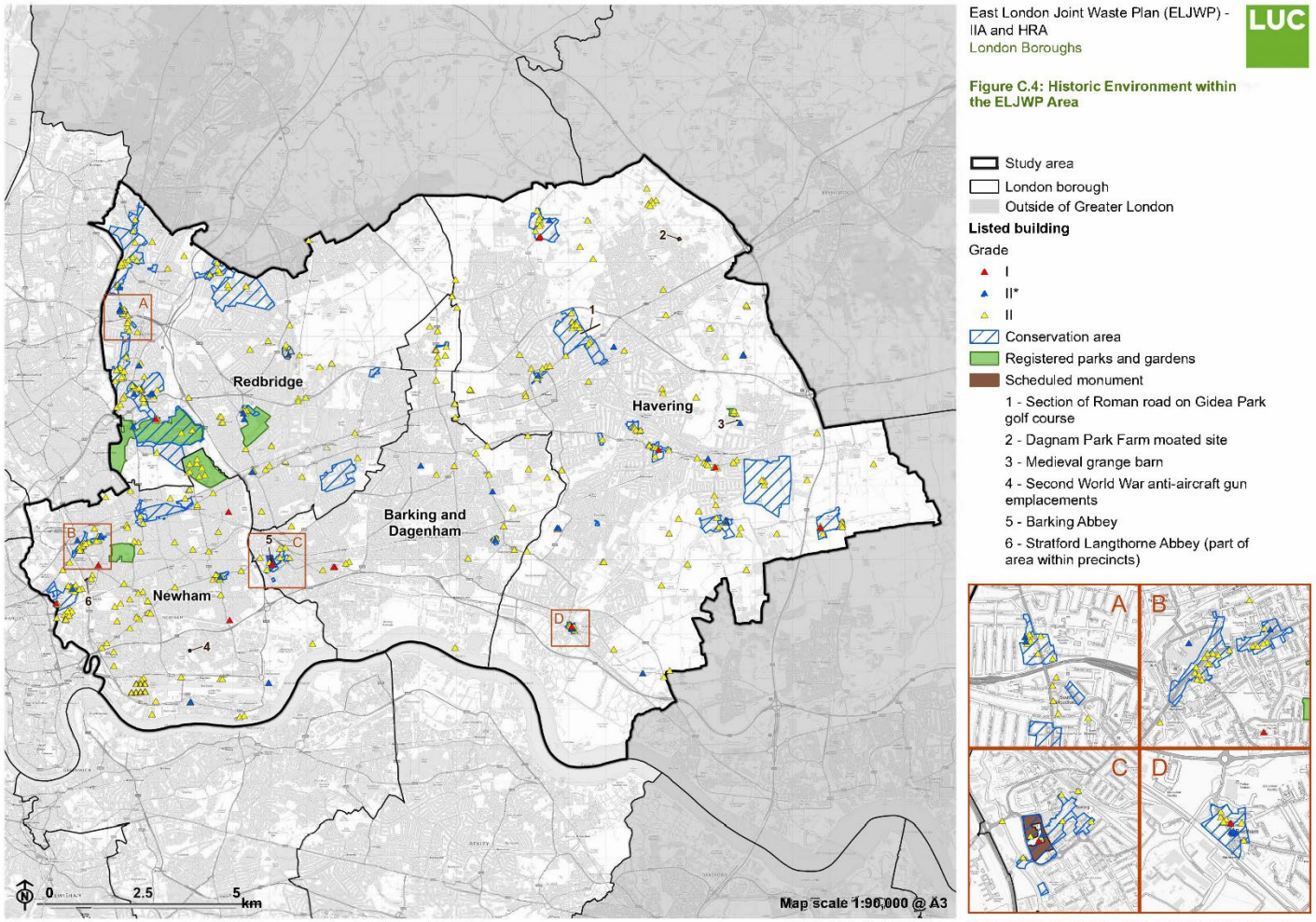


Figure C.5:Open Space and Metropolitan Green Belt within the EJLWP Area

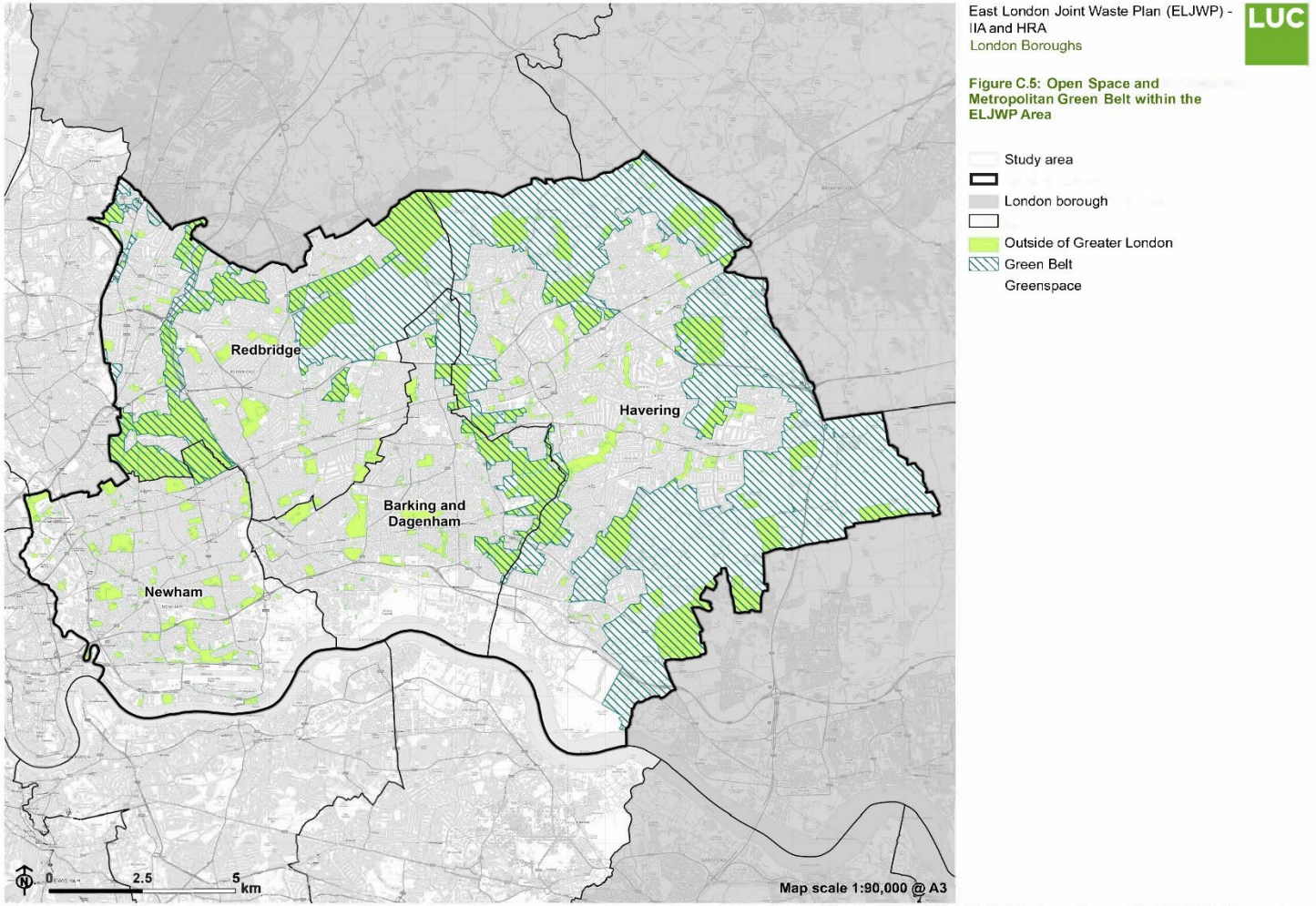


Figure C.6:Biodiversity within the EJLWP Area

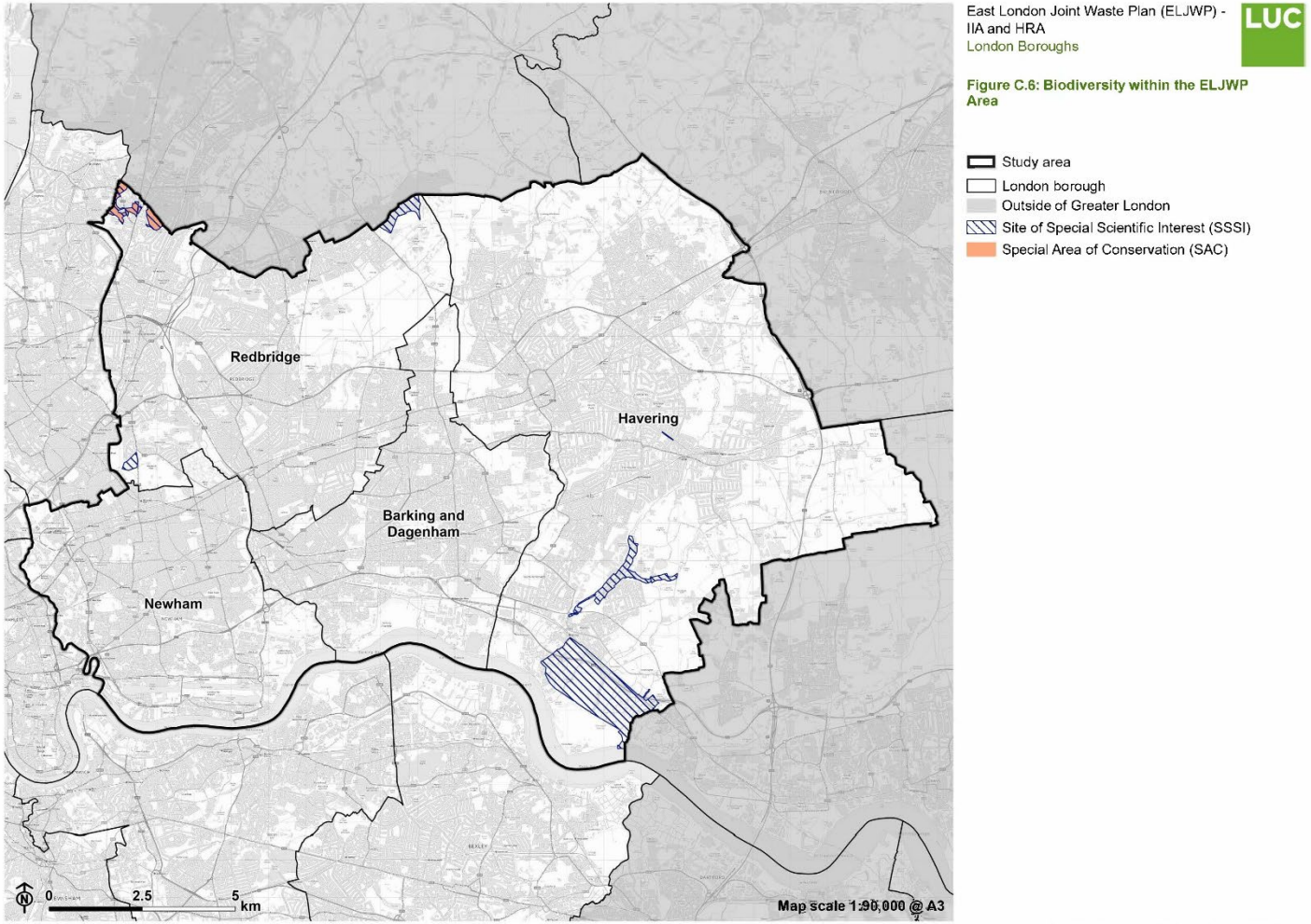
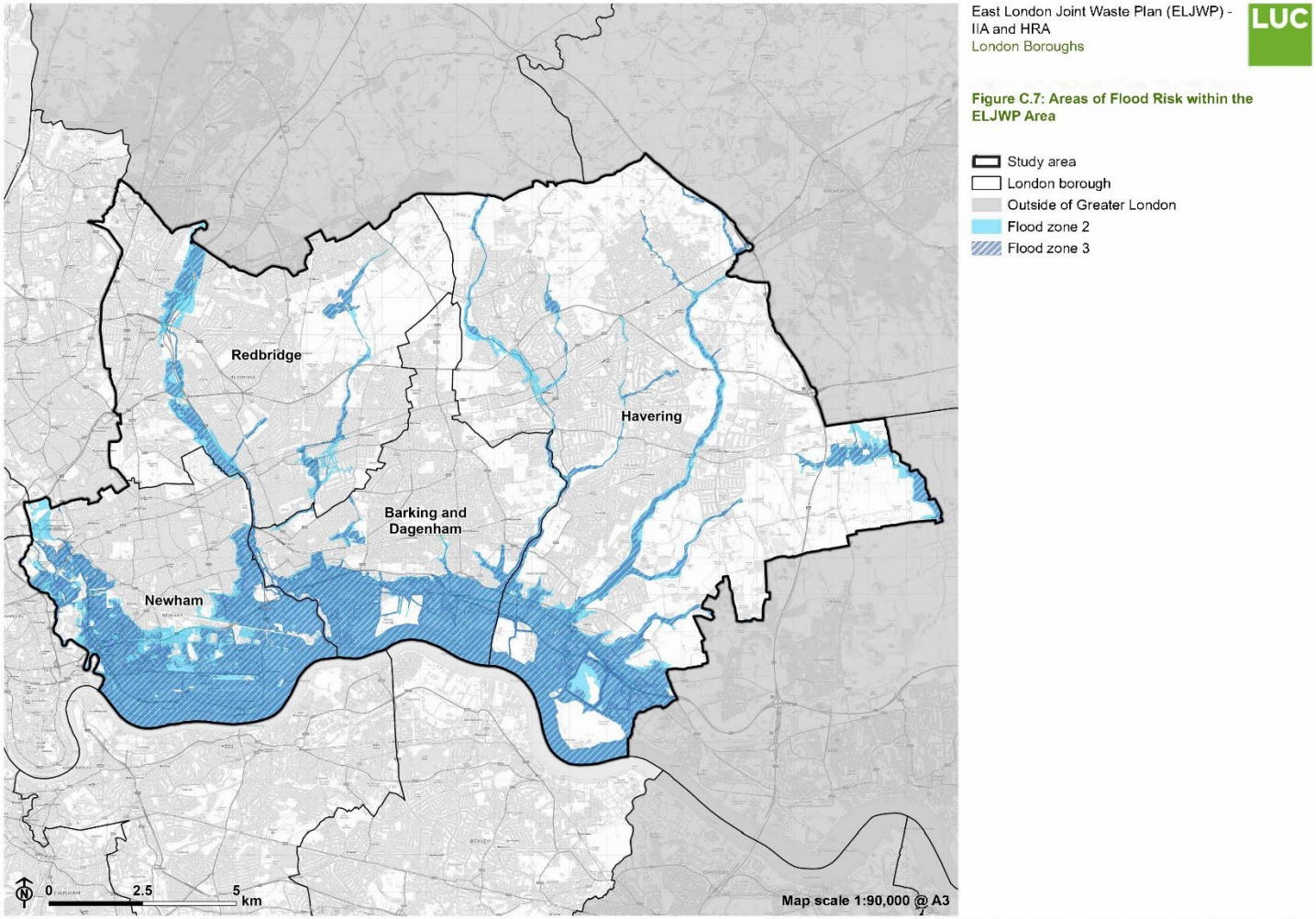


Figure C.7: Areas of Flood Risk within the EJLWP Area



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Habitats Regulations Assessment of the East London Joint Waste Plan

HRA Report

London Boroughs of Barking & Dagenham, Havering, Newham, and Redbridge

Final report

Prepared by LUC

February 2025

Version	Status	Prepared	Checked	Approved	Date
1	Draft Regulation 19 HRA	H Ennis K Sydney	K Sydney	J Pearson	21.01.2025
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Executive Summary

LUC was commissioned to carry out a Habitats Regulations Assessment (HRA) of the emerging East London Joint Waste Plan (ELJWP). The new ELJWP will provide the local planning policy framework for all waste planning matters across the London Borough of Barking and Dagenham, London Borough of Havering, London Borough of Newham, and London Borough of Redbridge. The ELJWP contains seven strategic policies covering how and where waste will be managed and will be used to determine planning applications affecting the management of waste.

The purpose of the HRA is to determine whether the ELJWP policies or any development proposed will have adverse effects on the integrity of any Habitats Sites: Special Areas of Conservation (SACs), Special Protection Areas (SPAs) or Ramsar sites. The Habitats Sites considered in the HRA are: Epping Forest SAC (within the ELJWP area); and Lee Valley SPA/Ramsar site, Wormley Hoddesdonpark SAC, and Thames Estuary & Marshes SPA/ Ramsar site (all within 15km of the ELJWP area and therefore have the potential to be affected by development from the plan). The HRA also takes into account potential impacts on habitats outside the designated areas that provide vital support to species (e.g. birds) for which the Habitats Sites are designated. These are known as ‘functionally linked’ habitats and are most relevant where a Habitat Site is designated for bird species (SPA and Ramsar sites), although are sometimes used by other species including invertebrates (e.g. stag beetles from Epping Forest SAC).

HRA screening has been undertaken to identify likely significant effects associated with the plan’s policies and the locations in which waste development could occur. At screening stage, likely significant impacts could not be ruled out for:

- Physical damage and loss of habitat (Epping Forest SAC);
- Air pollution due to dust (Epping Forests SAC);

- Air pollution due to industrial emissions or vehicle emissions (Epping Forest SAC and Lee Valley SPA/Ramsar site);
- Pests and vermin (Epping Forest SAC);
- Changes to water quality and quantity - direct pollution (Thames Estuary & Marshes SPA/Ramsar site);
- Changes to water quality and quantity – abstraction (Lee Valley SPA/Ramsar site); and
- Changes to water quality and quantity - wastewater (Lee Valley SPA/Ramsar site and Thames Estuary & Marshes SPA/Ramsar site).

These impacts would arise from four of the ELJWP's policies: JWP2: Safeguarding and Provision of Waste Capacity, JWP2B: Safeguarding and Provision of wastewater Treatment Capacity, JWP5: Energy from Waste and JWP6: Deposit of Waste on Land.

Appropriate Assessment was therefore undertaken in order to determine whether the identified impact pathways would result in an adverse effect on the integrity of any Habitats Sites; i.e. prevent a site's conservation objectives from being met. The Appropriate Assessment takes into account any mitigation or safeguards within the policies that would reduce the severity of an effect.

Safeguards within Policy JWP4: Design of Waste Management and Wastewater Treatment Facilities and JWP5: Energy from Waste, along with environmental permitting requirements for industrial emissions, and water abstraction and wastewater treatment will ensure that the ELJWP will not have an adverse effect on the integrity of any Habitats Sites or their functionally linked habitats, either alone or in combination with other plans or projects.

This HRA has therefore concluded that with the mitigation proposed through the ELJWP, no likely significant impacts are expected as a result of the ELJWP. The HRA will be subject to consultation with Natural England alongside the Submission ELJWP (Regulation 19) to confirm that they agree with the conclusions of the assessment.

Chapter 1

Introduction

1.1 LUC was commissioned to carry out a Habitats Regulations Assessment (HRA) of the emerging East London Joint Waste Plan (ELJWP). The ELJWP is a joint plan for the London Borough of Barking and Dagenham, London Borough of Havering, London Borough of Newham, and the London Borough of Redbridge.

1.2 The purpose of the HRA is to determine whether the ELJWP policies or development within site allocations is likely to have significant effects on, or adverse effects on the integrity of, any sites designated as Special Protection Areas (SPAs), Special Areas of Conservation (SACs), or Ramsar sites.

Context of the new East London Joint Waste Plan

1.3 The ELJWP area is consistent with the geography for the East London Waste Authority **[See reference** 1**]** formed by the four most easterly London Boroughs north of the Thames: London Borough of Barking and Dagenham, London Borough of Havering, London Borough of Newham, and the London Borough of Redbridge. The ELJWP also includes the area formerly covered by the London Legacy Development Corporation (LLDC) within the London Borough of Newham, in which planning powers have now been transferred back to Newham. The LLDC does not have a separate waste apportionment within the London Plan 2021, and therefore waste is planned for by the London Borough of Newham.

1.4 The current version of the ELJWP was adopted in 2012 **[See reference** 2**]** and set out to meet the requirements of the national policy and the London Plan at that time, to plan effectively for waste across the four London Boroughs.

There have been four iterations of the London Plan since 2011: the London Plan (2016), the Revised Early Minor Alterations to the London Plan (2013) to align within the NPPF, the Further Alterations to the London Plan (2015), and the current adopted London Plan (2021).

1.5 The new ELJWP will provide the local planning policy framework for all waste planning matters across London Borough of Barking and Dagenham, London Borough of Havering, London Borough of Newham, and London Borough of Redbridge. This includes the area of Newham in which the LLDC formerly had planning powers.

1.6 This HRA assesses the Submission ELJWP which has been prepared for 'Regulation 19' consultation.

Previous HRA work

1.7 The 2012 ELJWP was subject to HRA but since then, there are likely to have been significant changes to the environmental baseline and there have been changes to how HRA is undertaken (see ‘case law’ section of Chapter 3). The 2024 HRA of the emerging new ELJWP therefore does not rely on the previous HRA assumptions or findings.

1.8 HRA of the draft ELJWP was undertaken in May 2024 and consulted on alongside the draft plan as part of the Regulation 18 consultation. This HRA updates that assessment to take into account changes in the plan since the Regulation 18 consultation and comments received during the Regulation 18 consultation (see Appendix C).

The requirement to undertake Habitats Regulations Assessment of development plans

1.9 The requirement to undertake HRA of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in 2007 **[See reference 3]**; which is now known as the Habitats Regulations 2017 (as amended) **[See reference 4]**. When preparing the development plans, the joint authorities therefore required by law to carry out an HRA. The joint authorities can commission consultants to undertake HRA work on its behalf and this (the work documented in this report) is then reported to and considered by the joint authorities as the 'competent authority'. They will consider this work and would usually only progress the ELJWP if they consider that the ELJWP will not adversely affect the integrity **[See reference 5]** of any of the 'Habitats Sites, as defined below (the exception to this would be where 'imperative reasons of overriding public interest' can be demonstrated). The requirement for authorities to comply with the Habitats Regulations when preparing a development plan is also noted in the Government's online Planning Practice Guidance (PPG) **[See reference 6]**.

1.10 HRA refers to the assessment of the potential effects of a development plan on one or more sites afforded the highest level of protection in the UK: Special Protected Areas (SPAs) and Special Areas of Conservation (SACs). These were classified under European Union (EU) legislation but since 1 January 2021 are protected in the UK by the Habitats Regulations 2017 (as amended) **[See reference 7]**. Although the EU Directives from which the UK's Habitats Regulations originally derived are no longer binding, the Regulations still make reference to the lists of habitats and species that the sites were designated for, which are listed in annexes to the EU Directives:

- SACs are designated for particular habitat types (specified in Annex 1 of the EU Habitats Directive **[See reference 8]**) and species (Annex II). The listed habitat types and species (excluding birds) are those considered to be most in need of conservation at a European level. Designation of SACs

also has regard to the threats of degradation or destruction to which the sites are exposed and, before EU exit day, to the coherence of the 'Natura 2000' network of 'European sites'. After EU exit day, regard is had to the importance of such sites for the coherence of the UK's 'National Site Network'.

- SPAs are classified for rare and vulnerable birds (Annex I of the EU Birds Directive **[See reference** 9**]**), and for regularly occurring migratory species not listed in Annex I.

1.11 The term 'European Sites' was previously commonly used in HRA to refer to 'Natura 2000' sites **[See reference** 10**]** and Ramsar sites (international designated under the Ramsar Convention). However, a Government Policy Paper **[See reference** 11**]** on changes to the Habitats Regulations 2017 post-Brexit states that:

- Any references to Natura 2000 in the 2017 Regulations and in guidance now refer to the new 'National Site Network';
- The National Site Network includes existing SACs and SPAs; and new SACs and SPAs designated under these Regulations; and
- Designated Wetlands of International Importance (known as Ramsar sites) do not form part of the national site network. Many Ramsar sites overlap with SACs and SPAs and may be designated for the same or different species and habitats.

1.12 Although Ramsar sites do not form part of the new National Site Network, Government guidance **[See reference** 12**]** states that:

> Any proposals affecting the following sites would also require an HRA because these are protected by government policy:
>
> - Proposed SACs
> - P4otential SPAs

- Ramsar sites – wetlands of international importance (both listed and proposed)
- Areas secured as sites compensating for damage to a European site."

1.13 Furthermore, the NPPF **[See reference** 13**]** and practice guidance **[See reference** 14**]** currently state that competent authorities responsible for carrying out HRA should treat Ramsar sites in the same way as SACs and SPAs. The legislative requirement for HRA does not apply to other nationally designated wildlife sites such as Sites of Special Scientific Interest or National Nature Reserves.

1.14 For simplicity, and in line with common usage, this report uses the term 'Habitats Site' to refer to all types of designated site within the 'National Site Network' for which Government guidance **[See reference** 15**]** requires an HRA.

1.15 The overall purpose of an HRA is to conclude whether or not a proposal or policy, or a whole development plan would adversely affect the integrity of the Habitats Site in question. This is judged in terms of the implications of the plan for a site's 'qualifying features' (i.e. those Annex I habitats, Annex II species, and Annex I bird populations for which it has been designated). Significantly, HRA is based on the precautionary principle. Where uncertainty or doubt remains, an adverse effect should be assumed.

Structure of this report

1.16 This chapter (**Chapter 1**) has introduced the requirement to undertake HRA of the ELJWP. The remainder of the report is structured as follows:

- **Chapter 2** summarises the content of the Submission ELJWP, which is the subject of this report, as relevant to the HRA.
- **Chapter 3** describes the HRA methodology, which took into account the requirements of the Habitats Regulations and relevant case law.

- **Chapter 4** describes the findings of the screening stage of the HRA.
- **Chapter 5**: describes the findings of the Appropriate Assessment stage of the HRA.
- **Chapter 6**: Summarises the HRA conclusions and describes the next steps to be undertaken.

1.17 The information in the main body of the report is supported by the following appendices:

- **Appendix A** presents the attributes of Habitats Sites screened into the HRA.
- **Appendix B** presents the HRA screening of the policies of the Regulation 19 ELJWP.
- **Appendix C** outlines the responses received on the HRA in previous consultations and how these have been addressed.

Chapter 2

Submission East London Joint Waste Plan

2.1 The Submission ELJWP sets out how and where waste will be managed and it will be used to determine planning applications affecting the management of waste in the four East London boroughs that are the joint authorities preparing the plan (Barking & Dagenham, Havering, Newham and Redbridge).

2.2 The ELJWP will form part of the Development Plan for each of the boroughs, sitting alongside separate Local Plans that are concerned with other forms of development such as housing and employment.

2.3 The ELJWP sets out a Vision and eight strategic objectives:

- Strategic Objective 1: Establish a Fully Functioning Circular Economy by 2040;
- Strategic Objective 2: All Built Development Will Contribute to the Achievement of a Fully Functioning Circular Economy by 2041;
- Strategic Objective 3: Appropriately Locate Waste Management Capacity;
- Strategic Objective 4: Contribute to East London's Regeneration and Economic Growth;
- Strategic Objective 5: Achieve Net Zero Waste Management;
- Strategic Objective 6: Optimise Existing Waste Management Capacity;
- Strategic Objective 7: Minimise Transportation and Establish Alternative Infrastructure; and
- Strategic Objective 8: Restrict Landfilling to Exceptional Circumstances.

2.4 There are seven strategic policies set out in the ELJWP. In some cases there may be overlap between the policies of the Borough's Local Plans and the policies in this Plan. Where this occurs the latest policy to have been adopted will take precedence.

2.5 The policies align with the strategic objectives as below:

- Strategic Objective 1: Policy JWP1: Circular Economy;
- Strategic Objective 2: Policy JWP1: Circular Economy & Policy JWP4: Design of Waste Management and Wastewater Treatment Facilities;
- Strategic Objective 3: Policy JWP2: Safeguarding and Provision of Waste Capacity, Policy JWP2B: Safeguarding and Provision of Wastewater Treatment Capacity, Policy JWP3 Prevention of Encroachment, Policy JWP5 Energy From Waste & Policy JWP6 Deposit of Waste on Land;
- Strategic Objective 4: Policy JWP1 Circular Economy; Policy JWP2: Safeguarding and Provision of Waste Capacity, Policy JWP2B: Safeguarding and Provision of Wastewater Treatment Capacity, Policy JWP4: Design of Waste Management and Wastewater Treatment Facilities, JWP5 Energy From Waste & Policy JWP6 Deposit of Waste on Land;
- Strategic Objective 5: Policy JWP1: Circular Economy, Policy JWP4: Design of Waste Management and Wastewater Treatment Facilities, JWP5 Energy From Waste & Policy JWP6: Deposit of Waste on Land;
- Strategic Objective 6: Policy JWP2: Safeguarding and Provision of Waste Capacity, Policy JWP2B: Safeguarding and Provision of Wastewater Treatment Capacity & Policy JWP3 Prevention of Encroachment;
- Strategic Objective 7: Policy JWP4: Design of Waste Management and Wastewater Treatment Facilities & JWP5 Energy From Waste; and
- Strategic Objective 8: Policy JWP6: Deposit of Waste on Land.

2.6 It is estimated that there is currently 2,619,508tpa of waste management capacity in East London which is more than sufficient to manage the London Plan apportioned forecast arisings to 2041. The plan states there is sufficient

waste management capacity in East London to meet requirements over the plan period. In light of this, the ELJWP does not allocate specific areas of land for the development of additional waste management facilities. This means the status of the sites allocated for the development of waste management capacity in the current East London Waste Plan would fall away. The need for additional wastewater treatment capacity is determined through the 'Asset Management Planning' (AMP) process. The AMP process identifies the need for new and enhanced wastewater treatment capacity over a five year period between 2025 and 2030.

2.7 Through the plan-making process, a number of existing waste sites have been identified as being surplus to requirements whose re-development will achieve wider planning objectives (i.e. have been identified for other uses either in borough Local Plans or through planning consents) and so are no longer safeguarded for waste use. This includes a total of three sites within the London Borough of Barking and Dagenham; and one site in the London Borough of Newham. The sites being released are listed in Table 9 of the ELJWP. All other existing waste sites are safeguarded, as listed in the appendices of the ELJWP.

2.8 For the purposes of this HRA of the ELJWP, it is currently assumed that waste activities could occur at any safeguarded waste site and wastewater treatment facility. The ELJWP contains a list of safeguarded waste sites and wastewater treatment facilities. This includes 25 waste sites safeguarded in the London Borough of Barking and Dagenham; 20 waste sites in the London Borough of Havering; 14 waste sites in the London Borough of Newham; and five waste sites in the London Borough of Redbridge. In addition, two wastewater treatment facilities are safeguarded in the London Borough of Havering.

2.9 As there will be no additional waste and wastewater treatment capacity resulting from the ELJWP, development in new locations would not be expected to provide additional waste management capacity, but is more likely to replace existing capacity lost elsewhere. Within existing waste sites and wastewater treatment facilities, changes arising from the plan that are relevant to the HRA are those that will result in changes in operation (e.g. changes in waste

management process and/or vehicles trips to a site) that alter impact pathways or scale of impact.

Chapter 3

Approach to HRA

3.1 This chapter describes the approach that has been taken to the HRA of the ELJWP throughout its development.

Stages of HRA

3.2 The HRA of development plans is undertaken in stages (as described below) and should conclude whether or not a proposal would adversely affect the integrity of the Habitats Site(s) in question.

3.3 The outputs will be reported to and considered by the joint authorities, as the competent authority, before adopting the Plan.

3.4 The HRA also requires close working with Natural England as the statutory nature conservation body **[See reference** 16**]** in order to obtain the necessary information, agree the process, outcomes and mitigation proposals. Non-statutory consultees may also be in a strong position to provide advice and information throughout the process, for example the Environment Agency which is required to undertake HRA for its existing licences and future licensing of activities. Chapter 6 provides further information on anticipated consultation and next steps.

Requirements of the Habitats Regulations

3.5 In assessing the effects of a development plan in accordance with Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (as amended) (the 'Habitats Regulations'), there are potentially two tests to be applied by the competent authority: a 'Significance Test' followed, if necessary,

by an Appropriate Assessment which would inform the 'Integrity Test'. The relevant sequence of questions is as follows:

- Step 1: Under Reg. 105(1)(b), consider whether the plan is directly connected with or necessary to the management of the sites. If not, proceed to Step 2.
- Step 2: Under Reg. 105(1)(a), consider whether the plan is likely to have a significant effect on a Habitats Site , either alone or in combination with other plans or projects (the 'Significance Test'). If yes, proceed to Step 3.

3.6 [Steps 1 and 2 are undertaken as part of Stage 1: HRA Screening.]

- Step 3: Under Reg. 105(1), make an Appropriate Assessment of the implications for the Habitats Site in view of its current conservation objectives (the 'Integrity Test'). In so doing, it is mandatory under Reg. 105(2) to consult Natural England, and optional under Reg. 105(3) to take the opinion of the general public.

3.7 [This step is undertaken during Stage 2: Appropriate Assessment.]

- Step 4: In accordance with Reg. 105(4), but subject to Reg. 107, give effect to the land use plan only after having ascertained that the plan would not adversely affect the integrity of a Habitats Site.

3.8 [This step follows Stage 2 where a finding of 'no adverse effect' is concluded. If it cannot be it proceeds to Step 5 as part of Stage 3 of the HRA process].

- Step 5: Under Reg. 107, if Step 4 is unable to rule out adverse effects on the integrity of a Habitats Site and no alternative solutions exist then the competent authority may nevertheless agree to the plan or project if it must be carried out for 'imperative reasons of overriding public interest' (IROPI).

3.9 [This step is undertaken during Stage 3: Assessment where no alternatives exist, and adverse impacts remain taking into account mitigation].

Typical stages

3.10 The following sections summarise the stages and associated tasks and outcomes typically involved in carrying out a full HRA of a development plan, based on various guidance documents **[See reference** 17**]** **[See reference** 18**]** **[See reference** 19**]**. This report presents the outputs of the tasks outlined below under Stage 1: HRA Screening and Stage 2: Appropriate Assessment.

Stage 1: HRA screening

3.11 Task

- Description of the development plan and confirmation that it is not directly connected with or necessary to the management of Habitats Sites.
- Identification of potentially affected Habitats Sites and their conservation objectives **[See reference** 20**]**.
- Assessment of likely significant effects of the development plan alone or in combination with other plans and projects (without consideration of avoidance or reduction ('mitigation') measures) **[See reference** 21**]**.

3.12 Outcome

- Where effects are unlikely, prepare a 'finding of no significant effect report'.
- Where effects judged likely, or lack of information to prove otherwise, proceed to Stage 2.

Stage 2: Appropriate Assessment (where Stage 1 does not rule out likely significant effects)

3.13 Task

- Information gathering (development plan and Habitats Sites) **[See reference** 22**]**.
- Impact prediction.
- Evaluation of development plan impacts in view of conservation objectives of Habitats Sites.
- Where impacts are considered to directly or indirectly affect qualifying features of Habitats Sites, identify how these effects will be avoided or reduced ('mitigation').

3.14 Outcome

- Appropriate assessment report describing the plan, Habitats Site baseline conditions, the adverse effects of the plan on the Habitats Site, how these effects will be avoided or reduced, including the mechanisms and timescale for these mitigation measures.
- If effects remain after all alternatives and mitigation measures have been considered proceed to Stage 3.

Stage 3: Assessment where no alternatives exist and adverse impacts remain taking into account mitigation

3.15 Task

- Identify 'imperative reasons of overriding public interest' (IROPI).
- Demonstrate no alternatives exist.
- Identify potential compensatory measures.

3.16 Outcome

- This stage should be avoided if at all possible. The test of IROPI and the requirements for compensation are extremely onerous.

3.17 It is normally anticipated that an emphasis on Stages 1 and 2 of this process will, through a series of iterations, help ensure that potential adverse effects are identified and eliminated through the inclusion of mitigation measures designed to avoid or reduce effects. The need to consider alternatives could imply more onerous changes to a plan document. It is generally understood that so called 'imperative reasons of overriding public interest' (IROPI) are likely to be justified only very occasionally and would involve engagement with the Government.

Case law

3.18 This HRA has been prepared in accordance with relevant case law, including most notably the *'People over Wind'* and *'Holohan'* rulings from the Court of Justice for the European Union (CJEU).

3.19 The *People over Wind, Peter Sweetman v Coillte Teoranta* (April 2018) judgment ruled that Article 6(3) of the Habitats Directive should be interpreted as meaning that mitigation measures should be assessed as part of an Appropriate Assessment and should not be taken into account at the screening stage. The precise wording of the ruling is as follows:

> "Article 6(3) ……must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an appropriate assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on that site."

3.20 In light of the above, the HRA screening stage does not rely upon avoidance or mitigation measures to draw conclusions as to whether the ELJWP could result in likely significant effects on Habitats Sites, with any such measures being considered at the Appropriate Assessment stage as relevant.

3.21 This HRA is also be undertaken in line with the *Holohan v An Bord Pleanala* (November 2018) judgment which stated that:

> "Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora must be interpreted as meaning that an 'appropriate assessment' must, on the one hand, catalogue the entirety of habitat types and species for which a site is protected, and, on the other, identify and examine both the implications of the proposed project for the species present on that site, and for which that site has not been listed, and the implications for habitat types and species to be found outside the boundaries of that site, provided that those implications are liable to affect the conservation objectives of the site."

3.22 In undertaking HRA, LUC considers the potential for effects on species and habitats, including those not listed as qualifying features, to result in secondary effects upon the qualifying features of Habitats Sites, including the potential for complex interactions and dependencies. In addition, the potential for offsite impacts, such as through impacts to functionally linked land, and or species and habitats located beyond the boundaries of Habitats Sites, but which may be important in supporting the ecological processes of the qualifying features, is considered.

3.23 Similarly, effects on both qualifying and supporting habitats and species on functionally linked land (FLL) or habitat are considered, in line with the High Court judgment in RSPB and others v Secretary of State and London Ashford Airport Ltd [2014 EWHC 1523 Admin] (paragraph 27), which stated that:

> "There is no authority on the significance of the non-statutory status of the FLL. However, the fact that the FLL was not within a protected site does not mean that the effect which a deterioration in its quality or function could have on a protected site is to be ignored. The indirect effect was still

> protected. Although the question of its legal status was mooted, I am satisfied …. that while no particular legal status attaches to FLL, the fact that land is functionally linked to protected land means that the indirectly adverse effects on a protected site, produced by effects on FLL, are scrutinised in the same legal framework just as are the direct effects of acts carried out on the protected site itself. That is the only sensible and purposive approach where a species or effect is not confined by a line on a map or boundary fence. This is particularly important where the boundaries of designated sites are drawn tightly as may be the UK practice".

3.24 In addition to this, the HRA takes into consideration the *'Wealden'* judgment from the CJEU.

3.25 *Wealden District Council v Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority* (2017) ruled that it was not appropriate to scope out the need for a detailed assessment for an individual plan or project based on the annual average daily traffic (AADT) figures detailed in the Design Manual for Roads and Bridges or the critical loads used by Defra or Environmental Agency without considering the in-combination impacts with other plans and projects.

3.26 In light of this judgment, the HRA therefore considers traffic growth based on the effects of development from the ELJWP in combination with other drivers of growth such as development proposed in neighbouring boroughs and demographic change.

3.27 The HRA also takes into account the *Grace and Sweetman* (July 2018) judgment from the CJEU which stated that:

> "there is a distinction to be drawn between protective measures forming part of a project and intended to avoid or reduce any direct adverse effects that may be caused by the project in order to ensure that the project does

not adversely affect the integrity of the area, which are covered by Article 6(3), and measures which, in accordance with Article 6(4), are aimed at compensating for the negative effects of the project on a protected area and cannot be taken into account in the assessment of the implications of the project."

"As a general rule, any positive effects of the future creation of a new habitat, which is aimed at compensating for the loss of area and quality of that habitat type in a protected area, are highly difficult to forecast with any degree of certainty or will be visible only in the future."

"A mitigation strategy may only be taken into account at AA (a.6(3)) where the competent authority is "sufficiently certain that a measure will make an effective contribution to avoiding harm, guaranteeing beyond all reasonable doubt that the project will not adversely affect the integrity of the area."

"Otherwise it falls to be considered to be a compensatory measure to be considered under a.6(4) only where there are: 'imperative reasons of overriding public interest'"

3.28 The Appropriate Assessment of the ELJWP therefore only considers the existence of measures to avoid or reduce its direct adverse effects (mitigation) if the expected benefits of those measures are beyond reasonable doubt at the time of the assessment.

Screening methodology

3.29 HRA Screening of the ELJWP was undertaken in line with current available guidance and seek to meet the requirements of the Habitats Regulations.

3.30 The purpose of the screening stage is to:

- Identify all aspects of the plan which would have no effect on a Habitats Site, so that that they can be eliminated from further consideration in respect of this and other plans;
- Identify all aspects of the plan which would not be likely to have a significant effect on a Habitats Site (i.e. would have some effect, because of links/connectivity, but which are not significant), either alone or in combination with other aspects of the same plan or other plans or projects, which therefore do not require Appropriate Assessment; and
- Identify those aspects of the plan where it is not possible to rule out the risk of significant effects on a Habitats Site, either alone or in combination with other plans or projects. This provides a clear scope for the parts of the plan that will require appropriate assessment.

3.31 Each ELJWP policy will be considered, alone and in-combination with plans or projects from neighbouring authorities.

3.32 A risk-based approach, involving the application of the precautionary principle, has been adopted in the assessment, such that a conclusion of ‘no significant effect’ has only been reached where it is considered unlikely, based on current knowledge and the information available, that a ELJWP policy would have a significant effect on a Habitats Site.

3.33 The screening assessment (**Chapter 4**) considers the potential for likely significant effects resulting from each policy in the ELJWP, without taking mitigation (e.g. embedded in policy) into account, in accordance with the 'People over Wind' judgment.

3.34 For some types of impacts, the potential for likely significant effects can been determined on a proximity basis, using GIS data to determine the proximity of potential development locations to the Habitats Sites that are the subject of the assessment. However, there are many uncertainties associated with using set distances as there are very few standards available as a guide to how far impacts will travel. Therefore, where assumptions have been made or

where additional information has been utilised to determine whether the ELJWP is likely to have a significant effect, these are set out in **Chapter 4**.

3.35 Chapter 4 and **Appendix B** provide the findings of the HRA screening of the ELJWP.

3.36 The Appropriate Assessment within **Chapter 5** focuses on those policies that have been screened in.

Potential impacts of the ELJWP on Habitats Sites

3.37 In our experience of HRA of waste plans, and based on previous statutory consultee comments on HRAs undertaken elsewhere, the types of development (and related activities) that are permitted by waste plans have the potential to result in a range of impacts that could affect Habitats Sites, for example air pollution from changes in traffic movements and non-physical disturbance (noise, vibration or light) from new development or changes in waste management activity. These impacts could occur directly at the Habitats Sites or indirectly, for example at habitats relied on by qualifying species from the Habitats Sites – known as ‘functionally linked habitat’.

3.1 For each of the ELJWP policies, consideration is given to the type of development or activity the policy could result in, impacts that could arise from that type of development or activity, and then whether there is an impact pathway to any Habitats Sites sensitive to that impact.

3.2 Further consideration of the types of impact that could be relevant to the ELJWP and possible impact pathways to Habitats Sites is provided in **Chapter 4**.

Identification of Habitats Sites which may be affected by the ELJWP

3.3 To begin the search of Habitats Sites that could potentially be affected by the ELJWP, it is established practice in HRAs to consider Habitats Sites within the local planning authority area covered by a plan, and also within a buffer distance from the boundary of the plan area.

3.4 A distance of 15km from the ELJWP area boundary has been used as a starting point to identify Habitats Sites that could be affected by impacts relating to the ELJWP. The use of this distance presents a precautionary approach to the screening assessment; however, consideration is also given to Habitats Sites beyond this distance that may be functionally connected to the plan area, for example through hydrological pathways.

3.5 As shown in **Figure 3.1**, one Habitats Site is within the ELJWP area:

- Epping Forest SAC (partly within the London Borough of Redbridge).

3.6 Habitats Sites that lie outside of the ELJWP area but within 15km are:

- Lee Valley SPA and Ramsar site;
- Wormley Hoddesdonpark Woods SAC; and
- Thames Estuary and Marshes SPA and Ramsar site.

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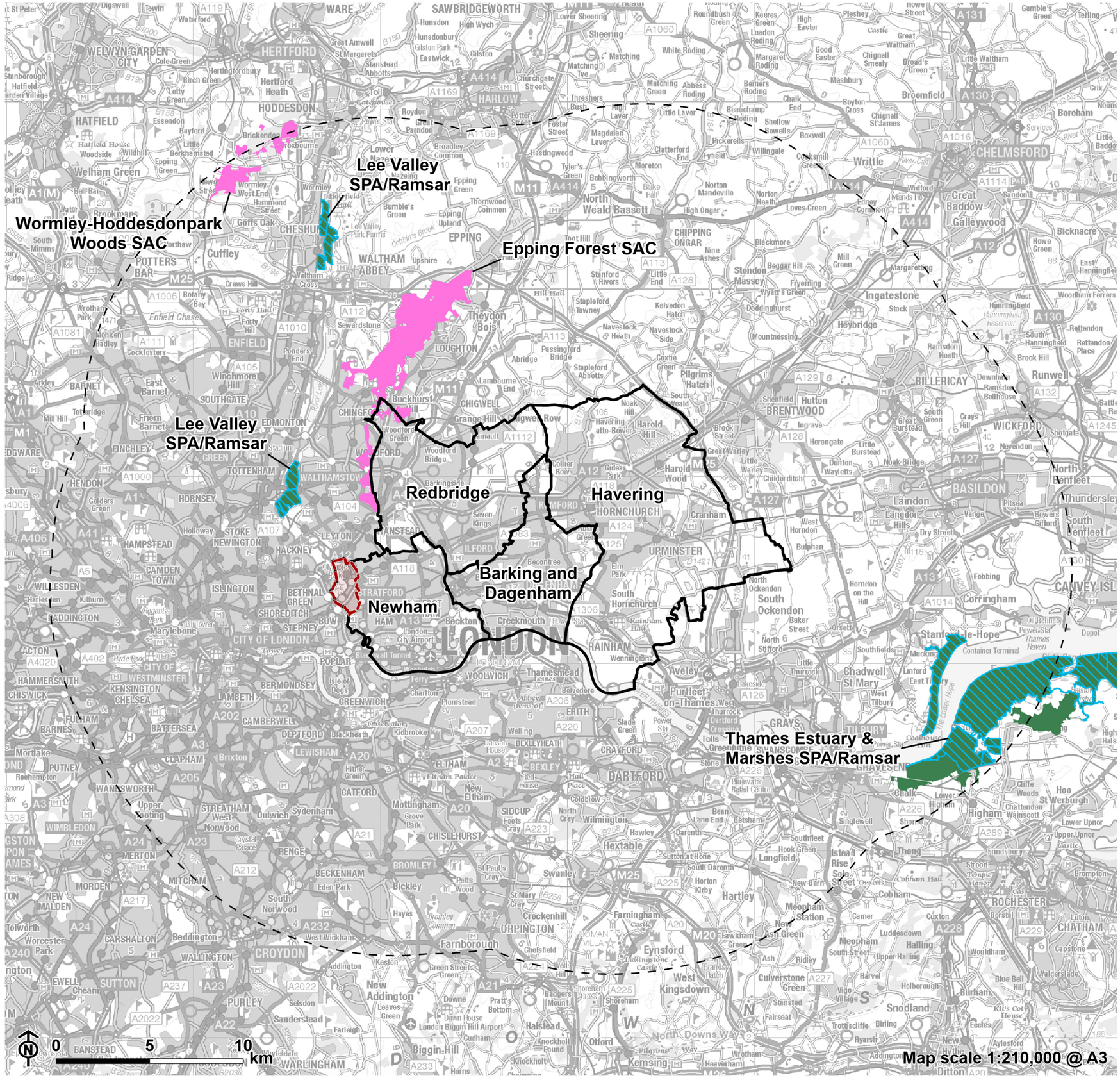
LUC

Figure 3.1: Habitat Sites within 15km of the Plan Area



- London Borough boundary
- Plan area 15km buffer
- London Legacy Development Corporation within plan area
- Special Area of Conservation
- Special Protection Area
- Ramsar site

12681_HRA_Fig3_1_r1_Hab_Sites_15km_A3L 01/05/2024 EB:maslin_z

3.7 The assessment also takes into account areas that may be functionally linked to the Habitats Sites. The term ‘functional linkage’ can be used to refer to the role or ‘function’ that land or other habitats beyond the boundary of a Habitats Site might fulfil in supporting the species populations for which the site was designated or classified. Such an area is therefore ‘linked’ to the site in question because it provides a (potentially important) role in maintaining or restoring a protected population at favourable conservation status.

3.8 While the boundary of a Habitats Site will usually be drawn to include key supporting habitat for a qualifying species, this cannot always be the case where the population for which a site is designated or classified is particularly mobile. Individuals of the population will not necessarily remain in the site all the time. Sometimes, the mobility of qualifying species is considerable and may extend so far from the key habitat that forms the SAC or SPA that it would be entirely impractical to attempt to designate or classify all of the land or sea that may conceivably be used by the species. HRA therefore considers whether any qualifying species of nearby (or linked) Habitats Sites make use of functionally linked habitats, and the impacts that could affect those habitats.

3.9 The following Habitats Sites are designated for mobile species, which may use habitats outside the designated Habitats Sites:

- Lee Valley SPA and Ramsar site, designated for bird species: great bittern, northern shoveler, gadwall). Although the lower reaches of the River Lee/Lea pass along the edge of the plan area, the open water and reedbed habitats that these species prefer occurs in the reservoirs of the upper Lee, outside the ELJWP area.
- Thames Estuary and Marshes SPA and Ramsar site, designated for bird species: pied avocet, ringed plover, grey plover, black-tailed godwit, red knot, dunlin, common redshank). These species favour coastal and estuarine habitats including marshes, mudflats, sandy beaches. Although there are some wetland habitats in the east of the plan area (by the Thames and Rainham Creek), these are c.15km from the SPA/Ramsar and the sites’ species are unlikely to depend upon them as functionally linked habitat.

- Epping Forest SAC, designated for stag beetle. Due to the rarity of many of the qualifying invertebrate species, there is very limited published data on their use of habitats located outside of Habitats Sites; however it is considered precautionary to assume that stag beetles may rely on suitable habitat (i.e. woodland habitats with decaying wood) within 500m of Habitats Site.

3.10 Functionally linked habitat used by birds from the SPA and Ramsar sites is not likely to occur within the plan area, as birds make use of habitats outside the plan area, as described above; and is therefore scoped out. However, the HRA considers the potential for ELJWP policies to result in changes that affect potential functionally linked habitats used by stag beetles within 500m of Epping Forest SAC (in Redbridge) and habitats used by birds from the SPA and Ramsar sites that are beyond the plan area.

3.11 Detailed information about each Habitats Site screened into the HRA is provided in **Appendix A**, described with reference to Standard Data Forms, for the SPAs and SACs, Information Sheets for the Ramsar sites **[See reference 23]**, and Natural England's Site Improvement Plans **[See reference 24]**. Natural England's conservation objectives **[See reference 25]** and any supplementary advice on conserving and restoring site features for the SPAs and SACs have also been reviewed. All of the conservation objectives state that site integrity must be maintained or restored by maintaining or restoring the habitats of qualifying features, the supporting processes on which they rely, and populations of qualifying species.

Assessment of 'likely significant effect'

3.12 As required under Regulation 105 of The Conservation of Habitats and Species Regulations 2017 (SI 2017/1012), as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579), an assessment will be undertaken of the 'likely significant effects' of the policy approaches set out within the emerging ELJWP. The assessment will be undertaken to identify which policies would be likely to have a significant effect

on Habitats Sites in ELJWP area (+15km). This assessment will need to be repeated with each HRA iteration of the ELJWP.

3.13 A risk-based approach involving the application of the precautionary principle will be adopted in the assessment, such that a conclusion of 'no significant effect' will only be reached where it is considered very unlikely, based on current knowledge and the information available, that a proposal in the ELJWP would have a significant effect on the integrity of a Habitats Site.

Interpretation of 'likely significant effect'

3.14 Relevant case law helps to interpret when effects should be considered as a Likely Significant Effect (LSE), when carrying out HRA of a development plan.

3.15 In the Waddenzee case **[See reference** 26**]**, the European Court of Justice ruled on the interpretation of Article 6(3) of the Habitats Directive (translated into Reg. 102 in the Habitats Regulations), including that:

- An effect should be considered 'likely', "if it cannot be excluded, on the basis of objective information, that it will have a significant effect on the site" (para 44);
- An effect should be considered 'significant', "if it undermines the conservation objectives" (para 48); and
- Where a plan or project has an effect on a site "but is not likely to undermine its conservation objectives, it cannot be considered likely to have a significant effect on the site concerned" (para 47).

3.16 An opinion delivered to the Court of Justice of the European Union **[See reference** 27**]** commented that:

> "The requirement that an effect in question be 'significant' exists in order to lay down a de minimis threshold. Plans or projects that have no appreciable

effect on the site are thereby excluded. If all plans or projects capable of having any effect whatsoever on the site were to be caught by Article 6(3), activities on or near the site would risk being impossible by reason of legislative overkill."

3.17 This opinion (the 'Sweetman' case) therefore allows for the authorisation of plans and projects whose possible effects, alone or in combination, can be considered 'trivial' or de minimis; referring to such cases as those "which have no appreciable effect on the site". In practice such effects could be screened out as having no likely significant effect; they would be 'insignificant'.

3.18 The HRA screening assessment therefore considers whether the ELJWP policies could have likely significant effects either alone or in combination.

In-combination effects

3.19 Regulation 105 of the Habitats Regulations 2017 requires an Appropriate Assessment where "a land use plan is likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and is not directly connected with or necessary to the management of the site". Therefore, the Screening assessment must consider whether any impacts identified from the ELJWP may combine with other plans or projects to give rise to significant effects in-combination.

3.20 If the HRA Screening determines that the ELJWP will have a particular type of effect (e.g. due to water pollution) on its own but it is not likely to be significant, the in-combination assessment at Screening stage will need to determine whether there may also be the same type of effect from other plans or projects that could combine with the ELJWP to produce a significant effect. If so, this likely significant effect arising from the ELJWP in combination with other plans or projects would then need to be considered through the Appropriate Assessment stage to determine if it would have an adverse effect on integrity of the relevant Habitats Site. However, if the screening assessment concludes that

there is no impact pathway by which development proposed in the ELJWP could affect the conditions necessary to maintain qualifying features of a Habitats Site, then there will be no in-combination effects to assess at the Screening or Appropriate Assessment stage. This approach accords with recent guidance on HRA **[See reference** 28**]**.

3.21 If impact pathways are found to exist for a particular type of effect but it is not likely to be significant from the ELJWP alone, the in-combination assessment will identify which other plans and programmes could result in the same impact on the same Habitats Site. This will focus on planned growth (including housing, employment, transport, minerals and waste) around the affected site, or along the impact corridor, for example, if impacts could arise as a result of changes to a waterway, then planned growth in local authorities along that waterway will be considered.

3.22 Where required, the potential for in-combination impacts therefore focusses on plans prepared by local authorities that overlap with the Habitats Site that are within the scope of the HRA. The findings of any associated HRA work for those plans are reviewed where available. Where relevant, any strategic projects in the area that could have in-combination effects with the ELJWP are also identified and reviewed.

3.23 The online HRA Handbook suggests the following plans and projects may be relevant to consider as part of the in-combination assessment:

- Applications lodged but not yet determined, including refusals subject to an outstanding appeal or legal challenge;
- Projects subject to periodic review e.g. annual licences, during the time that their renewal is under consideration;
- Projects authorised but not yet started;
- Projects started but not yet completed;
- Known projects that do not require external authorisation;
- Proposals in adopted plans; and

- Proposals in draft plans formally published or submitted for final consultation, examination or adoption.

3.24 The need for in-combination assessment also arises at the Appropriate Assessment stage, as discussed in the Appropriate Assessment section below.

Appropriate Assessment methodology

3.25 Following the screening stage, if likely significant effects on the Habitats Site are unable to be ruled out, the plan-making authority is required under Regulation 105 of the Habitats Regulations 2017 to make an 'Appropriate Assessment' of the implications of the plan for the Habitats Site, in view of their conservation objectives. European Commission Guidance states that the Appropriate Assessment should consider the impacts of the plan (either alone or in combination with other projects or plans) on the integrity of the Habitats Site with respect to their conservation objectives and to their structure and function.

Assessing the effects on site integrity

3.26 A site's integrity depends on it being able to sustain its 'qualifying features' (i.e. those Annex 1 habitats, Annex II species, and Annex 1 bird populations for which it has been designated) and to ensure their continued viability. The 'Holohan' judgement also clarifies that effects on species and habitats not listed as qualifying features, but which could result in secondary effects upon the qualifying features of Habitats Sites also need to be considered. The Appropriate Assessment, if required, will build upon the information set out in Appendix A of this report, to consider the characteristics of supporting habitats and species that could be affected by impacts identified at the screening stage.

3.27 A high degree of integrity is considered to exist where the potential to meet a site's conservation objectives is realised and where the site is capable of self-repair and renewal with a minimum of external management support.

3.28 A conclusion needs to be reached as to whether or not the ELJWP would adversely affect the integrity of the Habitats Site. As stated in the European Commission Guidance, assessing the effects on the site(s) integrity involves considering whether the predicted impacts of the ELJWP policies (either alone or in combination) have the potential to:

- Cause delays to the achievement of conservation objectives for the site;
- Interrupt progress towards the achievement of conservation objectives for the site;
- Disrupt those factors that help to maintain the favourable conditions of the site;
- Interfere with the balance, distribution and density of key species that are the indicators of the favourable condition of the site;
- Cause changes to the vital defining aspects (e.g. nutrient balance) that determine how the site functions as a habitat or ecosystem;
- Change the dynamics of relationships that define the structure or function of the site (e.g. relationships between soil and water, or animals and plants);
- Interfere with anticipated natural changes to the site;
- Reduce the extent of key habitats or the population of key species;
- Reduce the diversity of the site;
- Result in disturbance that could affect the population, density or balance between key species;
- Result in fragmentation; or
- Result in the loss of key features.

3.29 The conservation objectives for each Habitats Site (**Appendix A**) are generally to maintain the qualifying features in favourable condition. The Site Improvement Plans for each Habitats Site provide an overview of the issues (both current and predicted) affecting the condition of the European features on the site(s) and outline the priority measures required to improve the condition of

the features. These have been drawn on to help to understand what is needed to maintain the integrity of the Habitats Site.

3.30 For each Habitats Site where HRA Screening identified an uncertain or likely significant effect in relation to the ELJWP, the potential impacts have been set out and judgements made (based on the information available) regarding whether the impact will have an adverse effect on the integrity of the site. Consideration has been given to the potential for mitigation measures to be implemented that could reduce the likelihood or severity of the potential impacts, such that there would not be an adverse effect on the integrity of the site.

Chapter 4

HRA Screening

4.1 This chapter sets out the assumptions used in screening the ELJWP policies, along with the conclusions of the screening process (see also **Appendix B**).

Physical damage and loss of habitat

4.2 New development or changes to waste management activities resulting from the ELJWP would take place within the ELJWP area and largely within existing waste sites or wastewater treatment facilities. None of the existing waste sites or wastewater treatment facilities are within Habitats Sites or could be functionally linked habitats. However, the following policies permit (limited) development outside of existing waste sites or wastewater treatment facilities that could, in theory (if mitigation is not taken into account; see Chapter 5), fall within a Habitats Site or its functionally linked habitats:

- Policy JWP2: Safeguarding and Provision of Waste Capacity;
- Policy JWP2B: Safeguarding and Provision of Wastewater Treatment Capacity;
- Policy JWP5: Energy from Waste; and
- Policy JWP6: Deposit of Waste on Land.

4.3 Epping Forest SAC is within the plan area and may have functionally linked habitats used by stag beetle (within 500m of the SAC) that are also within the plan area.

In relation to physical damage and loss of habitat, likely significant effects (for the ELJWP alone) could not be ruled out for:

- Epping Forest SAC (directly or via functionally linked habitats)

This will be considered further in the Appropriate Assessment

Non-physical disturbance

4.4 Noise and vibration effects, e.g. during the operation of waste management sites or wastewater treatment facilities, are most likely to disturb bird species and are thus a key consideration with respect to Habitats Sites where birds are the qualifying features, although some mammals and fish species may also be affected. Artificial lighting at night (e.g. from streetlamps, flood lighting and security lights) is most likely to affect bat populations and some nocturnal bird species, and therefore have potential to adversely affect the integrity of Habitats Sites where bats or nocturnal birds are a qualifying feature.

4.5 It has been assumed (on a precautionary basis and based on our experience of previous HRAs and consultation on those with Natural England) that the effects of noise, vibration and light pollution are capable of causing an adverse effect if development takes place within 500m of a Habitats Site (or functionally linked habitat) with qualifying features sensitive to these disturbances.

4.6 Habitats Sites that may be adversely affected by noise, vibration and light pollution as a result of the ELJWP are those that are both within the ELJWP area or within 500m of its boundary and that also support bird species. The scoped-in SPA and Ramsar sites and their potential functionally linked land are beyond 500m from the ELJWP boundary. All other Habitats Sites are located over 500m from the ELJWP area boundary at the closest point and/or do not support species likely to be significantly affected as a result of noise, vibration and light pollution.

Non-physical disturbance is screened out as there is no impact pathway.

No Appropriate Assessment is required.

Air pollution

Dust

4.7 Air pollution can be caused by the creation of dust from construction or operation. This can smother terrestrial habitats or increase the turbidity of freshwater, estuarine and coastal habitats, preventing natural processes. It can also contribute to nutrient enrichment, which can lead to changes in the rate of vegetative succession and habitat composition.

4.8 The effects of dust creation are most likely to be significant if development takes place within 500m of a Habitats Site with qualifying features sensitive to these effects, such as terrestrial, freshwater or estuarine and coastal habitats, or sites designated for habitats and plant species. This is the distance that, in our experience, provides a robust assessment of effects in plan-level HRA and meets with the agreement of Natural England.

4.9 Habitats Sites that may be adversely affected by the creation of dust as a result of development as part of the ELJWP are those within the ELJWP area or within 500m of its boundary with habitats sensitive to dust, i.e.:

- Epping Forest SAC (qualifying habitats).

4.10 It is primarily Epping Forest's qualifying beech habitat that would be affected by air pollution, although its qualifying species (stag beetles) may also be indirectly affected by dust, if the impact of dust is significant enough to reduce the extent of woodland that stag beetle rely on. However, the scale of potential impact from dust due to the ELJWP is not considered likely to have significant effects on stag beetle, either within the SAC or at any functionally linked land within 500m of the SAC. Therefore only direct impacts on the qualifying habitats of the SAC are screened in.

4.11 All other Habitats Sites are located over 500m from the ELJWP area boundary at the closest point and/or do not support qualifying features likely to be sensitive to the effects of dust.

4.12 Policies that could result in activities that produce dust are:

- Policy JWP2: Safeguarding and Provision of Waste Capacity; and
- Policy JWP6: Deposit of Waste on Land.

In relation to dust, likely significant effects (for the ELJWP alone) could not be ruled out for:

- Epping Forest SAC (direct impacts only)

This will be considered further in the Appropriate Assessment

Industrial emissions

4.13 Industrial emissions may arise from processes such as energy from waste, which can produce air pollutants that include acid gases, particulates, dioxins and heavy metals.

4.14 The area over which industrial emissions can have an adverse effect depends on the nature of the emissions and factors such as stack height and topography of the surrounding area.

4.15 Policy JWP5: Energy from Waste permits development that results in industrial emissions.

4.16 Environment Agency guidance on environmental permitting **[See reference** 29**]** uses a distance of 10km to screen the potential for effects on Habitats Sites from industrial emissions. Habitats Sites within 10km of the ELJWP boundary that are sensitive to air pollution are:

- Epping Forest SAC; and
- Lee Valley SPA and Ramsar site.

4.17 Thames Estuary and Marshes is c.9km from the plan area at its nearest point and a dynamic environment, flushed by tides. This site has therefore been screened out for air pollution.

4.18 Epping Forest SAC and Lee Valley Ramsar's qualifying habitats and plant species may be affected directly. Indirect effects on the sites' qualifying species (birds of the Ramsar site and associated SPAs, and stag beetles at the SAC) may be indirectly affected by air pollution, if it is significant enough to alter the species' supporting habitat, on or off site. This has been screened in for bird species at Lee Valley SPA/Ramsar as a precaution, but screened out for functionally linked land (for both SPA/Ramsar sites) as it is unlikely that air pollution at habitats outside the designated site would affect birds to the extent that they no longer use the SPA/Ramsar.

4.19 Likely significant effects are not anticipated for stag beetle at Epping Forest SAC or its functionally linked land.

In relation to industrial emissions, likely significant effects (for the ELJWP alone or in-combination) could not be ruled out for:

- Epping Forest SAC (direct impacts on qualifying habitats); and
- Lee Valley SPA and Ramsar site (direct impacts on qualifying plant species and indirect impacts on bird species, within the SPA/Ramsar).

This will be considered further in the Appropriate Assessment

Vehicle emissions

4.20 Air pollution can be caused by the deposition of pollutants to the ground and vegetation, which can alter the characteristics of the soil, affecting the pH and nitrogen (N) availability that can then affect plant health, productivity and species composition.

4.21 Air pollution is most likely to affect Habitats Sites where freshwater and estuarine habitats, nitrogen limited terrestrial habitats, or plants are the qualifying features. However, some qualifying animal species may also be affected directly or indirectly, by deterioration in habitat as a result of air pollution.

4.22 In terms of vehicle emissions, nitrogen oxides (NOx, i.e. NO and NO_2) are considered to be the key pollutants, although ammonia can also arise from vehicle emissions. Deposition of nitrogen compounds may lead to both soil and freshwater acidification, and NOx can cause eutrophication of soils and water.

4.23 The DMRB Guidance for the assessment of local air quality **[See reference** 30**]** in relation to highways developments provides criteria that should be applied to ascertain whether there are likely to be significant impacts associated with routes or corridors. Based on the DMRB guidance, roads that should be assessed are those where:

- Daily traffic flows will change by 1,000 AADT (Annual Average Daily Traffic) or more; or
- Heavy duty vehicle (HDV) flows will change by 200 AADT or more; or
- Daily average speed will change by 10km/hr or more; or
- Peak hour speed will change by 20km/hr or more; or
- Road alignment will change by 5m or more.

4.24 In line with the Wealden judgment **[See reference 31]**, where the road traffic effects of other plans or projects are known or can be reasonably

estimated (including those of adopted plans or consented projects), then these should be included in road traffic modelling by the local authority whose plan or project is being assessed. The screening criteria of 1,000 AADT should then be applied to the traffic flows of the plans in combination.

4.25 Policies within the ELJWP that could alter traffic flows and therefore air pollution levels are:

- Policy JWP2: Safeguarding and Provision of Waste Capacity;
- Policy JWP2B: Safeguarding and Provision of Wastewater Treatment Capacity;
- Policy JWP5: Energy from Waste; and
- Policy JWP6: Deposit of Waste on Land.

4.26 The JNCC's 'Guidance on decision-making thresholds for air pollution' **[See reference** 32**]** states that, when assessing the air pollution impacts of a development plan, 10km should be used as a zone of influence within which the plan is likely to have significant effects on air quality.

4.27 Typically, it is the roads forming part of the strategic road network (motorways and trunk roads) that experience a significant increase in vehicle traffic as a result of development (e.g. greater than 200 AADT HDVs), although there are sometimes exceptions. The 'affected road network' is confirmed through traffic modelling, in line with DMRB guidance; however roads within 10km of the plan area and within 200m of the Habitats Sites considered in this HRA include:

- Epping Forest SAC (directly): A406 (north circular), A104, A1199, A121, which are all within of adjacent to the plan area; and several other roads to the north of the plan area.
- Lee Valley SPA/Ramsar site (directly): A503, which links the Habitats Site to the plan area.

4.28 The portion of the Thames Estuary & Marshes SPA and Ramsar site that is within 10km of the Plan area is not adjacent to any major roads and is screened out in relation to vehicle emissions.

4.29 As with dust and industrial emissions (paragraph 4.17), effects on functionally linked habitats are screened out in relation to vehicle emissions.

In relation to air pollution, likely significant effects (from the ELJWP alone or in-combination) could not be ruled out at:

- Epping Forest SAC (direct impacts on qualifying habitats); and
- Lee Valley SPA and Ramsar site (direct impacts on qualifying plant species and indirect impacts on bird species, within the SPA/Ramsar site).

Recreation and urban impacts

4.30 Recreational activities and human presence can result in significant effects on Habitats Sites as a result of erosion and trampling, associated impacts such as fire and vandalism or disturbance to sensitive features, such as birds, through both terrestrial and water-based forms of recreation.

4.31 The ELJWP will not alter patterns of recreation and urban impacts.

Recreation and urban impacts are screened out as there is no impact pathway. No Appropriate Assessment is required.

Pests and vermin

4.32 There are potential vermin or pest impacts where waste is managed in the open air, for example composting or landfill. However, it is assumed that impacts from waste facilities would not be significant unless the potential waste site extends within the boundary of a Habitats Site, or would affect off-site habitats that sustain the site.

4.33 Development due to the ELJWP would largely occur at existing waste sites or wastewater treatment facilities, which are not within a Habitats Site or likely to be functionally linked land; however, the following policy could permit landfill outside of existing waste sites:

- Policy JWP6: Deposit of Waste on Land.

4.34 Epping Forest SAC is within the plan area and may have functionally linked habitats used by stag beetle (within 500m of the SAC) that are also within the plan area.

In relation to pests and vermin, likely significant effects (for the ELJWP alone) could not be ruled out for:

- Epping Forest SAC (directly or via functionally linked habitats)

This will be considered further in the Appropriate Assessment

Water quality and quantity

4.35 Changes in water quality or quantity can affect Habitats Sites due to:

- Pollution from direct run-off between new development and waterbodies.
- Abstraction for water supply affecting the hydrology of the aquifer or waterbody being abstracted;

- Discharge of wastewater affecting water quality of receiving water body (the sea), for example due to nutrient loading or other pollutants; and

4.36 Habitats Sites with the potential to be affected by changes in water quantity or quality that result from development provided for by the ELJWP are principally those that that support qualifying features of freshwater, estuarine, coastal and marine habitats either lie within the ELJWP area boundary or that are otherwise hydrologically connected to the ELJWP, i.e.:

- Lee Valley SPA and Ramsar site; and
- Thames Estuary and Marshes SPA and Ramsar site.

Direct pollution - runoff

4.37 Direct pollution can occur during construction or due to runoff of surface or groundwater water and the distance at which this impact can occur depends on the topography and geology of a site.

4.38 The following policies could result in changes that could cause direct pollution of water:

- Policy JWP2: Safeguarding and Provision of Waste Capacity;
- Policy JWP2B: Safeguarding and Provision of Wastewater Treatment Capacity; and
- Policy JWP6: Deposit of Waste on Land.

4.39 Lee Valley SPA and Ramsar site is upstream of the plan area and therefore direct pollution of this site will not occur. Thames Estuary and Marshes SPA and Ramsar site is downstream (along the River Thames); however, given its distance, large volumes of pollution would need to run-off from waste management locations along the Thames or its tributaries for there to be likely significant effects.

4.40 Policy JWP2B safeguards a number of wastewater treatment facilities located along the Thames within the London Boroughs of Havering and Newham. Therefore, construction activities at these wastewater treatment facilities could (without mitigation) lead to pollution of the River Thames resulting in potential impacts on the qualifying features of the Thames Estuary and Marshes SPA and Ramsar site.

In relation to direct pollution (runoff), likely significant effects (for the ELJWP alone) could not be ruled out for:

- Thames Estuary and Marshes SPA and Ramsar site

This will be considered further in the Appropriate Assessment

Abstraction

4.41 Water is supplied to plan area by Thames Water (most of the plan area) and Essex & Suffolk Water (Barking and Dagenham). Thames Water store water, pumped from the River Thames and River Lee, in large reservoirs in Oxfordshire, West London and North London, including along the River Lee. In North London, the reservoirs are also topped up with groundwater pumped from the chalk aquifer. In the Essex & Suffolk Water area, most of the water comes from river sources. Much of this water is imported from outside the region through a river transfer system that supports the low yield Essex rivers.

4.42 Increased demand for water could therefore increase abstraction of water from the Lee Valley SPA and Ramsar site. Increases in abstraction are likely to only occur if a waste management process changes to one that uses more water (for example change from landfill to energy from waste). The following policy could therefore result in changes in water abstraction:

- Policy JWP5: Energy from Waste

4.43 Other Habitats Sites and functionally linked land are not in locations that could be affected by abstraction associated with the ELJWP.

In relation to abstraction, likely significant effects (for the ELJWP alone or in-combination) could not be ruled out for:

- Lee Valley SPA and Ramsar site (direct impacts only)

This will be considered further in the Appropriate Assessment.

Wastewater treatment

4.44 Sewerage services are provided within the plan area by Thames Water and much of the area's water is treated at Coppermills wastewater treatment works (WwTW), which is adjacent to Lee Valley SPA/Ramsar site. It is the largest water treatment works in north London and treats water from across London.

4.45 Beckton Sewage Treatment Works, located in the Borough of Newham, also serves East London and is one of the UK's largest treatment works; it discharges into the River Thames, upstream of Thames Estuary and Marshes SPA/Ramsar site. Major upgrade works are currently underway so it can receive wastewater from the new Thames Tideway Tunnel. Riverside Wastewater Treatment Works in the Borough of Havering may also require upgrading over the Plan period; this facility discharges into Rainham Creek, a tributary of the Thames upstream of Thames Estuary & Marshes SPA/Ramsar site.

4.46 Increases in wastewater being discharged into the water environment are only likely to occur where existing wastewater treatment works are upgraded or new wastewater treatment works are developed. The following policy could therefore result increases in wastewater being discharged:

- Policy JWP2B: Safeguarding and Provision of Wastewater Treatment Capacity

In relation to wastewater, likely significant effects (for the ELJWP alone or in-combination) could not be ruled out for:

- Lee Valley SPA/Ramsar site (direct impacts)
- Thames Estuary & Marshes SPA/Ramsar site (direct impacts)

This will be considered further in the Appropriate Assessment.

Summary of HRA Screening

4.47 Following the HRA screening (Chapter 4 above and Appendix B), likely significant effects could not be ruled out in relation to:

- **Physical damage and loss of habitat**: Epping Forest SAC (and its functionally linked habitats) – ELJWP alone.
- **Air pollution - dust:** Epping Forest SAC – ELJWP alone.
- **Air pollution – industrial emissions**: Epping Forest SAC, Lee Valley SPA/Ramsar site – ELJWP in-combination with other plans / projects.
- **Air pollution – vehicle emissions:** Epping Forest SAC, and Lee Valley SPA/Ramsar site – ELJWP in-combination with other plans / projects.
- **Pests and vermin**: Epping Forest SAC (and its functionally linked habitats) – ELJWP alone.
- **Water quality and quantity – direct pollution (runoff)**: Thames Estuary & Marshes SPA/Ramsar site – ELJWP alone or in-combination with other plans / projects.
- **Water quality and quantity – abstraction:** Lee Valley SPA/Ramsar site – ELJWP in-combination with other plans / projects.

- **Water quality and quantity – wastewater**: Lee Valley SPA/Ramsar site, and Thames Estuary & Marshes SPA/Ramsar site – ELJWP in-combination with other plans / projects.

4.48 Non-physical disturbance and recreation pressure have been screened out as there are no impact pathways.

4.49 The following policies may contribute to the impact pathways screened in and will therefore be considered further in the Appropriate Assessment:

- Policy JWP2: Safeguarding and Provision of Waste Capacity;
- Policy JWP2B: Safeguarding and Provision of Wastewater Treatment Capacity;
- Policy JWP5: Energy from Waste; and
- Policy JWP6: Deposit of Waste on Land.

Chapter 5

Appropriate Assessment

5.1 At the screening stage, likely significant impacts could not be ruled out for:

- Physical damage and loss of habitat;
- Air pollution due to dust, industrial emissions, and vehicle emissions;
- Pests and vermin; or
- Changes in water quantity or quality due to abstraction, direct pollution (runoff), and wastewater treatment.

5.2 However, the Appropriate Assessment allows mitigation to be taken into account, which makes it possible to conclude that some impacts will not have an adverse effect on the integrity of Habitats Sites, and to identify where further evidence or mitigation may be required to avoid adverse effects on integrity.

5.3 Policy JWP4: Design of Waste Management and Wastewater Treatment Facilities is the main policy providing mitigation for other policies in the ELJWP. It states that:

> "Proposals for waste management development and wastewater treatment development will only be permitted which have been designed to address the following during their construction and operation (including associated vehicle movements):
>
> - The emission of greenhouse gases is minimised by working towards net zero where practicable or, where this isn't practical, an appropriate contribution will be made to the relevant Borough's carbon offset fund;
> - Measures to avoid unacceptable adverse impacts arising from noise, dust, litter, vermin, vibration, odour, bioaerosols, external lighting, visual

intrusion, traffic or associated risks to the environment (including the water environment) and health and wellbeing of local communities;

- Storage and management of waste (other than by landfill) and wastewater within a building or an appropriate level of protection is provided with respect to impacts on the local environment and amenity;
- Efficient use of energy and water;
- Climate adaptation measures such as sustainable drainage systems, flood resistance and resilience, water storage and recycling, open space design, green roofs and drought-resistant landscaping;
- Contributions to green and blue infrastructure, community benefits (including Public Rights of Way), and biodiversity enhancement and net gain where required;
- The need to protect the historic environment by including measures to avoid and/or mitigate adverse impacts;
- Protecting the best and most versatile agricultural land and soil quality more generally;
- Achievement of a BREEAM 'Excellent' rating or its equivalent unless it is demonstrated that this isn't practical;
- The need to ensure development is secure in accordance with 'Secure by Design' principles;
- Preference being given to non-road transport where practicable; and,
- Measures to control and reduce vehicle impacts including: emissions, through the use of low emission vehicles, installation of vehicle charging points and scheduling and management of vehicle routing; impacts on the safety of other road users including pedestrians.

Proposals for development must demonstrate that opportunities will be provided for residents of the Borough in which the proposal is located, to access employment in both the construction and operational stages in accordance with relevant Local Plan policy and related guidance.

Proposals that have an adverse effect on the integrity of sites designated as Special Areas of Conservation (SAC), Special Protection Areas (SPAs) or Ramsar sites will not be permitted, in line with The Conservation of Habitats and Species Regulations 2017 (as amended). Any mitigation required to avoid adverse effects on their integrity, for example due to pollution risk or disturbance, must be detailed in, and secured as part of the grant of planning permission."

5.4 The statement that proposals will not be permitted that would have an adverse effect on SACs, SPAs or Ramsar sites, and that any required mitigation must be detailed in and secured as part of the planning permission, provides overarching protection for Habitats Sites.

5.5 This is sufficient to ensure that waste and wastewater treatment development is not permitted within a Habitats Site or its functionally linked habitat. This will avoid adverse effects due to physical damage or loss of habitat and, along with the inclusion of 'dust' and 'vermin' in the list of unacceptable adverse impacts, is considered sufficient to avoid adverse effects on integrity due to dust and due to pests and vermin.

5.6 In relation to vehicle emissions, mitigation for air pollution effects arising from a development plan (particularly where there are in-combination effects with other plans or projects) is usually provided at the strategic/plan level, rather than relying on individual developments to mitigate possible in-combination effects. However, in this case, as the ELJWP does not plan for increased waste capacity but instead allows for development that replaces existing capacity (for example to move the management of waste up the waste hierarchy), it is not possible at this stage to quantify likely trips that would be associated with the plan, although the scale of development as a whole is likely to be relatively small in scale compared to plans with allocated sites for development. The requirements of Policy JWP4 to "avoid unacceptable adverse impacts arising from… traffic", give "preference… to non-road transport where practicable" and to "control and reduce vehicle emissions, through the use of low emission vehicles, installation of vehicle charging points and scheduling and

management of vehicle routing" are therefore likely to sufficiently reduce the risks of air pollution from vehicles emissions. However, the requirement to demonstrate that development will not have an adverse effect on Habitats Site will ensure that the effect of individual developments on vehicle emissions is assessed and, if necessary, mitigated further.

5.7 Industrial emissions, water abstraction and wastewater treatment are subject to environmental permitting by the Environment Agency and Defra, which includes ensuring that proposals will not have an adverse effect on the integrity of Habitats Sites. Policy JWP5 also states that Energy from Waste development would only be permitted where the use will "not result in long distance vehicle movements"; is energy efficient; and "the release of non-biogenic gaseous carbon emissions will be minimised, with mechanisms to capture for use and/or storage". Policy JWP4 also ensures proposals for waste management and wastewater treatment development have no adverse impact on the water environment.

5.8 With safeguards within Policy JWP4: Design of Waste Management and Wastewater Treatment Facilities and Policy JWP5: Energy from Waste, along with environmental permitting requirements for industrial emissions, water abstraction and treatment of wastewater, it is considered that the ELJWP will not have an adverse effect on the integrity of any Habitats Sites or their functionally linked habitats, either alone or in combination with other plans or projects.

Chapter 6

Conclusions and next steps

6.1 The HRA Screening (Chapter 4) could not rule out likely significant effects in relation to physical damage and loss of habitat; water abstraction; wastewater; air pollution due to dust; industrial emissions; vehicle emissions; and pests and vermin. These impacts would arise from four of the ELJWP's policies: JWP2, JWP2B, JWP5 and JWP6. However, the Appropriate Assessment (Chapter 5) concluded that, with safeguards provided by Policy JWP4 and Policy JWP5, along with environmental permitting requirements for industrial emissions and water abstraction, adverse effects on the integrity of Habitats Sites will be avoided.

6.2 HRA is an iterative process and as such may need to be updated in light of newly available evidence and comments from key consultees. This HRA will be subject to consultation with Natural England alongside the Submission ELJWP (Regulation 19) to confirm that they agree with the conclusions of the assessment.

LUC

February 2025

Appendix A

Attributes of Habitats Sites considered in the HRA

Epping Forest Special Area of Conservation (SAC)

Location

- Epping Forest SAC is formed of several fragmented sites located to the east and north of the borough of Redbridge boundary. Part of the site falls within the borough of Redbridge boundary.

Qualifying features

- Annex 1 Habitats (which are a primary reason for the selection of this site):
  - Atlantic acidophilous beech forests with *Ilex* and sometimes also *Taxus* in the shrublayer (*Quercion robori-petraeae* or *Ilici-Fagenion*).
- Annex 1 Habitats (which are present as a qualifying feature but not a primary reason for the selection of this site):
  - European dry heaths
  - North Atlantic wet heaths with *Erica tetralix* (wet heathland with etan-leaved heath).
- Annex II species (that are a primary reason for the selection of this site):
  - Stag beetle *Lucanus cervus*

Threats and pressures

- Threats and pressures **[See reference** 33**]** on this site include the following:
  - Air pollution: impact of atmospheric nitrogen deposition
  - Undergrazing
  - Public access / disturbance
  - Changes in species distributions
  - Inappropriate water levels
  - Water pollution
  - Invasive species
  - Disease
  - Invasive species
- Air Pollution: impact of atmospheric nitrogen deposition – Nitrogen deposition exceeds site-relevant critical loads for ecosystem protection. Some parts of the site are assessed as in unfavourable condition for reasons linked to air pollution impacts.
- Undergrazing – The quality and diversity of the SAC features requires targeted management best achieved through grazing to: minimise scrub invasion; minimise robust grass domination, and maximise the species diversity of heathland plant communities.
- Public Access / Disturbance – Epping Forest is subject to high recreation pressure.
- Changes in species distributions – Beech tree health and recruitment may not be coping sufficiently with environmental conditions to sustain its presence and representation within the SAC feature. This may be linked to climate change as well as other factors such as air quality, recreation pressure and water availability.

- Inappropriate water levels – Wet heath is dependent on suitable ground water levels. There is a threat of prolonged drying out through climate change.
- Water pollution – Surface run-off of poor quality water from roads with elevated levels of pollutants, nutrients and salinity may be affecting wet heath, probably mostly around the edges.
- Invasive species – Heather beetle has locally impacted on some heathland areas. Grey squirrel is not currently known to be significantly affecting tree health or regeneration but this will need to be monitored.
- Disease – Tree diseases such as Phytopthora present a real threat to Beech.
- In addition to the above, the supplementary advice **[See reference** 34**]** identifies the following vulnerabilities:
  - Adaptation and resilience of the feature – the vulnerability of Epping Forest SAC to climate change has been assessed by Natural England as being Medium taking into account the sensitivity, fragmentation, topography and management of its habitats.
  - Functional connectivity with wider landscape- The heathland resource is extensive in county terms but is fragmented, mainly by closed tree canopy habitat and roads. It is therefore vulnerable to encroachment, boundary effects, pollution, recreational impact and hydrological changes.
  - Vegetation structure – Variations in the structure of the heathland vegetation (vegetation height, amount of canopy closure, and patch structure) is needed to maintain high niche diversity and hence high species richness of characteristic heathland plants and animals. There is currently low cover (<25%) of dwarf shrubs present for the feature and less than 15% of scrub and tree cover.
  - Soils – the soils of the wet heath habitat are vulnerable to, and have been exposed to acidification, nutrient enrichment and pollution due to their fragmentation and proximity to roads and urban/residential development.

- Illumination – Epping Forest is fragmented by roads and largely surrounded by urban development and residential areas. Opportunities should be sought to minimise and reduce light pollution from existing development and any development plans or projects to ensure SAC features and significant biodiversity assets are safeguarded.

Non-qualifying habitats and species upon which the qualifying habitats and/or species depend

- Stag beetles require decaying wood of broadleaved trees for larvae to feed, although not of a particular tree species. The supplementary advice on conserving and restoring site features **[See reference** 35**]** states that off-site trees in local gardens, parks and along the roadside may be important in helping to maintain the local stag beetle population if decaying timber is present and may help to 'connect' the SAC population with neighbouring colonies.
- The supplementary advice also states:
- The qualifying habitat comprises beech Fagus sylvatica forests with holly *Ilex aquifolium*, growing on acid soils, in a humid Atlantic climate. Sites of this habitat type often are, or were, managed as wood-pasture systems, in which pollarding of beech *Fagus sylvatica* and oak *Quercus* spp. Was common.
- Wet heath usually occurs on acidic, nutrient-poor substrates, such as shallow peats or sandy soils with impeded drainage.
- European dry heaths typically occur on freely-draining, acidic to circumneutral soils with generally low nutrient content. Nearly all dry heath is seminatural, being derived from woodland through a long history of grazing and burning. Most dry heaths are managed as extensive grazing for livestock.
- Some plant or animal species (or related groups of such species) make a particularly important contribution to the necessary structure, function and/or quality of qualifying habitats. For wet heath, this includes: *Calluna vulgaris*, *Erica cinerea*, *E. tetralix*, *Salix repens*, *Ulex minor*, *Vaccinium*

spp. *Carex panicea*, *C. pulicaris*, *Dactylorrhiza etanus* , *Eleocharis* spp., *Eriophorum angustifolium*, *Juncus acutiflorus*, *J. etanus ion*, *Molinia caerulea*, *Anagallis tenella*, *Drosera* spp., *Galium saxatile*, *Genista anglica*, *Polygala serpyllifolia*, *Potentilla erecta*, *Succisa pratensis*. *Pedicularis sylvatica*. For dry heath, this includes: *Calluna vulgaris*, *Erica cinerea*, *E. tetralix*, *Ulex minor*, *Vaccinium* spp *Genista anglica*, *Agrostis* spp., *Carex* spp., *Danthonia decumbens*, *Deschampsia flexuosa*, *Festuca* spp., *Molinia caerulea*, *Nardus stricta*, *Galium saxatile*, *Hypochaeris radicata*, *Lotus corniculatus*, *Pedicularis sylvatica*, *Plantago lanceolata*, *Polygala* spp. *Potentilla erecta*, *Rumex acetosella*, *Succisa pratensis*, *Scilla verna*, *Serratula tinctoria*, *Teucrium scorodonia Thymus praecox*, *Viola riviniana*,

- There are many plants and animals which use or co-exist with non-native trees, but many rare and threatened woodland species are specialists adapted to one or a few native trees or shrub species (birches, willows and oaks, are examples of trees that host many specialist insect species). At this SAC, site-native species of tree and shrub include those typical of the H9120 type including Beech *Fagus sylvatica*, Oak *Quercus robur* and *Quercus petraea*, Holly *Ilex aquifolium*, Bramble *Rubus fruticosus agg*. Honeysuckle *Lonicera periclymenum*, Hornbeam *Carpinus betulus*, Silver birch *Betula pendula*, Downy birch *Betula pubescens*, Yew *Taxus baccata*, Elder *Sambucus nigra*, Goat willow *Salix caprea* and Wild Cherry *Prunus avium*. In addition to this, the characteristic mosaics and transitions of ancient forests and wood-pasture-types are well-represented within the site and are necessary for the conservation of SAC features and site integrity.
- Key species of ground flora, epiphytic bryophytes, mosses, liverworts and lichens are also listed.

Lee Valley Special Protection Area SPA and Ramsar

Location

- Lee Valley SPA & Ramsar is formed of several fragmented sites. The closest sections of the sites lie 4.5km west of the Redbridge borough boundary 3.3km north of the Newham borough boundary.

Qualifying features

SPA:

- Annex 1 species (non – breeding):
  - Great bittern *Botaurus stellaris*
- Annex 1 (migratory species, non – breeding):
  - Northern shoveler *Anas clypeata*
  - Gadwall *Anas strepera*
- Non Qualifying Species of Interest:
  - Cormorant *Phalacrocorax carbo*
  - Great Crested Grebe *Podiceps cristatus*
  - Tufted Duck *Aythya fuligula*
  - Pochard *Aythya etanu*
  - Grey Heron *Ardea cinereal*

Ramsar:

- The site supports the nationally scarce plant species whorled watermilfoil *Myriophyllum verticillatum* and the rare or vulnerable invertebrate *Micronecta minutissima* (a waterboatman).

- Over winter the area regularly supports:
- Gadwell, *Anas strepera* – 456 individuals, representing an average of 1.5% of the population
- Shoveler, *Anas clypeata* – 406 individuals, representing an average of 1% of the population

Threats and pressures

- Threats and pressures **[See reference** 36**]** on this site include the following:
  - Water pollution
  - Hydrological changes
  - Public access / disturbance
  - Inappropriate scrub control
  - Fisheries: Fish stocking
  - Invasive species
  - Inappropriate cutting / mowing
  - Air pollution: risk of atmospheric nitrogen deposition
- Threats and pressures [See reference] on this site include the following:
- Water pollution
- Hydrological changes
- Public access / disturbance
- Inappropriate scrub control
- Fisheries: Fish stocking
- Invasive species
- Inappropriate cutting / mowing

- Air pollution: risk of atmospheric nitrogen deposition
- Water Pollution – The vegetation and invertebrates provide food for the ducks, while fish provide food for the bitterns; and the habitat mosaic needs to vary from clear open water with abundant aquatic vegetation to moderately eutrophic conditions. Changes in water quality need to be managed to prevent loss of suitable habitat and food sources.
- Hydrological changes – Reservoir levels linked to operational requirements and all water bodies subject to natural fluctuations accounting for abstraction and climatic change.
- Public Access/Disturbance – Areas of the SPA are subject to a range of recreation pressures including watersports, angling and dog walking. This has the potential to affect SPA populations directly or indirectly.
- Inappropriate scrub control – The reedbed habitats, muddy fringes, and bankside all provide habitat as part of the mosaic for the SPA birds. Scrub control is necessary to ensure these habitats are maintained.
- Fisheries: Fish stocking – Fish population and species composition needs to be appropriate to ensure suitable habitats including food resource and water quality are maintained for SPA bird species.
- Invasive species – Azolla and/or invasive aquatic blanket weeds will adversely affect aquatic habitat (food sources).
- Inappropriate cutting/mowing – The reedbed requires rotational management for bittern.
- Air Pollution: risk of atmospheric nitrogen deposition – Nitrogen deposition exceeds site relevant critical loads.
- The Information Sheet on Ramsar Wetlands **[See reference** 37**]** also notes the whole site supports high levels of visitor pressure; principally for purposes of angling, walking, cycling and birdwatching; with boating on the adjacent canal. These activities are mostly well regulated and at current levels are not considered to threaten the interest of the Ramsar site (although they may reduce the potential for enhancing the interest). In addition to the above, the supplementary advice **[See reference** 38**]** identifies the following vulnerabilities:

- Conservation measures – Active and ongoing conservation management is often needed to protect, maintain or restore Botaurus stellaris Great bittern (non-breeding) at this site.
- Vegetation characteristics – Many bird species will have specific requirements that conservation measures will aim to maintain, for others such requirements will be less clear. Activities that may directly or indirectly affect the vegetation of supporting habitats and modify these characteristics may adversely affect the feature.
- Connectivity with supporting habitats – Bitterns clearly move between sites within the Lee Valley and to do this they will need to move safely to and from supporting habitat between individual waterbodies and above/across land outside the SPA. Also, the ability of Northern Shoveler to safely and successfully move to and from feeding and roosting areas is critical to their adult fitness and survival.
- Water depth – As the birds will rely on detecting their prey within the water to hunt, the depth of water at critical times of year may be paramount for successful feeding and therefore their fitness and survival.
- Population abundance – the population of Northern Shoveler within Lee Valley SPA has shown a slight decrease since Classification. The key SPA sites at Amwell and Turnford & Cheshunt Pits experienced a population decline during the 1999/00 – 2008/09 period, along with the is linked non-SPA Holyfield gravel pits. The SPA Walthamstow reservoirs and non-SPA Chingford reservoirs show population trends that appear to be related to water levels and available food resource.
- Food availability within supporting habitat – the availability of an abundant food supply is critically important for successful breeding, adult fitness and survival and the overall sustainability of the population. As a result, inappropriate management and direct or indirect impacts which may affect the distribution, abundance and availability of prey may adversely affect the population.

Non qualifying habitats and species upon which the qualifying habitats and/or species depend

- The information below is drawn from the supplementary advice on conserving and restoring site features **[See reference** 39**]**.
- Great bittern
  - Standing open water and canals – bittern rely on the presence and continuity of open water habitat. Changes in water area, and associated marginal habitat, can adversely affect the suitability of supporting open water habitat.
  - Reedbeds.
  - Open terrain – bittern favour large areas of open terrain, largely free of obstructions, in and around its nesting, roosting and feeding areas. Often there is a need to maintain an unobstructed line of sight within nesting, feeding or roosting habitat to detect approaching predators, or to ensure visibility of displaying behaviour.
  - Key prey species include eel, rudd, roach, frogs, toads and invertebrates.
  - Within the SPA/Ramsar, the majority of bittern are found in the Turnford and Cheshunt Pits site while Amwell Quarry and Rye Meads also support the species. Walthamstow Reservoirs also occasionally supports bittern.
- Gadwall
  - Standing open water – gadwall favour gravel pits and reservoirs during the winter period where they feed on seeds, leaves and stems of water plants.
  - Preferred food plants – sweet-grass (*Glyceria fluitans*), creeping bent (*Arostis stolonifera*), stoneworts (*Chara*), pondweeds (*Potomageton*, *Ceratophyllum* spp., *Ruppia*, *Elodeo nuttallii*).
- Each of the SPA/Ramsar's component SSSIs support gadwall in numbers which are sufficient to qualify them as being of national importance.

- Northern shoveler
  - Standing open water – in winter, shoveler frequent shallow water areas on marshes, flooded pasture, reservoirs and lakes with plentiful, marginal reeds or emergent vegetation and are found throughout.
  - Preferred food plants – Scirpus, Eleocharis, Carex, Potaogeton, Glyceria. Shoveler also feed on zooplankton (e.g. Hydrobia, crustaceans, caddisflies, Diptera, beetles) in the shallow margins of waterbodies. Preferred food plants are linked with early successional stages of waterbodies, therefore succession, particularly tree cover, can lead to the loss of suitable foraging habitat.
- BTO Bird Facts
- The British Trust for Ornithology **[See reference** 40**]** records the site's qualifying bird species' diets as:
  - Bittern: mostly fish, amphibians, insects but wide variety;
  - Shoveler: omnivorous (incl. insects, crustaceans, molluscs, seeds); and
  - Gadwall: leaves and shoots.
- The Information Sheet on Ramsar Wetlands **[See reference** 41**]** also notes the ecological features of the site include open water, with associated wetland habitats including reedbeds, fen grassland and woodland which support a number of wetland plant and animal species including internationally important numbers of wintering wildfowl.

Wormley - Hoddesdonpark Woods SAC

- Site area: (336.47 ha)

Location

- Wormley-Hoddesdonpark Woods SAC is formed of several fragmented sites located north of the borough and within the 15km boundary buffer. The closest site is 4.3km north of the LBE boundary.

Qualifying features

- Annex I Habitats (which are a primary reason for the selection of this site):
  - Sub-Atlantic and medio – European oak, or oak-hornbeam forests of the *Carpionion betuli*.

Threats and pressures

- Threats and pressures **[See reference** 42**]** on this site include the following:
  - Disease
  - Invasive species
  - Air Pollution: risk of atmospheric nitrogen deposition
  - Deer
  - Vehicles: illicit
  - Forestry and woodland management
  - Public access / disturbance
- Disease - Acute Oak Decline (AOD) is present in at least two parts of the site and affects both native oak species, which are key components of this woodland type.
- Invasive species - Several tree and shrub species not native to the site are present. Where they are not being actively controlled, they are gradually spreading. The more invasive of these include sycamore, turkey oak, rhododendron and snowberry.
- Air Pollution: risk of atmospheric nitrogen deposition - Nitrogen deposition exceeds the site-relevant critical load for ecosystem protection and hence there is a risk of harmful effects, but the sensitive features are currently considered to be in favourable condition on the site.
- Deer – Browsing and grazing by deer can reduce tree regeneration and damage the woodland understorey and ground flora. Deer damage levels

are currently only moderate and do not appear to be affecting tree regeneration, habitat structure or species composition greatly.

- Vehicles: illicit - Illegal use of restricted byways and bridleways by off-road vehicles causes localised but sometimes severe rutting and soil compaction, damaging the woodland ground flora, shrubs and trees. Fly-tipping damages the ground flora directly and can introduce toxins and alien species.
- Forestry and woodland management - The larger woodland units with public access are under appropriate management but some of the smaller, privately-owned units are not which can result in a reduction in structural and species diversity (particularly in previously coppiced areas), the loss of temporary and permanent open space, the over-shading and deterioration of veteran pollards, and the spread of invasive species.
- Public Access/Disturbance – As the site is a large, attractive area of ancient woodland with extensive public access and close to large urban centres, it is heavily used by the public for recreational purposes.
- In addition to the above, the supplementary advice **[See reference** 43**]** identifies the following vulnerabilities:
    - Vegetation community composition - maintaining or restoring these characteristic and distinctive vegetation types, and the range of types as appropriate, will be important to sustaining the overall habitat feature.
    - Vegetation Structure – open space (for woodland pasture with old trees) - having some open, sunlit and largely tree-less areas as part of the woodland community is often important to facilitate natural tree and shrub regeneration and also to provide supporting habitat for specialist woodland invertebrates, birds, vascular and lower plants. Currently, the areas of open space within the wood-pasture areas are insufficient to meet the desired target.
    - Vegetation structure – dead wood – for this habitat type, old or over-mature elements of the woodland are particularly characteristic and important features, and their continuity should be a priority.

- Root zones of ancient trees - unless carefully managed, activities such as construction, forestry management and trampling by grazing livestock and human feet during recreational activity may all contribute to excessive soil compaction around ancient trees.

Non-qualifying habitats and species upon which the qualifying habitats and/or species depend

- The supplementary advice on conserving and restoring site features **[See reference** 44**]** makes it clear that the qualifying habitat can be affected by change of habitat and soil disturbance/compaction adjacent to the site.
- Light grazing and browsing by sheep and deer helps promote a diverse woodland structure but heavy browsing can prevent woodland regeneration.
- The supplementary advice identifies the following non qualifying habitats/features that the qualifying features depend on:
  - Vegetation community composition - maintaining or restoring these characteristic and distinctive vegetation types, and the range of types as appropriate, will be important to sustaining the overall habitat feature.
  - Vegetation Structure – open space (for woodland pasture with old trees) - having some open, sunlit and largely tree-less areas as part of the woodland community is often important to facilitate natural tree and shrub regeneration and also to provide supporting habitat for specialist woodland invertebrates, birds, vascular and lower plants.
  - Vegetation structure – dead wood – for this habitat type, old or over-mature elements of the woodland are particularly characteristic and important features.
- The vegetation community composition is as follows:
  - The largest part of the site is oak-bracken-bramble woodland, dominated by sessile oak *Quercus petraea* and hornbeam *Carpinus betulus*, with areas of pedunculate oak *Quercus robur* and hornbeam.

Further there are large stands of almost pure hornbeam (former coppice). There are also marshy areas with alder *Alnus glutinosa*, pendulous sedge *Carex pendula* and yellow pimpernel *Lysimachia nemorum* as well as areas with higher proportions of ash *Fraxinus excelsior*, Dogs Mercury *Mercurialis perennis* and Yellow Archangel *Lamium galeobdolon* on the chalky boulder clay. Areas dominated by bluebell *Hyacinthoides non-scripta* do occur, but elsewhere there are stands of great wood-rush *Luzula sylvatica* with carpets of the mosses *Dicranum majus* and *Leucobryum glaucum*. Locally, a bryophyte community more typical of continental Europe occurs, including the mosses *Dicranum montanum*, *D. flagellare* and *D. tauricum*.

Thames Estuary & Marshes Ramsar and SPA

Location

- The SPA/Ramsar is formed of several fragmented sites. The site is located approximately 12.5 km to the south east of Havering borough boundary

Qualifying features

SPA:

- Dunlin: *Calidris alpina alpina*
- Red knot: *Calidris canutus*
- Ringed plover: *Charadrius hiaticula*
- Hen harrier : *Circus cyaneus*
- Black-tailed godwit: *Limosa limosa islandica*
- Grey plover: *Pluvialis squatarola*

- Pied avocet : *Recurvirostra avosetta*
- Common redshank: *Tringa totanus*

Ramsar:

- The site supports one endangered plant species and at least 14 nationally scarce plants of wetland habitats. The site also supports more than 20 British Red Data Book invertebrates.
- Wintering waterfowl assemblage
- Ringed plover: *Charadrius hiaticula*
- Black-tailed godwit: *Limosa limosa islandica*
- Grey plover: *Pluvialis squatarola*
- Dunlin: *Calidris alpina alpina*
- Common redshank: *Tringa tetanus*

Threats and pressures

- Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:
- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

Non-qualifying habitats and species upon which the qualifying habitats and/or species depend

- In general, the qualifying bird species of the SPA rely on:
  - The sites ecosystem as a whole (see list of habitats below).
  - Maintenance of populations of species that they feed on (see list of diets below).
  - Off-site habitat, which provide foraging habitat for these species.
  - Open landscape with unobstructed line of sight within nesting, foraging or roosting habitat.
- The individual qualifying species of the SPA also rely on the following habitats and species:
- *Recurvirostra avosetta*: Pied avocet
  - Habitat Preference – Mudflats, lagoons and sandy beaches.
  - Diet – Aquatic insects and their larvae, crustaceans and worms.
- *Circus cyaneus*: Hen harrier
  - Habitat Preference – Moor, marsh, steppe and fields; wintering at coastal areas, farmland, heathland, coastal marshes, fenland and river valleys.
  - Diet - Mainly small birds and mammals.
- *Charadrius hiaticula*: Ringed plover
  - Habitat Preference - Sandy areas with low vegetation, and on migration estuaries.
  - Diet - In summer, invertebrates and in winter primarily marine worms, crustaceans and molluscs.
- *Pluvialis squatarola*: Grey plover
  - Habitat Preference - Tundra, and on migration pasture and estuaries.

- Diet - In summer, invertebrates and in winter primarily marine worms, crustaceans and molluscs.

- *Limosa limosa islandica*: Black-tailed godwit
  - Habitat Preference - Marshy grassland and steppe, and on migration mudflats.
  - Diet - Insects, worms and snails, but also some plants, beetles, grasshoppers and other small insects during the breeding season.
- *Calidris canutus*: Red knot
  - Habitat Preference - Tundra, and on migration coastal habitat.
  - Diet - In summer, insects and plant material, and in winter inter-tidal invertebrates, esp molluscs.
- *Calidris alpina alpina*: Dunlin
  - Habitat Preference - Tundra, moor, heath, and on migration estuaries and coastal habitat.
  - Diet - Insects, snails and worms.
- *Tringa totanus*: Common redshank
  - Habitat Preference - Rivers, wet grassland, moors and estuaries.
  - Diet - Invertebrates, especially earthworms, cranefly larvae (inland) crustaceans, molluscs, marine worms (estuaries).

Appendix B

Screening of policies

Policy JWP1: Circular Economy

Activities likely to result as a consequence of the policy

B.1 None – this policy sets out principles for the sustainable management of waste from any development coming forward under the local authorities' Local Plans (not just waste management development), which will move waste up the waste hierarchy e.g. reduce landfill and reuse/recycling of construction and demolition waste. However, the target recycling rates have been taken into account in the calculation of required waste management capacity of the boroughs and the policy itself will not result in new development or activities.

Likely effect if policy is implemented

B.2 None

Will the policy have likely significant effects and therefore require Appropriate Assessment?

B.3 No

Policy JWP2: Safeguarding and Provision of Waste Capacity

Activities likely to result as a consequence of the policy

B.4 New waste management facilities – permitted in limited circumstances for local authority collected waste and construction & industrial waste, e.g. where the proposals move development up the waste hierarchy, increase capacity at an existing facility, consolidate waste activities, or compensate for capacity lost elsewhere.

Likely effect if policy is implemented

B.5 Development outside of existing waste sites: physical damage and loss of habitat

B.6 Change in vehicle movements: air pollution (vehicle emissions)

B.7 Construction / operational activities: air pollution (dust), non-physical disturbance, direct pollution

Will the policy have likely significant effects and therefore require Appropriate Assessment?

B.8 Yes – there are likely significant effects relating to physical damage and loss of habitat, vehicle emissions and dust.

B.9 Physical damage and loss of habitats: Epping Forest SAC (and potentially functionally linked habitats within 500m of it) is within the plan area.

B.10 Air pollution (vehicle emissions): Epping Forest SAC and Lee Valley SPA/Ramsar site are within 10km of the plan area and within 200m of A-roads that link to the plan area.

B.11 Air pollution (dust): Epping Forest SAC is within the plan area and could be affected by development within 500m.

B.12 Non-physical disturbance: there are no qualifying features that are particularly sensitive to light/noise within 500m of the plan area.

B.13 Direct pollution: Lee Valley SPA/Ramsar and Thames Estuary & Marshes SPA/Ramsar are hydrologically connected to the plan area but the Lee Valley SPA/Ramsar is upstream (no impact pathway) and the Thames Estuary & Marshes is sufficient distance away that significant effects are not likely (no LSE).

Policy JWP2B: Safeguarding and Provision of Wastewater Treatment Capacity

Activities likely to result as a consequence of the policy

B.14 New wastewater treatment facilities – permitted in limited circumstances for local authority management, treatment and disposal of wastewater and sewage sludge and increase capacity at existing wastewater treatment facilities. The policy also safeguards wastewater treatment facilities where development

could lead to the loss and/or constrain operation and development of the waste site.

Likely effect if policy is implemented

B.15 Change in vehicle movements: air pollution (vehicle emissions).

B.16 Construction / operational activities: non-physical disturbance, direct pollution and wastewater.

Will the policy have likely significant effects and therefore require Appropriate Assessment?

B.17 Yes – there are likely significant effects relating to vehicle emissions and dust, direct pollution and wastewater.

B.18 Air pollution (vehicle emissions): Epping Forest SAC and Lee Valley SPA/Ramsar site are within 10km of the plan area and within 200m of A-roads that link to the plan area.

B.19 Direct pollution and wastewater: Lee Valley SPA/Ramsar and Thames Estuary & Marshes SPA/Ramsar are hydrologically connected to the plan area but the Lee Valley SPA/Ramsar is upstream (no impact pathway). However, the Thames Estuary & Marshes is downstream and therefore the potential for likely significant effects (LSE).

B.20 Although Epping Forest SAC (and potentially functionally linked habitats within 500m of it) is within the plan area, wastewater treatment would occur near to watercourses and not in proximity to the SAC. Physical damage and loss of habitats are therefore screened out.

Policy JWP3 Prevention of Encroachment

Activities likely to result as a consequence of the policy

B.21 None – this policy protects safeguarded waste management sites and wastewater treatment facilities from encroachment by other types of development, and will not result in new development or activities.

Likely effect if policy is implemented

B.22 None.

Will the policy have likely significant effects and therefore require Appropriate Assessment?

B.23 No.

Policy JWP4: Design of Waste Management and Wastewater Treatment Facilities

Activities likely to result as a consequence of the policy

B.24 None – this policy sets out principles for reducing environmental impacts from waste development and wastewater treatment facilities, but will not itself result in new development or activities.

Likely effect if policy is implemented

B.25 None.

Will the policy have likely significant effects and therefore require Appropriate Assessment?

B.26 No, although this policy may provide mitigation for impacts associated with other policies within the ELJWP, for example the policy states that development must be designed to: “avoid unacceptable adverse impacts arising from noise, dust, litter, vermin, vibration, odour, bioaerosols, external lighting, visual intrusion, traffic or associated risks to the environment (including the water environment) and health and wellbeing of local communities”; and:

B.27 “Proposals that have an adverse effect on the integrity of sites designated as Special Areas of Conservation (SAC), Special Protection Areas (SPAs) or Ramsar sites will not be permitted, in line with The Conservation of Habitats and

Species Regulations 2017 (as amended). Any mitigation required to avoid adverse effects on their integrity, for example due to pollution risk or disturbance, must be detailed in, and secured as part of the grant of planning permission."

Policy JWP5: Energy from Waste

Activities likely to result as a consequence of the policy

B.28 New Energy from Waste facilities (within existing waste management sites) permitted in limited circumstances, e.g. as 'recover' rather than 'disposal' facilities; where waste cannot practically be managed by other means further up the waste hierarchy.

Likely effect if policy is implemented

B.29 Development outside of existing waste sites: physical damage and loss of habitat.

B.30 Burning of waste: air pollution (industrial).

B.31 Change in vehicle movements: air pollution (vehicle emissions).

B.32 Construction / operational activities: non-physical disturbance.

B.33 Increased demand for water: water abstraction.

Will the policy have likely significant effects and therefore require Appropriate Assessment?

B.34 Yes – there are likely significant effects relating to physical damage and loss of habitat, industrial emissions, vehicle emissions and water abstraction.

B.35 Physical damage and loss of habitats: Epping Forest SAC (and potentially functionally linked habitats within 500m of it) is within the plan area.

B.36 Air pollution (industrial emissions): Epping Forest SAC, Lee Valley SPA and Ramsar site and Thames Estuary & Marshes SPA and Ramsar site are within the 10km screening distance for impacts from industrial emissions.

B.37 Air pollution (vehicle emissions): Epping Forest SAC and Lee Valley SPA/Ramsar site are within 10km of the plan area and within 200m of A-roads that link to the plan area.

B.38 Water abstraction: waterbodies linked to the Lee Valley SPA and Ramsar supply water to the region.

B.39 Non-physical disturbance: there are no qualifying features that are particularly sensitive to light/noise within 500m of the plan area.

Policy JWP6: Deposit of Waste on Land

Activities likely to result as a consequence of the policy

B.40 New waste management facilities – permitted in limited circumstances for the disposal of non-inert waste to land, e.g. where waste cannot be practically

be managed by other means further up the waste hierarchy; and for inert waste where the waste will be used for a beneficial purpose e.g. restoring landfill sites or use in an engineering operation. This policy also allows for the re-working of old landfill sites.

Likely effect if policy is implemented

B.41 Development outside of existing waste sites: physical damage and loss of habitat.

B.42 Change in vehicle movements: air pollution (vehicle emissions).

B.43 Construction / operational activities: air pollution (dust), non-physical disturbance, direct pollution.

B.44 Waste open to the air: pests and vermin.

Will the policy have likely significant effects and therefore require Appropriate Assessment?

B.45 Yes – there are likely significant effects relating to vehicle emissions and dust.

B.46 Physical damage and loss of habitats: Epping Forest SAC (and potentially functionally linked habitats within 500m of it) is within the plan area.

B.47 Air pollution (vehicle emissions): Epping Forest SAC and Lee Valley SPA/Ramsar site are within 10km of the plan area and within 200m of A-roads that link to the plan area.

B.48 Air pollution (dust): Epping Forest SAC is within the plan area and could be affected by development within 500m.

B.49 Pests and vermin: Epping Forest SAC (and potentially functionally linked habitats within 500m of it) is within the plan area.

B.50 Non-physical disturbance: there are no qualifying features that are particularly sensitive to light/noise within 500m of the plan area.

B.51 Direct pollution: Lee Valley SPA/Ramsar and Thames Estuary & Marshes SPA/Ramsar are hydrologically connected to the plan area but the Lee Valley SPA/Ramsar is upstream (no impact pathway) and the Thames Estuary & Marshes is sufficient distance away that significant effects are not likely (no LSE).

Appendix C

Responses related to the HRA received in response to previous consultations

C.1 The following sets out the excerpts from comments received during the Local Plan Regulation 18 consultation that are relevant to the HRA. All comments have been addressed in this version of the HRA (Regulation 19).

Natural England

C.2 “The requirement to consider all proposed new sites under Policy JWP4 should mean that any ill-conceived proposals are rejected, and protections are correctly afforded to the likes of Epping Forest SAC. As noted under paragraph 3.34, relating to functionally linked land, Epping Forest SAC and the stag beetle were screened in for waste plan sites within 500m of the SAC for precautionary reasons and we would agree with this approach.

C.3 As far as the impact of air pollution from waste sites goes, we would wish to see mention of the impacts on the beechwood habitats of the Epping Forest SAC within the HRA as this is the habitat that is likely to see impacts. The Atlantic acidophilous beech forests which are Annex 1 habitats under the designation of the site as a Special Area of Conservation should be screened in for further assessment in terms of air quality.

C.4 Natural England notes that your authority, as competent authority, has undertaken an appropriate assessment of the proposal in accordance with regulation 63 of the Conservation of Species and Habitats Regulations 2017 (as amended). Natural England is a statutory consultee on the appropriate assessment stage of the Habitats Regulations Assessment process.

C.5 Your appropriate assessment concludes that your authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any of the sites in question. Having considered the assessment, and the measures proposed to mitigate for all identified adverse effects that could potentially occur as a result of the proposal, Natural England advises that we concur with the assessment conclusions, providing that all mitigation measures are appropriately secured in any planning permission given."

Environment Agency

"Policy JWP4

Achievement of BREEAM excellent or equivalent is too onerous for waste operators, and it is not applicable to waste facilities generally. We advise the application of CEEQUAL standards for development/redevelopment of waste sites.

Expect risk to groundwater to be included as part of this policy, particularly given the constraints in this area."

References

1 East London Waste Authority (2022) Joint Strategy [online]. Available at: https://eastlondonwaste.gov.uk/east-london-waste-authority/jointstrategy

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3 The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007 (2007) (SI No. 2007/1843). TSO (The Stationery Office), London.

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East London Joint Waste Plan
Integrated Impact Assessment
Scoping Report

East London Waste Authorities of Barking and Dagenham, Havering, Newham, and Redbridge

Final report
Prepared by LUC
February 2024

Version	Status	Prepared	Checked	Approved	Date
1	Draft	R Finnigan T Berliner O Price K Williamson	K Williamson	J Allen	26.01.2024.
2	Final	K Williamson	K Williamson	J Allen	28.02.2024

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Chapter 1
Introduction

1.1 LUC was commissioned in October 2023 to undertake an Integrated Impact Assessment, comprising Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA), Equalities Impact Assessment (EqIA), and Habitats Regulations Assessment (HRA) for the new East London Joint Waste Plan (ELJWP).

1.2 The ELJWP is a joint venture between the London Borough of Barking and Dagenham, London Borough of Havering, London Borough of Newham, and the London Borough of Redbridge.

1.3 The HIA and EqIA will be presented as part of the SA, therefore, for simplicity within this report we mostly refer just to the SA, which should be taken as incorporating SEA, HIA, and EqIA.

1.4 The purpose of this Scoping Report is to establish an appropriate scope and level of detail for the SA of the ELJWP and to document this as a basis for consultation with the statutory consultees for SA.

Geographical context for the East London Joint Waste Plan

1.5 The ELJWP area is consistent with the geography for the East London Waste Authority **[See reference** 1**]** formed by the four most easterly London Boroughs north of the Thames: London Borough of Barking and Dagenham, London Borough of Havering, London Borough of Newham, and the London Borough of Redbridge. The ELJWP also includes the area covered by the London Legacy Development Corporation (LLDC) within the London Borough of Newham. The LLDC does not have a separate waste apportionment within the

London Plan 2021, and therefore waste is planned for by the London Borough of Newham.

1.6 The plan area is bordered within London by the London Borough of Waltham Forest, London Borough of Hackney and the London Borough of Tower Hamlets to the west, and the London Borough of Greenwich and the London Borough Bexley to the south of the river Thames. To the north and east, outside of the Greater London area, are the Districts of Epping Forest and Brentwood and the unitary area of Thurrock, respectively – all within the county of Essex.

1.7 The administrative geography of London is overseen at a regional level by the Greater London Authority (GLA). There are thirty-three-administrative areas within London: twelve inner boroughs, twenty outer boroughs, and the City of London. LB Newham is the only inner borough within the East London Joint Waste Local Plan area.

1.8 The population of the ELJWP Area has grown from 772,900 in the 2011 Census to 1,142,300 in the 2021 Census. The London Plan predicts that the population of London is projected to increase by 70,000 every year, reaching 10.8 million in 2041, and East London will play a large role in providing for this growth **[See reference** 2**]**

1.9 The London Borough of Barking and Dagenham (LBBD) is located between the City of London to the West, and the M25 motorway which circles the capital, to the East with the River Thames immediately to the South. Barking has been designated as a Metropolitan Centre in the London Plan (2021). LBBD includes many of capital's largest stretches of undeveloped riverside frontage, and the most affordable premises for large and small businesses in London. One third of the LBBD is green open space, amounting to 463 hectares. Barking Riverside Overground station, opened in 2022, connects passengers to Barking in seven minutes, and to central London in twenty-two minutes.

1.10 The London Borough of Havering (LBH) includes Romford, identified as a Metropolitan centre within the London Plan 2021. LBH is bordered to the south

by part of the London Riverside Opportunity Area, containing Rainham and Beam Park. Part of the LBH extends beyond the M25 to the east, with the A12, A123, A1306 and A13 forming key routes across the borough. Over half the LBH is identified as Metropolitan Green Belt.

1.11 The London Borough of Newham (LBN) includes Stratford and East Ham, identified as major centres within the London Plan 2021. The borough is home to London City Airport. The newly opened Elizabeth Line on the London rail network provides direct train services to Heathrow and Reading via Paddington station. Royal Docks is within the Thames Gateway, and is identified within the London Plan as one of the largest regeneration opportunities within the greater London area. The recently adopted Royal Docks and Beckton Riverside Opportunity Area Planning Framework (OAPF) **[See reference 3]** guides emerging and ongoing development in the area, and sets the context for the proposed extension of the DLR to Thamesmead via Beckton Riverside. The OAPF identifies the potential to provide 38,600 new homes and create 55,800 new jobs. LBN includes part of the area of the London Legacy Development Corporation which covers Queen Elizabeth Park and part of its surroundings.

1.12 The London Borough of Redbridge (LBR) sits approximately 7 miles east of the City of London, adjoining LB Waltham Forest, LB Newham, LBBD, and between two strategic growth corridors. The Thames Gateway runs to the south and east, and the London-Stansted-Cambridge growth corridor covers the western half of the Borough and beyond, extending south to the river Thames and north, through Hertfordshire, towards Cambridge. There are four Elizabeth Line stations within the borough. LBR includes the Metropolitan centre of Ilford. Just under half of the borough is considered to be green space, and around one third of the borough is designated Metropolitan Green Belt.

1.13 There are three European protected wildlife sites within 5km of the four Boroughs; Epping Forest Special Area of Conservation (SAC), Lee Valley Special Protection Area (SPA) and Lee Valley Ramsar. The south edge of Epping Forest crosses into the northern boundary of Redbridge. Downstream from the river Thames, which forms the southern boundary of the Plan area are Thames Estuary & Marshes Ramsar and SPA and the Benfleet and Southend Marshes SPA.

1.14 Due to the location of the plan area within Greater London, the four boroughs benefit from strategic transport links including access to the M11 and M25 motorways via the A12, A13, A1020 and the A406. There is water transport connectivity for leisure and freight on the river Thames, good connectivity to rail hubs in central London, as well as good access to London City Airport and London Stanstead.

East London Joint Waste Plan

1.15 The current version of the ELJWP was adopted in 2012 **[See reference 4]** and set out to meet the requirements of the national policy and the London Plan at that time, to plan effectively for waste across the four London Boroughs. There have been four iterations of the London Plan since 2011: the London Plan (2016), the Revised Early Minor Alterations to the London Plan (2013) to align within the NPPF, the Further Alterations to the London Plan (2015), and the current adopted London Plan (2021).

1.16 The ELJWP (2012) predates the original National Planning Policy Framework (2012) and instead considered the requirements of Planning Policy Statement 10: Planning for Waste and Planning Policy Statement 12: Local Development Framework. The PPS system has been replaced and current national policy requirements are set out in the National Planning Policy Framework (NPPF, 2023), the National Planning Policy for Waste (NPPW, 2014) and the accompanying Planning Practice Guidance (PPG, 2014).

1.17 The new ELJWP will provide the local planning policy framework for all waste planning matters across London Borough of Barking and Dagenham, London Borough of Havering, London Borough of Newham, and London Borough of Redbridge. The LLDC will transfer planning powers back to LBN by the end of 2024.

1.18 The East London Waste Authority published a new Joint Strategy for East London Resources and Waste in 2023 **[See reference 5]**. The strategy focuses

on waste prevention to meet the GLA objective of London becoming a zero-waste city by 2050.

Sustainability appraisal and strategic environmental assessment

1.19 Under the amended Planning and Compulsory Purchase Act 2004 **[See reference 6]**, SA is mandatory for Development Plan Documents. For these documents it is also necessary to conduct an environmental assessment in accordance with the requirements of the Strategic Environmental Assessment (SEA) Directive (European Directive 2001/42/EC) as transposed into law in England by the SEA Regulations **[See reference 7]**, which currently remain in force despite the UK exiting the European Union in January 2020. Therefore, it is a legal requirement for the ELJWP to be subject to SA and SEA throughout its preparation.

1.20 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process (as advocated in the national Planning Practice Guidance **[See reference 8]**), whereby users can comply with the requirements of the SEA Regulations through a single integrated SA process – this is the process that is being undertaken for the ELJWP. From here on, the term 'SA' should therefore be taken to mean 'SA incorporating the requirements of the SEA Regulations'.

1.21 The SA process comprises a number of stages, with scoping being Stage A as shown below:

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope.

Stage B: Developing and refining options and assessing effects.

Stage C: Preparing the Sustainability Appraisal Report.

Stage D: Consulting on the Waste Local Plan and the SA Report.

Stage E: Monitoring the significant effects of implementing the ELJWP.

Health impact assessment

1.22 Although not a statutory requirement, Health Impact Assessment (HIA) aims to ensure that health-related issues are integrated into the plan-making process. The HIA of the ELJWP will be carried out as part of the SA by ensuring that the SA objectives against which the Plan is appraised address relevant health issues. Recommendations will be made in relation to how the health-related impacts of the Plan can be optimised as the options are developed into detailed policies and site allocations.

Equalities impact assessment

1.23 The requirement to undertake formal Equalities Impact Assessment (EqIA) of development plans was introduced in the Equality Act 2010 but was abolished in 2012. Despite this, authorities are still required to have regard to the provisions of the Equality Act, namely the Public Sector Duty which requires public authorities to have due regard for equalities considerations when exercising their functions.

1.24 In fulfilling this duty, many authorities still find it useful to produce a written record of how equality issues have been considered. Therefore, an EqIA will be carried out and presented in an appendix to the IIA report, setting out how the ELJWP is likely to be compatible or incompatible with the duties that each of the London Boroughs must perform under the Equalities Act 2010. The findings will

be taken into account and highlighted within the SA in relation to sustainability objectives covering equality issues.

Habitats regulations assessment

1.25 The requirement to undertake Habitats Regulations Assessment (HRA) of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in July 2007 and updated in 2010 and again in 2012 and 2017 **[See reference 9]**. The Regulations translate Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive) and 79/409/EEC (Birds Directive) into UK law and currently remain a legal requirement despite the UK exiting the European Union.

1.26 The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European Site and to ascertain whether it would adversely affect the integrity of that site.

1.27 The HRA will be undertaken separately but the findings will be taken into account in the SA where relevant (for example to inform judgements about the likely effects of potential development locations on biodiversity).

Approach to scoping

1.28 The main tasks associated with the scoping stage of the IIA (stage A) are as follows:

- **Stage A1:** Setting out the policy context for the IIA of the Local Plan, i.e., key policies and strategies that influence what the local Plan and the IIA need to consider.
- **Stage A2:** Setting out the baseline for the IIA of the Local Plan, i.e., the current and environmental, social (including health and equalities), and

economic conditions in the four London Boroughs and their likely evolution in the absence of the Plan.

- **Stage A3:** Drawing on A1 and A2, identify the sustainability problems and/or opportunities ('issues') that the Local Plan and IIA should address.
- **Stage A4:** Drawing on A1, A2 and A3, develop a framework of IIA objectives and assessment criteria against which to appraise the constituent parts of the Local Plan in isolation and in combination.
- **Stage A5:** Consulting on the intended scope and level of detail of the IIA.

1.29 This Scoping Report sets out the intended scope and level of detail of the IIA of the Local Plan for consultation with the relevant environmental authorities. It fulfils the requirements set out above and provides the foundations for later appraisal of the likely effects of constituent parts of the Local Plan, as plan-making progresses. In accordance with the Government's Planning Practice Guidance on SEA/SA, the Scoping Report is proportionate and relevant to the Local Plan, focussing on what is needed to assess likely significant effects **[See reference** 10**]**. It also takes account of the National Planning Policy Framework (NPPF) and the emphasis it places on achieving sustainable development.

1.30 This IIA Scoping Report follows key legislation, policy and guidance including:

- Directive 2001/42/EC on the assessment of the effects of certain plans, and programmes on the environment i.e., the SEA Directive **[See reference** 11**]**;
- The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633) **[See reference 12]**, as amended by the Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232) **[See reference 13]**;
- Strategic Environmental Assessment and Sustainability Appraisal National Planning Practice Guidance **[See reference** 14**]**;
- A Practical Guide to the Strategic Environmental Assessment Directive **[See reference** 15**]**;

- Guidance on Integrating Climate Change and Biodiversity into Strategic Environmental Assessment **[See reference** 16**]**;
- Guidance on Strategic Environmental Assessment / Sustainability Appraisal and the Historic Environment **[See reference** 17**]**;
- Strategic Environmental Assessment: Improving the effectiveness and efficiency of Strategic Environmental Assessment / Sustainability Appraisal for land use plans **[See reference** 18**]**;
- Draft Guidance on Assessing Health Impacts in Strategic Environmental Assessment **[See reference** 19**]**; and
- Health Impact Assessment in spatial planning: A guide for local authority public health and planning teams **[See reference** 20**].**

1.31 The Levelling-up and Regeneration Act 2023 (LURA 2023) **[See reference** 21**]** received royal assent on 26 October 2023. The Act provides for changes to the planning system, including the replacement of the current environmental reports regime. These changes have not been brought forward through secondary legislation at the time of this report. Any future changes to the planning system through LURA will be picked up at later stages of the IIA process, where it is appropriate to do so.

Where the SEA Regulations are addressed in this Scoping Report

1.32 The text in this section signposts the relevant sections of the Scoping Report that are considered to meet the SEA Regulations requirements (the remainder will be met during subsequent stages of the IIA of the ELJWP). This section will be updated and included in the full IIA Report at each stage of the IIA to show how the requirements of the SEA Regulations have been met through the IIA process.

Regulation 12 and Schedule 2

1.33 The SEA Regulations require the responsible authority to prepare, or secure the preparation of, an 'environmental report', which in this case will comprise the IIA report. The environmental report must identify, describe and evaluate the likely significant effects on the environment of implementing the plan or programme and reasonable alternatives, taking into account the objectives and geographical scope of the plan or programme (Regulation 12). The information required by Schedule 2 of the SEA Regulations is set out below, indicating which part(s) of the IIA Scoping Report provide that information:

- An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.
  - Covered in **Chapter 1** of this Scoping Report.
- The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.
  - Covered in **Chapter 3** of this Scoping Report.
- The environmental characteristics of areas likely to be significantly affected.
  - Covered in **Chapter 3** of this Scoping Report.
- Any existing environmental problems which are relevant to the plan or programme including those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.
  - Covered in **Chapter 3** of this Scoping Report.
- The environmental protection objectives established at international, community or national level that are relevant to the plan or programme and the way those objectives and any environmental considerations have been considered during its preparation.

- Covered in **Chapter 2** and **Appendix A** of this Scoping Report. **Chapter 4** describes the IIA Framework, which shows how the objectives have been considered.

- The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape, and the interrelationship between these issues.
  - This requirement will be met at a later stage in the IIA process. **Chapter 4** describes the method by which significant effects will be identified.
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.
  - This requirement will be met at a later stage in the IIA process.
- An outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken, including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.
  - This requirement will be met at a later stage in the IIA process.
- A description of measures envisaged concerning monitoring in accordance with Regulation 17.
  - This requirement will be met at a later stage in the IIA process.
- A non-technical summary of the information provided under the above headings.
  - This requirement will be met at a later stage in the IIA process.

1.34 The report shall include the information that may reasonably be required considering current knowledge and methods of assessment, the contents and

level of detail in the plan or programme, its stage in the decision-making process, and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Reg. 12(3)).

- This is addressed throughout the Scoping Report.

1.35 When deciding on the scope and level of detail of the information that must be included in the environmental report, the responsible authority shall consult the consultation bodies (Reg. 12(5)).

- Consultation will be undertaken on the IIA Scoping Report early in 2024 with the three consultation bodies (Environment Agency, Historic England and Natural England).

Regulation 13

1.36 Authorities with environmental responsibility and the public shall be given an effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Regulation 13).

- Public consultation on the ELJWP and accompanying IIA Reports will take place as the ELJWP develops in accordance with the Council's Local Development Scheme.

Regulation 14

1.37 EU Member States must be consulted where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Regulation 14).

- The ELJWP is not expected to have significant effects on EU Member States.

Regulation 16

1.38 Provision of information on the decision: When the plan or programme is adopted, the public and any countries consulted under Reg. 14 must be informed and the following made available to those so informed:

- The plan or programme as adopted;
- A statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report, the opinions expressed, and the results of consultations entered have been considered, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
- The measures to be taken to monitor the likely significant effects of the plan or programme.
    - To be addressed after the ELJWP is adopted.

Regulation 17

1.39 Monitoring of the significant environmental effects of the plan's or programme's implementation.

- To be addressed after the ELJWP is adopted.

Quality assurance

1.40 Environmental reports should be of a sufficient standard to meet the requirements of the SEA Regulations.

- This Scoping Report has been produced in line with current guidance and good practice for SEA/SA and this section has demonstrated where the requirements of the SEA Regulations have been met.

Structure of the scoping report

1.41 This chapter describes the background to the production of the East London Joint Waste Plan and the requirement to undertake IIA and other assessment processes. The remainder of this Scoping Report is structured into the following sections:

- **Chapter 2** presents the policy context for the ELJWP and the IIA.
- **Chapter 3** presents the baseline against which the effects of the policies and site options in the emerging ELJWP will be assessed.
- **Chapter 3** also identifies the key environmental, social and economic issues in the four London Boroughs of relevance to the emerging ELJWP and considers the likely evolution of those issues without its implementation.
- **Chapter 4** presents the IIA framework that will be used for the appraisal of the ELJWP and the proposed method for carrying out the IIA.
- **Chapter 5** describes the next steps to be undertaken in the IIA of the ELJWP.

Chapter 2

Relevant Plans and Programmes

Key national plans and programmes

2.1 The National Planning Policy Framework (NPPF) **[See reference** 22**]** is the overarching planning framework which provides national planning policy and principles for the planning system in England. The East London Waste Local Plan must be consistent with the requirements of the NPPF which sets out information about the purposes of local plan-making. It states:

> "Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings".

2.2 The NPPF does not contain specific waste policies. The detailed waste planning policies are contained in the National Planning Policy for Waste (2015). The policies state that when preparing Local Plans, waste planning authorities should take account of a number of criteria including:

- Driving waste management up the waste hierarchy;
- Identifying the need for waste management facilities
- Working jointly and collaboratively with other planning authorities to provide a network of facilities to deliver sustainable waste management; and,
- Identifying suitable sites and areas for waste management facilities in line with the proximity principle, giving priority to the re-use of previously developed land.

2.3 The NPPF is supported by Planning Practice Guidance which includes guidance on Waste (2015) **[See reference** 23**]**. The PPG provides guidance on implementing the waste hierarchy, the preparation of local plans and sustainability appraisals for waste local plans, and determining planning applications for waste facilities. According to the guidance on flood risk and coastal change, waste treatment facilities are classified as less vulnerable and are suitable in all flood zones, excluding 3b (the functional floodplain). Landfills and sites used for waste management facilities for hazardous waste are considered to be more vulnerable and are suitable only in Flood Zones 1 and 2, and potentially 3a.

2.4 Also of particular relevance to the East London Waste Local Plan is the National Waste Management Plan for England (DEFRA, 2021) which provides an analysis of the current waste management situation in England and supports the implementation of the objectives and provisions of the Waste (England and Wales) Regulations 2011.

2.5 Table 2.1 lists the national plans and programmes that are of greatest relevance to the emerging Waste Local Plan. Further national plans and programmes are included in **Appendix A**. It should be noted that some of the documents will be updated in the timeline of preparing the IIA for the Waste Local Plan. This list will be updated at each stage of the IIA, where appropriate.

Table 2.1: Key national plans and programmes of relevance for the ELJWP

National Legislation
HM Government (1979) Ancient Monuments and Archaeological Areas Act 1979
HM Government (1981) The Wildlife and Countryside Act 1981
HM Government (1990) Planning (Listed Building and Conservation Areas) Act
HM Government (1990) Environmental Protection Act 1990

National Legislation
HM Government (2000) Countryside and Rights of Way Act 2000
HM Government (2003) Sustainable Energy Act
HM Government (2006) The Natural Environment and Rural Communities (NERC) Act
HM Government (2016) Energy Act 2016
HM Government (2008) The Climate Change Act 2008 (as amended)
HM Government (2008) The Planning Act 2008
HM Government (2021) The Environment Act 2021
HM Government (2010) Flood and Water Management Act 2010
HM Government (2014) Water Act 2014
National Regulations
HM Government (2015) Water Framework Directive (England and Wales) (amendment) Regulations 2015
HM Government (2016) Environmental Permitting (England and Wales) Regulations 2016
HM Government (2010) The Conservation of Habitats and Species Regulations 2010
HM Government (2002) The Landfill (England and Wales) Regulations 2002
HM Government (1994) Urban Waste Water Treatment (England and Wales) Regulations 1994
HM Government (2005) The Hazardous Waste (England and Wales) Regulations 2005
HM Government (2011) The Animal By-Products (Enforcement) (England) Regulations 2011
HM Government (2005) Waste Management (England and Wales) Regulations 2005
HM Government (2012) Waste (England and Wales) (Amendment) Regulations 2012

National Legislation
HM Government (2002) Air Quality (England) (Amendment) Regulations 2002
HM Government Circular 1/2003: Safeguarding, Aerodromes, Technical Sites and Military Explosive Storage Areas
HM Government (2017) The Conservation of Habitats and Species Regulations 2017 (as amended)
HM Government (2020) The Waste (Circular Economy) (Amendment) Regulations 2020
National Policies, Plans and Strategies
DCMS (2013) Scheduled Monuments & Nationally Important but Non-Scheduled Monuments Policy Statement
HM Government (2019) Clean Air Strategy 2019 Policy Paper
DEFRA (2011) Safeguarding our Soils: A Strategy for England Policy Paper
Natural England (2021) Guide to assessing development proposals on agricultural land – National Guidance
Environment Agency (2020) National Flood and Coastal Erosion Risk Management Strategy for England Policy Paper
Environment Agency (2022) Flood risk assessments: climate change allowances – National Guidance
DEFRA (2011) Future water: The Government's Water Strategy for England Policy Paper
Environment Agency (2017) Groundwater protection guides
DfT (2021) Transitioning to zero emission cars and vans: 2035 delivery plan – National Guidance
DEFRA (2013) Hazardous Waste National Policy Statement
DECC (2011) National Policy Statement for Renewable Energy Infrastructure (EN-3)
DECC (2012) Strategy for the management of solid low level radioactive waste from the non-nuclear industry
DECC (2009) The UK Renewable Energy Strategy
HM Government (2021) Net Zero Strategy: Build Back Greener

National Legislation
BEIS (2021) Industrial Decarbonisation Strategy
DEFRA (2020) Rural proofing in England 2020 Policy Paper
DLUHC (2021) National Design Guide
MHCLG (2023) National Planning Policy Framework
DCLG (2014) National Planning Policy for Waste
DLUHC National Planning Practice Guidance (living document)
DEFRA (2021) National Waste Management Plan for England
DEFRA (2013) Waste prevention programme for England: Prevention is better than cure – The role of waste prevention in moving to a more resource efficient economy Policy Paper
DEFRA (2018) Our Waste, Our Resources: A strategy for England Policy Paper
BEIS (2022) British Energy Security Strategy Policy Paper
DfT (2022) Air quality: clean air zone framework for England Policy Paper
HM Government (2017) Litter Strategy for England Policy Paper
DfT (2022) Future of freight plan Policy Paper
DEFRA (2022) Landscapes Review (National Parks and AONBs): government response Policy Paper
DEFRA (2020) Agricultural Transition Plan 2021 to 2024 Policy Paper
DCLG (2021) National Planning Policy Framework
DCLG (2015) Planning Practice Guidance on Waste
DEFRA (2012) National Policy Statement for Waste Water
DEFRA (2013) National Policy Statement for Hazardous Waste
HM Government (2013) Waste prevention programme for England: Prevention is better than cure – The role of waste prevention in moving to a more resource efficient economy
Our Waste, Our Resources: A strategy for England (2018)

National Legislation
British Energy Security Strategy (2022)
DEFRA (GP3): Underground, Under threat – Groundwater Protection: Policy and Practice
DLHC (2022) Flood risk and coastal change guidance
Environment Agency (2022) National Flood and Coastal Erosion Risk Management Strategy for England
DEFRA (2008) Future Water: The Government's Water Strategy for England
Environment Agency (2009) Water for People and the Environment: Water Resources Strategy for England and Wales
MHCLG (2019) Clean Air Strategy
DECC (2014) Community Energy Strategy
Government policy papers
DEFRA (2021) The Water White Paper
25 Year Environment Plan (2018)
Resources and Waste Strategy for England (2018)

2.6 The East London Joint Waste Local Plan (ELJWP) is not being prepared in isolation but is influenced by, and influences, other polices, plans and programmes. The Plan needs to be consistent with international and national guidance and strategic planning policies and should contribute to the goals of a wide range of other programmes and plans. It must also conform to environmental protection legislation and the sustainability objectives established at the international, national and local levels.

2.7 Schedule 2 of the SEA Regulations requires:

(1) "an outline of the…relationship with other relevant plans or programmes"; and

(5) “the environmental protection objectives established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation”

2.8 In order to establish a clear scope for the IIA it is necessary to review and develop an understanding of the environmental, social and economic objectives contained within international and national plans and programmes that are of relevance to the emerging East London Waste Local Plan. The review is not exhaustive, and an exhaustive approach would not be proportionate or be useful in understanding the policy environment that the Waste Local Plan must be prepared within. Instead, the review focuses on a limited number of key policy documents that are of particular importance of setting the parameters of what the Waste Local Plan should and should not do. It should be noted that the policy context within which the Waste Local Plan and its IIA are being prepared is inherently uncertain given the following key factors:

- **UK economy** – The UK economy contracted by 0.3% in the fourth quarter of 2023 which was the second successive fall in GDP. However, quarter four of 2023 was 1.0% above its pre-pandemic level of Q4 2019 **[See reference 24]** Whilst the UK is in a technical recession recession, the Organisation for Economic Co-operation and Development (OECD) forecasts UK GDP to grow by 0.7% in 2024 and by 1.2% in 2025 (unchanged from its previous forecast made in November). The International Monetary Fund (IMF) forecasts UK GDP to grow by 0.6% in 2024 (unchanged from its previous forecast made in October) and by 1.6% in 2025. The UK is currently experiencing a cost of living crisis and for the first time in four decades, the Confederation of British Industry (CBI) expects real household incomes to drop for a second consecutive year (-1.3%), before recovering in 2024 (1.1%). Brought on by high inflation and low wage growth, the economy is underperforming compared to its G7 peers. As the UK’s economy continues to take a downturn, the potential implications for planning and development include Government spending cuts impacting on support available for services and facilities, and new infrastructure.

- **Brexit** – Following the UK's departure from the European Union on 31st January 2020, it entered a transition period which ended on 31st December 2020. From 1st January 2021, directly applicable EU law no longer applies to the UK and the UK is free to repeal EU law that has been transposed into UK law. Where EU law has been transposed into UK law and not repealed, the relevant EU and UK legislation is still referred to in this report.
- **COVID-19** – The COVID-19 pandemic has led to far-reaching changes to society in the UK and around the world. Which of these changes will continue in the long term is unknown. However, emerging evidence suggests that there has been an increase in remote working, reduced commuting and related congestion and air pollution, and increased prioritisation of walking and cycling over private transport in towns and cities.
- **The Levelling Up and Regeneration Act** – Published on 11th May 2022, and received Royal Assent on 26th October 2023, the Act introduces several reforms to the planning system. It sets out the Government's plans to drive local growth and empower local leaders to regenerate their areas. The Act introduces a new Infrastructure Levy, new powers for councils to bring vacant properties back into use, a new approach to environmental assessments, and changes to neighbourhood planning including digitisation of the system.

Key international plans and programmes

2.9 Relevant international plans and policy (including those at the EU level) are transposed into national plans, policy and legislation and these have been considered.

2.10 At the international level, Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive') and Directive 92/43/EEC on the conservation of natural habitats and

of wild fauna and flora (the 'Habitats Directive') have been transposed into UK Regulations. They are particularly significant given that Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) are to be undertaken in relation to the emerging East London Waste Local Plan. These assessment processes should be undertaken iteratively and integrated into the production of the plan in order to ensure that any potential negative environmental effects (including on nature conservation sites of international importance) are identified and can be mitigated.

2.11 Directive 2008/98/EC (Waste Framework Directive) is also of particular relevance. It has also been transposed into UK law and aims to protect the environment and human health by preventing or reducing the adverse impacts of the generation and management of waste and by reducing overall impacts of resource use and improving the efficiency of such use.

2.12 There are a wide range of other EU Directives relating to issues such as water and air quality, most of which have been transposed into UK law through national-level policy.

2.13 Furthermore, the 2030 Agenda for Sustainable Development (2015) **[See reference 25]:** This initiative, adopted by all United Nations Member States, provides a shared blueprint for peace and prosperity for people and the planet and includes 17 Sustainable Development Goals (SDGs), designed to achieve a better and more sustainable future for all. Relevant to this topic are:

- SDG 6: Clean Water and Sanitation
- SDG 08: Decent Work and Economic Growth
- SDG 09: Industry, Innovation and Infrastructure
- SDG 11: Sustainable Cities and Communities
- SDG 12: Responsible Consumption and Production
- SDG 13: Climate Action
- SDG 14: Life Below Water.
- SDG 15: Life on Land.

2.14 Further international plans and programmes are included in **Appendix A**

Regional, sub-regional and local plans and programmes

2.15 It is not a requirement of the SEA Regulations to describe the relevance of policy objectives established at sub-national scale for the Waste Local Plan. However, since they provide further context for the Waste Local Plan, those considered of most relevance (e.g. relating to the economy, transport, climate change and green infrastructure) are listed below.

Table 2.2: Key GLA policies, strategies and guidance

Key Greater London Authority (GLA) policies, strategies and guidance
The London Plan (2021)
Climate Action Strategy 2020-2027 (2020)
London Environment Strategy (2022)
Local Nature Recovery Strategy (in progress)
Accessible London SPG (2014)
Optimising Site Capacity: A Design - Led Approach LPG (2023)
Characterisation and Growth Strategy (2023)
Air quality positive LPG (2023)
Air quality neutral LPG (2023)
Be Seen energy monitoring LPG (2021)
Circular economy statements LPG (2022)
Energy Planning guidance (2022)
The control of dust and emissions in construction SPG (2014)

Key Greater London Authority (GLA) policies, strategies and guidance
Whole life carbon LPG (2022)
Sustainable Transport, Walking and Cycling (2022)
Urban Green Factor LPG (2023)
London Sustainable Drainage Action Plan (2015)

2.16 There are also a wide range of plans and programmes at the district / local authority scale. While such local plans do not set policy objectives that the Waste Local Plan must follow, the Waste Local Plan may nevertheless need to take into account development provided for by those local plans. This section therefore also lists local plan documents considered of greatest potential relevance to the Waste Local Plan. The table includes plans adopted or that have reached Regulation 19 stage at the date this document was published. The table includes document relating to the London Legacy Development Corporation. Planning powers for the area covered by the London Legacy Development Corporation will return to Newham, Hackney, Tower Hamlets and Waltham Forest, by the end of December 2024. Chapter 3 setting out the baseline of the ELJWP area, draws from these local plans, programmes and policies to highlight future trends relevant to waste management in East London, such as the scale and distribution of each London Borough's housing and employment growth.

Table 2.3: Key Local plans, programmes and policies

Key Local plans, programmes and policies
East London wide
Joint Waste Development Plan for the East London Waste Authority Boroughs (2012)
A Joint Strategy for East London's Resources and Waste 2027 – 2057 (2022)
Evidence Base for the East London Joint Waste Plan (and appendices) (2022)

Key Local plans, programmes and policies
East London Waste Prevention Action Plan 2023-24 (2023)
East London Integrated Waste Management Services Procurement and Contract Expiry (pace) Outline Business Case (obc) (2023)
London Borough of Barking and Dagenham
New Local Plan (Regulation 19 draft, 2021) and Proposed Site Allocations (2021)
LBBD Local Plan Sustainability Appraisal (2021)
Climate Emergency Declaration (2020)
Barking & Dagenham Inclusive Growth 2022 to 2026 draft (2022)
Barking and Dagenham Authority Monitoring Report 2021-2022 (2023)
Barking and Dagenham Air Quality Action Plan 2020-2025 (2020)
Be First Waste Needs Assessment (2021)
London Borough of Barking and Dagenham Industrial Land Strategy (2021)
Barking and Dagenham Wide Transport Priorities 2021-2037 (2021)
Planning Advice Note (PAN3) – Waste and Recycling Provisions (updated 2021)
Barking and Dagenham Reduction and Recycling Plan April 2023 to March 2025 (2023)
London Borough of Havering
Havering Local Plan 2016 – 2031(2021)
Havering Local Plan 2016 – 2031 – Polices Map (North 2021)
Havering Local Plan 2016 – 2031 – Policies Map (South 2021)
Sustainability Appraisal for the Havering Local Plan (2021)
Climate Change Action Plan (2021)
Havering Inclusive Growth Strategy 2020-2045 (2020)
Havering Local Implementation Plan: Transport strategy (2019)
Havering Authority Monitoring Report 2022-2023 (2023)

Key Local plans, programmes and policies
Havering Reduction and Recycling Plan April 2023 to March 2025 (2022)
Climate Emergency Declaration (2021)
Havering Nature Conservation and Biodiversity Strategy (2014)
Romford Area Action Plan Development Plan Document (2008)
Site Specific Allocations Development Plan Document (Romford) (2008)
London Borough of Newham
Newham Local Plan (2018)
Local Plan Polices Map (2018)
Climate Emergency Action Plan Climate Emergency Statement (2020)
Newham's Climate Emergency Annual Report (2021-2022)
Newham's Climate Action Just Transition Plan (2023)*
AMR: Waste, Energy and Infrastructure Delivery Monitoring Bulletin (2013-2018)
AMR: Sustainability and Climate Monitoring Bulletin (2013-2018)
Waste Management Guidelines for Developers*(2014)
Equalities and the Local Plan (2017)
Air Quality Action Plan (2019)*
London Borough of Redbridge
Redbridge Local Plan 2015-2030 (2018)
Climate Action Plan (2021)
Climate Change Annual report (2022)
Redbridge Reduction and Recycling Plan 2023-2025 (2022)
Redbridge Biodiversity Action Plan (2006)
Redbridge Third Implementation Plan (2019)
Waste Reduction Strategy (2019)

Key Local plans, programmes and policies
London Legacy Development Corporation
Local Plan 2020-2036 (2020)
Getting to Net Zero SPD (2022)

Chapter 3

Baseline Information

3.1 Baseline information provides the basis for predicting and monitoring the likely sustainability effects of a plan and helps to identify key sustainability issues.

3.2 Schedule 2 of the SEA Regulations requires information to be provided on:

1. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.
2. The environmental characteristics of areas likely to be significantly affected.
3. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds and the Habitats Directive [92/43/EEC].

3.3 The environmental, social and economic baseline for the East London Joint Waste Plan (ELJWP) is organised under the following topic headers:

- Waste.
- Climate change, adaptation and mitigation.
- Population, health and wellbeing.
- Economy.
- Transport.
- Historic environment.

- Landscape and townscape.
- Biodiversity.
- Air, land and water quality.

3.4 Analysis of baseline information and the policy context has informed identification of sustainability issues facing Barking and Dagenham, Havering, Newham and Redbridge Boroughs that are of relevance to the ELJWP, in line with the requirements of Schedule 2 of the SEA Regulations. The key sustainability issues that have been identified are set out underneath each baseline topic section, along with an outline of their relevance, i.e. how the Plan could avoid exacerbating these issues or help to solve them.

3.5 Maps illustrating the spatial dimension of some of the baseline conditions described below are presented at the end of this chapter.

Waste

Waste Streams

Current baseline information

3.6 Information within this section is taken from the ELJWP evidence base 2023 **[See reference** 26**]**. Future iterations of the IIA will be updated in line with the emerging evidence for the new ELJWP.

Waste arisings

3.7 The London Plan states that London should manage as much of its waste within its boundaries as practicable, aiming to achieve waste net self-sufficiency

by 2026 in all waste streams except for excavation waste. To meet this aim, the plan requires boroughs to allocate sufficient land and identify waste management facilities to provide capacity to manage the tonnages of waste apportioned in the plan and to plan for those waste streams not apportioned by the London Plan.

3.8 The London Plan sets out both waste arising forecasts and apportionment targets for each borough. The apportionment targets for East London are significantly higher than the area's projected arisings, so the London Plan envisages that East London could be a major contributor to London's target of net self-sufficiency by 2026. London Plan arisings and forecasts for the East London Boroughs are set out below.

Table 3.1: Comparison of collective waste arisings and apportionment targets for the East London Boroughs (thousand tonnes)

London Borough	Waste Arising 2021	Waste Arising 2041	Apportionment Target 2021	Apportionment Target 2041
Barking and Dagenham	214	230	505	537
Havering	229	249	370	393
Newham	244	260	383	407
Redbridge	196	216	151	160
Total	883	955	1,409	1,497

3.9 It is estimated that East London manages 57% of its own Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) waste arisings and 58% of its own Construction and Demolition (C&D) waste within East London. Seven percent of East London's LACW and C&I, and 19% of C&D waste, is managed elsewhere in London. Exports account for 36% and 23% of these waste streams respectively. A higher proportion of hazardous waste and

excavation waste is exported outside of London, which is to be expected due to the specialist nature of facilities dealing with these waste streams

Table 3.2: East London's waste arisings and management destinations 2019

Waste Stream	Amount Managed in East London	Amount Managed Elsewhere in London	Amount exported outside London
LACW/C&I	57%	7%	36%
C&D	58%	19%	23%
Hazardous (HWDI)	18%	5%	77%
Excavation	17%	2%	81%

Construction, demolition and excavation waste current baseline

3.10 In 2019, 326,000 tonnes of inert C&D waste was generated in East London. Of this 6% was incinerated, 12% was landfilled, 63% was recycled/reuse/recovered or treated, 0% was disposed on/in land, and 18% was transferred to another site for further processing/disposal.

3.11 In 2019, 909,000 tonnes of Inert Excavation waste was generated in East London. Of this 0% was incinerated, 67% was landfilled, 6% was recycled/reuse/recovered or treated, 12% was disposed on/in land, and 15% was transferred to another site for further processing/disposal.

Waste management routes current baseline

3.12 The management routes for East London's waste in 2019 are set out in the **Table 3.3** below. The table shows an estimated 42% of LACW/C&I waste was recycled in 2019 but nearly a third of these two waste streams are still being disposed of to landfill. The target for LACW and (part of) C&I waste streams is 65% recycling, composting or reuse by 2030.

3.13 An estimated 69% per cent of C&I waste is being recycled or recovered, but this falls short of the London Plan target which is 95%. Two thirds of excavation waste is being disposed of to landfill but some or all of this may be for restoration purposes which is a beneficial use

Table 3.3: East London's waste management routes

Waste stream	Recycling	Recovery	Landfill	Transfer
LACW/C&I	46%	2%	31%	21%
C&D	63%	6%	12%	18%
Hazardous	93%	0	0	6%
Excavation	6%	12%	67%	15%

Exports from ELJWP Boroughs

3.14 The London Plan aims for London as a whole to be net self-sufficient in waste management capacity for all waste streams except excavation waste by 2026.

3.15 Waste is a strategic cross-boundary issue and is subject to the duty to co-operate. The duty to cooperate is a mechanism for waste planning authorities (WPAs) to engage with each other on waste movements between their areas to work together to manage waste streams.

3.16 The following guideline tonnages in relation to the Duty to Cooperate have been agreed by the London Waste Planning Forum (LWPF), South East Waste Planning Advisory Group (SEWPAG) and the East of England Waste Technical Advisory Board (EoEWTAB). The guideline tonnages per annum (tpa) are:

- 5,000 tpa non-hazardous waste (LACW and C&I).
- 10,000 tpa inert waste (CD&E).
- 100 tpa hazardous waste.

3.17 Around 1.4 million tonnes of waste was reported as exported from East London in 2019. Just over half of this (52%) was excavation waste and just over a third (36%) was LACW/C&I waste.

3.18 Only 12% of waste exports were managed elsewhere in London. The majority (88%) were exported to locations in the south east and east of England.

3.19 Over half (54%) of all waste exported from East London was deposited to landfill and a further 8% was put to beneficial use in/on land.

3.20 Buckinghamshire and Thurrock received the greatest proportion of exported CD&E waste in 2019. In that year around 500,000 tonnes of CD&E waste went to landfill with a further 110,000 tonnes being put to beneficial use on/in land.

3.21 Cambridgeshire & Peterborough, Kent and Northamptonshire receive the greatest quantity of hazardous waste from East London. The data shows that hazardous waste tends to travel further than other types of wastes, due to the specialist nature and requirements for specialist treatment. It also shows that there are a number of facilities that consistently receive quantities of hazardous waste from East London, while exports to other facilities have a more irregular pattern.

Imports to ELJWP Boroughs

3.22 Approximately 6 million tonnes of waste was reported as being imported to East London in the waste data interrogator 2019. However, it should be noted that a large proportion of this (40%) is categorised as “WPA not codeable (London)”. Around half of waste in the “WPA not codeable (London)” category is excavation waste, just over a quarter is C&D waste and just under a quarter is LACW/C&I waste. This compares with 43% LACW/C&I waste, 40% excavation and 16% C&D waste in all other categories.

3.23 In addition to the issue of uncodeable waste, 1.7 million tonnes of waste imports (29% of the total) were received by transfer stations to be sorted and bulked before its onward journey to a final destination waste treatment facilities.

3.24 The largest proportion of waste recorded as imported to East London was excavation waste (43%), followed by LACW/C&I waste (35%), C&D waste (21%) and hazardous waste (1%).

3.25 Well over half of waste imports (60%) are reported as coming from other London Boroughs, although as mentioned above, this could include waste arising in East London. If the ‘non-codeable London’ category is removed, the proportion of imports recorded as originating in the rest of London reduces to 34%. Most of the remaining imports in 2019 originated from the wider south east, in particular Essex (806,000 tonnes) and Kent (214,000 tonnes). The WDI also includes other ‘non-codeable’ categories and 280,000 tonnes of waste was imported to East London from ‘WPA not codeable (South East)’ which means it is not possible to identify exactly which authorities this waste came from.

3.26 Just over a third (36%) of waste recorded as imported to East London was recycled, processed or treated, a quarter went to a transfer facility to be sorted and bulked and 21% was deposited to landfill with a further 11% put to beneficial use in/on land.

3.27 In 2019, East London received 2.1 million tonnes of LACW and C&I waste. Just under a quarter of this was deposited at Rainham landfill site and around 10% went Hitch Street Anaerobic Digestion Plant. Essex, Kent and Lewisham are the most significant users of East London waste facilities to manage their LACW and C&I waste external to the four boroughs, but as already mentioned large amounts of uncodeable waste from 'London' and the 'South East' are also received at East London Facilities.

3.28 In 2019, East London received 1.2 million tonnes of C&D and 2.6 million tonnes of excavation waste which was not identified as being generated within the four boroughs. However, 2.7 million tonnes of this (70%) was 'uncodeable' and therefore not directly attributable to specific WPAs. In addition to the uncodeable categories, Wandsworth, Essex, Tower Hamlets and Hackney were the most significant users of East London waste facilities in 2019 to manage their CD&E waste external to the four boroughs.

3.29 In 2019, East London received over 125,000 tonnes (as measured by the Hazardous Waste Data Interrogator (HWDI) **[See reference** 27**]**) or 48,000 tonnes (as measured by the Waste Data Interrogator (WDI) **[See reference** 28**]**) of hazardous waste not originating from within the four boroughs. The HWDI reports the main origins of hazardous waste received by East London in 2019 as Greenwich (25,300 tonnes), followed by Merton (13,000 tonnes) and Tower Hamlets (10,000 tonnes). The WDI reports the main origins of hazardous waste received by East London in 2019 as Hackney (14,300 tonnes), 'WPA not codeable (London)' (13,300 tonnes) and Essex (8,200 tonnes).

3.30 It is not possible to be entirely accurate in imports and exports data. It is acknowledged that not all waste which is imported to or exported from East London is represented in the figures; however, the issues with the data cannot be resolved without the Environment Agency changing the way waste data is collected and recorded. All waste planners use the same waste data sources and it is considered the best available source of data for the duty to co-operate.

Projected baseline information

3.31 The London Plan sets out both waste arising forecasts and apportionment targets for each borough. The apportionment targets for East London are significantly higher than the area's projected arisings. The London Plan anticipates that East London could be a major contributor to London's target of net self-sufficiency by 2026.

Waste sites

Current baseline information

3.32 There are a range of waste management facilities distributed throughout the four boroughs within the ELJWP area that support the movement of waste up the waste hierarchy. The facilities are shown in Figure 8 of the Evidence Base for the East London Joint Waste Plan **[See reference** 29**]** . Appendix 5 of the evidence base **[See reference** 30**]** sets out site profiles for each of the identified waste sites within the plan area.

3.33 The adopted East London Joint Waste Local Plan 2012 **[See reference** 31**]** identified waste management infrastructure requirements needed for the period from 2012 to 2027/8. The evidence base was updated in 2022 and is currently being updated in preparation for the new East London Joint Waste Plan which will be informed by this IIA.

3.34 Waste has historically been transported by road and river into, out of and across London and this is likely to continue based on the established network of waste management facilities. However, this activity risks contributing to amenity impacts such as noise and dust; exacerbating levels of air pollution; and increasing traffic congestion, highway maintenance and safety concerns. The haulage of waste by way of conventional, fossil-fuel powered vehicles is also a

significant contributor to the local waste management sector's greenhouse gas emissions.

Projected baseline information

3.35 Although there is currently a surplus of demand across the ELJWP area, as set out in the updated evidence prepared in support of the update to the ELJWP **[See reference** 32**]**, this may provide additional capacity for other areas of London in the future, or there may be a need for different types of waste management facilities over the plan period.

Implications for health

3.36 The provision of a network of well managed waste management facilities can ensure that impacts on health (through noise, odour, pollution and transport movements) are minimised and appropriately distributed.

Key sustainability issues and opportunities for the ELWJP to address them

3.37 Across the four boroughs, there is a low level of waste that is reused, recycled, or reclaimed and high levels of waste are sent to landfill. There are missed opportunities to achieve higher rates of recycling and the efficiency benefits associated with the transition to a circular economy. Furthermore, future economic and population growth is likely to put pressure on the existing network of waste management facilities. In addition, disposal to landfill is at present an unavoidable and least bad solution for some wastes.

3.38 The ELJWP will have limited influence on the amount of waste that is generated and needs to be managed each year. A key role of the ELJWP could be to make provision for the right waste management facilities, in the right

locations for the purposes of implementing sustainable waste management practices that will meet waste targets and other ambitions set across the four Boroughs.

3.39 The ELJWP should ensure that where waste is unavoidable, it is managed in an efficient and sustainable manner, by employing the 'waste hierarchy'. In addition, the ELJWP could support the evolution of the four Boroughs waste infrastructure network to the most sustainable locations. Policies could also support the most efficient and appropriate freight routes, and an accelerated transition to low and zero carbon alternatives to conventional fossil-fuel based road freight. Furthermore, opportunities to utilise efficient and more sustainable modes of transport could be promoted to achieve maximum diversion of waste away from road haulage.

Climate change adaptation and mitigation

Climate change predictions

Current baseline information

3.40 Climate change presents a global risk, with a range of different social, economic and environmental impacts that are likely to be felt within the plan area across numerous receptors. A key challenge in protecting the environment will be to tackle the causes and consequences of climate change: warmer, drier summers and wetter winters with more severe weather events all year, higher sea levels and increased river flooding. A strong reaction is required from planning to ensure appropriate action can be taken to help species and habitats adapt and to enable the agricultural sector to continue to deliver diverse, affordable and good quality produce.

3.41 There has been a general trend towards warmer average temperatures in recent years with the most recent decade (2012–2021) being on average 0.2°C warmer than the 1991–2020 average and 1.0°C warmer than 1961–1990. All the top ten warmest years for the UK in the series from 1884 have occurred this century **[See reference** 33**]**.

3.42 Heavy rainfall and flooding events have been demonstrated to have increased potential to occur in the UK as the climate has generally become wetter. For example, for the most recent decade (2012–2021) UK summers have been on average 6% wetter than 1991–2020 and 15% wetter than 1961–1990 **[See reference** 34**]**.

3.43 The Intergovernmental Panel on Climate Change (IPCC) special report on global warming outlines that, under emissions in line with current pledges under the Paris Agreement, global warming is expected to surpass 1.5ºC, even if these pledges are supplemented with very challenging increases in the scale and ambition of mitigation after 2030. This increased action would need to achieve net zero CO_2 emissions in less than 15 years **[See reference** 35**]**..

3.44 In December 2018, the London Assembly declared a climate emergency, and called on the Mayor of London to do likewise and put in place specific emergency plans so that London is carbon neutral by 2030 **[See reference** 36**]**. The Mayor declared a climate emergency shortly after the Assembly and set a target for London to be net zero-carbon by 2030.

3.45 London Borough Barking and Dagenham declared a climate emergency in 2019 **[See reference** 37**]**. London Borough of Havering declared a climate and ecological emergency in 2023 **[See reference** 38**]**. London Borough of Newham declared a climate emergency in 2019 **[See reference** 39**]**. London Borough of Redbridge have an action plan to be carbon neutral by 2030 and carbon zero by 2050 **[See reference** 40**]**.

Projected baseline information

3.46 UK Climate Projections 18 (UKCP18) for London identify the following main changes (relative to 1981-2000) to the climate by the end of the plan period (2038) **[See reference** 41**]**:

- Increase in mean winter temperature by 0.9°C;
- Increase in mean summer temperature by 1.3°C;
- Increase in mean winter precipitation by 8%; and
- Decrease in mean summer precipitation by -9%.

3.47 The UK Climate Risk Independent Assessment (CCEA3) identifies likely trends from climate change and sets out 61 specific risks and opportunities to the UK from climate change, including the following **[See reference** 42**]**:

Risks

- The number of incidents of food poisoning, heat stress and heat related deaths may increase in summer.
- Domestic energy use may increase during summer months as refrigeration and air conditioning demand increases.
- Wetter winters and more intense rainfall events throughout the year may result in a higher risk of flooding from rivers.
- More intense rainstorms may in some locations result in the amount of surface water runoff exceeding the capacity of drainage systems, consequently leading to more frequent and severe localised flash flooding.
- More frequent storms and floods may cause increased damage to property and infrastructure, resulting in significant economic costs.
- Periods of drought in summer could lead to soil shrinking and subsidence, causing damage to buildings and transport networks.

Drought may also impact negatively on agriculture, industry and biodiversity.

- Warmer and drier summers are likely to affect the quantity and quality of water supply, which will need careful management.
- The changing climate will impact on the behaviour and distribution of species and may encourage the spread of invasive species.

Opportunities

- Milder winters should reduce the costs of heating homes and other buildings, helping to alleviate fuel poverty and reducing the number of winter deaths from cold.
- Domestic energy use may decrease in winter due to higher temperatures.
- Warmer and drier summers may benefit the recreation and tourism economy.

Emissions and energy

Current baseline information

3.48 Carbon Dioxide (CO_2) is the main greenhouse gas, accounting for about 80% of the UK greenhouse gas emissions. Emissions are produced when fossil fuels such as coal or gas are burnt or processed. In recent years, increasing emphasis has been placed on the role of regional bodies and local government in contributing to energy efficiency improvements, and hence reductions in carbon dioxide emissions. In line with the wider UK, London has seen a decrease in CO_2 emissions in recent years. One of the main drivers for reduced levels of emissions has been a decrease in the use of coal for electricity generation, accounting for a decrease in emissions for domestic electricity.

3.49 The Government regularly publishes local authority and regional carbon dioxide emissions national statistics **[See reference** 43**]**. The statistics are largely consistent with the UK national Greenhouse Gas Inventory and with the Devolved Administration Greenhouse Gas Inventories. In London, CO_2 emissions have fallen from 6.2 tonnes (t) per capita to 3.2t per capita (equivalent to a 52% reduction) from 2005 to 2019. Emissions in each of the four London Boroughs are like those of London, falling steadily over the same period as demonstrated in **Table 3.4 (Total Emissions)** and **Table 3.5 (Per Capita Emissions).** It should be noted the figures in **Table 3.4 [See reference** 44**]** and **3.5 [See reference** 45**]** do not account for Land Use, Land Use Change and Forestry (LULUCF) figures. In 2020, LULUCF accounted for -60.8 kilotons (Kt) CO_2 emissions in London.

Table 3.4: CO_2 emissions estimates in the ELJWP Area 2005-2019 (Kt)

Year	Barking and Dagenham	Havering	Newham	Redbridge
2005	935.7	1,320.9	1,471.7	1,147.4
2006	943.1	1,334.8	1,576.2	1,141.5
2007	931.5	1,276.9	1,554.4	1,117.2
2008	907.6	1,258.3	1,561.2	1,091.2
2009	825.1	1,164.4	1,495.4	1,018.6
2010	895.3	1,245.0	1,574.7	1,080.8
2011	811.5	1,125.2	1,464.8	1,008.5
2012	848.0	1,178.2	1,499.1	1,061.2
2013	816.0	1,158.2	1,481.9	1,025.0
2014	715.5	1,046.3	1,299.9	918.8
2015	685.8	1,025.5	1,242.1	889.4
2016	633.3	992.6	1,163.1	859.2

Year	Barking and Dagenham	Havering	Newham	Redbridge
2017	605.2	958.8	1,091.6	820.7
2018	590.3	963.6	1,066.3	823.6
2019	563.6	926.6	1,021.0	790.4

Table 3.5: CO_2 emissions estimates in the ELJWP area (per capita)

Year	Barking and Dagenham	Havering	Newham	Redbridge
2005	5.6	5.8	5.8	4.6
2006	5.6	5.8	6.1	4.5
2007	5.5	5.6	5.8	4.3
2008	5.3	5.4	5.6	4.1
2009	4.6	5.0	5.2	3.8
2010	4.9	5.3	5.3	3.9
2011	4.3	4.7	4.7	3.6
2012	4.4	4.9	4.7	3.7
2013	4.2	4.8	4.6	3.5
2014	3.6	4.3	4.0	3.1
2015	3.4	4.1	3.7	3.0
2016	3.0	3.9	3.4	2.9
2017	2.9	3.7	3.1	2.7
2018	2.8	3.7	3.0	2.7
2019	2.6	3.6	2.9	2.6

3.50 The Department for Business, Energy & Industrial Strategy (now split into Department for Business and Trade, the Department for Energy Security and Net Zero, and the Department for Science, Innovation and Technology) produced the following consumption figures for the East London Joint Waste Plan area in 2020 **[See reference 46]**

- **Coal** – a total of 3.3 kilo tonnes of oil equivalent (ktoe) predominantly through domestic use;
- **Manufactured fuels** – a total of 4.3ktoe predominantly through domestic use;
- **Petroleum** – a total of 2,639.3ktoe predominantly through road transport;
- **Gas** – a total of 5,302.5ktoe predominantly through domestic use;
- **Electricity** – a total of 2,940.2ktoe predominantly through industrial and commercial use; and,
- **Bioenergy and wastes** – a total of 156.2ktoe, predominantly through road transport.

3.51 Between 2005 and 2020 the total reported energy consumption forLondon fell from 338.7 to 291.3ktoe. The changes in consumption by energy type are shown in **Table 3.6.**

Table 3.6: Energy Consumption in London by type 2005-2020

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2020)
Coal	4.5	3.3
Manufactured fuels	5.6	4.3
Petroleum	3,225.1	2,639.3
Gas	6,865.8	5,302.5
Electricity	3,562.8	2,940.2
Bioenergy and wastes	18.2	156.2

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2020)
Total	**13,682**	**11,385.8**

Table 3.7: Energy Consumption in Barking and Dagenham 2005-2020

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2020)
Coal	0.2	0.1
Manufactured fuels	0.1	0.1
Petroleum	72.1	65.3
Gas	113.2	87.4
Electricity	67.4	48.5
Bioenergy and wastes	0.4	3.4
Total	**253.4**	**204.8**

Table 3.8: Energy Consumption in Havering by type 2005-2020

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2020)
Coal	0.1	0.1
Manufactured fuels	0.2	0.2
Petroleum	132.0	128.7
Gas	183.4	143.0
Electricity	75.9	64.7
Bioenergy and wastes	0.4	7.6

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2020)
Total	**392.0**	**344.3**

Table 3.9: Energy Consumption in Newham by type 2005-2020

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2020)
Coal	0.1	0.1
Manufactured fuels	0.2	0.1
Petroleum	100.4	86.2
Gas	242.8	176.8
Electricity	92.9	108.2
Bioenergy and wastes	0.3	4.7
Total	**436.7**	**376.1**

Table 3.10: Energy Consumption in Redbridge by type 2005-2020

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2020)
Coal	0.1	0.1
Manufactured fuels	0.1	0.1
Petroleum	105.1	96.2
Gas	187.9	151.1
Electricity	64.5	53.9
Bioenergy and wastes	0.3	5.3

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2020)
Total	**358.0**	**306.7**

Projected baseline information

3.52 The Tyndall Centre for Climate Change Research has undertaken work to calculate the 'fair' contribution of local authorities towards the Paris Climate Change Agreement. Based on the analysis undertaken the following recommendations have been made for London **[See reference** 47**]**:

- Stay within a maximum cumulative carbon dioxide emissions budget of 203.5 million tonnes ($MtCO_2$) for the period of 2020 to 2100. At 2017 CO_2 emission levels, London would use this entire budget within 7 years from 2020.
- Initiate an immediate programme of CO_2 mitigation to deliver cuts in emissions averaging a minimum of -12.2% per year to deliver a Paris aligned carbon budget. These annual reductions in emissions require national and local action, and could be part of a wider collaboration with other local authorities.
- Reach zero or near zero carbon no later than 2043. This report provides an indicative CO2 reduction pathway that stays within the recommended maximum carbon budget of 203.5 MtCO2. At 2043 5% of the budget remains. This represents very low levels of residual CO2 emissions by this time, or the Authority may opt to forgo these residual emissions and cut emissions to zero at this point. Earlier years for reaching zero CO2 emissions are also within the recommended budget, provided that interim budgets with lower cumulative CO2 emissions are also adopted.

3.53 Given the trends in carbon emissions and energy consumption at both national and local level, carbon emissions in London, and each of the four London Boroughs within the ELJWP area, are likely to continue declining.

Road travel and associated energy consumption

Current baseline information

3.54 CO_2 emissions in the UK are provisionally estimated to have increased by 6.3% in 2021 from 2020, to 341.5 million tonnes (Mt), however compared to 2019, the most recent pre-pandemic year, 2021 CO_2 emissions are down 5.0% **[See reference** 48**]**. This increase in 2021 is primarily due to the increase in the use of road transport as nationwide lockdowns were eased, along with increases in emissions from power stations and the residential sector. CO_2 emissions from transport rose 10.0% in 2021, accounting for almost half of the overall increase from 2020 **[See reference** 49**]**.

3.55 Road transport accounts for more than half of oil demand in the UK and relies on petrol and diesel to meet around 98% cent of its energy needs. This has implications for carbon emissions considering the regular need to travel for both residents and those undertaking business.

3.56 The overall road energy consumption in Inner London decreased between 2005 and 2021 from 999t of equivalent oil (ktoe) to 683.2ktoe. This change was most influenced by the decreasing energy consumption for personal road travel which fell during this period from 765.9ktoe to 487.3ktoe. During this period energy consumption recorded in Inner London for freight uses declined from 233.2ktoe to 195.9ktoe **[See reference** 50**]**.

3.57 The overall road energy consumption in Outer London decreased between 2005 and 2021 from 1,798.1t of equivalent oil (ktoe) to 1621.6ktoe. This change was most influenced by the decreasing energy consumption for personal road travel which fell during this period from 1,374.4ktoe to 1,147.1ktoe. During this period energy consumption recorded in Inner London for freight uses rose slightly from 423.6ktoe to 474.5ktoe **[See reference** 51**]**.

3.58 Recent trends across the UK indicate that diesel consumption excluding biodiesel fell in 2018 for the first time since 2009. The trend is due in part to a slowing of growth in the diesel vehicle fleet following sharp drops in new registrations as well as increased efficiencies. It is expected that the UK will diversify in road transport to include more electric and ultra-low emissions vehicles in the coming years **[See reference** 52**]**.

3.59 The ELJWP area benefits from good transport and connectivity to the central and Greater London, Essex, Thurrock, further afield to Hertfordshire and Cambridgeshire to the north. There is a significant road transport network across the area, including the A12, A13, A1020 and the A406, with easy access to the M25 and M11.

Projected baseline information

3.60 Growth in traffic levels may occur in London because of projected population growth and associated development needs. The UK Government aims to ban the sale of new petrol and diesel cars by 2030 **[See reference** 53**]** which will significantly cut carbon emissions across the UK. While the full effect of this will not be seen immediately as people continue to use their existing vehicles, the market share of electric cars in the UK is already significant and likely to continue growing rapidly.

Renewable and low carbon energy constraints and opportunities

Current baseline information

3.61 Published as part of the National Statistics publication Energy Trends produced by the Department for Business, Energy and Industrial Strategy (now by Department for Energy Security and Net Zero, Department for Science,

Innovation and Technology, and Department for Business and Trade), data concerning renewable electricity generation, capacity and number of sites is available at Borough level between 2014 and 2021 **[See reference 54]**.

- In **Barking and Dagenham** capacity increased from 2.6 MW in 2014 to 11.9 MW in 2022, providing 6,668 MWh of electricity generation in 2022.
- In **Havering** capacity increased from 41.4 MW in 2014 to 49.7 MW in 2022, providing 129,870 MWh of electricity generation in 2022.
- In **Newham** capacity increased from 21.4 MW in 2014 to 44.0 MW in 2022, providing 41,824 MWh of electricity generation in 2022.
- In **Redbridge** capacity increased from 1.6 MW in 2014 to 6.0 MW in 2022, providing 4,730 MWh of electricity generation in 2022.

Projected baseline information

3.62 It is clear from existing trends that East London is significantly increasing its capacity to generate renewable and low carbon sources of energy, with scope to increase capacity further across of a range of technology types. If capacity continues to increase over the medium to long term, energy generation is also likely to significantly increase. Further renewable energy development may be constrained by lack of capacity in the national grid, currently affecting West London, and constraints on development within urban areas.

Flood risk

Current baseline information

3.63 The UK Climate Projections (UKCP18) predicts that by 2070, under a high emission scenario, average winter precipitation is projected to increase, whilst average summer rainfall is projected to decrease. Although summer rainfall is

projected to decrease, there will be an increased frequency of short-lived high intensity showers **[See reference** 55**]**.

3.64 All areas within the ELJWP will become more vulnerable to fluvial flooding, water supply deficiencies, as the local climate continues to change. The Thames Tidal Defence system provides some protection to the ELJWP area.

3.65 Figure 3.8 at the end of this chapter illustrates the main areas of flood risk across the ELJWP area.

3.66 Local flood risk assessments are summarised for each borough below:

- **Barking and Dagenham:** Following the 2007 nation-wide flood events, more consideration is being given to potential risks from surface water, groundwater and sewerage, however the key source of flood risk is fluvial and tidal flooding from the River Thames. The local flood management strategy seeks to manage those risks, working with other statutory and non-statutory partners, and raising awareness in local communities **[See reference** 56**]**.
- **Havering:** Within Havering, the main areas of flood risk are tidal and fluvial, and generally limited to the southern part of the borough. Flood risk is concentrated around the River Thames, the River Beam and the Ingrebourne and their tributaries **[See reference** 57**]**.
- **Newham:** Historic flooding within Newham has related to the Thames, the River Lea and the River Roding. Newham shares a boundary with the Thames to the south, and the greatest risk is from tidal surges occurring at high tides, or fluvial flooding in the upper catchment. **[See reference** 58**]**
- **Redbridge**: Within Redbridge, the main sources of flood risk are surface water flooding and fluvial flooding from the River Roding, the Cran Brook and Seven Kings water. The River Thames has a tidal effect on the River Roding **[See reference** 59**]**.

Projected baseline information

3.67 As previously outlined in the 'climate change predictions' section of this chapter, the climate in London is expected to change, presenting a series of risks. These include wetter winters, more intense rainfall events and more frequent storms and floods, leading to increased damage to property and infrastructure and significant economic costs. The Environment Agency has provided 'local flood risk assessments: climate change allowances' **[See reference** 60**]** indicating climate change impacts on peak rainfall intensity and peak river flows.

3.68 Due to the geography of London and the proximity to the River Thames, flooding (including flash, fluvial and tidal flooding) is one of the greatest risks to the East London Boroughs from climate change. Climate change will likely result in sea level rise which could lead to more frequent flooding in the ELJWP area and impact communities, businesses and local authority services. Additionally, incidences of heavy rainfall are expected to continue to rise and will present challenges in terms of drainage and flood risk.

Implications for health

3.69 Climate change has potential for substantial implications on human health, including:

- Disruption to health, social care and emergency management services and schools provision, from flooding, heatwaves and storms.
- Flooding poses multiple risks to people's health, such as heart attacks, trauma, an increase in waterborne infectious diseases, and common mental and post-traumatic stress disorders. Damp housing and damage to water and sanitation infrastructure can further reinforce the adverse effects on health.
- Climate change may bring increases in both cold weather excess mortality and heat-related deaths and illness occurring in the summer. Excess heat

represents a serious threat for the entire population, but the elderly and small children, and people with pre-existing cardiovascular, respiratory and renal diseases, diabetes and neurological disorders, are more susceptible. Urban areas tend to be at greater risk due to the "urban heat island" effect. The number of excess deaths in England resulting from heatwaves (excluding COVID-19) in 2022 was 2,803 for those aged 65 and over. Cumulative excess deaths resulting from heatwaves in summer 2022 was the highest recorded on record since the heatwave plan for England was introduced in 2004 **[See reference 61]**.

- Cases of food poisoning in the UK that are linked to warm weather have been increasing rapidly.
- Wildfire likelihood and severity set to increase due to climate change.
- The likely increase in occurrence of severe winter gales is a cause for concern. Deaths during severe gales are commonplace, as are severe injuries. The likely loss of electrical power supplies during severe storms adds very significantly to these problems. Better forecasting of gales and better design and more frequent exercising of disaster plans may well help to mitigate the worst effects.

Key sustainability issues and opportunities for the ELJWP to address them

3.70 There is a need to significantly reduce greenhouse gas emissions to help meet international and national greenhouse gas reduction targets. The ELJWP provides opportunities to help achieve this through:

- Encouraging energy efficiency measures in the construction and design of new buildings.
- Reducing carbon emissions from freight use by reducing the need to travel to process and dispose of waste, as well as supporting the use of low or zero emission transport modes, as discussed below in the section covering transport.

- Promoting green infrastructure within new waste sites to deliver carbon sequestration.

3.71 The effects of climate change in the ELJWP area are likely to result in extreme weather events becoming more common and more intense. Flood risk is of particular significance in this regard, alongside heatwaves and drought. Fluvial and surface water flooding poses the most significant risk to the plan area, particularly in areas in close proximity to the Thames river. The ELJWP provides an opportunity to help adapt to the unavoidable effects of climate change by:

- Locating development in locations with no or low flood risk.
- Encouraging flood and heat resilient development.
- Promoting on-site biodiversity net-gain, as well as links to green infrastructure to deliver flood retention, shading/ cooling, air quality improvements and safe havens for vulnerable species.
- The waste industry has the potential to contribute to climate change via the emission of greenhouse gases generated by the use of energy in processes and transportation involved in the industries. In 2019, the UK government set a legally binding target to achieve net zero greenhouse gas emissions (GHG) by 2050. Correspondingly, each of the four Boroughs have declared a climate emergency and have set monitored targets to reduce emissions to aid in reaching this goal.

3.72 Areas across the four Boroughs, which are at higher risk of flooding now and, in the future, (e.g. low-lying land on the floodplain) are also often attractive for development. Despite policies in the NPPF and NPPW, the ELJWP could play a key role in ensuring sufficient weight is given to the risk of flooding from all sources and over time; and that new or expanded waste management facilities are directed towards areas with the lowest risk of flooding. Furthermore, the ELJWP could demand highly resilient design to address residual risks of flooding and to tackle flood risk vulnerabilities locally and elsewhere.

Population, health and wellbeing

Population

Current baseline information

3.73 In England, the population has continued to age. More than one in six people (18.4%) were aged 65 years and over on Census Day in 2021. This is an increase of 20.1% since 2011. This is a higher percentage than ever before. On average in London, the largest age group in 2011 was those aged 25 to 29 years. More recently, in 2021, the largest age group in London was those aged 30 to 34 years **[See reference** 62**]**.

3.74 Within the East London area, Newham has seen the largest increase in people aged 65 years and over with an increase of 21.9%, followed by Redbridge with 13.5% and Havering with 9.3%. The only exception is Barking and Dagenham, which whilst it saw the second largest increase in population between 2011 and 2021 in London, saw a decrease of 1.7% in people aged 65 years and over **[See reference** 63**]**. Barking and Dagenham has the highest birthrate in London, the highest percentage of children under 4 years old, and the highest number of under 15-year-olds in England **[See reference** 64**]**

3.75 In Barking and Dagenham, the population size has increased by 17.7% since the 2011 census, the second largest increase out of the London Boroughs. Similarly, Newham's population has grown by 14% (fourth largest), Redbridge by 11.2% (sixth largest) and Havering's population has increased by 10.4%, (eighth largest). These population increases are higher than the overall increase for London (7.7%). **Table 3.11** presents the most recent (2021) population changes by Borough in Barking and Dagenham, Havering, Newham and Redbridge **[See reference** 65**].**

3.76 As of 2021, Havering is the second least densely populated of London's 33 local authority areas with 2,332 people per km2, Newham is the eighth, Redbridge is the 14th, and Barking and Dagenham is the 16th least densely populated.

Table 3.11: Population change in the ELJWP area from 2011-2021

Area	2011 Census	2021 Census
Barking and Dagenham	185,900	218,900
Newham	308,000	351,100
Havering	237, 200	262,000
Redbridge	279,000	310,300
Total	772,900	1,142,300

Projected baseline information

3.77 Each of the borough's populations have continued to grow over the last decade, and it is predicted that each of the Borough's populations will continue to grow. The London Plan predicts that the population of London is projected to increase by 70,000 every year, reaching 10.8 million in 2041, and East London will play a large role in providing for this growth **[See reference** 66**]**. The London Plan also states that over a fifth of London's population is under 16, but over the coming decades the number of Londoners aged 65 or over is projected to increase by 90%. This is reflected in the high growth of those that are over 65 in each Borough (excluding Barking and Dagenham) over the past decade, and it is predicted that this trend will continue.

3.78 As the population grows so do the Borough's respective population densities. On average, the four Boroughs of East London have a slightly higher population density of 58.96 population per hectare than the London average of 55.96 population per hectare **[See reference** 67**]**. The greater the population density the greater the challenge to ensure that each Borough's communities have the quality of life, facilities and services and infrastructure they need, including public and private open space. However, increased population density can have both positive and negative effects in sustainable development terms, depending upon how it is designed and delivered (indeed, some of the most attractive and desirable parts of cities and towns in the UK and abroad are often those areas that are most densely developed).

Housing

Current baseline information

3.79 London's average house prices remain the most expensive of any region in the UK, with an average price of £537,000 in September 2023 and an annual inflation rate of negative 1.1% in the 12 months to September 2023. London's annual inflation slowed in September 2023 because London prices decreased (negative 0.3%) between August and September 2023, while prices increased between the same months last year **[See reference** 68**]**.

3.80 As of August 2023, Redbridge has the highest average house prices out of the four Boroughs (£467,406) and Barking and Dagenham has the lowest average house prices (£351,021) out of the four Boroughs and London as a whole. The average for the East London area is £411,487, which is lower than the London average **[See reference** 69**]**.

3.81 The London Plan contains 10-year targets for net housing completions from 2019/20 up to 2028/29. This includes a total of approximately 52,000 homes per year over ten years. In 2017, the Strategic Housing Market Assessment identified that London needs around 66,000 net new homes a year

to meet its housing need. This includes a target of 19,440 for Barking and Dagenham, 12,850 for Havering, 47,600 for Newham (including the area currently administered by the LLDC) and 14,090 for Redbridge. To date, Barking and Dagenham has achieved 4,636 completions since 2019/20, Havering has achieved 3,430, Newham has achieved 6,655 and Redbridge has achieved 2,156. None of the four Boroughs have achieved their target housing delivery goal for over five years. Most recently, Newham surpassed their target of 1,994 dwellings by 38 in 2016/17. The average percentage across each East London Borough since 2019/20 is 66%. Havering has achieved the highest rate of delivery by achieving 79% of its housing delivery target whilst Redbridge has achieved the lowest with 45% **[See reference** 70**]**.

3.82 The GLA's residential completions dashboard demonstrates that London is falling behind its housing completion targets. As a whole, London has failed to reach its housing delivery targets for the last seven years, although delivery did reach 103% in 2017/18. Since then, the average percentage of completions of target across London has been 76.8%. The year 2023/24 is so far (as of December 2023) just 4% towards its target of 36,134 homes **[See reference** 71**]**.

3.83 London was the worst-performing region in the Housing Delivery Test 2022. Fewer than half of London boroughs delivered more than 95% of their appropriate housing requirement for the test over the three-year monitoring period.

3.84 London's housing affordability challenge is the worst in the country, facing almost double the house price to earnings ratio compared to the rest of England, and a significantly more unaffordable private rented sector. Over the last 20 years, affordability has worsened in London more than anywhere else in the country, driven largely by house prices increasing faster than earnings **[See reference** 72**]**.

3.85 From 2015 to the end of March 2023, there have been 55,027 affordable housing completions, relating to the 116,782 homes that were started under the AHP 2016-23. This leaves 61,755, out of the 116,782 starts, to complete. There

were 1,261 homes started and also completed in 2015-16. In 2022-23, 13,949 homes were completed; this represents the highest number of completions in one year. There is no target set for when all 116,782 homes started under the AHP 2016-23 will be completed **[See reference** 73**]**.

3.86 Between 2016-17 to 2022-23, Newham had the second highest number of affordable housing completions in London, with 4,709. The remaining East London Boroughs achieved significantly less, with Barking and Dagenham completing 2013 new affordable homes, Havering achieve 914 and Redbridge just 709 **[See reference** 74**]**.

3.87 The London Plan suggests that the boroughs are best placed to assess the needs and make provision for Gypsy and Travellers through new pitch provision, protection or enhancement of existing pitches, or by other means. The London Plan 2021 requires each London Borough to provide for a set amount of gypsy and traveller accommodations, based on the midpoint projections of the 2007 assessment. The London Plan provisions are to be used as a starting point dependant on whether or not a more up-to-date assessment has been carried out at the Borough level.

3.88 Following the judgment in the Court of Appeal in the case of Smith v SSLUHC & Ors **[See reference** 75**]**, the government has reverted to the definition of Gypsies and Travellers used in the Planning Policy for Travellers Sites to that adopted in 2012, with this change applying from 19 December 2023, for plan and decision making. The Gypsy and Traveller Accommodation Assessment (GTAA) for each borough, considers the definition of Gypsies and Travellers that was in place at the time the assessment was prepared. There are likely to be further changes to national policy and guidance in 2024.

3.89 The Havering GTAA (2018) provides a robust assessment of current and future need for Gypsy, Traveller and Travelling Showperson accommodation in the borough up to 2031. The Assessment identifies a need for 70 additional pitches for the Gypsy and Traveller households who meet the planning definition as set out in the National Planning Policy for Traveller Sites. Of the 70 pitches needed, 57 pitches are required within the first 5-year period of the Plan

(2016 – 2021), and the remaining 13 pitches in the latter part of the plan period. No additional need has been identified for plots for Travelling Showpeople over the 15-year plan period (2016-2031) **See reference** 76**].** In Barking and Dagenham there is a need for 24 pitches over the period to 2034 for Gypsy and Traveller households **[See reference** 77**]**. In Newham, there is no identified need for households that meet the updated PPTS definition, however the borough has identified a need for 23 pitches for households that do not meet the 'planning definition' **[See reference** 78**]**. In Redbridge, there is no need for additional pitches **[See reference** 79**]**.

Projected baseline information

3.90 The joint interim report by the London Housing Directors' Group and G15 **[See reference** 80**]** examines the barriers to housing delivery in London, particularly for affordable housing. The report highlights the extent of market failure in London's housing sector and the affordability challenge that has been created because of housing undersupply. The key findings are:

- Housing completions will average 43,000 per year over the period 2021-2025, compared to the London Plan target of 52,000 homes per year, with around 30% expected to be affordable or intermediate housing. Analysis suggests the actual need may be nearer 100,000 new homes per year, including 42,500 affordable homes.
- London requires 90,000-100,000 homes with at least 42,500 affordable homes required in London per year, compared to the London Plan target of 52,000 homes per year. This compares to an average of 7,900 affordable homes delivered annually since 2015/16.
- A forecast of future supply against demand shows that the largest supply shortfall over the next five years will be in the lower mainstream market segment below £450 pound per square foot (psf) and in the sub-market rent segment, demonstrating the market's failure to deliver an adequate supply of homes that are affordable to low and middle-income households.
- London's affordability challenge is much starker than elsewhere in the country and the need for affordable housing greater. Average house prices

in the capital are 93% higher than the UK average compared to wages that are just 49% higher, with a house price to earnings ratio in London of 12.5, compared to the national average of 7.7. Based on affordability alone, the annual need for additional affordable housing in London is 7.6 times greater than supply, compared to 2.6 in England.

- The boroughs have seen significant increases in homelessness, in part as a consequence of increasing costs resulting from under-supply, with 24,630 households owed a homelessness relief duty by a London borough in 2019/20 compared to 10,180 homelessness acceptances in 2010/11.

3.91 The four borough's strategies for housing growth are set out below.

- **Barking and Dagenham** aim to deliver more than 40,000 dwellings between 2024and 2037 **[See reference** 81**]**. Growth is focussed in:
  - Barking and the River Roding;
  - Thames Riverside;
  - Dagenham Dock, Freeport;
  - Becontree and Heathway;
  - Chadwell and Marks Gate;
  - Becontree Heath and Rush Green; and
  - Dagenham East and Village.
- **Havering** aim to deliver a minimum of 18,930 dwellings over the adopted plan period (2016 to 2031) to meet an increased population of over 293,000 people. Growth will be focussed in Romford town centre and the Rainham and Beam Park area, in conformity with the London Plan **[See reference** 82**]**.
- **Newham** aim to deliver 43,000 dwelling across the plan area between 2017 and 2033 **[See reference** 83**]**. Growth is focussed in community neighbourhoods, and strategic sites in the following areas:
  - Stratford and West Ham;
  - Royal Docks;

- Custom House and Canning Town;
- Beckton;
- Urban Newham – Forest Gate;
- Urban Newham – East Ham: and
- Urban Newham – Green Street.

- **Redbridge** aims to deliver a minimum of 16,845 new dwellings between 2015 and 2030 by prioritising housing delivery in:
  - Investment and Growth Areas of Ilford;
  - Crossrail Corridor;
  - Gants Hill;
  - South Woodford; and
  - Barkingside **[See reference** 84**]**.

Health

Current baseline information

3.92 Health is a cross-cutting topic and as such many topic areas explored in this Scoping Report influence health either directly or indirectly.

3.93 The Office of National Statistics (ONS) have created an index that gives every local area in England an overall health score for each of the past six years. This overall score is made up of measures in different categories, called domains and subdomains. These measures include physical and mental health conditions like diabetes or anxiety, local unemployment, road safety, and behaviours like healthy eating **[See reference** 85**]**.

3.94 This score can show whether health in a local area is improving. The Health Index score has a baseline of 100, which represents England's health in 2015. A score higher than 100 means that an area has better health for that measure than was average in 2015, lower than 100 means worse health than the 2015 average. In 2021, the four East London Boroughs scores were as follows:

- Barking and Dagenham – 93.8
- Havering – 104.2
- Newham – 93.6
- Redbridge – 100.1

General health trends in Barking and Dagenham

3.95 Barking and Dagenham has an overall Health Index score of 93.8, which is up 1.5 points compared with the previous year, however, Barking and Dagenham ranked in the bottom 20 percent of local authority areas in England for health in 2021.

3.96 Barking and Dagenham's best score across all subdomains is 132.2 for health relating to "physical health conditions". "Physical health conditions" looks at cancer, cardiovascular conditions, dementia, diabetes, kidney and liver disease, musculoskeletal conditions, and respiratory conditions.

3.97 The second highest scoring subdomain is "mental health", while Barking and Dagenham's worst score is for "protective measures".

General health trends in Havering

3.98 Havering has an overall Health Index score of 104.2, which is down 2.7 points compared with the previous year. Havering ranked around average among local authority areas in England for health in 2021.

3.99 Havering's best score across all subdomains is 114.6 for "mental health". "Mental health" looks at children's social, emotional and mental health, mental health conditions, self-harm, and suicides. Self-harm figures are counted through hospital admissions and so not all cases are recorded. During the coronavirus pandemic, people may have been less likely to seek help at hospital because of fears of infection or overwhelming services. Suicides per area are based on a three-year period, so these figures show longer-term trends rather than a change year to year. Suicide registrations were also affected by inquest delays in 2020.

3.100 The second highest scoring subdomain is "physical health conditions", while Havering's worst score is for "physiological risk factors".

3.101 Havering's score for "physical health conditions" fell from 116.8 in 2020 to 108.2 in 2021. This means Havering went from being among the best 10% of local authority areas to being among the best 30% across England for this subdomain.

3.102 The change was largely because of an increase in diabetes (the index worsened by 15.9 points) and an increase in cardiovascular conditions (the index worsened by 9.6 points)

General health trends in Newham

3.103 Newham has an overall Health Index score of 93.6, which is up 0.3 points compared with the previous year. Newham ranked in the bottom 20 percent of local authority areas in England for health in 2021.

3.104 Newham's best score across all subdomains is 123.0 for health relating to "difficulties in daily life".

3.105 "Difficulties in daily life" looks at disability and frailty. "Frailty" measures hospital admissions as a result of a hip fracture in those aged 65 years and over. Figures may have been affected by higher mortality rates in frailer people

during the pandemic, or people being less exposed to injury while less active and staying at home.

3.106 The second highest scoring subdomain is "mental health", while Newham's worst score is for "physiological risk factors" declining from 72 in 2015 to 60 in 2021.

General health trends in Redbridge

3.107 Redbridge has an overall Health Index score of 100.1, which is down 1.4 points compared with the previous year. Redbridge ranked around average among local authority areas in England for health in 2021.

3.108 Redbridge's best score across all subdomains is 119.4 for "mental health". "Mental health" looks at children's social, emotional and mental health, mental health conditions, self-harm, and suicides.

3.109 Self-harm figures are counted through hospital admissions and so not all cases are recorded. During the coronavirus pandemic, people may have been less likely to seek help at hospital because of fears of infection or overwhelming services. Suicides per area are based on a three-year period, so these figures show longer-term trends rather than a change year to year. Suicide registrations were also affected by inquest delays in 2020.

3.110 The second highest scoring subdomain is "physical health conditions", while Redbridge's worst score is for "protective measures".

Life expectancy

3.111 In the UK, there has been a steady increase in life expectancy for both men and women for the first decade of the 2000s. However, in the last 10 years the trend has levelled off. **Table 3.12** sets out the average life expectancy

across the four East London Boroughs, for 2021, and the average across 2018 to 2020.

Table 3.12: Life expectancy by London Borough

Borough	Male 2018 to 2020	Male 2021	Female 2018 to 2020	Female 2021
Barking and Dagenham	77.0	75.6	81.7	80.3
Havering	79.7	79.0	83.5	82.9
Newham	79.0	75.8	83.1	80.7
Redbridge	80.5	78.9	84.6	83.2

3.112 Across East London, the lowest life expectancy at birth in 2021 was 75.6 for males and 80.3 for females. The highest life expectancy at birth in 2021 was 79.0 for males and 83.2 for females. Life expectancy for women is almost 3 years lower in London Borough of Barking and Dagenham than in London Borough of Redbridge, and almost 4.5 years lower for men.

Obesity

3.113 Being overweight or obese carries numerous health risks, including increased likelihood of type 2 diabetes, cancer, heart and liver disease, stroke and related mental health conditions. It is estimated this health issue places a cost of at least £5.1 billion on the NHS and tens of billions on wider UK society every year. Obesity in adults in London is slightly lower than England as a whole, although over half of adults in London are classified as overweight or obese.

3.114 There is also a high level of obesity amongst children in the London. In 2021/22 by Year 6 25.8% of children are classified as overweight or obese. This

is worse than England average of 22.7%. Within East London, Barking and Dagenham has the highest level of obesity amongst Year 6 children at 33.2% in 2021.

- Havering: 24.6%
- Newham 32.0%
- Redbridge: 27.9% **[See reference** 86**]**.

Mental health and perception of wellbeing

3.115 National research highlights that good emotional and mental health is fundamental to the quality of life. As set out in **Table 3.13**, residents in East London had broadly similar responses in comparison to England on a national scale out of ten (7.55, 7,78, and 7.45 respectively) during the 2021/22 period **[See reference** 87**]**.

Table 3.13: Perception of Wellbeing 2021/22 by Borough

Borough	Life Satisfaction	Happiness	Sense that life is worthwhile
Barking and Dagenham	7.6	7.8	7.8
Havering	7.6	7.8	7.4
Newham	7.7	7.8	7.7
Redbridge	7.6	7.5	7.3

Social isolation/loneliness

3.116 The ONS mapped loneliness rates by local authorities between October 2020 to February 2021 during the COVID-19 pandemic. Areas with higher concentrations of younger people and higher rates of unemployment tended to

have higher rates of loneliness during the study period. Across the UK, local authorities in more urban areas had a higher loneliness rate than rural, industrial, or other types of areas. In the London, 7.3% of the adult population reported they 'often or always' felt lonely. This was slightly higher than the British average of 7.2% **[See reference** 88**]**. Within the East London Boroughs, Newham and Redbridge had relatively low levels of the adult population reporting they 'often or always' felt lonely at 4.53% and 4.73% respectively. This contrasts with the reported levels within Barking and Dagenham (11.25) and Havering (8.8%).

COVID-19

3.117 The COVID-19 pandemic highlighted health inequalities nationally, including the differences in people's health and well-being that result from the conditions in which they are born, grow, live, work and age. For example, the pandemic has impacted social and community networks, showing that lack of social contact has a detrimental impact on mental health (causing or facilitating anxiety and depression). It also had a negative impact on individual lifestyle factors such as lack of exercise and unhealthy diet, causing other health issues.

Projected baseline information

3.118 Given that London has performed poorly for some health indicators against regional and national averages, it is likely it will continue to do so without substantial intervention. There are a range of potential changes in determinants that will affect health in the UK and London in the future including climate change. Summers are expected to become hotter, and overheating may increase the excess mortality rate for vulnerable groups.

Access to services and facilities

Current baseline information

3.119 Services and facilities include hospitals and GPs, recreational resources, food retailers, employment and education centres, and other aspects of social infrastructure such as community centres and places of worship. Good and equitable accessibility and the provision of sufficient community facilities is a vital part of development's role in improving the health and well-being of a community.

3.120 The most recent Department for Transport 'journey time statistics' **[See reference 89]** demonstrates the average journey time taken to reach the nearest key services (employment centres, primary and secondary schools, further education, GPs, hospitals, food stores and town centres) across local authorities. The average times taken to reach the nearest key services in each of the ELJWP London Boroughs are broadly the same or slightly higher than their regional and comparisons **[See reference 90]** as set out in **Table 3.14** below.

Table 3.14: Average journey times to key services (minutes)

Location	Public Transport/ walking	Cycle	Car	Walking
Inner London	10.0	9.1	8.0	11.6
Outer London	13.2	10.9	8.9	17.1
Barking and Dagenham	12.7	10.8	8.8	16.6
Havering	15.1	12.0	9.5	20.5
Newham	10.7	9.4	7.8	12.5

Location	Public Transport/ walking	Cycle	Car	Walking
LB Redbridge	12.6	10.6	8.7	15.6

3.121 Along with being physically available, support services need to provide people with a positive experience to promote uptake and engagement for early intervention and reducing or delaying development of additional health and care needs in the longer term. In London, fewer patients have a good experience in making a GP appointment overall. The rate had been falling over recent years, to the lowest in 2020 which likely had been impacted by changes resulting from the pandemic as improvements have been seen in reported experience lately and have surpassed levels seen in most recent years.

Projected baseline information

3.122 Access to key services and facilities could become more challenging as the population in the four London Boroughs continues to grow, if this results in insufficient capacity in the nearest services. As the population ages, this may result in a larger proportion of the plan area's population not having access to key services that are only readily accessible by car.

Open spaces

Current baseline information

3.123 In 2012, the NPPF introduced a new concept of a Local Green Space designation. The Local Green Space designation provides communities with a way to place special protection against the development of green areas of particular importance to them.

3.124 Barking and Dagenham has ambitions to be the 'Green Capital of the Capital' as set out in the Regulation 19 submission Local Plan **[See reference** 91**]**. One third of the borough is green open space (463 hectares) and the borough is in close proximity to Epping Forest.

3.125 More than 50% of Havering is classed as Metropolitan Green Belt, and the borough has some of the most green space in London. The town centre in Romford has a lack of green space although it is within walking distance of number of local parks. This mirrors other areas of the borough where, if there is a lack of one type of open space it is often met by another type of open space. There is generally a good coverage of parks, gardens, natural and semi natural spaces and amenity greenspaces across the borough.

3.126 Newham has an extensive network of natural and open areas, encompassing not only nature reserves, parks, and rivers but also playgrounds, playing fields, allotments, gardens, hedges, green walls, green/brown roofs, cycle and footpaths, street trees, docks, lakes, and ponds. Specifically, Newham has 101 parks and gardens, and amenity greenspace which, along with natural and semi-natural greenspaces and sports facilities total approximately 254.72 ha of publicly accessible green space. However, the Borough has 16% tree cover which is the second lowest in London **[See reference** 92**]**. There are deficiencies in local and district park access, the former in Urban Newham, and the latter particularly in the east and west of the borough.

3.127 Redbridge, one of London’s greenest boroughs, comprises extensive Green Belt land (37% of total area) to the north-east. About 48% of the borough comprises open spaces, including notable locations like Hainault Forest Country Park, Roding Valley Park, Fairlop Waters Country Park, Valentines Park, and around 120 hectares of countryside. These open spaces, including country parks and formal parks, contribute to the borough's character, biodiversity, and climate change mitigation efforts.

Projected baseline information

3.128 Development pressure could lead to the loss of some existing open space and sports/recreation facilities while projected population increases are likely to increase demand for such facilities.

Crime

Current baseline information

3.129 In the year ending July 2022, there was an average of 20 to 25 police recorded crimes per 1,000 population in London **[See reference** 93**]**.

3.130 According to Police UK **[See reference** 94**]**, crime in the each of the four Boroughs is lower than the London average, except for Havering although crime rates are increasing.

Projected baseline information

3.131 Crime rates are influenced by so many variables that it is very difficult to anticipate future trends. Spatial variation that currently exists in relative crime deprivation across the plan area is likely to remain for the foreseeable future, and for the most part will likely mirror overall deprivation trends.

Deprivation

Current baseline information

3.132 Poverty impacts upon entire families and has significant impacts on health, education, skills and life chances. Efforts to lift people out of poverty is a challenge, especially as it is linked to so many other factors such as income levels, cost of living and family size. The Indices of Multiple Deprivation (IMD) 2019 **[See reference 95]** provide comparison data down to the postcode level. **Figure 3.3** at the end of this chapter shows the IMD across the ELJWP area.

Barking and Dagenham

3.133 In Barking and Dagenham, 19.4% of the population was income-deprived in 2019, making the area the 20th most income-deprived local authority in England, excluding the Isles of Scilly. There are 110 neighbourhood areas within LBBD, and 49 of those are within the 20% most deprived in England. No neighbourhoods within LBBD are within the 20% least deprived in England.

Havering

3.134 In Havering, 10.8% of the population was income-deprived in 2019, making the area the 160th most income-deprived local authority in England, excluding the Isles of Scilly. There are 150 neighbourhood areas within LBH, and 14 of those are within the 20% most deprived in England. Thirty-two neighbourhoods within LBH are within the 20% least deprived in England.

Newham

3.135 In Newham, 16% of the population was income-deprived in 2019, making the area the 43rd most income-deprived local authority in England, excluding the Isles of Scilly. There are 164 neighbourhood areas within LBN, and 38 of those are within the 20% most deprived in England. Four neighbourhoods within LN are within the 20% least deprived in England.

Redbridge

3.136 In Redbridge, 12.1% of the population was income-deprived in 2019, making the area the 131st most income-deprived local authority in England, excluding the Isles of Scilly. There are 161 neighbourhood areas within LBR, and 11 of those are within the 20% most deprived in England. Fifteen neighbourhoods within LBR are within the 20% least deprived in England.

3.137 Figure 3.3 at the end of this Chapter illustrates the range and distribution of deprivation across the Borough.

Projected baseline information

3.138 There are disparities in the level of deprivation across all four boroughs and within each borough. The GLA and each of the boroughs have strategies to address inequalities over time but there are uncertainties if current trends will continue over time.

Equalities

Current baseline information

3.139 The Equality Act 2010 identifies nine 'protected characteristics' and seeks to protect people from discrimination based on these characteristics. It presents three main duties: to eliminate discrimination, harassment, victimisation and other conduct that is prohibited under the Act; to advance equality of opportunity between persons who share relevant protected characteristics and persons who do not share it; and to foster good relations between persons who share a relevant protected characteristic and persons who do not share it. The nine protected characteristics identified through the Act are:

- Age: Children (0-4), Younger people (aged 16-24), older people (aged 65 and over);
- Disability: Disabled people, people with physical and mental impairment;
- Gender reassignment;
- Marriage and civil partnership;
- Pregnancy and maternity;
- Race;
- Religion or belief;
- Sex; and
- Sexual orientation.

3.140 The data referred to below was collected in the 2021 UK Census.

Age

3.141 The latest dataset relates to the 2021 UK Census **[See reference** 96**]**. The 2021 Census suggests that across London, the age profile has changed very little since 2011 and remains younger than the broader national average. In relation to the four London Boroughs, the Boroughs of Barking and Dagenham, Newham, and Redbridge have all seen minimal increases in their median age, whilst Havering has seen a decrease by one year, from 40 to 39 years of age.

3.142 The age protected characteristic is split into three. For children up to four years old, the following applies to each of the four London boroughs:

- In **Barking and Dagenham,** the percentage of children aged 4 and below showed a decrease from 10.0% in 2011, to 7.9% in 2021.
- In **Havering,** the percentage of children aged 4 and below rose from 5.8% in 2011 to 6.3% in 2021.
- In **Newham,** the percentage of children aged 4 and below showed a decrease of 1.4%, between 2011 and 2021, from 8.2% to 6.8%.
- In **Redbridge,** the percentage of children aged 4 and below decreased from 7.8% in 2011 to 6.8% in 2021.

3.143 For younger people aged from 16 to 24 years old:

- In **Barking and Dagenham,** the percentage of younger people aged 16 – 24 displayed a slight decrease from 12.4% in 2011 to 11.4% in 2021.
- In **Havering,** the proportion of younger people aged 16 – 24 also showed a decrease of from 11.5% in 2011 to 9.7% in 2021, signifying a 1.8% decrease.
- In **Newham,** the percentage of younger people aged 16 – 24 displayed a decrease from 15.9% in 2011, to 13.2% in 2021.
- In **Redbridge,** the percentage of younger people aged 16 – 24 displayed a decrease from 23.9% in 2011, to 21.1%.

3.144 Older people (65 and over):

- In **Barking and Dagenham,** the percentage of older people, aged 65 above displayed a decrease of 1.7% between 2011 and 2021, from 10.4% in 2011 to 8.7% in 2021.
- In **Havering,** the percentage of older people aged 65 and above presented a slight decrease between 2011 and 2021, from 17.9% in 2011 to 17.7% in 2021.
- In **Newham**, the percentage of older people aged 65 and above showed a small increase of 0.4%, between 2011 and 2021, from 6.7% in 2011 to 7.1 in 2021.
- In **Redbridge,** the percentage of older people aged 65 and above displayed a slight increase from 11.9% in 2011, to 12.2%.

Disability

3.145 Disabled people and people with physical and mental impairment:

- In **Barking and Dagenham**, in 2021 17.9% of the population identified as having a disability. Of this, 9% of the population reported significant limitations due to disability, whilst 8.9% reported minor limitations. This marks a 5.2% decrease from 2011, when 23.1% of the population identified as having a disability.
- In **Havering**, 15.3% of the population identified as having a disability in 2021. Of this, 6.6% of the population reported significant limitations due to disability, whilst 8.7% reported minor limitations. This marks a 2.6% decrease from 2011, when 17.9% of the population identified as disabled, with 8.5% reported significant limitations due to disability, and 9.4% of the population reported minor limitations.
- In **Newham**, 9.1% of the population identified as disabled and limited a lot in 2021. This represents a 4.4% decrease from 13.5% in 2011. In 2021, 8.4% identified as disabled and limited a little, representing an increase from 11.2% in 2011.

- In **Redbridge**, 14.6% of the population identified as having a disability in 2021. Of this, 6.7% of the population reported significant limitations due to disability, whilst 7.9% reported minor limitations. This marks a 4.8% decrease from 2011, when 19.4% of the population identified as disabled, with 9.3% reported significant limitations due to disability, and 10.1% of the population reported minor limitations.

3.146 Concerning mental health, the London Boroughs of Barking & Dagenham, Havering, and Redbridge have a relatively small percentage of the adult population experiencing severe mental illnesses (SMI), including schizophrenia, bipolar affective disorder and other psychoses. Rates of SMI are lower than the national average in all three boroughs – nevertheless more than 6,800 people have a SMI **[See reference** 97**].** In Newham **[See reference** 98**]**, the rater of mental health issues are higher in lower age groups than in older people.

Marriage and civil partnership

3.147 From the 2021 census data, the percentage of people married or in a civil partnership across England fell from 46.8% to 44.7%. During the same period, the London percentage fell from 40.2% to 40.0%.**[See reference** 99**]**.

- In **Barking and Dagenham,** the percentage of people married (or in a civil partnership) rose from 42.1% in 2011 to 42.8% in 2021. The percentage of adults who had never married or registered a civil increased from 38.8% to 41.8%, while the percentage of adults who had divorced or dissolved a civil partnership decreased from 8.7% to 8.1%.
- In **Havering**, the percentage of people married (or in a civil partnership) declined slightly from 48.6% in 2011 to 47.0% in 2021. The proportion of people aged 16 years and over who had never been married or in a civil partnership rose from 33.0% in 2011 to 36.9% in 2021, and the percentage of adults who had divorced or dissolved a civil partnership declined from 8% to 7.8%.
- In **Newham**, the percentage of people married or in a civil partnership, was almost the same in 2021 as 2011, at 40.8% and 40.7% respectively.

The percentage of adults in Newham that had divorced or dissolved a civil partnership was 6.2% in 2011 and 2021. The proportion of people aged 16 years or over who had never been married or in a civil partnership rose from 45.2% in 2011 to 47.1% in 2021.

- In **Redbridge**, the percentage of people married (or in a civil partnership) rose slightly from 50.5% in 2011 to 51.1% in 2021. The proportion of people aged 16 years or over who had never been married or in a civil partnership rose from 34.6% in 2011 to 35.9% in 2021. the percentage of adults who had divorced or dissolved a civil partnership decreased slightly from 6.2% in 2011 to 6.1% in 2021.

Pregnancy and maternity

3.148 The total fertility rate (TFR) for England was 1.62 children per woman in 2021, increasing from 1.59 in 2020, an increase of 1.9%. In London the TFR was 1.52 children per women in 2021, a small decrease from 1.54 in 2020 **[See reference 100]**.

- In **Barking and Dagenham**, there were a total of 3,255 births in 2021, with a TFR of 2.04 children per woman, decreasing from 2.16 in 2020
- In **Havering**, the TFR rate was 1.66 in 2021, with a total of 3,057 births. This is a minimal decrease from 1.71 2020.
- In **Newham**, there were a total of 5, 346 births in 2021, with a TFR of 1.8 children per woman. This represents a small decrease from a TFR of 1.85 children per woman in 2020.
- In **Redbridge,** the TFR was 1.99 in 2021, with a total of 4,275 births. This is a minimal decrease from the TFR of 2.01 in 2020.

Ethnicity

3.149 Across London, the percentage of people from the "Asian, Asian British or Asian Welsh" ethnic group increased from 18.5% in 2011 to 20.7% in 2021,

while across England the percentage increased from 7.5% to 9.3% **[See reference** 101**]**.

- Barking and Dagenham:
  - 25.9% of Barking and Dagenham residents identified their ethnic group within the "Asian, Asian British or Asian Welsh" category in 2021, compared with 15.9% in 2011.
  - 44.9% of people in Barking and Dagenham identified their ethnic group within the "White" category in 2021, compared with 58.3% in 2011.
  - 21.4% identified their ethnic group within the "Black, Black British, Black Welsh, Caribbean or African" category in 2021, compared with 20.0% the previous decade
  - 4.3% identified their ethnic group within the "Mixed or Multiple" category in 2021, increased from 4.2% in 2011.
- Havering:
  - 10.7% of Havering residents identified their ethnic group within the "Asian, Asian British or Asian Welsh" category in 2021, up from 4.9% in 2011.
  - 75.3% of people in Havering identified their ethnic group within the "White" category, in 2021, compared with 87.7% in 2011.
  - 8.2% of Havering residents identified their ethnic group within the "Black, Black British, Black Welsh, Caribbean or African" category in 2021, compared with 4.8% in 2011.
  - 3.7% identified their ethnic group within the "Mixed or Multiple" category in 2011, increased from to 2.1% in 2021.
- Newham:
  - 42.2% of people in Newham identified their ethnic group within the "Asian, Asian British or Asian Welsh" category in 2021, compared with 43.5% in 2011.
  - 30.8% of Newham residents identified their ethnic group within the "White" category, in 2021 up from 29.0% in 2011.

- 17.5% identified their ethnic group within the "Black, Black British, Black Welsh, Caribbean or African" category in 2021, compared with 19.6% in 2011.
- The percentage of residents that % identified their ethnic group within the "Mixed or Multiple" category has remained reasonably constant, from 4.5% in 2011 to 4.7% in 2021.

- Redbridge
  - 47.3% of Redbridge residents identified their ethnic group within the "Asian, Asian British or Asian Welsh" category in 2021, compared with 41.8% in 2011, representing a 5.5% change which was the largest increase among high-level ethnic groups in this area.
  - 34.8% of people in Redbridge identified their ethnic group within the "White" category in 2021, compared with 42.5% in 2011.
  - The percentage of residents that identified their ethnic group within the "Black, Black British, Black Welsh, Caribbean or African" category in Redbridge has remained largely constant, from 8.4% in 2021, compared with 8.9% the previous decade

The percentage of residents that identified their ethnic group within the “Mixed or Multiple" category has remained the same from 2011 to 2021, standing at 4.1%. Religion and belief

3.150 As religion is self-reported in the census, caution is needed when comparing data across areas and between each census. In London, the percentage of residents who described themselves as Muslim increased from 12.6% to 15.0% between 2011 and 2021, while across England the percentage increased from 5.0% to 6.7% **[See reference** 102**]**.

- Barking and Dagenham:
  - 24.4% of residents described themselves as Muslim in 2021, up from 13.7% in 2011.

- 45.4% of residents described themselves as Christian in 2021, down from 56.0% in 2011.
- 18.8% of residents reported having "No religion" in 2021, down from 18.9% in 2011.

- Havering:
  - 6.2% of residents described themselves as Muslim in 2021, up from 2.0% in 2011.
  - 52.2% of residents described themselves as Christian in 2021, down from 65.6% in 2011.
  - 30.6% of residents reported having "No religion" in 2021, up from 22.6% in 2011.
- Newham:
  - 34.8% described themselves as Muslim in 2021, up from 32.0% in 2011.
  - 35.3% of people in Newham described themselves as Christian in 2021, down from 40.0% in 2011.
  - 14.5% of Newham residents reported having "No religion" in 2021, up from 9.5% in 2011
- Redbridge
  - In 2021, 31.3% of Redbridge residents described themselves as Muslim, making it the most common response in this local authority area. This marks an 8% increase from 23.3% in 2011.
  - 30.4% of people in Redbridge described themselves as Christian in 2021, down from 36.8% in 2011.
  - 12.6% of Redbridge residents reported having “No religion” in 2021, up from 11% in 2011.

Sex

3.151 In 2020, across London, there were 4.51 million males, constituting 50.1% of the population, and 4.48 million females, making up 49.9%. This distribution remained consistent despite a smaller overall population. According to mid-year population estimates from the ONS, in 2019, there were 4.51 million males, constituting 50.1% of the population, and 4.49 million females, making up 49.9% **[See reference** 103**]**. Looking broadly at England, in 2020, males comprised 49.5% of the population whilst females comprised 50.5%. This remains largely consistent to 2019 estimates, in which males made up 49.4% of the population, and females 50.6%.

- Barking and Dagenham: In 2020 the borough had a total population of 214,107, of which 49.9% were male and 50.1% were female.
- Havering: In 2020 the borough had a total population of 260,651, of which 48.2% were male and 51.8% were female.
- Newham: In 2020 the borough had a total population of 355,266, of which 53.2% were male and 46.8% were female.
- Redbridge: In 2020 the borough had a total population of 305,658, of which 50.8% were male and 49.2% were female.

Sexual orientation and gender identity

3.152 Sexual orientation **[See reference 104]**:

- Barking and Dagenham: 2.3% of the population identified as LGB+ (those who described their sexual orientation as something other than heterosexual)
- Havering: From the 2021 census data, 91.1% of the population identified as straight or heterosexual, whilst 1.95% identified as LGB+ orientation.
- Newham: 4% of the population identified as LGB+. The vast majority of the population identified as heterosexual, at 83.3%.

- Redbridge: The 2021 Census data shows that in Redbridge, approximately 2.5% of residents ages 16 and over identify as part of the LGBT+ community, whilst 88.1% of the population identified as heterosexual.

3.153 Gender identity **[See reference 105]**:

- Barking and Dagenham: Barking and Dagenham has the highest proportion of trans women (0.25%) and 3rd highest proportion of trans men (0.24%) in England and Wales.
- Havering: As of 2021, within London, Havering has the 5th lowest proportion of residents aged 16 and over reporting that the gender that they identify with now is different to their sex registered at birth, at 0.25%. Of this figure, 0.11% identified as a trans woman, and 0.10% identified as a trans man. 5.82% of Havering residents did not answer the question.
- Newham: Newham has the second highest percentage who identified as a trans men (0.25%). Furthermore, in Newham, 1.51% of people aged 16 and over said their gender identity was different from their sex at birth. Of them, 692 people were trans men and 645 were trans women. A further 168 said they were non-binary.
- Redbridge: 1% of residents aged 16 and over stated that they did not identify with the gender assigned to them at birth. Of them, 465 people were trans men and 401 were trans women. A further 61 said they were non-binary. About 20,300 people did not answer the voluntary question.

Projected baseline information

3.154 A review of the baseline information suggests that London has a younger than average population, greater ethnic and religious diversity, and a low mortality rate, although mortality rate and life expectancy differs across the four boroughs in the ELJWP area.

Implications for health

3.155 Some areas of the four London boroughs within the plan area experience health challenges, with high levels of obesity and risk of associated health problems. The UK Chief Medical Officers advise that for good physical and mental health, adults should aim to be physically active every day. Over the course of a week adults should accumulate at least 150 minutes of moderate intensity activity; or 75 minutes of vigorous intensity activity day; or even shorter durations of very vigorous intensity activity; or a combination of moderate, vigorous and very vigorous intensity activity **[See reference** 106**]**.

3.156 Similarly, open spaces and recreational facilities provide residents space in which they can undertake physical activity to the benefit of public health, including lowering the risk of specific health conditions such as depression, anxiety, cortisol, blood pressure, pre-term birth, low birthweight, and type 2 diabetes. There is generally positive evidence relating to the impacts of activities in natural environments on children's mental health and their cognitive, emotional and behavioural functioning. These health benefits are thought to arise through a range of pathways, including providing opportunities and safe spaces for physical activity, for restoration and relaxation, and for socialising with friends and family. Exposure to green and blue space is also associated with higher levels of life satisfaction. Impacts appear to differ according to socio-economic status and other demographic factors such as age or gender.

3.157 Encouraging active travel, such as walking, wheeling and cycling can have a wider range of positive implications for health, including increased physical activity and opportunities for social interaction. In addition, an increase in active travel would be associated with a decrease in vehicular transport and an associated decrease in air pollutants that can be harmful to human health.

Key sustainability issues and opportunities for the ELJWP to address them

3.158 Across the four boroughs, population is forecast to increase, with younger (0 to 15) and older (over 65) groups seeing the largest increase. In Barking and Dagenham for example, the population is forecast to grow to 250,000 by 2031 with annual growth of households of 1,519 a year in that period. In the absence of any significant change in per capita resource consumption, the consequence of population growth will be an increase in the amount of waste being generated. The existing network of waste management facilities will need to become more efficient and may also need to expand in places to keep pace with demand for waste management services.

Economy

Economy and employment

Current baseline information

3.159 London is an international city which has established itself as a major centre of economic activity. As measured by Gross Value Added (GVA), London's total economic output was worth around £364 billion in 2014, 6.8% higher than in 2013. In 2014, London accounted for 22.5% of the UK's total GVA, up from 18.9% in 1997 **[See reference** 107**]**.

3.160 Between 1971 and 2015, the total number of jobs in London has increased by almost one million. The professional, scientific and technical activities sector accounts for the largest number of jobs, at 755,000 (or 14%). Compared to the wider UK, London is specialised (in terms of jobs) in both the information and communications sector and the financial and insurance

activities sector. This sector is the largest in London, generating £68.7 billion of GVA and accounting for 18.9% of London's total economic output. Within these broad sectors there are a large number of significant subsectors of particular specialisation within London. In addition to this specialisation, there are significant levels of employment in a number of broad sectors – making for quite a diverse economic structure. The spatial make-up of London's economy shows that different sectors are important to different boroughs. The Financial and insurance activities sector accounts for 66.6% of total output in the City of London; whereas in Havering has the greatest proportional share of, the Distribution, transport, accommodation and food sector, accounting for accounts for 24.2% of output. Barking and Dagenham has the greatest proportional share ofthe Production industries, accounting for 21.2% of total output. Newham has the greatest proportional share of local authority output, public administration, education and health, accounting for 18.9% within London.**[See reference** 108**]**.

3.161 In Havering, Barking and Dagenham and Redbridge, the largest percentage of residents aged 16 and over (27.8%, 23% and 26.7% respectively) are employed in the public administration, education and health sector. In Newham, the largest employment sector is banking, finance and insurance, employing 29.8% **[See reference** 109**]**.

3.162 Of people aged 16 to 64 years living in Havering, 82.6% were employed in the year ending June 2023. This is the highest employment rate when compared to the other three borough's. Consequently, it also has the lowest rate of unemployment (those without jobs who are actively seeking work and available to take up a job) at 3.5%. Newham has the second highest rate of employment (75.5%), and an unemployment rate of 4.7%. Barking and Dagenham has an employment rate of 73.1% and an unemployment rate of 5.5%. Redbridge has the lowest employment rate (72.5%) and an unemployment rate of 5.1%.

3.163 Across London in the year ending June 2023, 75.1% of people aged 16 to 64 years were employed. This means that Barking and Dagenham and Redbridge are below the London average. Across London in the year ending June 2023, 4.6% of people aged 16 to 64 years were unemployed. This means

that Newham, Barking and Dagenham and Redbridge have a higher unemployment rate than the London average. Newham has the fifth highest unemployment rate out of all London boroughs **[See reference** 110**]**.

3.164 GLA analysis of the departure from the European Union **[See reference** 111**]** notes that the economy in London will be most impacted by changes to the provision of financial services, the loss of low skilled labour from the European Economic Area, with less impact to trade in comparison with the wider UK.

Growth Areas

3.165 The Growth Strategy for Barking and Dagenham 2013-2023 sets out the key aims and areas for growth in the borough, to increase investment and create a higher skilled workforce **[See reference** 112**]**. The LBBD Regulation 19 Submission Local Plan (2021) **[See reference** 113**]** identifies the following areas for economic growth for the period between 2019 and 2037:

- Barking Town Centre and the River Roding
- Barking River side
- Thames Road
- Castle Green
- Chadwell Heath and Marks Gate
- Dagenham Dock and Beam Park
- Dagenham East
- Dagenham Heathway

3.166 Havering's Inclusive Growth Strategy (2020-2045) **[See reference** 114**]** provides an analysis of the local economy and identifies the types of employment growth and locations for growth over the period to 2045 **[See reference** 115**]**. The LBH Local Plan 2021 **[See reference** 116**]** focusses growth on the areas of Rainham and Beam Park, and Romford, consistent with the London Plan 2021.

3.167 Three of the London Plan (2021) Opportunity Areas are located or partly located in Newham: Royal Dock and Beckton Riverside, and the Poplar Riverside and Olympic Legacy cross boundary Opportunity Areas. The Regulation 18 draft Newham Local Plan (2023) incorporates these areas and also includes a number of Micro Business Opportunity Areas, to promote business use around existing town centres.

3.168 The Redbridge Local Plan (2018) **[See reference** 117**]** identifies the following areas for economic growth for the period between 2015 and 2030, noting the inclusion of the Ilford Opportunity Area within the London Plan (2021):

- Ilford Investment and Growth Area
- Crossrail Corridor Investment and Growth Area
- Kind George and Goodmayes Hospital
- Land at Billet Road
- Gants Hill Investment and Growth Area
- Barkingside Investment and Growth Area
- South Woodford Investment and Growth Area

Strategic Industrial Land

3.169 Strategic Industrial Locations (SIL) are protected through Policy E5 of the London Plan. The London Plan notes the importance of these locations in east London, and the role the Thames Gateway will play in a " strategically co-ordinated plan-led consolidation of SILs in order to manage down overall vacancy rates, particularly in the boroughs of Newham and Barking & Dagenham" Plan **[See reference** 118**]**.

Projected baseline information

3.170 The full economic impact of the COVID-19 pandemic will not be known for some time. However, anecdotal evidence suggests that office-based staff will work remotely/at home more frequently; consequently, businesses are likely to reduce their office space. Rising heating costs have the potential to encourage people back into the office however it is uncertain whether attendance will return to pre-pandemic levels. The full impacts of Brexit are still to be felt, and the continued impacts on London's economy will be different to the impacts on the UK as a whole, as set out above.

Implications for health

3.171 Employment and job security influence mental health and levels of stress. Income can also influence physical health, in terms of the quality and location of housing that people can afford. A strong local economy will help create more job opportunities, contribute to greater job stability and raise the quality of life for local people, resulting in improved health outcomes.

Key sustainability issues and opportunities for the ELJWP to address them

3.172 Beneficial economic characteristics have not been equally shared across the four borough's local communities. The consequence for this has been levels of local inequality, including areas such as South Hornchurch and Harold Hill in Havering, and areas within the wards Abbey, Gascoigne, Chadwell Heath, Thames and Abbey fall in Barking and Dagenham falling within the 10% more deprived Lower Super Output Areas in England.

3.173 The ELJWP could support a local policy framework that will make a small, but present, contribution towards improving the diversity and quality of local employment opportunities available in more deprived urban localities. It may

also bring about training investment, where relevant skills deficits might be present within local communities.

Transport

Current baseline information

3.174 London Infrastructure Plan 2050: Transport Supporting Paper **[See reference** 119**]** notes that across London, trip rates are expected to remain constant on a per person basis, but that expected growth in population will require significant additional capacity across London's transport networks by 2050.

- **Barking and Dagenham:** The Barking Borough Wide Transport Strategy (2021) **[See reference** 120**]** considers the key concerns are around the capacity and air quality in the vicinity of the A12 and A13, the lack of access to public transport, fragmented cycling and walking links, and the continued high rates of accidents.
- **LB Havering:** The Local Implementation Plan 3 **[See reference** 121**]** sets out how the borough will aim to achieve the target of 65% of all trips being made on foot, cycle or public transport by 2041, as well as improving casualty reduction and air quality.
- **LB Newham:** The Local Implementation Plan **[See reference** 122**]** focusses on the aim of 83% of all trips in Newham to be made by foot, by cycle or using public transport by 2041 as well as the Borough's corporate aims regarding air quality, sustainable and active travel and public health.
- **LB Redbridge:** The third Local Implementation Plan (2019) **[See reference** 123**]** focusses on transport improvements aligned to areas of growth, reducing car use to meet climate change targets, and improving access to sustainable transport across the borough and in new growth locations.

3.175 Figure 3.2 at the end of this chapter illustrates the main road, rail and cycling routes in the ELJWP Area.

3.176 The Lower Thames Crossing is a proposed new motorway connecting Kent, Thurrock and Essex through a tunnel beneath the river Thames. If permission is granted, the project will provide over 90% additional road capacity across the Thames east of London. The new motorway will have three lanes in each direction, with a speed limit of 70mph. It will connect the tunnel to the A2 and M2 in Kent on the southern side and A13 and junction 29 of the M25 in the London Borough of Havering on the northern side. The crossing will also feature a 4km-long twin-tube tunnel under the Thames River, for southbound and northbound traffic. With a diameter of 16m, the tunnel will be one of the largest bored-tunnels in the world **[See reference** 124**]**. A decision is expected later in 2024.

3.177 At the time of Census 2021, UK government guidance and lockdown restrictions resulted in unprecedented changes to travel behaviour and patterns **[See reference** 125**]**. As seen in **Table 3.15**, between one fifth and just over one third of residents were working from home in 2021. The prevalence of car use over public transport in all boroughs other than Newham reflects the location of LBN within inner London.

Table 3.15: Method of travel to work 2021

Method of travel to work	Barking and Dagenham	Havering	Newham	Redbridge
Total surveyed	94,586	124,781	163,446	141,627
Work mainly at or from home (%)	20.7	33.4	29.2	34.9
Underground, metro, light rail, tram (%)	16.2	6.7	23.5	14.6

Method of travel to work	Barking and Dagenham	Havering	Newham	Redbridge
Train (%)	9.2	7.0	8.6	6.0
Bus, minibus or coach (%)	10.2	5.6	9.1	5.8
Taxi (%)	0.6	0.6	0.5	0.6
Motorcycle, scooter or moped (%)	0.6	0.5	0.7	0.5
Driving a car or van (%)	32.5	36.8	17.3	28.4
Passenger in a car or van (%)	2.5	2.7	1.5	2.1
Bicycle (%)	1.3	0.7	2.3	1.1
On foot (%)	4.7	4.9	6.0	4.8
Other method of travel to work (%)	1.5	1.2	1.4	1.3

Projected baseline information

3.178 Sustainable public transport, including active travel investment is essential alongside direct road congestion interventions if each borough is to continue to reduce the reliance on car travel, and support the use of more sustainable alternatives.

Implications for health

3.179 A lack of sustainable and active travel options can have negative impacts on public health whilst also increasing reliance on relatively expensive private motorised transit and exacerbating existing inequalities. Encouraging active travel, such as walking, wheeling and cycling can have a wide range of positive implications for health, including increased physical activity and opportunities for social interaction. In addition, an increase in active travel could be associated with a decrease in reliance on often expensive vehicular transport, and an associated decrease in air pollutants that can be harmful to human health.

Key sustainability issues and opportunities for the ELJWP to address them

3.180 Several of the ELJWP road links are inadequate, with several roads and junctions noted as being at or near to capacity, and many experiencing congestion at peak times. Adverse traffic conditions on these routes often have knock-on effects on local roads, leading to localised gridlock on occasion and impacting negatively on economic productivity. In addition, with planned developments and increased housing and job provision, more pressure may be placed on the road networks.

3.181 Without the ELJWP it is anticipated that traffic congestion and air and noise pollution from transport associated with waste developments will continue to increase with the rising population and car dependency will continue to be high. The implications of air pollution for human health and the natural environment are described in subsequent sections.

3.182 The ELJWP provides an opportunity to reduce the demand on the transport network from waste development and to address potential adverse effects of travel by:

- Locating waste development where there is good access to sustainable transport modes for waste and employees
- Supporting and prioritising sustainable travel choices through workplace travel plans; and
- Supporting the uptake of electric vehicles through the provision of electric vehicle charging infrastructure at waste sites.

Historic environment

Current baseline information

Barking and Dagenham

3.183 The Regulation 19 Submission Local Plan for Barking and Dagenham **[See reference** 126**]** notes the importance of conserving and enhancing heritage and cultural assets as the borough continues to grow.

3.184 The borough has 45 statutory listed buildings, 123 locally listed buildings, 1 scheduled ancient monument and four conservation areas **[See reference** 127**]**.

3.185 The greatest concentration of listed buildings is in Barking **[See reference** 128**]**. The site of Barking Abbey is Barking and Dagenham's only Scheduled Ancient Monument. It includes the ruins of the Abbey and most of Abbey Green.

3.186 There are four conservation areas:

- Abbey and Barking Town Centre Conservation Area;
- Abbey Road Riverside Conservation Area;

- Chadwell Heath Anti-aircraft Gun Site Conservation Area; and,
- Dagenham Village Conservation area.

3.187 London Borough of Barking and Dagenham Archaeological Priority Areas Appraisal **[See reference** 129**]** found a total of 20 Archaeological Priority Areas are recommended for Barking and Dagenham.

Havering

3.188 The adopted 2021 Havering London Borough Local Plan 2016-2031 **[See reference** 130**]** highlights the importance of the plan in protecting the boroughs most valued historic assets by conserving and enhancing Havering's rich heritage and historic environment.

3.189 The borough contains a wealth of designated heritage assets, including 140 listed buildings. There are 3 Scheduled Monuments and 11 Conservation Areas **[See reference** 131**]**.

- Corbets Tey Conservation Area;
- Cranham Conservation Area;
- Gidea Park Conservation Area;
- Havering-atte-Bower Conservation Area;
- Langtons Conservation Area;
- North Ockendon Conservation Area;
- RAF Hornchurch Conservation Area;
- Rainham Conservation Area;
- Romford Conservation Area;
- St Andrews Conservation Area; and
- St Leonards Hornchurch Conservation Area.

3.190 Special townscape or landscape character areas are areas that have a special and unique character which adds to the townscape and landscape quality of Havering, of which Havering currently has two: Emerson Park, which is typified by large and varied dwellings set in spacious, mature, well landscaped grounds, and the Hall Lane Policy Area typified by large detached and semi-detached dwellings set in large gardens with considerable tree and shrub planting. All of the areas have unique characters which add considerable value to the borough's environment.

3.191 There is just one listed garden in Havering - Upminster Court Gardens, and just one scheduled monument which can be found within the Romford conservation area.

Newham

3.192 The Newham Local plan 2018-2033 **[See reference** 132**]** looks to tackle the legacy of Newham's historic position in London and integrate the area with local historic context.

3.193 Newham has over 100 listed buildings, ranging from the 15th century Spotted Dog pub to the 19th century Abbey Mills Pumping Station. Eleven percent of listed buildings and monuments were considered to be 'At Risk' in 2017 **[See reference** 133**]**.

3.194 Newham's local list identifies historic buildings, spaces and features that are valued by the local community and that help give Newham its distinctive identity. The list identifies parts of the historic environment that are not already designated in another way (such as a listed building), but which nonetheless contribute to a sense of place, local distinctiveness and civic pride.

3.195 There are nine conservation areas in Newham:

- Durham Road Conservation Area, Manor Park, E12;
- East Ham Conservation Area, E6;

- Forest Gate Town Centre Conservation Area, E7;
- Romford Road Conservation Area, Forest Gate, E7;
- Stratford St John's Conservation Area, E15;
- Sugar House Lane Conservation Area, Stratford, E15;
- Three Mills Conservation Area, E3;
- University Conservation Area, Stratford, E15; and,
- Woodgrange Estate Conservation Area, Forest Gate, E7.

3.196 Two of Newham's conservation Areas: The Three Mills and Sugar House Lane are located in the London Legacy Development Corporation area.

3.197 The Local plan identifies Archaeological Priority Areas: five tier 1, sixteen tier 2, six tier 3 and one tier 4.

Redbridge

3.198 The Redbridge Local Plan 2015-2030 **[See reference** 134**]** looks to celebrate open spaces and enhance Redbridge's historic assets. The Council is also committed to the positive conservation and use of heritage assets as they make an important contribution to the identity, distinctiveness and character of Redbridge.

3.199 There are a range of heritage assets within the borough including over 200 statutorily listed buildings or structures of special architectural or historic interest and over 200 locally listed buildings.

3.200 There is also two Registered Historic Parks and Gardens, which are designed landscapes with special historic interest, no Archaeological sites and areas and eight Residential Precincts.

3.201 Redbridge has 16 Conservation Areas, which are statutory local designations covering areas of special architectural or historic interest:

- Aldersbrook and Lakehouse Conservation Area;
- Barnado's Village Homes Conservation Area;
- The Bungalow Estate Conservation Area;
- Claybury Conservation Area;
- George Lane Conservation Area;
- Little Heath Conservation Area;
- Snaresbrook Conservation Area;
- South Woodford Conservation Area;
- Valentines Mansion Conservation Area;
- Wanstead Park Conservation Area;
- Wanstead Grove Conservation Area;
- Wanstead Village Conservation Area;
- Woodford Bridge Conservation Area;
- Woodford Broadway Conservation Area;
- Woodford Green Conservation Area; and,
- Woodford Wells Conservation Area.

3.202 The 2016 London Borough of Redbridge Archaeological Priority Areas (APA) appraisal **[See reference** 135**]** finds a total of 36 Archaeological Priority Areas are recommended for Redbridge of which four are Tier 1 APAs, 28 are Tier 2 APAs and four are Tier 3 APAs.

Projected baseline information

3.203 The historic environment can be considered a finite resource. It cannot be replaced and is susceptible to decline over time as historic features experience degradation and decay. However, cultural heritage can evolve and change, and features which are not currently considered a valued part of the historic environment may become so in the future, either due to their uniqueness, past use, or historic or cultural significance.

3.204 At local level, new developments, infrastructure and environmental pressures, such as extreme weather and flooding, present the greatest risk to cultural heritage assets.

3.205 Historic England has a Heritage at Risk Register **[See reference 136]** which includes historic buildings, listed buildings, sites and Conservation Areas at risk of being lost through neglect, deterioration or decay. The register aims to highlight those places and buildings in greatest need of repair. As of 2023, there are eighty-one heritage assets registered as at risk within wider London. There are six heritage assets registered at risk within Barking and Dagenham, twelve within Havering, thirteen within Newham and nine within Redbridge.

Implications for health

3.206 Historic England explored the links between the historic environment and health in Wellbeing and the Historic Environment **[See reference** 137**]**. This identified mental and social wellbeing benefits of the historic environment, including opportunities to meet people and expand knowledge through volunteering or visiting historic sites and giving people a sense of place, community and belonging.

Key sustainability issues and opportunities for the ELJWP to address them

3.207 There are many designated and undesignated heritage assets and areas of historical and cultural interest in the ELJWP area that could be adversely affected by climate change and poorly located or designed development. While several of the historic assets in the plan area, for example Listed Buildings and Scheduled Monuments, will continue to be protected by statutory designations, without the ELJWP it is possible that these, and undesignated assets, will be adversely affected by inappropriate development. The ELJWP provides an opportunity to protect these assets (including their settings) from inappropriate waste development.

3.208 Although there is a high level of protection afforded historic sites within the NPPF and NPPW, more of an emphasis could be placed within the ELJWP on directing waste developments away from sensitive locations and requiring them to be designed and built so as to minimise adverse effects on the county's historic environment above and below ground.

Landscape and townscape

Current baseline information

3.209 The National Character Map defines the ELJWP area as lying within National Character Areas 111 - Northern Thames Basin and Area 112 – Inner London **[See reference** 138**]**.

3.210 The Northern Thames Basin area is more diverse mix of urban and rural landscapes. The rural and dispersed landscape adjacent to Essex becomes increasingly urban towards the centre of London. There is a mix of historic settlement patterns, with remnants of historical orchards and other communal

green and farmed spaces. Urban areas have low levels of tranquillity with pockets of perceived tranquillity, as with the Inner London area. Moving eastwards in the ELJWP area, tranquillity increases as green space and Green Belt areas increase.

3.211 Within the Inner London area, there is a strong sense of place along the Thames and particularly in the wharfs and creeks of East London as well as the parks and gardens, green spaces, rivers and other natural habitats. There are strong settlement patterns, and industrial features, with good public access to heritage assets. The whole NCA scores negatively for tranquillity, but there are good pockets of perceived tranquillity in public parks and other small spaces.

Projected baseline information

3.212 Within the **Inner London NCA**, there are several drivers for change that will put pressure on landscape. These include:

- Overheating, flooding and drought cause by hotter, drier summers; warmer, wetter winters; and more frequent incidences of extreme weather;
- Change in species composition and reduction in the connectivity of habitats;
- Reduced water availability and lower oxygen levels in water bodies;
- Regeneration and development: As well as ongoing commercial and housing development pressure, Inner London will be affected by major infrastructure projects such as the Thames Tideway Tunnel and Cross Rail. Changes to the London skyline and iconic views will be affected by new building developments in the centre; and
- Development on brownfield land and urban greening have reduced pressure on London's green spaces and can bring land back into beneficial use.

3.213 Within the **Northern Thames Basin NCA**, drivers for change include:

- Continued urban expansion of settlements putting pressure on their landscape setting;
- Provision of new open space to improve health and wellbeing, which could lead to habitat fragmentation and an altered landscape character;
- Increased development of infrastructure (transport, logistics and industrial);
- Continued demand for minerals;
- Climate change will lead to increased wind erosion in hotter and drier periods and water erosion in the wetter, colder periods;
- Loss of brownfield sites in developed areas putting pressure on invertebrate habitats; and
- Decreased water availability with potential loss of specific drought intolerant species and water quality of water bodies.

3.214 The urban landscapes can be conserved by maintaining green spaces, landscaping and trees and implementing good design practices in new developments. Maintaining the rural landscape and natural landforms will be dependent on being able to preserve and conserve ancient woodlands, unimproved grasslands, protected lanes, commons and hedge-rowed field patterns, as well as the ridges and hilltops from inappropriately located or designed development, changing agricultural practices and seasonal climate change.

Implications for health

3.215 The landscape can benefit mental health and wellbeing in providing a pleasant setting and identifying and enhancing local landscape contributes to sense of place and belonging. Sensitive landscape management can also improve social and physical health by encouraging physical recreation, including providing a pleasant environment for activities such as walking and cycling, providing good public access links and helping people to feel safe and confident in navigating landscapes.

Key sustainability issues and opportunities for the ELJWP to address them

3.216 East London's varied urban and more rural landscapes are vulnerable to adverse effects from urban intensification, increasing recreational pressures and seasonal climate change. The ELJWP provides an opportunity to help to protect and enhance such areas by directing development to the most sustainable locations and ensuring the design of new waste facilities is sympathetic to the surrounding area. The ELJWP will be best placed to do so if it is able to draw on up to date evidence on landscape character and sensitivity.

Biodiversity

Current baseline information

3.217 Biodiversity net gain (BNG) is mandatory in England from 12 February 2024 **[See reference** 139**]**. The NPPF emphasises that plans should identify and pursue opportunities for securing measurable net gains for biodiversity, and plans and decisions should minimise impacts and provide net gains for biodiversity. The statutory framework aims to ensure that developments will achieve at least a 10% gain in biodiversity value. The requirement will apply to most new planning applications within each borough, whether or not the requirement is captured within the adopted local plan.

3.218 The London Environment Strategy **[See reference** 140**]** includes policies and proposals that aim to ensure that more than half of London will be green by 2050 and the city's tree canopy cover increases by 10%. The Strategy aims to achieve this by:

- making it the first National Park City (achieved in 2019 **[See reference** 141**]**);
- working with others to expand and improve London's urban forest;

- highlighting the economic value of London's natural capital, and finding new ways to fund London's green infrastructure that recognise this value;
- providing guidance and support to help people manage and create habitats for wildlife and enhance London's biodiversity;
- making maps, data and research available to help others to make a case for and identify priorities for green infrastructure in their local area;
- including policies in the new London Plan to protect the green belt and our best wildlife habitats, and to ensure that new developments include enough urban greening; and,
- supporting communities and others to improve London's greenspaces and opportunities to enjoy nature through funding programmes.

3.219 The Strategy recognises that in the past, green spaces and biodiversity in London has deteriorated in size and quality and now faces many environmental challenges. One of the challenges identified is waste. The Strategy states that waste has a big impact on the biodiversity and the environment both locally and globally. Less than half of the 7m tonnes of waste that London's homes and businesses produce each year is currently recycled, and landfill capacity is set to run out by 2026. Plastic packaging not only litters London streets, but often finds its way into waterways and oceans, releasing toxic chemicals before breaking down – a process that can take centuries. London needs to reduce, reuse and recycle more, to see waste as the valuable resource that it is, and to reduce London's increasing waste bill as the city grows.

3.220 There are three European protected wildlife sites within 5km of the four boroughs; Epping Forest Special Area of Conservation (SAC), Lee Valley Special Protection Area (SPA) and Lee Valley Ramsar. The south edge of Epping Forest crosses into the northern boundary of Redbridge. Downstream from the river Thames, which forms the southern boundary of the Plan area are Thames Estuary & Marshes Ramsar and SPA and the Benfleet and Southend Marshes SPA.

3.221 Epping Forest is a former royal forest and one of the few remaining large-scale examples of ancient wood-pasture in lowland Britain. It is long (~19km)

but relatively narrow, covering a series of semi-natural woodland and grassland blocks between Wanstead in London (near the A12) and the M25 at Epping. Approximately two-thirds of the forest is designated as an SAC.

3.222 The site supports a mosaic of high-value habitats including ancient semi-natural beech woodlands (which dominate the site), unimproved acid grasslands, wet and dry heath, as well as small rivers, streams and bogs. The woodlands primarily correspond to the NVC communities W14 (Fagus sylvatica – Rubus fruticosus woodland), W15 (Fagus sylvatica – Deschampsia flexuosa woodland) and W10 (Quercus robur – Pteridium aquilinum – Rubus fruticosus woodland); the heathland habitats are primarily NVC communities M16 (Erica tetralix - Sphagnum compactum wet heath and H1 (Calluna vulgaris - Festuca ovina) heathland. The long history of grazing (formerly) and management has produced habitats (including large numbers of veteran trees) that are important for a range of associated species and species groups, including rare epiphyte communities, fungi, and saproxylic invertebrates.

3.223 The forest is London's largest open space and so is a significant resource for recreation, being used for a range of activities including walking, dog walking, running, cycling, wildlife watching and horse-riding. Indeed, the Epping Forest Act 1878 stipulates that it *"shall at all times [be kept]...as an open space for the recreation and enjoyment of the people".*

3.224 The SSSI underpinning the SAC is mostly in ‘favourable’ or ‘unfavourable recovering’ condition. The primary reasons for SSSI units being in ‘unfavourable no change’ or ‘unfavourable recovering’ condition are air pollution and public access / disturbance, although management and invasive aquatic species are also issues for some units. Accordingly, the improvement plan identifies the following pressures affecting site integrity:

- Air pollution (impact of atmospheric nitrogen (N) deposition);
- Undergrazing;
- Public access / disturbance; and
- Invasive species. Changes in species distributions (relates to tree recruitment), water level management (principally relating to groundwater

levels in wet heath areas), water pollution (primarily from local road run-off), disease (principally tree diseases) and invasive species (spread of heather beetle; impact of grey squirrel on woodland regeneration; Crassula dominance in Speakman's Pond) are all identified as threats.

3.225 The London Borough of Redbridge and the London Borough of Newham have an adopted interim position and are currently working with Natural England, City of London, and neighbouring Planning Authorities (Responsible Bodies) to develop a joint Strategic Access Management and Monitoring Strategy for Epping Forest SAC to manage the impact of visitor pressure, identified as a likely significant effect during Plan Making for neighbouring authorities. Each impacted authority is also leading individually on work to secure Suitable Alternative Natural Greenspace and to understand and mitigate any air quality impacts on the Forest.

3.226 The Lee Valley SPA and Lee Valley Ramsar site (hereafter the 'SPA/Ramsar' unless considering specific site features) comprise a series of man-made and semi-natural waterbodies (reservoirs, lagoons and gravel pits) along the River Lea in North London. The closest units to the Newham borough area are a group of reservoirs around Walthamstow constructed in the late 19th century; the remainder of the SPA/Ramsar is located north of the M25 and substantially beyond the zone of influence of the ELJWP. Parts of the sites are managed as nature reserves.

3.227 The Walthamstow reservoirs are operated by Thames Water and are used for fishing and birdwatching, but water sports are not permitted. There are however a number of well used public paths around the reservoir margins. Other units of the SPA are used for recreational water sports.

3.228 The SSSI units underpinning the SPA and Ramsar site are currently in 'favourable' or 'unfavourable recovering' condition, and the SIP does not identify any pressures currently affecting site integrity. The improvement plan **[See reference** 142**]** identifies several threats, principally:

- Water pollution (principally related to the need for clear open water and moderately eutrophic conditions);

- Water level management (principally relating to the operation of the reservoirs for water abstraction);
- Public access / disturbance (recreational water sports (not within Walthamstow reservoirs), angling and dog-walking);
- Inappropriate scrub control (relating to reedbed management and marginal habitats);
- Fish stocking (relating to recreational angling and the need to balance this against the interest feature requirements);
- Invasive species (the wetlands are periodically colonised by Azolla);
- Inappropriate cutting / mowing (rotational management of reedbed for bittern)
- Air pollution (principally relating to potential effects on reedbeds supporting bittern, although it should be noted that for most wetland habitats eutrophication via run-off and flood water is overwhelmingly more significant than air pollution, and available Nitrogen is rarely a limiting factor in these ecosystems).

3.229 The boroughs are also important locations for various nationally and locally important habitats and species. A total of eight sites are currently designated as Sites of Special Scientific Interest (SSSI's) in Redbridge, whilst Havering contains three SSSIs.

3.230 There are 42 Sites of Importance for Nature Conservation (SINCs) within the current Newham planning boundary (two Metropolitan, 20 Borough, and 16 Local). In Barking and Dagenham, a total of 25 sites are currently designated as SINCs. These comprise three Sites of Metropolitan Importance, seven Sites of Borough Importance Grade 1, eight Sites of Borough Importance Grade 2 and seven Sites of Local Importance. A total of 36 sites are currently designated as SINCs in Redbridge in addition to four local nature reserves. In Havering, there are 101 designated Sites of Importance for Nature Conservation, of which 11 are Metropolitan SINCS as well as a number of wildlife corridors. There are a seven Local Nature Reserves and a number of areas of ancient woodland.

3.231 Barking and Dagenham, does not have extensive natural assets, due to its industrial past and heritage . The borough does not have any Areas of Outstanding Natural Beauty (AONB), Ramsar sites, Special Areas of Conservation or SSSI's **[See reference** 143**]**.

3.232 Endangered species and habitats are protected through the compilation and delivery of Biodiversity Action Plans (BAPs) at national, regional and local levels. Priority Habitats and Species are regarded as the most important habitats and species that need to be conserved across the country.

Projected baseline information

3.233 At UK level, the publication of the State of Nature Report **[See reference** 144**]** provides an overview of the health of the country's wildlife and how human impacts are driving sweeping changes in the UK. It looks back over 50 years of monitoring to see how nature has changed since the 1970s, averaging a 13% decline in the average abundance of wildlife in the UK since the 1970s, with key drivers for change being agricultural productivity, climate change and increasing average temperatures, urbanisation and hydrological changes. The report finds that on average, metrics suggest that decline in species abundance and distribution of species has continued in the UK throughout the most recent decade. These trends are likely to continue in the absence of concerted action.

Implications for health

3.234 A strong link exists between access to nature and biodiversity and associated health and societal benefits. Considering the COVID-19 pandemic, the importance of safe, accessible and well-connected green and blue spaces for improving quality of life has also never been more pertinent.

3.235 According to the recently published World Health Organisation report 'Nature, Biodiversity and Health: An Overview of Interconnections' **[See reference** 145**]** increased exposure to nature has been associated with a lower

risk of specific health conditions including depression, anxiety, cortisol, blood pressure, pre-term birth, low birthweight, type 2 diabetes, and reduced risk of death from all causes. There is generally positive evidence relating to the impacts of activities in natural environments on children's mental health and their cognitive, emotional and behavioural functioning. These health benefits are thought to arise through a range of pathways, including providing opportunities and safe spaces for physical activity, for restoration and relaxation, and for socialising with friends and family. Exposure to green and blue space is also associated with higher levels of life satisfaction. Impacts appear to differ according to socio-economic status and other demographic factors such as age or gender.

Key sustainability issues and opportunities for the ELJWP to address them

3.236 The ELJWP area contains many areas of high ecological value ranging from European designated sites such as the Epping Forest SAC in Redbridge, to nationally designated Sites of Special Scientific Interest, Sites of Metropolitan Nature Conservation Importance and Sites of Importance for Nature Conservation among local green spaces and networks that provide ecological connectivity and greater biodiversity, and there is proximity to sites of national importance.

3.237 There is a need for continued preservation and long-term management of these areas within the plan area, as well as consideration of potential effects on sites outside the plan area boundary. Local Wildlife Sites in the borough are being negatively affected by actions such as inappropriate management, traffic pollution and recreational activities. If this continues, it could affect their wildlife value and contribution they make to biodiversity, landscapes and the natural environment. Biodiversity harm can occur outside of protected areas, and local wildlife corridors should also be protected, appropriately within the hierarchy of types of designations.

3.238 Without the ELJWP, important habitats and biodiversity sites will continue to receive statutory protection. However, the ELJWP presents an opportunity to manage the sensitivities of the sites and biodiversity networks, for example by locating waste development away from the most sensitive locations, providing for biodiversity net-gain in new development. The plan should also ensure that waste development does not adversely affect the current condition of sites and where possible contributes to their improvement. Harm to biodiversity can also be avoided through the consideration of sustainable transport and the avoidance and reduction of amenity impacts.

Air, land and water quality

Soils and geology

Current baseline information

3.239 Although all four boroughs are within the large urban expanse of Greater London, there are still large areas of green space, although these are mostly in non-agricultural use. Natural England land classification maps for London and the Southeast **[See reference** 146**]** show that although most land is classified as 'Land predominantly in urban use' there are pockets of Good to Moderate and potentially 'Excellent' land within the ELJWP area.

3.240 Most of the ELJWP area is considered brownfield or Previously Developed Land (PDL). All four boroughs have a history of industrial land use and potential for the discovery of contaminated land requiring mediation in tandem with new development.

3.241 There are limited minerals deposits or mineral processing facilities within the ELJWP area. National policy requires that mineral resources are safeguarded for future use **[See reference** 147**]**. The recycling of soils and

construction wastes on development sites is one of the main ways that use of these resources is minimised in the ELJWP area.

Projected baseline information

3.242 Soil is a finite natural resource which regenerates only over extremely long geological timescales and provides many essential services including food production, water management and support for valuable biodiversity and ecosystems. It also plays a role in preventing climate change as a larger storer of carbon.

3.243 Soils in England have degraded significantly over the last two decades due to intensive agricultural production and industrial pollution and continue to face the following threats:

- Soil erosion by wind and rain, affects the productivity of soils as well as water quality and aquatic ecosystems;
- Compaction of soil, reduces agricultural productivity and water infiltration, and increased flood risk through higher levels of runoff; and
- Organic matter decline affects the supply of nutrients in soil moisture (particularly during summer and autumn months) in the future, which is likely to affect the natural environment and landscape.

Water

Current baseline information

3.244 Water consumption rates per household are still mainly composed of flushing toilets, washing clothes or taking a bath or shower. The London Plan 2021 **[See reference** 148**]** sets water efficiency standards for new development of 105 litres or less per person per day.

3.245 Several water bodies across the four boroughs do not meet the required 'good' status, and a number of water bodies and watercourses are protected sites and sensitive to changes in water quality. In Newham, the Thames, Lea and Roding rivers have not improved in water quality over the past few years, whilst the River Beam (from Ravensbourne to the Thames) is classified as Bad and the Lower Roding, Mayesbrook River and the Goresbrook in Barking and Dagenham all fail on Chemical quality **[See reference** 149**]**.

Projected baseline information

3.246 Under predicted climate change scenarios, more frequent drought conditions are expected in London and the South East of England, along with increased demands on water resources. Future developments will create additional demand for water abstraction from surface and groundwater sources in London. At a high level, it is broadly assumed that the quality of water bodies will improve in line with national objectives. However, water quality is influenced by a wide range of internal and external factors, including climate change, geology and soils, human consumption and population change, and pollution from human activities such as industry, agriculture, contaminated runoff from roads and other built surfaces, combined sewer overflows, and nutrient enrichment from treated wastewater. Future development, particularly in areas close to water bodies, may therefore hamper efforts to improve water quality.

Air and noise pollution

Current baseline information

3.247 Human health, quality of life and the environment can all be negatively affected by air and noise pollution. Each of the four boroughs has designated an any Air Quality Management Areas (AQMA) and air quality is closely monitored.

3.248 The greatest cause for complaint in the four London Boroughs with regards to excessive noise is that more commonly associated with domestic sources (e.g., barking dogs) rather than industry or commerce. Noise arising from road traffic, aircraft noise and construction work do not represent significant reported local problems.

3.249 Levels of NO2 and PM10 across the ELJWP area are highest along the main roads, with hotspots in the south of Newham around London City Airport, and to the east of the ELJWP boundary. Air quality data for London shows that in 2016 monitoring sites in London recorded over 4,000 hours above the safe threshold for NO2. In 2019 this reduced to just over 100, a reduction of 97 per cent. In 2016 there were 995 recorded exceedances of the 24-hour limit value for PM2.5. In 2019 this reduced to 802, a reduction of 19 per cent **[See reference** 150**]**.

Projected baseline information

3.250 Each of the London Boroughs has declared an AQMA:

- Barking and Dagenham AQMA declared in 2008 for Nitrogen dioxide NO2 and Particulate Matter PM10.
- Havering AQMA 2006 for Nitrogen dioxide NO2 and Particulate Matter PM10.
- Newham AQMA (No.2) 2019 for Nitrogen dioxide NO2 and Particulate Matter PM10.
- Redbridge AQMA 2003 for Nitrogen dioxide NO2 and Particulate Matter PM10.

3.251 There is a possibility that air quality may worsen in the long-term because of climate change, due to a greater likelihood of prolonged periods of still, dry days, and to-date this relationship has been difficult to predict. This will need to be considered in the potential development of air quality action plans and monitoring regimes, as will the effects of major infrastructure developments.

3.252 The Mayor of London has designated a Low Emission Zone (LEZ), and an Ultra Low Emission Zone (ULEZ), in addition to the Congestion Charge zone. The LEZ covers all roads within Greater London, those at Heathrow and parts of the M1 and M4 are included, except the M25 (even where it passes within the GLA boundary). The LEZ is designed to target pollution from the heaviest polluting heavy diesel vehicles.

3.253 The ULEZ covers all London boroughs, except for the area of the M25, and applies to all cars, motorcycles, vans and specialist vehicles (up to and including 3.5 tonnes) and minibuses (up to and including 5 tonnes).

3.254 The congestion charge zone covers part of central London, outside of the ELJWP area, and is designed to discourage driving in the centre of London.

Implications for health

3.255 Air pollution is associated with several adverse health impacts and is recognised as a contributing factor in the onset of heart disease and cancer. Pollution particularly affects the most vulnerable in society such as children, the elderly, and those with existing heart and lung conditions. There is also often a strong correlation between poor air quality areas and less affluent areas.

3.256 London and the South East of England is one of the driest areas of the country and thus faces ongoing water resource challenges, growing demand, and uncertainty from climate change. In addition, poor water quality can increase the risk of water-borne disease.

Key sustainability issues and opportunities for the ELJWP to address them

Soils and geology

3.257 Without the ELJWP it is possible that development could result in unnecessary sterilisation of mineral and soil resources thereby preventing their use for future generations, if there is additional need for new or relocated waste sites. There is therefore a need to minimise the amount of development located on brownfield land or on important mineral processing facilities. In the absence of the ELJWP, the NPPF would apply. This supports the reuse of brownfield land, but the ELJWP provides an opportunity to strengthen this approach to ensure these natural assets are not lost or compromised by prioritising brownfield sites and lower quality agricultural land for development.

- Provide adequate space in new developments for waste facilities capable of accommodating general waste, recyclable waste and compostable waste;
- Ensure site allocations do not compromise the operation of nearby waste management facilities; and
- Ensure sufficient land is available in appropriate locations for new waste management facilities.

Water

3.258 There are many factors and initiatives outside of the local planning policy framework contained within the ELJWP that may impact on water quality and the use of water resources, such as land management practices and investment plans by utility bodies. However, the ELJWP has a role to play by ensuring new and expanded waste management developments will not adversely impact upon water quality and / or water quantity through securing efficient use of water resources. The ELJWP could also create a clear, positive and supportive

investment environment in which opportunities to upgrade and improve the network of waste water facilities across the county are taken.

3.259 Without the ELJWP, it is possible that unplanned development for waste could be in areas that could lead to further water quality issues and risks to the natural environment. However, existing safeguards, such as the Water Framework Regulations, would help to reduce the potential for this to occur. The ELJWP provides an opportunity to ensure that development is located and designed to consider the sensitivity of the water environment and water-dependent protected sites, to plan for adequate wastewater infrastructure, to incorporate sustainable drainage systems (SuDS), and to promote water efficiency and grey water recycling.

Air and noise

3.260 Air pollution associated with London's road network has exceed statutory NO_2 levels and needs active monitoring and management. Whilst noise complaints in the London Boroughs are more commonly associated with domestic noise, Building Regulations aim to manage the impact of noise from new domestic and industrial developments through good design. Furthermore, the increasing prevalence of sustainability standards such as BREEAM will also have a positive contribution.

3.261 Development of an up-to-date local planning framework will ensure that ELJWP and development management policies seek to address the current sustainability issues (including noise). In the absence of the ELJWP, the policies in the NPPF and the Clean Air Strategy **[See reference 151]** would apply which support measures to improve air quality through traffic and travel management; to develop and enhance green infrastructure; and to direct new development to sustainable locations which limits the need to travel and offer a choice of transport modes.

3.262 All local authorities have an obligation to declare AQMAs, via the Environment Act 1995, and develop action plans for improvement of air quality.

As set out in paragraph 3.246, each of the four boroughs has declared one AQMA that covers the whole borough. There is a risk that local air quality could be worsened by waste development, particularly through emissions from conventional fossil-fuel based transport of waste.

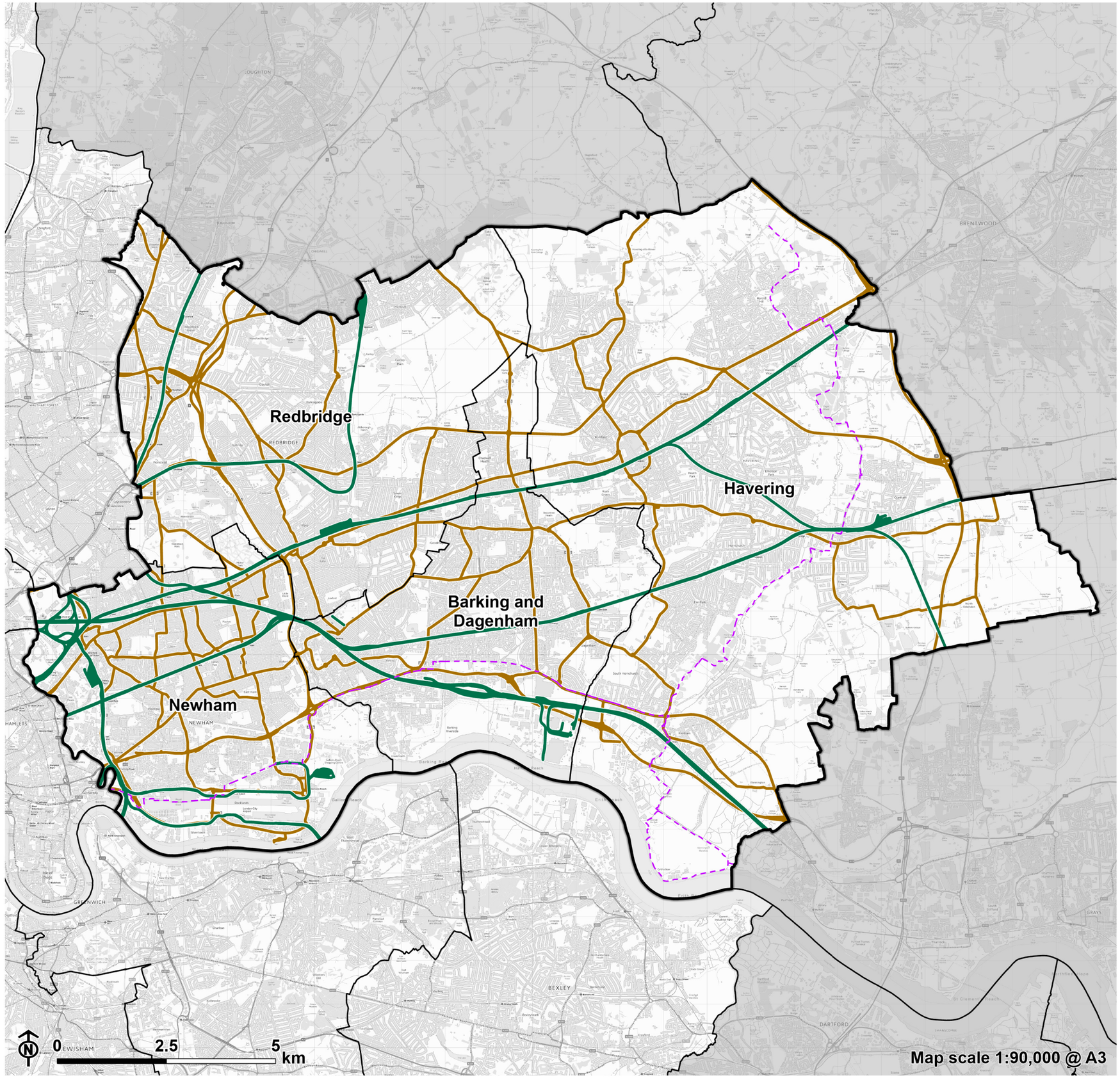
3.263 The ELJWP could support a spatial strategy that will facilitate an increasingly effective and efficient network of waste facilities that will reduce the frequency and miles needed to be travelled by waste. It could seek to use more sustainable alternatives to emission-generating fossil-fuel based road transport of waste. This could include switching to more sustainable modes of transport or to low and zero carbon road-based transport.

3.264 The ELJWP could also support efficient and appropriate freight routes for transporting waste by road that avoid areas with the worst rates of air pollution – namely AQMAs.

East London Joint Waste Plan (ELJWP) - IIA and HRA
London Boroughs

LUC

Figure 3.1: Transport Network within the ELJWP Area



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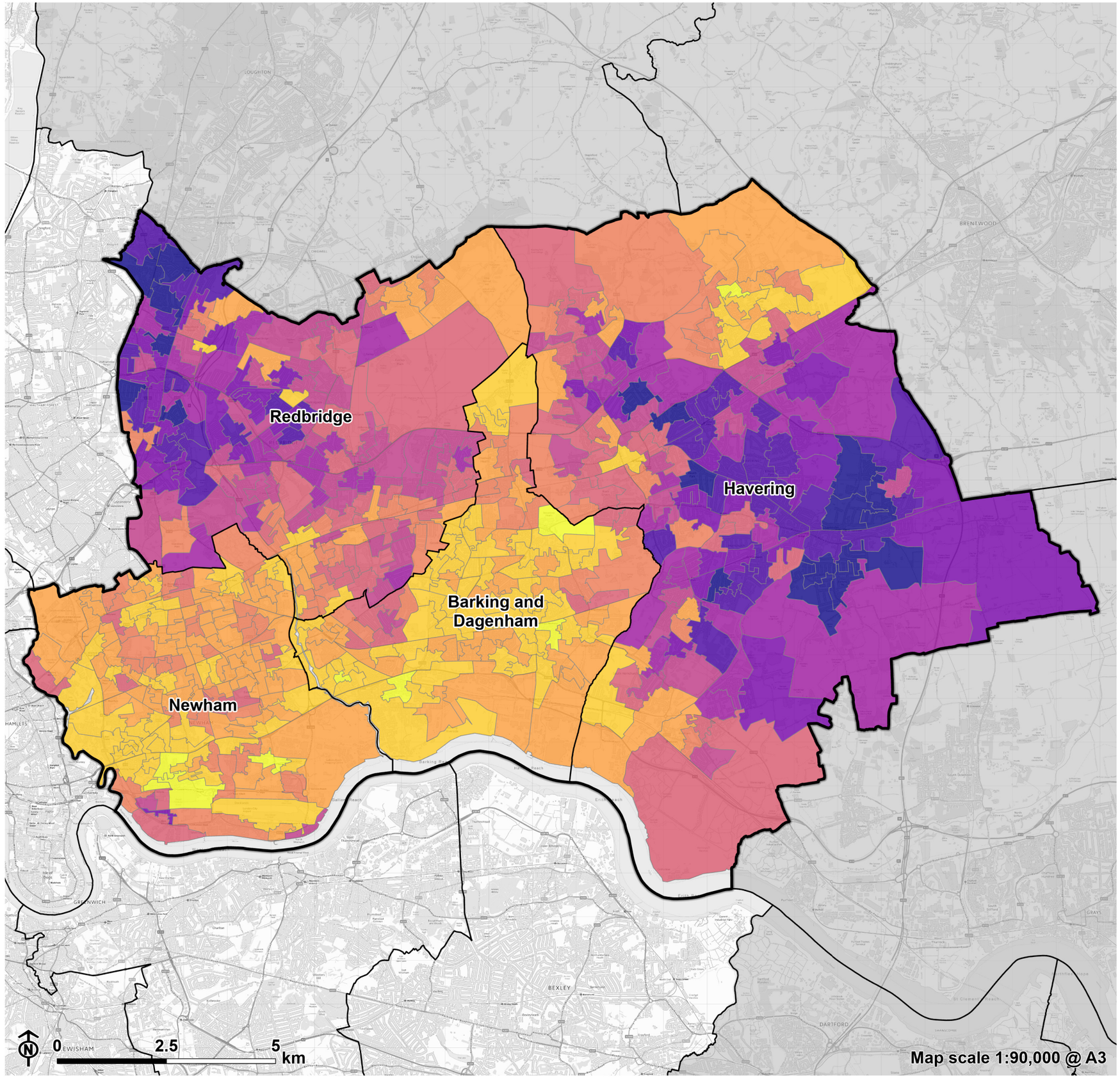
East London Joint Waste Plan (ELJWP) - IIA and HRA
London Boroughs

LUC

Figure 3.2: Indices of Deprivation within the ELJWP Area



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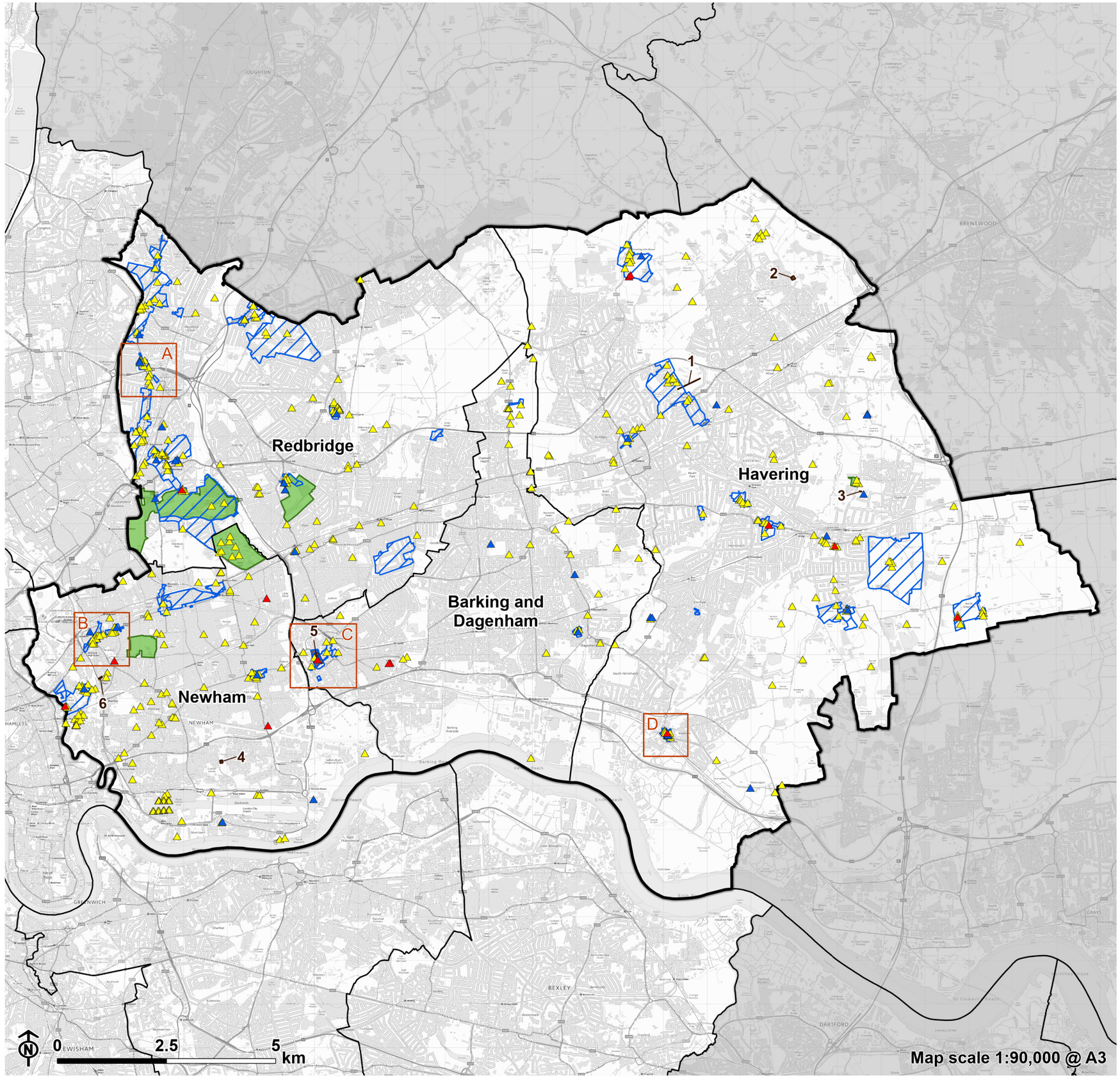
East London Joint Waste Plan (ELJWP) - IIA and HRA
London Boroughs

LUC

Figure 3.3: Historic Environment within the ELJWP Area



Study area
London borough
Outside of Greater London

Listed building

Grade

- I
- II*
- II

Conservation area
Registered parks and gardens
Scheduled monument

1 - Section of Roman road on Gidea Park golf course

2 - Dagnam Park Farm moated site

3 - Medieval grange barn

4 - Second World War anti-aircraft gun emplacements

5 - Barking Abbey

6 - Stratford Langthorne Abbey (part of area within precincts)

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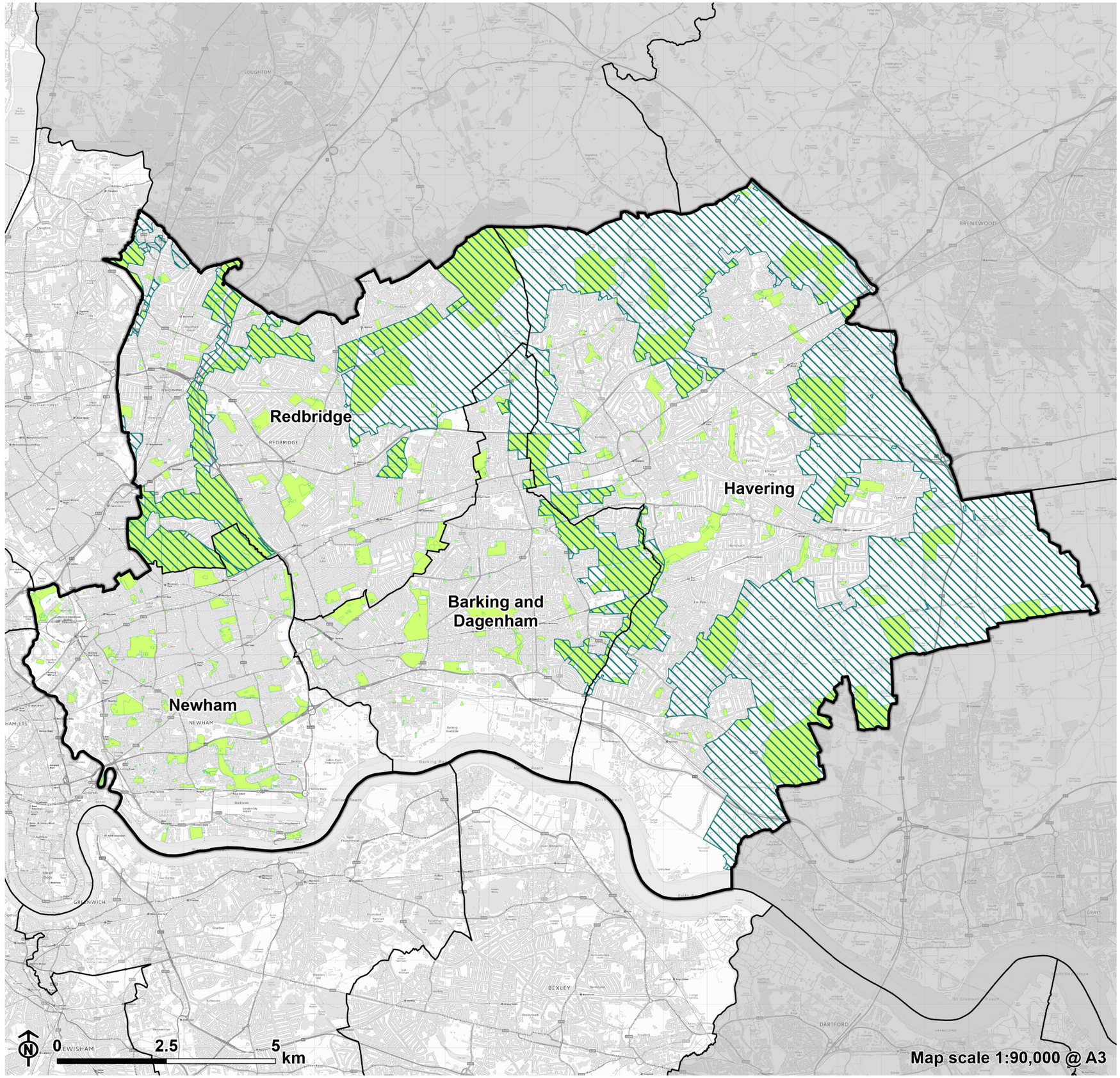
East London Joint Waste Plan (ELJWP) - IIA and HRA
London Boroughs

LUC

Figure 3.4: Open Space and Metropolitan Green Belt within the ELJWP Area

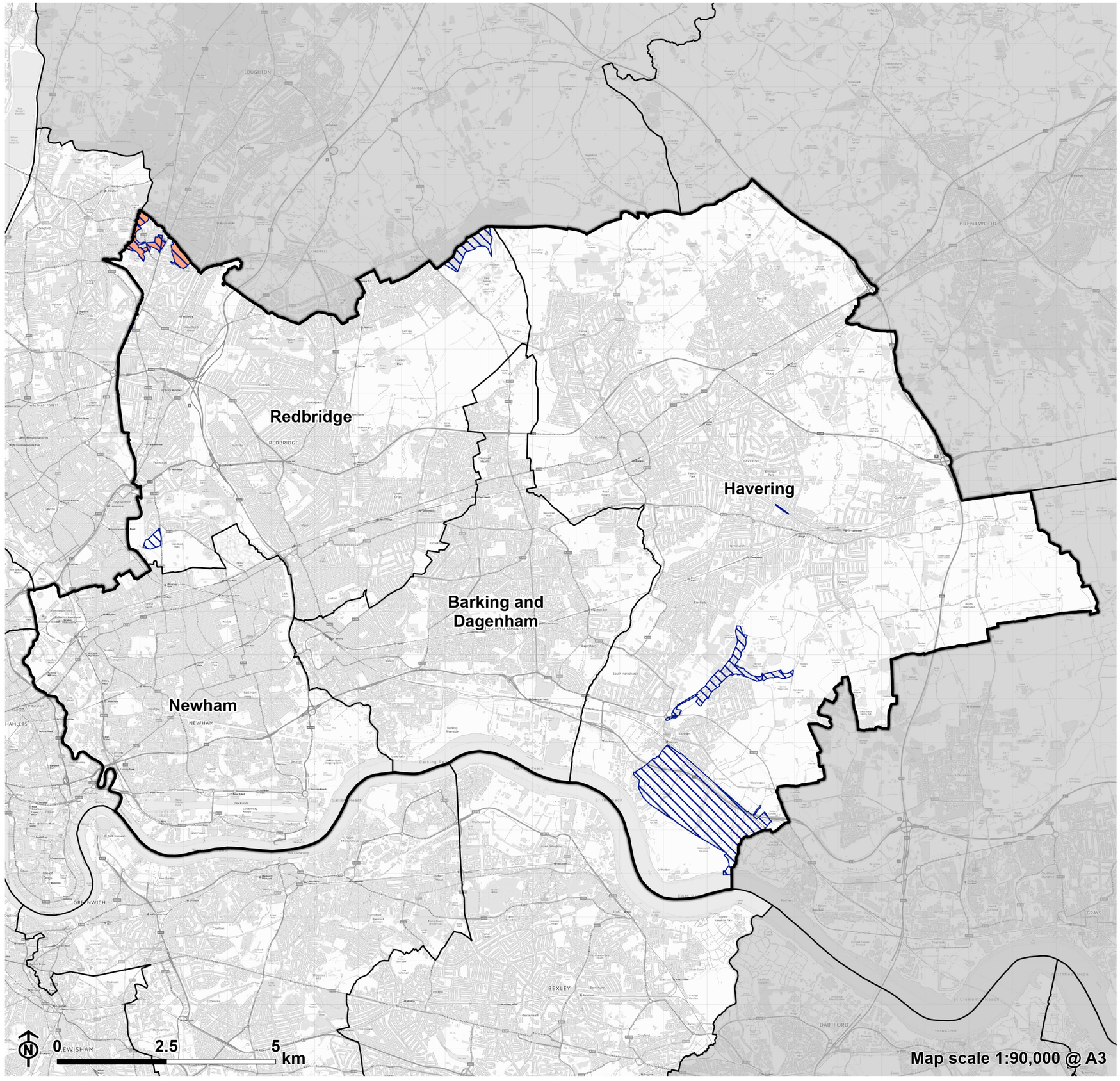


12681_001_ELJWP_Figures/12681_004_r0_GB_Open_Space_A3L 26/02/2024 EB:maslin_z

East London Joint Waste Plan (ELJWP) - IIA and HRA
London Boroughs

LUC

Figure 3.5: Biodiversity within the ELJWP Area

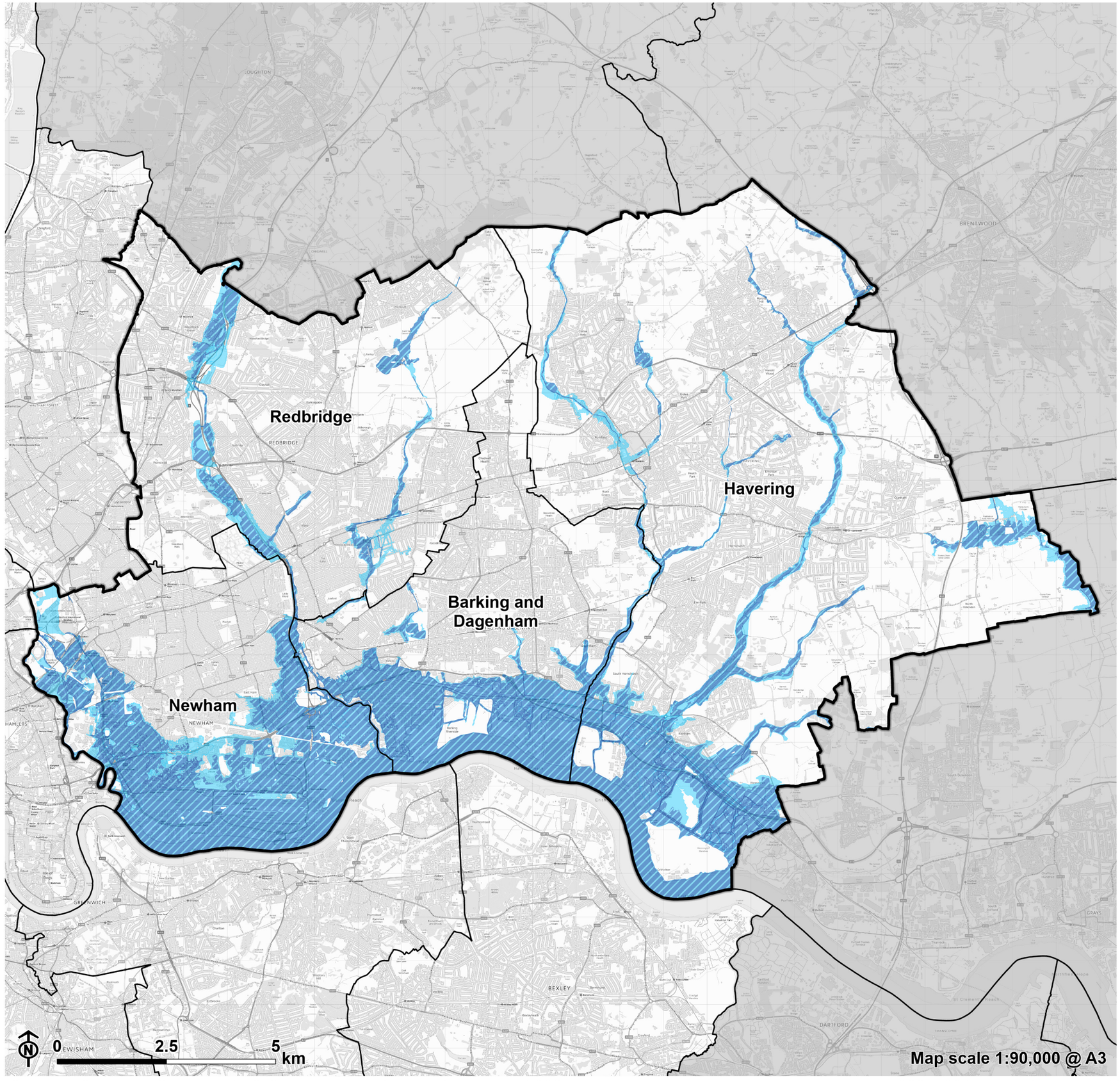


12681_001_ELJWP_Figures/12681_005_r0_Biodiversity_A3L 26/02/2024 EB:maslin_z

East London Joint Waste Plan (ELJWP) - IIA and HRA
London Boroughs

LUC

Figure 3.6: Areas of Flood Risk within the ELJWP Area



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Chapter 4

Integrated Impact Assessment Framework

4.1 The SEA Regulations, Schedule 2(6) require the Environmental Report to consider:

> "The likely significant effects on the environment, including short, medium and long term effects, permanent and temporary effects, positive and negative effects and secondary, cumulative and synergistic effects, on issues such as (a) biodiversity, (b) population, (c) human health, (d) fauna, (e) flora, (f) soil, (g) water, (h) air, (i) climatic factors, (j) material assets, (k) cultural heritage including architectural and archaeological heritage, (l) landscape and (m) the inter-relationship between the issues referred to in sub-paragraphs (a)–(l)."

4.2 The development of a set of IIA objectives (known as the IIA framework) is a recognised way in which the likely environmental and sustainability effects of a plan can be described, analysed and compared. The formulation of the IIA Framework presented overleaf, considered the SA frameworks set out in the SA documents for each of the four London boroughs within the ELJWP Area. The frameworks have also been reviewed and updated to consider the requirements of Health Impact Assessment (HIA) and Equalities Impact Assessment (EqIA) as well as Sustainability Appraisal (SA), the latest baseline and key sustainability issues and opportunities identified for the four London boroughs, and the latest targets and objectives set out in other relevant plans, programmes and strategies. This updated IIA Framework will help to ensure that the IIA of the ELJWP reflects recent global events (such as the COVID-19 pandemic), challenges and priorities, thereby helping to deliver an ambitious ELJWP.

4.3 The IIA objectives and appraisal guidance (which provide a guide to the factors that should be considered when carrying out assessments) set out in the IIA Framework are subject to change as new information comes to light during the IIA process.

4.4 The IIA Framework for the appraisal of the ELJWP is set out below; each primary bullet point constitutes an IIA objective and the sub-bullet points set out further guidance to help guide the appraisal of each objective. The questions included in the framework are not exhaustive, and some may be more relevant to certain Plan elements than others. The framework below also highlights the most relevant SEA topics for each IIA objective, and whether each objective supports the ELJWP Health Impact Assessment and/or Equalities Impact Assessment.

IIA framework for the East London Joint Waste Plan

IIA objective 1: To minimise the East London Joint Waste Plan's contribution to climate change through a reduction of greenhouse gas emissions from managing waste.

Appraisal questions:

- Will it reduce the East London Joint Waste Plan's contribution to climate change by reducing greenhouse gas emissions from waste management activities?
- Will it utilise the waste hierarchy to ensure less waste is being managed at the most appropriate level of the hierarchy?

- Will it support development of modern waste facilities for waste that cannot be recycled or composted?
- Will it promote energy efficiency by encouraging the use of energy efficient buildings and plant, and the use of appropriate renewable or low carbon energy sources on waste sites?

  Carbon emissions associated with waste transport are dealt with under IIA objective 7.

IIA objective 2: Move treatment of waste up the Waste Hierarchy within East London.

Appraisal questions:

- Will it contribute to the aim in the London Plan of a zero waste city by 2050?
- Will it promote a circular low carbon economy within ELJWP area, and within London?
- Will it contribute to minimising disposal of all forms of waste, across the ELJWP area and across London?
- Will it promote the re-use, recycling and recovery of waste?

IIA objective 3: Support, maintain or enhance the development of the economy of East London.

Appraisal questions:

- Will it generate employment opportunities in the waste and resource sector for local people, especially within areas of deprivation, providing opportunities to improve local skills?
- Will it minimise harm to the existing local economy, locating waste uses away from existing sensitive receptors?

IIA objective 4: Protect and improve the health of the people of the East London Joint Waste Plan area.

Appraisal questions:

- Will it avoid or minimise adverse effects on human health and safety, especially those with protected characteristics, including mental health, and those in more deprived areas?
- Will it provide opportunities to improve health and amenity through delivery of green infrastructure, enhanced public rights of way and improved access to recreation as part of the restoration of sites, or provision of biodiversity net-gain in new sites?
- Will it avoid or minimise adverse effects on the quality and extent of existing recreational assets?

- Will it reduce the incidence of crime associated with waste (e.g. fly-tipping and illegal dumping of large amounts of waste) by ensuring a sustainable network of waste facilities across the ELJWP area, and London?

IIA objective 5: Promote sustainable modes of transport in the East London Joint Waste Plan area by reducing road traffic, congestion and pollution.

Appraisal questions:

- Will it support an overall reduction in the distance travelled by waste, either within the ELJWP area or across the wider London area?
- Will it contribute towards a reduction in traffic congestion, particularly in designated AQMAs?
- Will it reduce reliance on road-based freight movements and support the use of rail and water where this represents a deliverable, efficient and sustainable choice?
- Will it support the transition from low to ultra-low and then zero emission vehicles for the transportation of waste by road?

IIA objective 6: Protect and enhance the historic environment within East London.

Appraisal questions:

- Will allocated waste facilities conserve, protect and enhance designated and undesignated heritage assets and their settings?

IIA objective 7: Protect, enhance, restore, and expand the biodiversity and geodiversity assets within the East London Joint Plan area.

Appraisal questions:

- Will it effect habitats of international, national, regional or local importance, particularly in relation to Epping Forrest?
- Will it protect and enhance habitats of international, national, regional or local importance, particularly in relation to Epping Forrest?
- Will it protect and improve local populations of terrestrial species that are of international, national, regional or locally importance?
- Taking into account the impact of climate change, will it conserve and enhance designated and undesignated ecological assets and networks?
- Will it maintain and enhance wildlife corridors and minimise fragmentation of ecological areas and green spaces, enhancing biodiversity and securing the level of net-gain set out in local, regional and national policy?
- Will it protect and support enhanced knowledge and understanding of geological sites of national, regional or local importance?

IIA objective 8: Protect, enhance, and restore open spaces and townscapes within the ELJWP area.

Appraisal questions:

- Will it minimise the visual intrusion of waste facilities on sensitive and/or distinct townscapes?

- Will it enhance and protect townscape features including open spaces, parks and gardens and their settings?
- Will it provide for the restoration of land to an appropriate after-use including the creation of accessible greenspaces and open spaces at former waste sites?

IIA objective 9: Protect and enhance the quality and quantity of watercourses and water bodies and maximise the efficient use of water within East London.

Appraisal questions:

- Will it maximise the efficient use of water?
- Will it protect the quantity of ground and surface water from over abstraction?
- Will it protect and enhance the quality of watercourses and water bodies?

IIA objective 10: To manage and reduce flood risk from all sources within East London.

Appraisal questions:

- Will it promote the use of SuDS, nature-based solutions or other flood resilient design measures?
- Through the appropriate allocation of waste sites, will it ensure waste developments are not at risk of flooding both presently and in the future,

taking into account climate change, and will it not result in an increase in the risk of flooding elsewhere?

IIA objective 11: Minimise noise, light and air pollution relating to waste development within East London.

Appraisal questions:

- Will it minimise pollution and impacts on amenity, including from noise and light, from activities associated with waste developments and minimise the potential for such pollution?
- Will it minimise air pollution and help achieve the objectives of Air Quality Management Plans, particularly within the designated AQMAs?

IIA objective 12: Protect and enhance mineral resources and soils within East London.

Appraisal questions:

- Will it ensure the safeguarding of mineral resources from sterilisation by waste management related development?
- Will it safeguard soil quality and quantity and reduce soil contamination?
- Will it avoid the loss of the best and most versatile agricultural land by prioritising the location of waste developments to appropriately located previously developed sites?

Predicting and evaluating effects

4.5 The prediction and evaluation of the effects of options in the ELJWP relies heavily on the IIA Framework – every policy and site option (and reasonable alternative) will be appraised for their likely impacts in relation to achievement of the IIA objectives. In line with the SEA Regulations, the following characteristics of effects will be predicted and evaluated:

- Probability;
- Duration, including short, medium and long-term impacts;
- Frequency;
- Reversibility;
- Cumulative and synergistic nature;
- Transboundary nature;
- Secondary nature;
- Permanent or temporary nature; and
- Positive or negative nature.

Probability

4.6 There is an inherent degree of uncertainty in carrying out an IIA. Should it be adopted, the East London Joint Waste Plan would likely be in force for several years. Over this time, currently unforeseen changes are likely to occur. These circumstances are impossible to predict. The planning system is generally robust enough to deal with such changes by re-assessing the needs of sites and communities at the time applications are made. Uncertainties are dealt with in IIA by adopting a precautionary approach, wherein a reasonable worst-case scenario is assumed unless reliable evidence suggests otherwise. This is to ensure that any potentially significant negative effects are identified, and appropriate consideration is given to how the ELJWP could help to avoid or

mitigate the worst effects if such scenarios were to arise. However, it is accepted that the likelihood of many such worst-case scenarios occurring is low, particularly as the comprehensive array of policies proposed in ELJWP would help to avoid or mitigate negative impacts.

4.7 The assessment of ELJWP options will indicate where uncertainties exist in relation to the effects identified.

Duration, including short, medium and long-term impacts

4.8 The temporal scope of the IIA covers the ELJWP period. For the purposes of the IIA:

- Short term covers the period for 0-5 years, or during construction (inclusive of temporary impacts);
- Medium term covers the period from 5-20 years; and
- Long term covers the period over 20 years, beyond the Plan period.

4.9 Effects can occur over multiple terms, such as arising in the short-term and residing in the long-term.

Frequency

4.10 All effects of the ELJWP are considered to occur once, unless indicated otherwise.

Reversibility

4.11 The assessment will consider whether effects are reversible or irreversible. Reversible effects may be identified where a former mineral site is proposed for restoration to open space; irreversible effects may be identified where development is proposed on greenfield land thereby resulting in the loss of best and most versatile agricultural land.

Cumulative and synergistic effects

4.12 The IIA will provide an appraisal of all reasonable options considered for inclusion in the ELJWP. The vision, strategic objectives, policies and site allocations of the Plan will not be adopted in isolation and therefore an evaluation of the cumulative and synergistic effects will be undertaken. Cumulative and synergistic effects are defined as follows:

- Cumulative effects arise, for instance, where several developments each have insignificant effects but together have a significant effect, or where several individual effects have a combined effect; and
- Synergistic effects interact to produce a total effect greater than the sum of the individual effects, so that the nature of the final impact is different to the nature of the individual impacts.

Transboundary effects

4.13 The geographical extent of effects will be experienced predominantly in the ELJWP area. However, where effects would be likely to be discernible in neighbouring authorities or at a greater scale, this will be specified. For example, transboundary effects may be experienced in relation to waste transported across local authority boundaries, either through an increase in air pollution or an increase in waste to be dealt with outside of the plan area. .

Secondary effects

4.14 The assessment process inherently includes a consideration of secondary effects. Secondary effects are defined as “effects that are not a direct result but occur away from the original effect or as a result of a complex pathway”.

Permanent or temporary

4.15 The assessment will indicate whether effects are temporary or permanent in nature. Should the ELJWP be adopted, it would only be in place for the Plan period and would subsequently be replaced by a new or revised ELJWP. Many of the effects of policies in the Plan are therefore typically temporary effects. Nevertheless, several the effects of new development on a greenfield site would be likely to be permanent.

Positive and negative effects and significance

4.16 The IIA will evaluate whether the nature of effects is likely to be positive, negative, neutral or mixed. The magnitude of effects in relation to each IIA objective will be defined as significant or minor. For example, a significant positive effect would be identified where an option is likely to significantly contribute to the achievement of an IIA objective, whereas an adverse effect (either significant or minor negative) would be identified where the option conflicts with the IIA objective. Options which are unlikely to significantly influence whether an objective will be achieved will receive a neutral rating. Mixed effects may be identified where an option is expected to have both a positive and negative effect on the IIA objective.

4.17 The IIA assessments will be carried out at a high level and so the dividing line between sustainability effects is often quite small. The effect of an option on a IIA objective will be significant where it is of such magnitude that it will have a

noticeable and measurable effect compared with other factors that may influence the achievement of that IIA objective.

4.18 Minor effects will still be identified as these assist with the identification of cumulative and synergistic effects (e.g., several minor effects can combine to become a significant effect), can help to identify opportunities for enhancements (e.g., enhancing a minor positive effect to make it significant) and better enable the Council to make a more informed decision over the sustainability performance of options.

4.19 In determining the significance of the effects of the options for potential inclusion in the ELJWP, the IIA will consider the plan's relationship with the other documents in the planning system such as the NPPF and other national policy approaches, and regulatory requirements, as these may provide additional safeguards or mitigation of potentially significant adverse effects.

4.20 The findings of the IIA will be presented as a colour coded symbol showing a score for each option (including reasonable alternatives) against each of the IIA objectives along with a concise justification for the score given, where appropriate. The use of colour coding in the matrices will allow for the magnitude of effects (both positive and negative) to be easily identified. **Table 4.1** presents the colour coded symbols and definitions that will be used to report the significance of effects of the ELJWP policies and sites and their reasonable alternatives.

Table 4.1: Effect symbols and colours used in IIA

IIA Effect	Description of Effect
++	Significant positive effect likely
++/-	Mixed significant positive and minor negative effects likely
+	Minor positive effect likely
+/-	Mixed minor effects likely

IIA Effect	Description of Effect
++/--	Mixed significant effects likely
-	Minor negative effect likely
--/+	Mixed significant negative and minor positive effects likely
--	Significant negative effect likely
0	No or negligible effect likely
?	Likely effect uncertain
N/A	Assessment criterion not applicable

Reasonable alternatives

4.21 The IIA must appraise not only the preferred options for inclusion in the ELJWP but also 'reasonable alternatives' to these options. This implies that alternatives that are not reasonable do not need to be subject to appraisal. Part (b) of Regulation 12(2) notes that reasonable alternatives will consider the objectives of the plan, as well as its geographical scope. Therefore, alternatives that do not meet the objectives of national policy or are outside the Plan area are unlikely to be reasonable.

4.22 The objectives, policies and site allocations to be considered for inclusion within the East London Joint Waste Plan are in the process of being identified and reviewed. The boroughs' reasons for selecting the alternatives to be included in the East London Joint Waste Plan will be reported at a later stage in the IIA process.

Site assessment criteria

4.23 It has yet to be established through evidence whether the emerging ELJWP will need to allocate new wastes sites or not. In fact some evidence

suggests that there is a sufficient surplus in waste management capacity to consider the release of waste sites that currently enjoy policy protection for waste management uses:

- Safeguarded existing waste management sites (Schedule 1 of the ELJWP).
- Sites in locations that are identified as suitable for strategic waste management facilities (Schedule 2 of the ELJWP).

4.24 It is not therefore clear at this stage whether the IIA will need appraise such site options, either for allocation or release from current allocation, against the IIA objectives through the use of spatial assessment criteria. Spatial assessment criteria relevant to each of the IIA objectives outlined above will be prepared at a later date if required.

4.25 To avoid abortive IIA work, the Councils must first establish whether the allocation and/or deallocation of sites is in fact reasonable and secondly the quantum of shortfall/surplus requiring allocation/deallocation, both in light of the evidence and following consultation with neighbouring authorities.

Health Impact Assessment

4.26 The background and overall approach to HIA is set out in **Chapter 1**. The IIA Framework above identifies the IIA objectives that have potential to impact the health and wellbeing of the population.

Equality Impact Assessment

4.27 There are three main duties set out in the Equality Act 2010, which public authorities including the London boroughs must meet in exercising their functions:

- To eliminate discrimination, harassment, victimisation and other conduct that is prohibited under the Act;
- To advance equality of opportunity between persons who share relevant protected characteristics and persons who do not share it; and
- To foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

4.28 The Equality Act 2010 identifies nine 'protected characteristics' and seeks to protect people from discrimination based on these characteristics:

- Protected characteristics identified in the Equality Act 2010:
  - Age: Children (0-4), Younger people (aged 18-24), older people (aged 60 and over);
  - Disability: Disabled people, people with physical and mental impairment;
  - Gender reassignment;
  - Marriage and civil partnership;
  - Pregnancy and maternity;
  - Race;
  - Religion or belief;
  - Sex; and
  - Sexual orientation.

4.29 This document sets out the baseline and projected baseline for the protected characteristics within **Chapter 3.** The ELJWP will therefore be assessed to consider the likely impacts of policy and any site options on each of the nine protected characteristics from the Equality Act.

Chapter 5

Conclusion and next steps

5.1 In order to meet the requirements of the SEA Regulations, the views of the three statutory consultees (Natural England, Historic England and the Environment Agency) are being sought in relation to the scope and level of detail to be included in the IIA report.

5.2 This IIA Scoping Report is being published for consultation with the three statutory bodies in early 2024.

5.3 In particular, the consultees are requested to consider:

- Whether any additional international or national plans and programmes should be included in the policy review (see Appendix A) because their objectives are of particular relevance to the sustainability of the ELJWP (see Chapter 2).
- Whether the information provided in Chapter 3 provides a sufficient baseline against which the Plan's sustainability effects can be assessed and monitored and which allows exiting sustainability issues of relevance to the Plan to be identified.
- Whether there are any additional key sustainability issues of relevance to the ELJWP (Chapter 3) that should be included.
- Whether the IIA framework (Chapter 4) is appropriate and includes a suitable range of objectives that are within the Waste Plan's remit.

5.4 As the ELJWP is drafted, its policies (and any allocations) and reasonable alternatives to these will be subject to appraisal against the IIA framework presented in Chapter 4. A full IIA report (incorporating the later stages of the IIA process) will then be produced and made available to stakeholders and the general public for consultation alongside the emerging draft ELJWP.

LUC

January 2023

Appendix A

Review of relevant plans, policies and programmes

International

IPCC's Sixth Assessment Report on Climate Change (IPCC, 2022)

Key objectives relevant to the Waste Local Plan

- To limit and/or reduce all greenhouse gas emissions which contribute to climate change.

Key targets and indicators relevant to the Waste Local Plan

- None.

Implications for the Waste Local Plan

- Plan should support reduction in emissions of greenhouse gases.

Implications for the IIA

- Include sustainability objectives to support reduction in emissions of greenhouse gases.

Johannesburg Declaration on Sustainable Development (2002)

Key objectives relevant to the Waste Local Plan

- Commitment to building a humane, equitable and caring global society aware of the need for human dignity for all.
- Areas of focus include:
  - Sustainable consumption and production patterns.
  - Accelerate shift towards sustainable consumption and production – 10-year framework of programmed of action.
  - Reverse trend in loss of natural resources.
  - Renewable energy and energy efficiency.
  - Urgently and substantially increase Global share of renewable energy.
  - Significantly reduce the rate of biodiversity loss by 2010.

Key targets and indicators relevant to the Waste Local Plan

- To promote greater resource efficiency, increase energy efficiency and develop new technology for renewable energy.

Implications for the Waste Local Plan

- Allocate sites and develop policies that take account of the Declaration.

Implications for the IIA

- Include sustainability objectives to enhance the natural environment and promote renewable energy and energy/resource efficiency.

Aarhus Convention (1998)

Key objectives relevant to the Waste Local Plan

- Established a number of rights of the public with regard to the environment.
- Local authorities should provide for:
  - The right of everyone to receive environmental information.
  - The right to participate from an early stage in environmental decision making.
  - The right to challenge in a court of law public decisions that have been made without respecting the two rights above or environmental law in general.

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Allocate sites and develop policies that take account of the Convention.

Implications for the IIA

- Ensure that the public are involved and consulted at all relevant stages of IIA production.

Bern Convention (1979)

Key objectives relevant to the Waste Local Plan

- The Convention on the Conservation of European Wildlife and Natural Habitats (the Bern Convention) was adopted in Bern, Switzerland in 1979, and came into force in 1982.
- The principal aims of the Convention are to ensure conservation and protection of wild plant and animal species and their natural habitats (listed in Appendices I and II of the Convention), to increase cooperation between contracting parties, and to regulate the exploitation of those species (including migratory species) listed in Appendix III.
- To this end the Convention imposes legal obligations on contracting parties, protecting over 500 wild plant species and more than 1,000 wild animal species.

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Allocate sites and develop policies that take account of the Convention.

Implications for the IIA

- Include sustainability objectives to protect and enhance biodiversity.

Ramsar Convention – Convention on Wetlands of International Importance (1971)

Key objectives relevant to the Waste Local Plan

- To promote the conservation and wise use of all wetlands through local, regional and national actions and international co-operation, as a contribution towards achieving sustainable development throughout the world.

Key targets and indicators relevant to the Waste Local Plan

- The number of Ramsar sites being designated in the UK.

Implications for the Waste Local Plan

- Plan should promote the conservation and make wise use of all wetland areas.

Implications for the IIA

- Consider inclusion of objectives which aim to promote conservation and wise use of wetland areas.

UN Paris Climate Change Agreement (2015)

Key objectives relevant to the Waste Local Plan

- International agreement to keep global temperature rise this century well below 2 degrees Celsius above pre-industrial levels.

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Allocate sites and develop policies that take account of the Agreement.

Implications for the IIA

- Consider climate change.

National

NPPF (2023)

Key objectives relevant to the Waste Local Plan

- Economic objective:
  - To help build a strong, responsive and competitive economy

  - By ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity
  - By identifying and coordinating the provision of infrastructure.
- Social objective:
  - To support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations
  - By fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.
- Environmental objective:
  - To protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution
  - Mitigating and adapting to climate change, including moving to a low carbon economy.

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Economic objective:
  - Plan should make adequate provision for waste management infrastructure to ensure the growth of the waste economy.
- Social objective:

  - Plan should include policies and objectives to promote a circular economy and the delivery of green infrastructure, enhanced public rights of way or improved access to recreation as part of the development and restoration of waste sites.

- Environmental objective:
  - Plan should include policies and objectives to address the causes and impacts of climate change relating to waste development activity, including using opportunities arising from waste operations and reclamation activity to mitigate and adapt to climate change and to leave a positive legacy.

Implications for the IIA

- Economic objective:
  - Include a sustainability objective relating to strengthening the economy.
- Social objective:
  - Include a sustainability objective relating to health and well-being.
- Environmental objective:
  - Include a sustainability objective relating to climate change mitigation and adaptation, conservation of historic features, conservation and enhancement of the natural environment.

NPPW (2015)

Key objectives relevant to the Waste Local Plan

- The National Planning Policy for Waste was adopted in October 2014 and sets out the need for local authorities to:
  - Prepare local plans using a robust proportionate evidence base
  - Identify need for waste management facilities

- Identify suitable sites and areas
- Determine planning applications
- Monitor and report
- Take up in allocated sites and areas
- Existing stock and changes in the stock of waste management facilities.
- The amount of waste recycled, recovered or going for disposal

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Allocate sites and develop policies that take account of the National Planning Policy for Waste.

Implications for the IIA

- Include a sustainability objective relating to sustainable waste management.

DEFRA (2021): National Waste Management Plan for England

Key objectives relevant to the Waste Local Plan

- Provides an analysis of the current waste management situation in England and evaluates how it will support implementation of the objectives and provisions of the revised Waste Framework Directive.
- At the local authority level, the Waste Management Plan notes that waste planning authorities (county and unitary authorities in England) are responsible for producing local waste management plans that cover the land use planning aspect of waste management for their areas.

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Allocate sites and develop policies that take account of the National Waste Management Plan.

Implications for the IIA

- Include a sustainability objective relating to sustainable waste management.

Resources and Waste Strategy for England (2018)

Key objectives relevant to the Waste Local Plan

- Sets out how to preserve material resources by minimising waste, promoting resource efficiency and moving towards a circular economy in England.
- It identifies five strategic ambitions:
  - To work towards all plastic packaging placed on the market being recyclable, reusable or compostable by 2025;
  - To work towards eliminating food waste to landfill by 2030;
  - To eliminate avoidable plastic waste over the lifetime of the 25 Year Environment Plan;
  - To double resource productivity by 2050; and
  - To eliminate avoidable waste of all kinds by 2050.

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Allocate sites and develop policies in line with the Resources and Waste Strategy.

Implications for the IIA

- Include a sustainability objective relating to sustainable waste management.

DCLG (2015): Planning Practice Guidance on Waste

Key objectives relevant to the Waste Local Plan

- Provides further information in support of the implementation of waste planning policy.
- At the local authority level, the Guidance outlines who is responsible for waste developments and which matters come within the scope of 'waste development'.

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Allocate sites and develop policies that take account of the Planning Practice Guidance on Waste.

Implications for the IIA

- Include a sustainability objective relating to sustainable waste management.

MHCLG Planning Practice Guidance (2021)

Key objectives relevant to the Waste Local Plan

- The PPG documents provide guidance on the interpretation and implementation of the NPPF.
- Of particular relevance are:
  - Planning Practice Guidance on air quality
  - Planning Practice Guidance on climate change
  - Planning Practice Guidance on conserving and enhancing the historic environment
  - Planning Practice Guidance on ensuring the vitality of town centre
  - Planning Practice Guidance on flood risk and coastal change
  - Planning Practice Guidance on health and wellbeing
  - Planning Practice Guidance on local plans
  - Planning Practice Guidance on the natural environment
  - Planning Practice Guidance on noise
  - Planning Practice Guidance on light pollution
  - Planning Practice Guidance on open space, sports and recreation facilities, public rights of way and local green space
  - Planning Practice Guidance on rural housing
  - DCLG Planning Practice Guidance on renewable and low carbon energy
  - Planning Practice Guidance on water supply, wastewater and water quality
  - Planning Practice Guidance on Waste

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Plan needs to be produced in accordance with the guidance outline in the NPPG.

Implications for the IIA

- The SA should be prepared in line with the NPPG.

DEFRA (2012): National Policy Statement for Waste Water

Key objectives relevant to the Waste Local Plan

- Sets out the proposed policy framework to inform planning decisions on applications for large waste water infrastructure projects.

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Allocate sites and develop policies that take account of the National Policy Statement for Waste Water.

Implications for the IIA

- Include IIA objectives that relate to sustainable waste management and the protection of water quality.

DEFRA (2013): National Policy Statement for Hazardous Waste

Key objectives relevant to the Waste Local Plan

- Sets out the strategic need and justification of Government policy for the provision of national significant infrastructure for the management of hazardous waste.

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Allocate sites and develop policies that take account of the National Policy Statement for Hazardous Waste.

Implications for the IIA

- Include IIA objectives that relate to sustainable waste management which will include hazardous waste.

HM Government (2013) Waste prevention programme for England: Prevention is better than cure – The role of waste prevention in moving to a more resource efficient economy

Key objectives relevant to the Waste Local Plan

- The aim of the Programme is to:
  - Improve the environment and protect human health by supporting a resource efficient economy, reducing the quantity and impact of waste produced whilst promoting sustainable economic growth.
  - Encourage businesses to contribute to a more sustainable economy by building waste reduction into design, offering alternative business models and delivering new and improved products and services.
  - Encourage a culture of valuing resources by making it easier for people and businesses to find out how to reduce their waste, to use products for longer, repair broken items, and enable reuse of items by others.
  - Help businesses recognise and act upon potential savings through better resource efficiency and preventing waste, to realise opportunities for growth.
  - Support action by central and local government, businesses and civil society to capitalise on these opportunities.

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Policies should take account of the strategic measures in the Programme.

Implications for the IIA

- Include IIA objectives which seek to promote waste prevention.

HM Government (2009): The UK Low Carbon Transition Plan

Key objectives relevant to the Waste Local Plan

- The Plan plots how the UK will meet the 34 percent cut in emissions on 1990 levels by 2020.
- The Plan shows how reductions in the power sector and heavy industry; transport; homes and communities; workplaces and jobs; and farming, land and waste sectors could enable carbon budgets to 2022 to be met.

Key targets and indicators relevant to the Waste Local Plan

- The plan includes a 5-point Action Plan covering the following areas:
  - Protecting the public from immediate risk;
  - Preparing for the future;

- Limiting the severity of future climate change through a new international climate agreement;
- Building a low carbon UK;
- Supporting individuals, communities and businesses to play their part.

Implications for the Waste Local Plan

- Plan should include policies that contribute towards achieving lower carbon emissions.

Implications for the IIA

- Objectives should reflect the aims set in the UK Low Carbon Transition Plan to reduce carbon emissions.

HM Government (2011): The Carbon Plan: Delivering our low carbon future

Key objectives relevant to the Waste Local Plan

- The Carbon Plan is a Government wide plan of action on climate change, including domestic and international activity.

Key targets and indicators relevant to the Waste Local Plan

- The plan includes a range of sectorial plans and targets including low carbon industry.

Implications for the Waste Local Plan

- Plan should include policies that contribute towards achieving lower carbon emissions such as:
  - Diverting waste from landfill by driving it up the waste hierarchy.
  - Using alternate or low emission transport options where viable.

Implications for the IIA

- Include a sustainability objective relating to reducing carbon emissions.

DECC (2009): The UK Renewable Energy Strategy

Key objectives relevant to the Waste Local Plan

- Increase our use of renewable electricity, heat and transport, and help tackle climate change.
- Build the UK low-carbon economy, promote energy security and take action against climate change.

Key targets and indicators relevant to the Waste Local Plan

- 15% of energy from renewable sources by 2020.
- Reducing UK CO2 emissions by 750 million tonnes by 2030.

Implications for the Waste Local Plan

- Ensure that site allocations and policies will support renewable energy provision including electricity, heat and transport.

Implications for the IIA

- Include a sustainability objective relating to increasing energy provided from renewable sources.

HM Government (2017) The Clean Growth Strategy

Key objectives relevant to the Waste Local Plan

- Under the Climate Change Act, the Government is required to publish a set of policies and proposals that will enable the legally-binding carbon budgets, on track to the 2050 target, to be met.
- The Clean Growth Strategy sets out a range of policies and proposals, as well as possible long-term pathways for UK emissions in two ways – by decreasing emissions and by increasing economic growth.

Key targets and indicators relevant to the Waste Local Plan

- The strategy covers the fourth and fifth carbon budgets, spanning 2023-2027 and 2028-2032, by when the UK must cut its greenhouse gas emissions to 57% below 1990 levels.

Implications for the Waste Local Plan

- Plan should support renewable energy provision including electricity, heat and transport.

Implications for the IIA

- Include a sustainability objective relating to promoting energy efficiency and the use of appropriate renewable or lower carbon energy sources on site.

DEFRA (2018): The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting– Making the Country Resilient to a Changing Climate

Key objectives relevant to the Waste Local Plan

- The report sets out visions for the following sectors:
  - People and the Built Environment – “to promote the development of a healthy, equitable and resilient population, well placed to reduce the harmful health impacts of climate change...buildings and places (including built heritage) and the people who live and work in them are resilient and organisations in the built environment sector have an increased capacity to address the risks and make the most of the opportunities of a changing climate.”
  - Infrastructure – “an infrastructure network that is resilient to today’s natural hazards and prepared for the future changing climate”.
  - Natural Environment – “the natural environment, with diverse and healthy ecosystems, is resilient to climate change, able to

accommodate change and valued for the adaptation services it provides."

- Business and Industry – "UK businesses are resilient to extreme weather and prepared for future risks and opportunities from climate change."
- Local Government – "Local government plays a central role in leading and supporting local places to become more resilient to a range of future risks and to be prepared for the opportunities from a changing climate."

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Policies should take account of the aims of the Programme.

Implications for the IIA

- Include IIA objectives which seek to promote the implementation of adaptation measures to make the area more resilient to a changing climate.

DEFRA (2013): Underground, Under threat – Groundwater Protection: Policy and Practice (GP3)

Key objectives relevant to the Waste Local Plan

- To prevent pollution of groundwater.

Key targets and indicators relevant to the Waste Local Plan

- To meet Water Framework Directive requirements for groundwater quality.

Implications for the Waste Local Plan

- Plan should recognise the importance and vulnerability of groundwater resources and ensure that they are not detrimentally affected by waste development.

Implications for the IIA

- Include an objective to protect groundwater quality.

Environment Agency (2011): The National Flood and Coastal Erosion Risk Management Strategy for England

Key objectives relevant to the Waste Local Plan

- This Strategy sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities.
- The strategic aims and objectives of the Strategy are to:
  - "manage the risk to people and their property;
  - Facilitate decision-making and action at the appropriate level – individual, community or local authority, river catchment, coastal cell or national;
  - Achieve environmental, social and economic benefits, consistent with the principles of sustainable development".

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Policies should seek to reduce and manage the risk of all types of flooding.

Implications for the IIA

- The IIA framework should include objectives which seek to reduce the risk and manage flooding sustainably.

DEFRA (2008) Future Water: The Government's Water Strategy for England

Key objectives relevant to the Waste Local Plan

- Sets out how the Government want the water sector to look by 2030 and an outline of the steps which need to be taken to get there.
- The vision for 2030 is one where we, as a country have:
  - "improved the quality of our water environment and the ecology it supports, and continue to maintain high standards of drinking water quality from taps;
  - Sustainably managed risks from flooding and coastal erosion, with greater understanding and more effective management of surface water;
  - Ensure a sustainable use of water resources, and implement fair, affordable and cost-reflective water charges;
  - Cut greenhouse gas emissions; and
  - Embed continuous adaptation to climate change and other pressures across the water industry and water users".

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Policies should aim to contribute to the vision set out in this Strategy.

Implications for the IIA

- Include IIA objectives which seek to protect, manage and enhance the water environment and promote water management and efficiency.

Environment Agency (2009): Water for People and the Environment: Water Resources Strategy for England and Wales

Key objectives relevant to the Waste Local Plan

- The Strategy vision for water resource “is for there to be enough water for people and the environment, meeting legitimate needs”.
- Its aims include:
  - To manage water resource and protect the water environment from climate change.
  - Restore, protect, improve and value species and habitats that depend on water.
  - To contribute to sustainable development through good water management.
  - People to understand how water and the water environment contribute to their quality of life.

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Policies should reflect the aims of the strategy where relevant.

Implications for the IIA

- Include IIA objective which seeks to promote water management and efficiency.

DEFRA (2009) Safeguarding our Soils: A Strategy for England

Key objectives relevant to the Waste Local Plan

- The vision is “by 2030, all England’s soils will be managed sustainability and degradation threats tackled successfully. This will improve the quality of England’s soils and safeguard their ability to provide essential services for future generations”.
- The Strategy highlights the areas for priority including:
  - Better protection for agricultural soils.
  - Protecting and enhancing stores of soil carbon.
  - Building the resilience of soils to a changing climate.
  - Preventing soil pollution.
  - Effective soil protection during construction and development.
  - Dealing with our legacy of contaminated land.

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Ensure that site allocations and policies will help protect and enhance the quality of soils and seek to sustainably manage their quality for future generations.

Implications for the IIA

- Include IIA objective which seeks to safeguard and enhance the quality of soil.

DEFRA (2007): The Air Quality Strategy for England, Scotland, Wales and Northern Ireland

Key objectives relevant to the Waste Local Plan

- Make sure that everyone can enjoy a level of ambient air quality in public spaces, which poses no significant risk to health or quality of life.
- Render polluting emissions harmless.

Key targets and indicators relevant to the Waste Local Plan

- Sets air quality standards for 13 air pollutants.

Implications for the Waste Local Plan

- Develop policies that aim to meet the standards.

Implications for the IIA

- Include sustainability objectives to reduce pollution and protect and improve air quality.

DEFRA Clean Air Strategy 2019

Key objectives relevant to the Waste Local Plan

- The Clean Air Strategy 2019 sets out actions to improve air quality by reducing pollution from a wide range of sources. The Clean Air Strategy informs the detailed National Air Pollution Control Programme.

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Ensure that site allocations and policies will contribute to maintaining and improving air quality.

Implications for the IIA

- Include sustainability objectives to protect and improve air quality.

DEFRA and DfT (2017): UK plan for tackling roadside nitrogen dioxide concentrations

Key objectives relevant to the Waste Local Plan

- The strategy aims to help local authorities by setting up a £225 million implementation fund, establishing a clear air fund and £100 million for retrofitting and new low emission buses.

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Ensure that site allocations and policies will contribute to maintaining and improving air quality.

Implications for the IIA

- Include sustainability objectives to protect and improve air quality.

DEFRA (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem services

Key objectives relevant to the Waste Local Plan

- The strategy aims to guide conservation efforts in England up to 2020 and move from a net biodiversity loss to gain. The strategy includes 22 priorities which include actions for the following sectors:
  - Agriculture;
  - Forestry;
  - Planning and Development;
  - Water Management;
  - Marine Management;
  - Fisheries;
  - Air Pollution; and
  - Invasive Non-Native Species.

Key targets and indicators relevant to the Waste Local Plan

- The strategy develops ambitious yet achievable goals for 2020 and 2050, based on Aichi Targets set at the Nagoya UN Biodiversity Summit in October 2010.

Implications for the Waste Local Plan

- Develop policies that promote conservation and enhancements of biodiversity and ensure that site allocations take account of the aims of the strategy.

Implications for the IIA

- Include sustainability objective that relates to biodiversity.

DEFRA (2011): Securing the Future: Delivering UK Sustainable Development Strategy

Key objectives relevant to the Waste Local Plan

- Enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life for future generations.
- There are 4 shared priorities:
  - sustainable consumption and production;
  - climate change and energy;
  - natural resource protection and environmental enhancement; and
  - sustainable communities.

Key targets and indicators relevant to the Waste Local Plan

- Sets out indicators to give an overview of sustainable development and priority areas in the UK.
- They include 20 of the UK Framework indicators and a further 48 indicators related to the priority areas.

Implications for the Waste Local Plan

- Ensure that site allocations and policies meet the aims of the Sustainable Development Strategy.

Implications for the IIA

- Include sustainability objectives to cover the Strategy's shared priorities.

DoH (2010): Healthy Lives, Healthy People: our Strategy for public health in England

Key objectives relevant to the Waste Local Plan

- Protect the population from serious health threats; helping people live longer, healthier and more fulfilling lives; and improving the health of the poorest, fastest.
- Prioritise public health funding from within the overall NHS budget.

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Ensure that site allocations and policies reflect the objectives of the strategy.

Implications for the IIA

- Include a sustainability objective relating to health and well-being.

DECC (2014): Community Energy Strategy

Key objectives relevant to the Waste Local Plan

- Sets out plans to promote and facilitate the planning and development of decentralised community energy initiatives in four main types of energy activity:
  - Generating energy (electricity or heat)
  - Reducing energy use (saving energy through energy efficiency and behaviour change)
  - Managing energy (balancing supply and demand)
  - Purchasing energy (collective purchasing or switching to save money on energy)

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Ensure that site allocations and policies will support community low carbon and renewable energy provision including electricity, heat and transport.

Implications for the IIA

- Include a sustainability objective relating to increasing energy provided from decentralised low carbon and renewable sources.

HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment

Key objectives relevant to the Waste Local Plan

- The 25 Year Environment Plan sets out government action to tackle a wide range of environmental pressures.
- The 25 Year Environment Plan identifies six areas around which action will be focused. These include:
  - Using and managing land sustainably.
  - Recovering nature and enhancing the beauty of landscapes.
  - Connecting people with the environment to improve health and wellbeing.
  - Increasing resource efficiency and reducing pollution and waste.
  - Securing clean, productive and biologically diverse seas and oceans.
  - Protecting and improving the global environment.

Key targets and indicators relevant to the Waste Local Plan

- The 25 Year Environment sets out ambitious goals to manage pressures on the environment in the UK, based on England's 159 National Character Areas and monitoring indicators.

Implications for the Waste Local Plan

- Develop policies that promote conservation and enhancements of the natural environment and ensure that site allocations take account of the goals of the Environment Plan.

Implications for the IIA

- Include sustainability objective that relates to the protection of the natural environment.

Our Waste, Our Resources: A strategy for England (2018)

Key objectives relevant to the Waste Local Plan

- The Strategy sets out how the Government will preserve stocks of material resources by minimising waste, promoting resource efficiency and moving towards a circular economy.
- The strategy is framed by natural capital thinking and guided by two overarching objectives:
  - To maximise the value of resource use; and;
  - To minimise waste and its impact on the environment.

Key targets and indicators relevant to the Waste Local Plan

- The Strategy seeks to contribute to the delivery of five strategic ambitions:
  - To work towards all plastic packaging placed on the market being recyclable, reusable or compostable by 2025;

- To work towards eliminating food waste to landfill by 2030;
- To eliminate avoidable15 plastic waste over the lifetime of the 25 Year Environment Plan;
- To double resource productivity by 2050; and
- To eliminate avoidable waste of all kinds by 2050.

Implications for the Waste Local Plan

- Develop policies that promote conservation and enhancements of the natural environment and ensure that site allocations take account of the goals of the Strategy.

Implications for the IIA

- Include sustainability objective that relates to the efficient use of resources.

British Energy Security Strategy (2022)

Key objectives relevant to the Waste Local Plan

- The Strategy sets out long-term targets for offshore wind, solar, hydrogen, and nuclear energy following the onset of conflict in Ukraine.

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Ensure that site allocations and policies will support community low carbon and renewable energy provision.

Implications for the IIA

- Include sustainability objective that relates to renewable energy.

DLHC (2022) Flood risk and coastal guidance

Key objectives relevant to the Waste Local Plan

- This report advises how to take account of and address the risks associated with flooding and coastal change in the planning process.

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Ensure that site allocations and policies will mitigate against flood risk.

Implications for the IIA

- Include sustainability objective that relates to mitigating and managing flood risk.

Environment Agency (2022) National Flood and Coastal Erosion Risk Management Strategy for England

Key objectives relevant to the Waste Local Plan

- The strategy outlines a series of measures risk management authorities must undertake to manage flood and coastal erosion risk.

Key targets and indicators relevant to the Waste Local Plan

- No targets or indicators.

Implications for the Waste Local Plan

- Ensure that site allocations and policies will mitigate against flood risk.

Implications for the IIA

- Include a sustainability objective that relates to mitigating and managing flood risk.

London

The London Plan (2021)

Key objectives relevant to the Waste Local Plan

- This spatial development strategy for London sets out an integrated economic, environmental, transport and social framework for London's development. As such it has a number of key objectives (policies) it seeks to achieve on waste:
  - To reduce waste as part of establishing a circular economy.
  - To achieve and maintain sufficient waste capacity such that London achieves self-sufficiency on waste management.
  - To safeguard and retain waste sites for wate management.

Key targets and indicators relevant to the Waste Local Plan

- The three objectives (representing three distinct policies within the London Plan) contain a number of commitments for the Mayor, Mayoral Development Corporations and Local Authorities. Key targets amongst these are:
  - ensure that there is zero biodegradable or recyclable waste to landfill by 2026.
  - meet or exceed the municipal waste recycling target of 65 per cent by 2030.
  - meet or exceed the targets for each of the following waste and material streams:
    - a) construction and demolition – 95 per cent reuse/recycling/recovery

    - b) excavation – 95 per cent beneficial use
- the equivalent of 100 per cent of London's waste should be managed within London (i.e. net self-sufficiency) by 2026.

Implications for the Waste Local Plan

- Include objectives for new and existing waste sites to promote circular economy practices as well as for circular economy practices to be supported through other activities that support resource conservation, re-use and recycling and reductions in waste going for disposal.
- Include objectives for full net self-sufficiency for waste management for the affected area.
- Include objectives to identify compensatory waste capacity where the loss of waste sites is possible.

Implications for the IIA

- The London Plan sets out a series of intentions for waste management policy, the design and operation of waste sites and the design and operation of all built developments in London. As such, it has a number of implications for the IIA on environmental, social and economic factors to be assessed. In particular, key implications from policies specifically aimed at waste policy and waste sites are to:
    - Include objectives and site assessment criteria for waste facilities to be integrated with non-waste related development and provide other local benefits.
    - Include objectives for achieving circular economy principles.
    - Include objectives for renewable energy generation.
    - Include objectives for greenhouse gas savings.
    - Include objectives for reducing impact on amenity in surrounding areas to waste sites.

- Include objectives that support waste minimisation.
- Include objectives and site assessment criteria to ensure waste sites are developed in accessible locations.

London Environment Strategy (2022)

Key objectives relevant to the Waste Local Plan

- This strategy of the Greater London Authority has a range of environmental objectives including for London to become a 'zero waste city'. This means that by 2026 no biodegradable or recyclable waste will be sent to landfill, and by 2030 65 per cent of London's municipal waste will be recycled. It also aims for London boroughs, businesses and the waste industry to increase the availability of recycling facilities and services.

Key targets and indicators relevant to the Waste Local Plan

- By 2026 no biodegradable or recyclable waste will be sent to landfill.
- By 2030 65 per cent of London's municipal waste will be recycled.
- By 2030 75 per cent minimum target for business waste recycling.

Implications for the Waste Local Plan

- Ensure a net zero waste capacity.
- Develop policies that support the creation of, recycling facilities.
- Develop policies in relation to waste sites that support households and commercial entities to recycle (including reuse, repair, and remanufacturing services).

Implications for the IIA

- Include objectives and sites criteria that prioritise the movement of waste up the waste hierarchy and away from landfill

Climate Action Strategy 2020-2027 (2020)

Key objectives relevant to the Waste Local Plan

- The main objective of the Climate Action Strategy is for London to become a zero carbon city by 2050. This requires zero emissions from all transport and buildings, and any residual emissions in London to be offset.

Key targets and indicators relevant to the Waste Local Plan

- The London wide actions are:
  - 40% reduction in CO2 between 2018 and 2022
  - 50% reduction in CO2 between 2023 and 2027
  - Zero waste to landfill in 2026
  - 15% of demand for energy will be met by renewable and district heating sources
  - 60% reduction in CO2 between 2028 and 2032

Implications for the Waste Local Plan

- Consideration of policy to meet the requirement of zero waste to landfill across London by 2026.
- Consideration of policy to reduce emissions across the plan period.

Implications for the IIA

- Inclusion of a sustainability objective and site assessment criteria in relation to the reduction of CO2 and the complete diversion of waste from landfill by 2026

Local Nature Recovery Strategy (*Upcoming*)

The Greater London Authority is currently preparing a Local Nature Recovery Strategy for London. This is a new system of spatial biodiversity strategies that will involve all 33 of the London boroughs as well as its six neighbouring counties, including Essex. It will provide a statement of London's strategic biodiversity priorities and a fully updated and comprehensive spatial habitat map.

The strategy is intended to be completed in 2025.

Accessible London: Achieving an Inclusive Environment Supplementary Planning Guidance (2014)

Key objectives relevant to the Waste Local Plan

- The document makes reference to the separate Housing SPG for London which requires new housing developments to make communal facilities and any storage facilities for waste and recycling to be accessible to all residents, including children and wheelchair users.

Key targets and indicators relevant to the Waste Local Plan

- No indicators or targets above those in the London Plan.

Implications for the Waste Local Plan

- Consider the inclusion of policy in relation to accessible spaces

Implications for the IIA

- Inclusion of a sustainability objective and site assessment criteria for waste sites and their accessibility.

Optimising Site Capacity: A Design-led Approach LPG (2023)

Key objectives relevant to the Waste Local Plan

- The LPG provides guidance on delivering the requirements of London Plan policies:
  - Policy D1 London's form, character and capacity for growth – Part (B3)
  - Policy D3 Optimising site capacity through the design-led approach Policy
  - D4 Delivering good design
- The design capacity approach applies to all existing site allocations as well as any new sites that come forward for development.

Key targets and indicators relevant to the Waste Local Plan

- Use of the 'Indicative Capacity Toolkit'
- Indicators within the toolkit provide additional detail in relation to the London Plan, and do not set further targets.

Implications for the Waste Local Plan

- Consideration of policy and site allocations through use of the toolkit to determine suitable capacity of development on allocated waste sites and other new waste development.

Implications for the IIA

- Inclusion of objectives relating to site capacity, green infrastructure, SuDS, accessibility and heritage

Characterisation and Growth Strategy (2023)

Key objectives relevant to the Waste Local Plan

- The Characterisation and Growth Strategy guidance provides information on how to carry out a borough or neighbourhood-wide character assessment (or study). This assessment should be used to inform a borough or neighbourhoods growth strategy, setting out how an area will change in the future. This includes identifying if and where there are locations where tall buildings may be appropriate.

Key targets and indicators relevant to the Waste Local Plan

- The Characterisation and Growth Strategy guidance relates to the implementation of London Plan polices:
  - Policy D1 London's form, character and capacity for growth
  - Policy D2 Infrastructure requirements for sustainable densities
  - Policy D3 Optimising site capacity through the design-led approach
  - Policy D9 Tall buildings
  - Policy HC1 Heritage conservation and growth
  - Policy SD9 (Part B) Town centres: Local partnerships and implementation

Implications for the Waste Local Plan

- Consideration of the location of waste sites in relation to the relevant Characterisation and Growth Study for each borough or neighbourhood.

Implications for the IIA

- Inclusion of objectives and site assessment criteria in relation to local characterisation and growth studies

Air Quality Positive (2023)

Key objectives relevant to the Waste Local Plan

- The Air Quality Positive approach is a process of identifying and implementing ways to push development beyond compliance with both the Air Quality Neutral benchmarks and the minimum requirements of an air quality assessment.

Key targets and indicators relevant to the Waste Local Plan

- Maximising improvements to air quality through consideration of design and layout, transport and energy.

Implications for the Waste Local Plan

- Consideration of policy to demonstrate a holistic approach to the improvement of air quality.

Implications for the IIA

- Inclusion of objectives and site assessment criteria to minimise effects on air quality.
- Inclusion of 'in combination' assessment in relation to effects on air quality.

Air Quality Neutral (2023)

Key objectives relevant to the Waste Local Plan

- To improve air quality by a reduction in emissions from the built environment.

Key targets and indicators relevant to the Waste Local Plan

- The document sets out a range of targets in relation to the emissions from heating or cooling buildings, and the effects of any trip rates associated with an individual development proposal.

Implications for the Waste Local Plan

- Consideration of site allocations in locations where trip rates will be reduced
- Consideration of policy in relation to energy from waste

Implications for the IIA

- Inclusion of objectives and site assessment criteria in relation to the reduction of emissions from waste facilities.
- Inclusion of objectives and site assessment criteria in relation to sustainable transport.

‘Be Seen’ energy monitoring guidance (2023)

Key objectives relevant to the Waste Local Plan

- The Be Seen energy monitoring guidance sets out a process of monitoring energy performance in development from planning through to 'as built' stages.

Key targets and indicators relevant to the Waste Local Plan

- Policy SI 2 of the London Plan.

Implications for the Waste Local Plan

- Consideration of policy to implement the requirement of new waste facilities to demonstrate energy performance.

Implications for the IIA

- Inclusion of objectives in relation to energy use and reduction in emissions

Circular Economy Statements (2022)

Key objectives relevant to the Waste Local Plan

- This document provides guidance for developers on producing Circular Economy Statements for new developments in London. Developers must produce statements on waste management from development and

operational waste management plans should be produced as part of the Circular Economy Statements, satisfying the London Plan and London Environment Strategy (see above)

Key targets and indicators relevant to the Waste Local Plan

- As a guidance document for producing statements that show conformity with the London Plan Policy SI7 on Circular Economy and the London Plan and London Environment Strategy (see above) more broadly, it does not contain new targets or indicators to meet.

Implications for the Waste Local Plan

- Consideration of policy in relation to the requirements and outputs of Circular Economy Statements.
- Consider the requirements of new types of waste facilities to meet demands in relation to the circular economy.

Implications for the IIA

- Inclusion of objectives in relation to the circular economy and waste minimisation.
- Inclusion of site assessment criteria in relation to waste sites needed to support the circular economy.

Energy Planning Guidance (2022)

Key objectives relevant to the Waste Local Plan

- This document provides Greater London Authority guidance on preparing energy assessments as part of planning applications. It provides some guidance for waste facilities that intend to produce fuel on maximising heat and power opportunities. The updated guidance confirms that all major developments in London must continue to meet the London Plan net zero carbon target by following the energy hierarchy (Policy SI 2), the heating hierarchy (Policy SI 3) and by maximising on-site carbon reductions.

Key targets and indicators relevant to the Waste Local Plan

- As a guidance document for producing statements that show conformity with the London Plan Policy SI7 on Circular Economy and the London Plan and London Environment Strategy (see above) more broadly, it does not contain new targets or indicators to meet.

Implications for the Waste Local Plan

- Major non-residential development is included within the scope of the guidance, including the requirement for non-carbon heating.
- Possible opportunities and demand for energy from waste facilities

Implications for the IIA

- Inclusion of objectives that take account of the requirement for carbon reduction within new waste developments

The Control of Dust and Emissions During Construction and Demolition (2014)

Key objectives relevant to the Waste Local Plan

- This document provides guidance on the control of dust and emissions during construction and demolition, responding to the requirements of the London Plan 2011. As such it does not provide new objectives relevant to the Waste Local Plan.

Key targets and indicators relevant to the Waste Local Plan

- This document provides guidance on the control of dust and emissions during construction and demolition, responding to the requirements of the London Plan 2011. As such it does not provide additional objectives relevant to the Waste Local Plan.

Implications for the Waste Local Plan

- Implications for all sites producing construction and demolitions wastes which may have an impact on waste streams

Implications for the IIA

- Include objectives for new or existing waste sites in relation to dust suppression and reduction of emissions

Whole Life-Cycle Carbon Assessments (2022)

Key objectives relevant to the Waste Local Plan

- This document provides guidance for explains how to prepare a Whole Life-Cycle Carbon (WLC) assessment in line with Policy SI2F of the London Plan 2021. As such it does not provide new objectives relevant to the Waste Local Plan.

Key targets and indicators relevant to the Waste Local Plan

- This document provides guidance for explains how to prepare a WLC assessment in line with Policy SI2F of the London Plan 2021. As such it does not provide new targets relevant to the Waste Local Plan.

Implications for the Waste Local Plan

- Consideration of WLC in relation to new or expanded waste sites.

Implications for the IIA

- Inclusion of WLC in objectives relating to climate change.

Sustainable Transport, Walking and Cycling LPG (2022)

Key objectives relevant to the Waste Local Plan

- This document provides guidance for plan-makers and developers on transport, walking and cycling in London, including the protection of planned schemes.

Key targets and indicators relevant to the Waste Local Plan

- None above the requirements of the London Plan.

Implications for the Waste Local Plan

- Consideration of the location new or expanded waste sites in relation to the effects on sustainable transport networks.

Implications for the IIA

- Inclusion of objectives and site assessment criteria relating to the impacts of waste sites on sustainable transport networks.

Urban Greening Factor (2023)

Key objectives relevant to the Waste Local Plan

- The Urban Greening Factor is a tool used to evaluate the quality and quantity of natural features proposed as part of a development application,

such as planting, waterbodies, and green roofs, collectively referred to as urban greening. This document advises developers on how to meet these requirements under London Plan Policy G5 Urban Greening.

Key targets and indicators relevant to the Waste Local Plan

- The Urban Greening Factor tool sets out design considerations in relation to the natural and built environment and provides a score in terms of meeting the aims of policy G5 of the London Plan.

Implications for the Waste Local Plan

- Consideration of the location of waste sites in relation to Sites of Importance for Nature Conservation (SINC), the Public Realm and Sustainable Drainage Systems (SuDS), as well as the potential opportunities for biodiversity in relation to roofs and facades of buildings.

Implications for the IIA

- Inclusion of objectives and site assessment criteria relating to SINCs, SuDS, and biodiversity gain.

London Sustainable Drainage Action Plan (2015)

Key objectives relevant to the Waste Local Plan

- This document is a long-term plan to coordinate the development of ‘sustainable drainage’ systems across London. The plan has been developed by the Drain London Programme, a partnership of the Mayor of Londin, Environment Agency, London Councils and Thames Water. It sets

out a range of actions for each major land-use sector including major utilities. As such, it makes very brief mention of some waste management sites likely being able to deliver SuDS cost-effectively.

Key targets and indicators relevant to the Waste Local Plan

- To achieve a 1% reduction in surface water flows in the sewer network each year for 25 years, resulting in a 25% reduction in flows by 2040.

Implications for the Waste Local Plan

- Consideration of policy and site allocations in relation to sustainable drainage within a London wide context.

Implications for the IIA

- Inclusion of objectives and site assessment criteria in relation to urban drainage

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ELJWP

East London Joint Waste Plan

Regulation 19 Submission Plan

Consultation Statement

Date: 12.02.25

Barking & Dagenham

Havering LONDON BOROUGH

Newham London

London Borough of Redbridge

Contents

Abbreviations:

- CCS - Carbon Capture and Storage
- CCUS - Carbon Capture, Utilisation and Storage
- CDE - Construction, Demolition, and Excavation waste
- EA – Environment Agency
- EfW – Energy from Waste
- GLA – Greater London Authority
- LP – London Plan
- SIL – Strategic Industrial Location
- SRN – Strategic Road Network
- TfL – Transport for London
- WPA – Waste Planning Authority

1 Introduction

Purpose

1.1 This Consultation Statement sets out how the East London Boroughs of Barking & Dagenham, Havering, Newham and Redbridge have involved residents and stakeholders in preparing the East London Joint Waste Plan 2025 to 2041 (ELJWP) in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (the 'plan making Regulations').

1.2 This Consultation Statement has been prepared to accompany the publication of the 'Submission Draft' ELJWP in accordance with Regulation 19 of the plan making Regulations. The Statement is intended to demonstrate that consultation during the preparation of the ELJWP has been undertaken in accordance with the relevant Regulations and the 'East London Joint Waste Plan Consultation Protocol'. This Consultation statement is therefore intended to inform representations made at the Regulation 19 stage related to whether the Plan has been prepared in accordance with the Regulations concerning consultation.

1.3 The East London Joint Waste Plan Consultation Protocol document sets out how the Boroughs will consult and involve the public, statutory consultees and other organisations when preparing the ELJWP. The latest version of the Consultation Protocol can be viewed on the consultation website. This statement therefore considers the actual consultation activities undertaken and how they compare with those set out in the consultation protocol.

1.4 This Consultation Statement comprises four sections as follows:

- Section 1 (this section) provides an introduction;
- Section 2 sets out the timeline which has been followed in preparing the East London Joint Waste Plan which is in accordance with the Boroughs' Local Development Schemes;
- Section 3 summarises the consultation process.
- Section 4 summarises main issues raised during the consultation carried out under Regulation 18 and how the comments received have been considered by the Boroughs. Section 4 is supported by Appendix 1 which provides more detail concerning the comments received and Boroughs' responses.

2 Plan Production Timeline

2.1 The creation of a new Waste Local Plan requires thorough and robust consultation. Engagement with the local community, businesses and organisations helps develop a plan that is tailored to the needs of the area in terms of strategy and the policies required.

2.2 The timetable below outlines the main stages of preparing the ELJWP, including publication of the Submission Draft ELJWP for representations in accordance with Regulation 19 of the plan making Regulations.

Key Plan Production Stages

Stage 1: Identify issues and collect evidence

2.3 In 2023, the four East London Boroughs agreed to jointly update the adopted East London Waste Plan. Preparation of the first draft replacement ELJWP (Regulation 18 draft) involved the following steps:

- Reviewed policies in the adopted East London Waste Plan and the adopted and emerging Borough Local Plans;
- Reviewed national and regional policy, in particular:
  - National Planning Policy Framework
  - National Planning Policy for Waste
  - The London Plan 2021
- Undertook a Waste Needs Assessment to establish the extent to which existing waste management capacity would be able to meet requirements for waste management over the Plan period, including the London Plan apportionments

2.4 From the above, the Boroughs identified the issues that needed to be addressed by the ELJWP and approaches to addressing them.

2.5 A draft Vision and Strategic Objectives were prepared setting out how the Boroughs would like to see land used for waste management in East London to 2041. Planning policies were drafted which are to be used when determining planning proposals. Text was also drafted for inclusion in the Plan to set out the vision and objectives, justify the policies and explain how they are to be implemented in practice.

Stage 2: Draft Local Plan consultation – July-September 2024

2.6 The Boroughs consulted on a full draft version of the ELJWP for a seven-week period between Monday 29 July and Monday 16 September. An evidence base was published alongside the draft ELJWP. The documents published are listed below:

- Draft East London Joint Waste Plan (July 2024)
- Draft East London Joint Waste Plan (July 2024) - Appendix 2
- Integrated Impact Assessment for the ELJWP
- Habitats Regulations Assessment for the ELJWP
- Circular Economy Topic Paper
- Climate Change Topic Paper
- Waste Management Topic Paper
- Assessment of Existing Waste Management Capacity Report
- Hazardous Waste Baseline and Arisings Report
- Construction, Demolition, & Excavation Waste Baseline and Arisings Report
- Strategic Waste Flows Report
- Release of Safeguarded Waste Sites Report
- ELJWP Consultation Protocol

Stage 3: Plan amendments and evidence base update – October 2024-January 2025

2.7 The Boroughs considered the comments received during the draft ELJWP consultation. The evidence base documents were updated, including the Integrated Impact Assessment, Capacity Assessment and assessment of sites for release from safeguarding. The ELJWP was updated to take account of the comments and ensure that it is sound i.e. Positively prepared; justified; effective; and, consistent with national policy.

Stage 4: Publish the Plan (Submission Plan Reg 19) – Mid 2025

2.8 In accordance with Regulation 19 of the plan making Regulations, a submission ready version of the ELJWP is being made available for stakeholders and the public to make representations on its soundness and legality for a statutory minimum period of 6 weeks. In accordance with the Local Plan Regulations, this consultation is formal and statutory, seeking comments specifically on the Plan's soundness for Examination in Public.

Stage 5: Submission to the Secretary of State: Late 2025/early 2026

2.9 The Boroughs will assess the representations received during the Regulation 19 formal consultation to confirm that they consider the ELJWP to be sound and therefore, that it can be submitted for examination by an independent inspector appointed by the Secretary of State.

Stage 6: Examination: Early-mid 2026

2.10 The Plan will be examined by an independent Planning Inspector.

Stage 7: Adopt - Late 2026

2.11 Subject to the Plan being found sound and legally compliant by the Inspector, the Plan will be adopted in late 2026.

3 Summary of Regulation 18 Consultation Process

3.1 During the preparation of the ELJWP a draft Plan was published for consultation for a period of seven weeks between 29 July and 16 September 2024. The Plan and the evidence base documents were made available for viewing online and hard copy documents were made available in each borough. Bodies and persons were invited to make representations under Regulation 18.

3.2 A total of approximately 2,665 organisations and individuals were specifically notified of the consultation and invited to make comments during the consultation. These included the following:

- All 32 London Borough Councils and the City of London Council.
- All joint waste authorities in London
- 24 Waste Planning Authorities outside of London
- The waste management industry (77 waste site operators/owners)
- Representatives from statutory and non-statutory consultees and other Duty to Cooperate prescribed bodies as follows:
  - Coal Authority
  - Department for Education
  - Environment Agency
  - Historic England
  - Marine Management Organisation
  - Natural England
  - NHS
  - Highways England / Highways Agency
  - Network Rail
  - Office of Rail and Road
  - Transport for London
  - Port of London Authority
  - Canal and River Trust
  - UK Power Networks
  - Thames Water
  - Anglian Water
  - Essex and Suffolk Water
  - National Grid
  - Cadent Gas
  - Homes England
  - Greater London Authority
  - London Local Nature Partnership
  - Sport England

How bodies and persons were invited to make representations

3.3 All contacts on the Boroughs' planning consultee databases, including statutory consultees, interested stakeholders and waste organisations were notified of the consultation directly via email on 29 July 2024. All emails included details of the consultation, how to make comments, and an invitation to attend events (drop-ins and online event).

3.4 Each Borough published a press notice about the consultation in their local newspapers and also published information on their social media channels.

3.5 The Regulation 18 public consultation on the ELJWP was facilitated using a bespoke website hosted by the London Borough of Havering (https://consultation.havering.gov.uk/planning/east-london-joint-waste-plan/). All consultation documents were available to view on the website from 29 July 2024.

3.6 Hard copies of the draft ELJWP were made available for inspection at the boroughs' main offices (Barking Town Hall, Havering Town Hall, Newham Dockside and Redbridge Town Hall), at Dagenham Library and local libraries in Newham.

3.7 All contacts were invited to an on-line consultation event which took place on 14 August 2024. The event was recorded and made available for viewing on the consultation website.

3.8 Further information about the ELJWP and the consultation was set in 'Frequently Asked Questions' which were published on the consultation website.

3.9 A feedback form was provided specifically for use in submitting comments and queries either by email or post.

3.10 Two drop-in sessions were held in each borough throughout the consultation period as detailed below. These sessions allowed anyone with an interest to request further information about the ELJWP in-person from representatives of the Borough Planning Policy teams.

Location	Date	Time
Redbridge Central Library (Studio 2), Clements Road, Ilford, IG1 1EA	5 August 2024	4pm - 6pm
Rainham Library, 6 Celtic Farm Road, Rainham RM13 9GP	6 August 2024	2:30pm – 4:30pm
East Ham Library (Café area), 328 Barking Rd, London E6 2RT	15 August 2024	5pm - 7pm

Location	Date	Time
Barking Town Hall (Committee Room 2) 1 Clockhouse Ave, Barking IG11 7LU	21 August 2024	3pm – 5pm
Romford Library, St Edwards Way, Romford RM1 3AR	28 August 2024	9:30 – 11:30am
Dagenham Learning Centre, 1 Church Elm Ln, Dagenham RM10 9QS	4 September 2024	11am - 1pm
Keith Axon Community Centre, 160 Grove Road, Chadwell Heath, Redbridge RM6 4XB	10 September 2024	4pm - 6pm
Stratford Library, 3 The Grove, Stratford, London, E15 1EL	12 September 2024	10am-12noon

Other consultation activity

3.11 Representatives of the boroughs attend the London Waste Planning Forum and were able to inform its members of the upcoming consultation and to remind them when the consultation was taking place. Relevant meetings of the LWPF took place on 8 November 2023 and 1 August 2024.

3.12 Meetings were held, and further correspondence took place, with certain stakeholders on parts of the Plan which were of particular interest to them as listed below:

- GLA
- East London Waste Authority
- Thames Water
- London Borough of Tower Hamlets
- Network Rail
- Legal and General
- Thurrock Council

3.13 In addition to the above, informal conversations about the ELJWP were held with representatives of the Boroughs preparing the West London Waste Plan. Where it was identified that a potentially strategically important quantity of waste which arose in the ELJWP area was being managed outside of the area, the relevant waste planning authority was contacted to obtain views on the importance of the movement, its quantity and whether that movement would be able to continue over the period of the ELJWP. Full details of which are laid out in the Duty to Cooperate statement.

4 Outcome of Consultation - Summary of Main Issues Raised

4.1 52 responses were received in total with the following breakdown of respondents:

- London Borough Councils = 2
- Joint waste authorities in London = 2
- Waste Planning Authorities outside of London = 3
- The waste management industry = 11
- Statutory consultation bodies = 12
- Utilities companies = 4
- Individuals = 18

4.2 A table has been prepared which summarises all the issues raised the consultation, and how these issues have been addressed, as appropriate, in the Regulation 19 Submission Draft East London Joint Waste Plan. This table is included in Appendix 1 of this document.

4.3 A summary of the main issues raised and how these have been addressed is included below:

Introduction and Background

- Broad support for the Plan's alignment with circular economy principles.
  - Response: Noted.
- Need for updates to context regarding the water environment and management of wastewater.
  - Response: Relevant text updated and added.
- Need for updates to context regarding the East London Waste Authority and the East London Joint Waste Strategy.
  - Response: Relevant text updated and added.

Policy and Strategic Framework

- Strong support for minimising waste from development and achieving net zero in waste management by 2041.
- Need to reference protection of historic environment
  - Response: Relevant updates made to Strategic Objective 3 and Policy JWP4.
- Need for specific policy and text addressing development associated with treatment of wastewater e.g. upgrades at Beckton and Riverside Sewage Treatment Works.
  - Response: Text of Plan amended with specific reference to wastewater (including changes to policies JWP3 and JWP4) and new

Policy JWP2A included to address wastewater and sewage sludge management development. Specific consultation distances for development proposed proximate to waste water treatment works have been added,

- Concerns raised regarding location and environmental impacts of incineration facilities managing East London's waste.
  - Response: Such facilities require Environmental Permits issued by the EA intended to control pollution; policy is also included in the Plan to address environmental impacts associated. Policy JWP2 strengthened regarding the protection of residential amenity. Text in Section 2 updated to provide details of locations of potential facilities.
- Request that the Plan acknowledges 'secure by design' principles.
  - Response: Supporting text and Policy JWP 4 updated to reference 'secure by design'
- Concern that waste sites are often not suitable for educational visits
  - Response: Requirement for educational facilities at waste facilities has been deleted from Policy JWP1.

Transportation

- Support for alternative transportation modes, particularly utilising the River Thames, to reduce road congestion and emissions.
  - Response: Support noted. Objective SO7 amended to emphasise need for energy efficiency in transport methods.
- Concerns about traffic impacts.
  - Response: Policies ensure any proposals account for traffic mitigation measures. Policy JWP4 has been strengthened to ensure applications consider the safety of road users. Text clarifying the need for, and content of, Travel Plans and Transport Assessments to be submitted with applications has been added.

Safeguarding

- Concern that Plan is not in general conformity with London Plan policy on the safeguarding of waste management sites and that there is a need to retain strategic sites, including Eurohub and Renwick Road Rail Hub, for future waste management.
  - Response: Proposed release of sites will not have a strategic impact on the ability of waste arising in East London (or elsewhere in London) to be managed in future. Release of some sites is necessary to facilitate other forms of development for which there is a critical shortage e.g. housing or the intensification of industrial land. Other Boroughs were invited to request surplus capacity as part of their plan making. Clarification added

to Policy JWP2 (and supporting text) regarding which category of sites will be safeguarded in relation to status in planning law.

- Some support for site releases to facilitate housing development but the need to mitigate potential conflicts with adjacent industrial uses was highlighted.
  - Response: Proposed release of sites will not have a strategic impact on the ability of waste arising in East London (or elsewhere in London) to be managed in future. Release of some sites is necessary to facilitate other forms of development for which there is a critical shortage e.g. housing or the intensification of industrial land. Clarification added to Policy JWP2 (and supporting text) regarding which category of sites will be safeguarded in relation to its status in planning law.
  - Response: Agent of Change principles in the NPPF and specific policy JWP3 are intended to ensure redevelopment does not impact on ability of existing sites to manage waste.

Future Waste Management Capacity Requirements

- Inconsistencies in data on waste between the Plan and supporting Waste Needs Assessments were noted.
  - Response: Waste data in Plan updated and cross-checked to ensure accuracy and alignment with evidence base reports.
- Concerns about grouping all Construction, Demolition, and Excavation (CDE) Waste CDE waste types into a single category.
  - Response: Supporting evidence base provides disaggregated data for CDE waste components.
- Concerns about the Plan's reliance on export of inert waste to other areas for landfill were raised
  - Response: Text added to clarify that the availability of land in East London for the deposit of inert excavation waste is more constrained and so such waste is frequently transported to areas outside of London for management. This is recognised in paragraph 9.8.1 of the London Plan 2021 which observes that target net self-sufficiency by 2026 does not relate to this waste stream.

Appendix 1: Analysis of Comments received to Regulation 18 consultation on the Draft East London Joint Waste Plan from July to September 2024

Part of Plan	Summary of comment	Borough Response including action arising
1. Introduction and Background		
Para 1.16	Support for recognition that the planning system should not duplicate other regulatory regimes, an often overlooked but crucial concept. *[Heidelberg Materials UK]*	Noted. No action arising.
General	Support the proposed requirement that all local authorities must collect food waste weekly. *[resident]*	Noted. No action arising.
2. The Context		
General	Initiatives used in other countries to improve recycling rates should be adopted. Good examples include Germany and Switzerland. There is a need for more recycling sites and bins made available to households. *[resident]*	Plan is consistent with current Government policy and takes account new impacts of new initiatives intended to improve recycling such as consistent collection, DRS and EPR. JWP1 intended to ensure development comes forward that allows for greater recycling by ensuring appropriate storage for recyclate is included. No action arising.
	Concerns about littering causing accidents like slips and trips. In Rwanda there are fines for littering which are very effective - keeps city hygienic. *[resident]*	Provision of waste facilities as proposed by the Plan will help reduce litter. Policy JWP4 intended to ensure that litter is not produced from waste management facilities. No action arising.
	Fly tipping an issue in East London. *[Metropolitan Police Service and resident]*	The Plan safeguards existing waste management sites and provides for the development of new ones to ensure there is sufficient capacity to allow waste to be managed lawfully. No action arising.

Part of Plan	Summary of comment	Borough Response including action arising
Paragraph 2.10	Mention of Epping Forest SAC as a key designated site is welcomed *[Natural England]*	Noted. No action arising.
Paras 2.21-2.23	Updates to context needed regarding the water environment and management of wastewater. *[Environment Agency (EA)]*	Text in chapter 2 updated accordingly.
Para 2.33	Para 2.33, states that 480,000t waste produced and 190,000t were burnt, 130,000t recycled and only 117t sent to landfill so 160,000t needs explaining. *[resident]*	Values have been checked and updated as necessary.
Para 2.33	Please specify where incineration of waste arising in East London waste takes place - it would be better to manage within East London. *[resident]*	Information included in paragraph 2.33. The total capacity of waste management facilities in East London exceeds that which arises in East London. Waste is transported across boundaries for Management by EfW, especially in London due to economies of scale.
Paragraph 2.35	Agree that most CDE waste can be recycled or recovered, provided suitable facilities are available. *[Heidelberg Materials UK]*	Noted. No action arising.
Para 2.45-2.47	Thames Water is the statutory sewerage undertaker for the Boroughs of Newham, Redbridge and majority of Barking & Dagenham. The key sewage treatment works (STW) is Beckton STW, but there are strategic sewage pumping stations in these Boroughs. Support reference to wastewater and sewage sludge in paras 2.45-2.47, ELJWLP recognises the need for ongoing development at Beckton STW during the plan period i.e. up to 2041. *[Thames Water]*	New policy JWP2A added which includes supporting text with details of expected upgrades.
	Havering Borough includes our Riverside STW which will also require upgrading during AMP8 so support should be included for this. *[Thames Water]*	New policy JWP2A added which includes supporting text with details of expected upgrades.
	There is a need for a specific wastewater treatment/sewage sludge policy as fundamentally, waste water treatment has different geographical and technical requirements from other forms of waste management. *[Thames Water]*	New policy JWP2A added which includes supporting text with details of expected upgrades.
Para 2.73 and 2.74	Support for CCS and CCUS technologies in EfW facilities though this is still in early stages. Priority should continue to be reducing overall carbon emissions through	No action arising.

Part of Plan	Summary of comment	Borough Response including action arising
	heat capture for re-use as a low carbon heat source (secondary heat recovery) wherever possible. *[Barking Riverside Ltd]*	Noted. ELJWP5 sets out need for CCUS and heat capture associated with EfW.
Para 2.7	Support for recognition of road congestion issues in the ELJWP in particular those affecting the A12 and A13. *[City of London Corporation]*	Noted. No action arising.
Para 2.88	Statement that excavation waste is excluded from LP net self-sufficiency target as it is difficult to recycle is incorrect as it being more difficult for London to provide sites for management or beneficial use. *[Thurrock Council]*	Excavation waste is used for beneficial recovery rather than recycling as it is not suited to recycling. Beneficial use sites normally have significant footprints and therefore accommodating such projects within the confines of the urban area of London is challenging. No action arising.
2.99	LP requirement to share any surplus capacity with boroughs facing a shortfall before considering release of site from safeguarding protection is supported. In deciding which sites to offer to other boroughs consideration should be given to those best located to meet their needs to minimise vehicle miles. Riverside and perhaps rail side sites could be well suited in locational terms. *[TfL]*	The sharing of apportionment does not (and cannot) involve identification of specific sites with surplus capacity for specific waste types as the Plan cannot dictate which existing sites are used to serve which areas. No action arising.
Paragraphs 2.112 to 2.118	Text is not quite accurate as to the nature of East London Waste Authority (ELWA) or the East London Joint Resources and Waste Strategy (2027-57). *[ELWA]*	Text updated in accordance with ELWA advice.
Pages 4 and 5	Other than reference to heritage and archaeology in the geographical context section of the Plan, there is no reference to the historic environment which could be included at bullet point 5 in relation to projects designed to increase or upgrade waste management capacity. *[Historic England]*	Text added to overarching approach in executive summary.
3. Vision		
	Support for circular economy principles, aiming for landfill to be a last resort by 2041, and high-quality restoration of landfill sites. *[Various]*	Noted. No action arising.
	Support for the Vision – consistent with water industry approach. *[Water industry]*	Noted. No action arising.
	Support for Vision that waste will be managed efficiently by maximising existing capacity of facilities, releasing underutilised or poorly located sites, minimising	Noted. No action arising.

Part of Plan	Summary of comment	Borough Response including action arising
	transportation and using infrastructure established for alternative means of waste movement, in particular via the River Thames. *[Port of London Authority]*	
	Waste industry cannot control products on market; *[Integrated Skills Ltd]*	Noted. No action arising.
	Vision needs to cover 'prevention' level of waste hierarchy; *[resident]*	Already addressed by the Vision which states *'By 2041, the principles of the circular economy will be fully integrated into all forms of development within East London, resulting in reduced waste production'.* No action arising.
	Positive Vision but not reflected in Plan or background documents. Specifically no information on transport of waste to authorities in the East of England. *[East of England Waste Technical Advisory Body]*	Figure 8 displays the balance between imports and exports by waste management method and waste type to and from East London in 2022. The report 'Identification of Strategically Significant Cross Boundary Waste Movements', BPP Consulting, April 2024 includes more details. No action arising.
	Vision and objectives should recognise the importance of the Local Nature Recovery Strategy being developed by the Greater London Authority (GLA) in helping to establish wider ecological connectivity. *[Natural England]*	The Vision and strategic objectives address the need to improve the natural environment (including biodiversity) in broad terms. Detail regarding the Local Nature Recovery Strategy being developed by the GLA has been inserted chapter 2 and in the supporting text to JWP4
Strategic Objectives		
SO1	Support for minimising waste from development. *[resident]*	Noted. No action arising.
	Net zero in waste management by 2041 will be difficult when waste industry cannot control products on market; *[Integrated Skills Ltd]*	The Government is introducing other initiatives to control products in the market that do not involve the waste industry. No action arising.

Part of Plan	Summary of comment	Borough Response including action arising
SO2	No specific comments	No action arising.
SO3	Strategic Objective 3 should also refer to the historic as well as natural environment. *[Historic England]*	Noted. Text of SO3 has been updated accordingly.
	Strategic Objectives 3 and 7 need to consider location of waste management capacity for those without access to a private car. For example, Havering has the Gerpins Lane RRC which is not accessible to anyone without a car. *[resident]*	Other communal facilities, not just, Reuse and Recycling Centres, and services are available for the management of waste from households. No action arising.
SO4	Support for strategic objective 4 seeking to ensure the high-quality restoration and aftercare of landfill sites maximize benefits to the community and the environment. *[Henry Boot Developments (HBD) and Barings]*	No action arising.
SO5	Does net zero include the production and use of the products, or just what happens after they become waste *[ELWA]*	The objective is concerned with achieving net zero in the management of waste I.e. how materials (which are waste) are managed. Although the use of recycled materials in the production of goods (or reduction in the use of materials e.g. light-weighting of packaging) reduces carbon impacts this is beyond the Plan's control except where those goods/materials are used in construction or refurbishment of development that requires planning permission. No action arising.
	Does plan consider fossil-based emissions, and biogenic emissions - if so how will they be distinguished from one another? *[ELWA]*	The issue of distinguishing between fossil based and biogenic based carbon emissions only arises with regard to development of new energy from waste capacity. In such a case it will be necessary to make such a distinction as energy derived from biogenic sources is offset by the carbon absorbed when the biogenic material is produced whereas the production of fossil based material (mainly plastic) does not involve absorption of carbon.

Part of Plan	Summary of comment	Borough Response including action arising
	Are emissions being counted even after waste has been exported, whether to other regions or abroad? *[ELWA]*	No because controlling the way in which exported waste is managed is beyond the remit of the Plan
	Details of benchmarks and models used may be required for other stakeholders to engage effectively on the delivery of this SO *[ELWA]*	Explanatory text is included in relevant policies any benchmarks and models used will have to be consistent with accepted practice at the time an application is made.
SO6	Support for safeguarding existing capacity *[Various including waste industry and local authorities]*	Noted. No action arising.
SO7	Support for alternative modes of transport including the River Thames *[Various including Port of London Authority]*	Noted. No action arising.
	Support SO7's aim to minimise transportation of waste and improve road safety by locating facilities as close as possible to their sources and establishing alternative transport means, including utilising the River Thames and railheads. *[Various including National Highways, Port of London Authority]*	Noted. No action arising.
	SO7 should be strengthened. River transportation is also largely fossil fuel powered. Emphasis should be given to the energy efficiency of transport i.e. water-based transport is considerably more efficient than land-based, regardless of energy source. *[EA]*	Noted. Text of SO7 has been updated accordingly.
	Move toward non road transport is welcomed however would only be realistic for the sites nearest the Thames. This proposal could help to achieve air quality and climate change targets due to less HGVs.	Noted. No action arising.
	Support SO7 which is in line with London Plan Policy T1. To deliver on this objective the strategy should take account of opportunities for the movement of waste by sustainable means, such as by river and rail if appropriate, and also ensuring location of facilities close to major generators of waste and places where there is demand for waste by products as well as reducing the amount of waste. *[TfL]*	Policy JWP2 encourages the development of facilities which are close to arisings and can make use of river and rail transportation. The Plan seeks to minimise waste production via Policy JWP1. No action arising.
SO8	What would amount to exceptional circumstances for landfill? *[Integrated Skills Ltd.]*	This is set out in Policy JWP6

Part of Plan	Summary of comment	Borough Response including action arising
		No action arising.
	Restriction of landfilling to exceptional circumstances welcomed, but unclear if this applies to landfill within the Plan area or outside it. *[East of England Waste Technical Advisory Body]*	The policies of the Plan can only be applied to the area covered by the Plan.
4. Future Requirements for Waste Management Capacity		
	Data in the plan needs cross checking with the Waste Needs Assessment documentation in particular relating to construction demolition and excavation waste. *[Integrated Skills Ltd.]*	Data has been checked and updated to ensure data in Plan is consistent with that in the data reports
	Table needed detailing waste exports. Authorities outside East London are currently not planning for waste from the area and so exported waste may have to travel further resulting in high financial and environmental costs. *[East of England Waste Technical Advisory Body]*	Such a table could be included but this would only be a snapshot. The scale of imports and exports is shown in Figure 8. DtC dialogue underway to establish likely management routes relating to waste exports.
	Add text highlighting that ongoing engagement and robust monitoring with regional waste technical groups and adjoining authorities to further understand the implications of flows of inert excavation waste will be needed. *[East of England Waste Technical Advisory Body]*	Text added to supporting text to JWP6 and related monitoring indicators.
Para 4.5	Combining all forms of construction demolition and excavation waste management together may present misleading picture regarding capacity requirements especially if Demolition and Excavation waste are combined. *[Integrated Skills Ltd.]*	C, D & E waste capacity is considered in greater detail in the separate evidence base report. The London Plan does not distinguish between the components of C, D & E waste other than excavation waste.
Para 4.9	Dialogue sought with respect to sharing surplus capacity to allow Western Riverside Waste Authority boroughs to meet their London Plan apportionments for HIC waste. *[Western Riverside Waste Authority]*	Affected boroughs (Lambeth and Wandsworth) have since confirmed that they do not wish to rely on surplus capacity in the ELJWP.
	Does the capacity assessment consider the impact from changes to the Permitting Regulations which will close sites operating T8 and T9 exemptions? *[Integrated Skills Ltd]*	Details of changes to the permitting regulations are still awaited and so it is not possible to state with any certainty what the impact will be. In any event sites which currently benefit from an

Part of Plan	Summary of comment	Borough Response including action arising
		exemption may continue to operate with an Environmental Permit. Note that if the capacity assessment were to include sites currently operating under the T8 and T9 exemptions, assessed available capacity would increase.
	Encourage further engagement with GLA to ensure there is a more formalised mechanism for accounting for the tonnage of materials shared between the boroughs for apportionment purposes going forward. This is so the overall strategic picture can be planned with more certainty with a pragmatic methodology which suits the needs of London as a whole. *[EA]*	Ongoing engagement with GLA is already taking place. Statement of Common Ground (SoCG) with GLA to be prepared.
5. Sites for Waste Management		
Table 9 Existing Waste Sites Proposed for Release from Safeguarding	London policy requirements relating to release of waste sites have not been met - the loss of any waste site would need evidence of the requisite alternative capacity being provided elsewhere in London – this is a general conformity issue. *[GLA]*	Only a small number of sites are proposed for release and there is substantial surplus capacity remaining. Sites proposed for release are those which are not compatible with wider Borough development aspirations, in particular relating to the provision of housing and regeneration which is also an important use of land. The London Plan allows for sites to be released under such circumstances providing the apportionments are still met and net self sufficiency is not compromised. SoCG with GLA to be prepared.
	If the principle of releasing waste sites is established, their capacity should be offered to boroughs with a shortfall in waste capacity. The GLA is aware that some London boroughs cannot meet their borough apportionment targets and have a shortfall in waste capacity. *[GLA]*	All Boroughs have been contacted and invited to consider whether surplus capacity in East London should be used to help meet waste requirements in their areas.
	All sites with Planning Permission or Environmental Permit should be safeguarded. *[GLA]*	See above.

Part of Plan	Summary of comment	Borough Response including action arising
	Annex of Shed A, Box Lane has full planning permission and an Environmental Permit. Shed A itself has full permission (granted May 2022) and a permit. Both sites located in SIL. Draft B&D Local Plan specifically identifies Box Lane for larger logistics and distribution and heavier industrial activities with rail connections. Removal of Box Lane sites (Eurohub, Shed A and the Annex) is in conflict with the LP and the draft local plan. *[Integrated Skills Ltd.]*	Sites to be released at landowner request as occupancy of waste uses to cease in 2025 and Environmental Permits to be surrendered on vacation.
	Loss of three sites proposed for release are located in the Castle Green Masterplan area: (1) Eurohub Box Lane (D B Cargo) (2) Eurohub Box Lane (Titan Waste) (3) Renwick Road Rail Hub (Biffa Waste Services) This is within SIL – any loss of industrial capacity or changes to SIL designation will need consideration of how any change in status could impact on a borough's industrial capacity and ability to meet its industrial needs as required by LP. *[GLA]*	Renwick Road Rail Hub (Biffa Waste Services) to be safeguarded. Other sites to be released at landowner request to enable the regeneration of the site as a freight terminal, as occupancy of waste uses to cease in 2025 and Environmental Permits to be surrendered on vacation.
	The existing Box Lane (Eurohub) site offers potential for transporting waste by rail including to Europe. Existing plans for redevelopment are entirely dependent on commercial viability; it is crucial that the site be allowed to offer a wide range of capabilities in order to optimise its chance of commercial success and so there is a need for some flexibility in redesignating the site. It will need to be able to handle waste to and from trains and the Plan should not prejudice that capability. *[Legal & General Investment Management]*	The site does not have full planning permission and is currently safeguarded only by virtue of Environmental Permits being in place. Sites to be released at landowner request to enable the regeneration of the site as a freight terminal, as occupancy of waste uses to cease in 2025 and Environmental Permits to be surrendered on vacation.
	Support for not safeguarding the Old Bus Depot waste management site *[City of London Corporation]*	Noted. No action arising.
	Support for not safeguarding the Dagenham Dock Sustainable Industries Park which is allocated in the adopted 2012 ELWP, in particular a site at Plot 64, Hindmans Way, Dagenham Dock, Barking. *[City of London Corporation]*	Noted. Parts of the Dagenham Dock Sustainable Industries Park that accommodate facilities classed as Existing Waste Sites under the London Plan will be safeguarded, but the remaining land currently allocated for waste development will be released.
	The Mayer Parry Wharf site at Bidder Street, London, E16 4ST is safeguarded by the adopted ELWP 2012 but is proposed for redevelopment without compromising	This site has already been effectively released from safeguarding when EMR relocated to Unit 6

Part of Plan	Summary of comment	Borough Response including action arising
	waste capacity within the ELJWP area and should be expressly identified as a site to be released from safeguarding. *[IXDS Ltd]*	Standard Industrial Estate in Newham and so was not counted as an existing waste site in the capacity assessment nor identified in Appendix 1 and 2. There is therefore no need for this site to be mentioned specifically. The site at Standard Industrial Estate is listed in the ELJWP as a safeguarded site.
	Object to release of 5 sites in Barking which will result in 'redirection' of waste to two sites in Newham resulting in increased impacts from traffic. *[resident]*	Unclear which two sites in Newham this comment relates to but existing waste sites have been granted planning permission on the basis that they will not cause unacceptable adverse impacts the highway including congestion. Note that 3 of the site in B&D do not benefit from planning permission for waste, and the remaining two are inactive (hence any waste managed at these sites will already be being managed elsewhere). No action arising.
Paragraph 5.1.2	It could be clarified that the provisions of Paragraph 5.1 indent 2 only apply to Local Plans adopted prior to the adoption of this emerging WLP. *[Barking Riverside Limited]*	Add 'adopted and emerging' before 'Local Plans' to clarify the position.
	Concern that proposals will lead to more traffic in Newham as the airport creates pollution and there are residential buildings and schools around the area. *[resident]*	The Plan includes policy which is intended to ensure new waste management development will not cause unacceptable impacts on congestion.
	Reducing sites when there is ever increasing population is short sighted. *[resident]*	In most case the release of sites is intended to facilitate the development of housing to accommodate the growing population. An assessment of capacity has been undertaken that shows there will be sufficient capacity to meet future needs with release of the sites identified.

Part of Plan	Summary of comment	Borough Response including action arising
		No action arising
	Renwick Road Rail should be safeguarded. *[Biffa]* Strongly oppose the release of railhead sites Barking Eurohub and Renwick Road Railhub from safeguarding due to the potential impact on waste management and the likely impact on sustainable transport initiatives. *[EA]*	The Renwick Road Rail site is now included as a site to be safeguarded. Other Barking Eurohub sites are proposed for released to facilitate redevelopment of the area as a freight terminal in accordance with the Local Plan and in response to landowner request as occupancy of waste uses to cease in 2025 and Environmental Permits to be surrendered on vacation.
	Release of land should take into account whether the site is subject to any specialist transfer or treatment of hazardous waste on site. *[EA]*	This has been undertaken. None of the sites proposed for release provide specialist transfer or treatment of hazardous waste. This information will be included in the evidence base. No action arising.
	As waste is moved up the hierarchy it needs more area per tonne to manage it. It is important that the current waste estate is maintained and loss of sites is minimised, especially those of strategic significance in terms of size or logistical considerations. *[EA]*	Only a small number of sites are proposed for release and there is substantial surplus capacity remaining. Only one of the site proposed for released might be classed as making a strategic contribution to management of East London's waste (Eurohub) and this does not benefit from permanent planning permission for waste. No action arising.
	If sites are to be released for housing, there is a need to consider the relationship with other adjacent remaining industrial and related uses to ensure that it is a feasible and suitable location for residential development taking account of the agent of change principle. We suggest that surplus sites are considered for other similar uses (e.g. bus garages, logistics) when in SIL or LSIS before release. *[TfL]*	Policies of the Borough Local Plans would ensure that proposals for redevelopment of waste sites for residential uses take account of the Agent of Change principle contained in the NPPF and are appropriate for the particular location. No action arising.

Part of Plan	Summary of comment	Borough Response including action arising
	Support approach that no land is proposed to be allocated specifically for the development of additional waste management facilities. *[Henry Boot Developments (HBD) and Barings]*	Noted. No action arising.
	No allocations being proposed means there is less chance of a site allocation having an impact on protected sites *[Natural England]*	Noted. No action arising.
6. Policies		
Policy JWP1: Circular Economy		
	Support for minimising waste from development *[Various]*	Noted. No action arising.
	Support for application of the circular economy to all forms of development. *[Various]*	Noted. No action arising.
	Support for JWP1 – consistent with water industry ambition. *[Water Industry]*	Noted. No action arising.
	Plans for infrastructure support such as sites for construction waste e.g. Circular Economy Construction Hubs) to facilitate a circular economy should be set out. *[Heidelberg Materials Ltd.]*	Noted. No action arising.
	Support for requirement for circular economy statements for major development proposals. *[Various]*	Noted. No action arising.
	Pleased to see flats included when considering recycling plans but not convinced will this be enforced especially with current purpose built flats. Currently experiencing unsatisfactory arrangements with insufficient collection facilities. How will the plan require new and existing flat developments to include recycling facilities and then enforce this? *[resident]*	Noted. JWP1 is intended to ensure new development only comes if appropriate recycling facilities are proposed to be included. The policies of the Plan can only be applied to determining proposals for new development which require planning permission and therefore cannot influence practice in existing development.

Part of Plan	Summary of comment	Borough Response including action arising
	Concerned that waste arrangements for the 6,000 or so flats which will be built along Rom Valley Way help to maximise recycling - often there is a tail-off in recycling levels in densely-developed flatted areas - and that effective arrangements are in place to ensure that bin areas in flats are kept clean and reduce smell from them. *[Romford Civic Society]*	Policy JWP1 is intended to ensure that appropriate and effective recycling provision is made in all forms of residential development which, if maintained, would not result in nuisance. No action arising.
	Support for more Repair centres with good access by public transport. *[resident]*	Noted. No action arising.
	Clause D requiring visitor facilities is generally not practical in most cases due to need to protect health and safety of visitors and sites often being inaccessible *[ELWA]*	The policy concerns 'major' waste facilities however it is recognised that it may not be practicable to incorporate waste facilities in every such development. In terms of providing such facilities, general meeting rooms included within facilities will often suffice. Amended wording policy is proposed (some changes to the supporting text are also necessary)
	Current waste sites should be safeguarded as much as possible and loss minimised, especially those of strategic significance in terms of size or logistical considerations. *[EA]*	Only a few sites are proposed for release and only one of the sites proposed for release might be classed as making a strategic contribution to management of East London's waste (Eurohub) and this does not benefit from permanent planning permission for waste.
Para 6.13	Support for introduction consistent collection of materials and weekly food waste collections. *[resident]*	Noted. No action arising.
Para 6.15	Specific figures relating to the Envac system at Barking Riverside should be removed as these are no longer accurate. *[Barking Riverside Limited]*	Information on Envac system at Barking Riverside has been updated.
Para 6.20 (table)	Table is unclear should be revised to show a total household recycling rate that combines dry mixed recyclables and food waste. Heading other wastes is ambiguous does this relate to non household developments. *[Barking Riverside Limited]*	The table has been updated to ensure its meaning is clear.
Paras 6.22 to 6.27	Issues relating to bin stores being used for rough sleeping and drug dealing have been ascribed to bin stores being left open during collection times for excessive	Supporting text updated to mention 'Secured by Design (SBD)' initiative.

Part of Plan	Summary of comment	Borough Response including action arising
	periods or not being shut properly. Should require consideration of security (e.g. gating, doorsets/windows, access control/CT measures, lighting and CCTV etc.) for Major and Non-Major development proposals where bin stores are incorporated. *[Metropolitan Police Service]*	
Policy JWP2: Safeguarding and Provision of Waste Capacity		
	Support for safeguarding existing waste management capacity *[Various including local authorities]*	Noted. No action arising.
	Support for the development of new waste management facilities in sustainable locations *[Various]*	Noted. No action arising.
	Policy JWP2 is overly complex and restrictive as part of the policy does not allow for any growth in CDE waste to be met. *[Heidelberg Materials UK]*	No action arising. Policy does allow for new capacity in certain, albeit limited circumstances.
	Waste sites should be located away from people and residential areas *[resident and Henry Boot Developments (HBD) and Barings]*	Policy JWP2 requires that facilities are developed in locations that will not cause unacceptable adverse impact on communities. No action arising.
	Safeguarding waste management capacity is essential. London is not net self-sufficient in waste capacity and the LP apportionments will not be met. East London will likely have to make a greater contribution to the management of waste in London overall. *[East of England Waste Technical Advisory Body]*	No evidence provided to justify statement that *'London is not net self-sufficient in waste capacity and the LP apportionments will not be met.'* The LP apportionments are set at a level which takes account of the fact that East London is expected to make a greater contribution to the management of waste produced in London and the capacity assessment shows that this will be met through to 2041. Local Plans in areas surrounding London should take account of the possibility of inert excavation

Part of Plan	Summary of comment	Borough Response including action arising
		waste being transported to its area as the London Plan 2021 recognises that the export of such waste to areas beyond London for management is likely to happen. The approach to safeguarding in Policy JWP2 has been updated but a small number of sites are still proposed for release (see separate report).
	The wording of Policy SI8 in the LP concerning release of waste sites based on compensatory capacity being available elsewhere and achievement of net self sufficiency should be included in the Plan. *[Lester Harrison & Partners, Chartered Surveyors]*	There is no need to repeat the text of the LP in the ELJWP - the text of the ELJWP already references and reflects the text of the LP. No action arising.
	What would the policy position be if land was allocated in a district local plan but did not come forward? *[Essex County Council]*	Assumed that this comment concerns the Borough Local Plans. Any allocation in the Borough non waste Local Plans would need to be consistent with the ELJWP or justify any divergence. In most instances, the latest policy to be adopted takes precedent. No action arising.
	Text of clause e should be made amended so it is clearer when waste development would be 'particularly needed' on greenfield land. *[Essex County Council]*	This has been covered in the supporting text.
	All sites should be safeguarded and release of safeguarding should not take place unless WPAs have been consulted in accordance with DtC. This is especially important for site close to boundary of the Plan area where release may result in waste arising in the Plan area being exported to other areas even though there is sufficient capacity across the area as a whole. *[Essex County Council, Cambridgeshire County Council]*	Very few sites are proposed for release and those that are those identified as not being compatible with wider Borough development aspirations, in particular relating to the provision of housing which is also an important use of land. The London Plan allows for sites to be released under certain circumstances. DtC discussions are taking place with other Boroughs and neighbouring WPAs. The approach to safeguarding in Policy JWP2 has been updated

Part of Plan	Summary of comment	Borough Response including action arising
		but a small number of sites are still proposed for release (see separate report).
	Change to operations associated with decarbonisation of waste management, as well as movement up the waste hierarchy, may mean operations have a reduced throughput and this form of repurposing should be allowed as well. *[ELWA]*	Not clear what process, which did not involve moving waste up the hierarchy, is envisaged that would lead to better carbon outcomes.
	Suggest clarifying that "new waste management capacity" includes re-purposing of existing waste management capacity in paragraph 6.36. *[ELWA]*	Text updated accordingly
	When accounting for capacity MBT facilities be considered as being at the 'recovery' level of the waste hierarchy. *[ELWA]*	Noted. In establishing whether there is sufficient capacity to meet the management of the London Plan apportioned HIC waste, other than avoidance of management by landfill, all forms of management contribute to the management of apportioned waste.
	Maximum flexibility for the development at safeguarded waste sites should be allowed in light of potential changes to the uses of existing waste sites during the plan period *[ELWA]*	Improvements to existing sites are encouraged in principle by the Plan. The release of sites from safeguarding needs to be tightly controlled to ensure sufficient waste management capacity is maintained. The criteria for release also need to be in general conformity with the London Plan. No change proposed.
	Policy should provide the opportunity to review the policies and approach of the ELJWP if underlying assumption that there is surplus capacity changes. Changes to technology may also affect capacity requirements *[ELWA]*	It is highly unlikely that the 'assumption' that there is surplus capacity will change but the Plan includes a requirement for monitoring of waste capacity which will take place on annual basis. If monitoring reveals issues with the provision of capacity then the Plan may be reviewed and updated accordingly. In any event the relevance of the Plan must be reviewed at least every five years.
	Safeguarding may help stimulate growth of 'green jobs'. Land is a scarce resource, and investment in new technologies to drive waste up the hierarchy will face significant competition for sites from other sectors. Safeguarding existing waste	Support for safeguarding noted. No action arising.

Part of Plan	Summary of comment	Borough Response including action arising
	management site capacity may help to encourage diversification and innovation within the resources and waste sector in East London. *[ELWA]*	
	Where sites are co-located release of safeguarding provision may result in encroachment of the remaining sites by non waste development. The WPA itself should agree to release rather than the Local Plan automatically removing any safeguarding provisions. *[Barking Riverside Limited]*	Any development of released site would need to consider location of existing facilities and Policy JWP3 would apply to ensure there would be no impacts.
	Clause 6v is too restrictive: Compost and digestate cannot be used repeatedly on adjoining land. Flexibility must be included to allow export. *[Integrated Skills Ltd.]*	Text updated to allow flexibility.
	Use of the word "generally" should be removed as the LP safeguards all waste management sites with planning permission or a permit. *[Integrated Skills Ltd.]*	The ELJWP proposed release of some sites hence use of the term 'generally'.
	Hazardous waste disposal points should not be sited near proposed new builds and radioactive materials should be disposed of carefully at sites with appropriate Counter Terrorism measures in place. *[EA]*	Policy JWP2 in the Plan ensures appropriate siting of facilities and ensures these matters are taken into account.
	Specific concern with any proposals which have the potential to impact the M25, M11, A13 and A12 which experience congestion at peak times. *[National Highways]*	Policy JWP2 intended to ensure that no development would take place if it were likely to cause impacts on the SRN.
	Concern with any increase in slow moving HGVs accessing the SRN and the resulting potential impact to the safe and efficient SRN. *[National Highways]*	Policy JWP2 intended to ensure that no development would take place if it were likely to cause impacts on the SRN.
	Support JWP2's aim to minimise the transportation of waste and improve road safety by locating facilities as close as possible to their sources and establishing alternative transport means, including utilising the River Thames and railheads. *[National Highways]*	Noted. No action arising.
	Several safeguarded sites are proximate to the SRN. If any new development does come forward in these locations, it should be ensured that Transport Assessments are submitted with alongside planning applications. If safeguarded sites are released for other forms of development, an assessment of SRN impacts should be provided. National Highways should be consulted at pre-application stage if possible. *[National Highways]*	Transport Assessment would be prepared in accordance with Local Plan policy which would include an assessment of impacts on the SRN.
	Any proposals which include operations that have air quality impacts would need to be situated as far from designated sites like Epping Forest SAC as possible and would need to be assessed for their possible impacts on the site. *[Natural England]*	The Plan recognises the need to protect designated sites like Epping Forest SAC and

Part of Plan	Summary of comment	Borough Response including action arising
		includes policy to ensure this is taken into account.
Policy JWP 3 Prevention of Encroachment		
	The Agent of Change principle should also apply to new waste sites or those where intensification or changes to waste operations are proposed, to ensure no adverse impacts on the occupants of existing / consented development in proximity to such waste sites. Policy JWP3 should be amended to make clear that new or expanded operations should have regard to impacts on existing and future occupiers of lawful development. *[Barking Riverside Ltd]*	This is already specifically addressed by Clause D. 4 iv which only allows waste development where it avoids *'creating an undue amenity impact on existing permitted non-waste uses, or land allocated, or land with permission for non-waste uses that could conflict with the proposed waste management use;'* No action arising.
	Development proposals for waste sites in or near SILs should not hinder their industrial function. *[City of London Corporation]*	See above No action arising.
	JWP3 is an important policy and is welcomed. *[Various including waste industry and developers]*	Noted. No action arising.
	Policy JWP3 and its supporting text should be combined with the safeguarding elements of Policy JWP2, and those parts of JWP2 associated with new capacity should be turned into a new Policy JWP3, which would then focus solely on new capacity. *[Essex County Council]*	Considered that separation of matters between JWP2 and JWP3 as proposed is not necessary.
	For waste local plans within the Anglian Water region there is generally a 400m waste consultation zone around water recycling centres to ensure that any necessary noise or odour assessments are provided to facilitate appropriate mitigation measures. Size of encroachment buffers for Water Recycling Centres are risk assessed according the to the size of the works and the population it serves. For Upminster water recycling centres a 250m encroachment buffer should be specified in the Policy. *[Anglian Water]*	Supporting text updated to specify 250m consultation zone for all wastewater treatment works except Beckton which has an agreed 800m zone.
	Policy should be clear whether it will also apply to extensions/new treatment facilities at the Upminster water recycling centre. *[Anglian Water]*	Supporting text updated to include wastewater treatment facilities.

Part of Plan	Summary of comment	Borough Response including action arising
Para 6.50	'Odour' should be included in the list of potential impacts that might arise from proposed developments with sensitive receptors within 250m radius of the Upminster Water Recycling Centre. *[Anglian Water]*	Supporting text (para 6.50 in the Reg 18 Draft)) updated to take this into account
	Reference to transport impacts should be included. *[TfL]*	Supporting text updated.
	Support for JWP3 specifically ensuring that existing safeguarded waste management facilities are safeguarded from nearby development. *[Various including waste industry]*	Noted. No action arising.
Policy JWP4: Design of Waste Management Facilities		
	General support for Policy ELJWP 4 *[Various]*	Noted. No action arising.
	Biodiversity measures should be integrated into new buildings, e.g. biodiverse roofs, swift bricks or boxes, green walls. *[Swifts Local Network: Swifts & Planning Group]*	Achievement of BNG might require such measures to be installed. Supporting text added.
	No measures mentioned about security. Some of the sites can count as part of the critical infrastructure and so could be targeted. New and existing sites should review areas such as gating, doorsets/windows, access control/CT measures, lighting, CCTV, staffing levels and intruder alarms to ensure that facilities are fit for purpose. *[Metropolitan Police Service]*	Supporting text updated to include mention of 'Secured by Design (SBD)' initiative.
	In line with the NPPF (including Section 8) and PPG (Health and wellbeing section) consideration should be given to how new development will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help. *[Sport England]*	Such matters are dealt with in the Borough Local Plans which would also need to be taken into account when proposals are considered.
	Supporting text should note detail needed to show how use of non-road transportation has been considered, for example through a Transport Assessment that specifically looks at the rail/river transportation opportunities. *[Port of London Authority]*	Text added setting out need for Transport Assessments. This is considered more relevant to Policy JWP2 which requires that proposals will: **i**. *Minimise transportation of waste by being well located in relation to the sources of waste to be managed; and,* *ii. have good access to railheads and wharves and utilise non road modes of transportation or*

Part of Plan	Summary of comment	Borough Response including action arising
		demonstrate why this would not be practicable; and, *Subject to criteria i., have good access to the road network and will not cause unacceptable adverse impacts on road safety or unacceptable adverse effects on the road network;*
	Achievement of BREEAM excellent or equivalent is too onerous for waste operators, and generally not applicable to waste facilities. The application of CEEQUAL standards for development/redevelopment of waste sites. *[EA]*	The clause states: 'achievement of a BREEAM 'Excellent' rating or its equivalent unless it is demonstrated that this isn't practical;' In light of the caveat included it is considered that this recognises that in certain circumstances waste facilities may not be able to achieve an excellent rating. No action raising
	Would expect risk to groundwater to be included as part of this policy. *[EA]*	Text updated to mention the 'water environment'. Definition of 'water environment' added to the glossary.
	Reference to historic environment should be added to clause A e.g. *'Any adverse impacts on the historic environment, including measures to avoid and/or mitigate effects.' [Historic England]*	Policy updated.
	The ELJWP should reference the use of Direct Vision Lorries for waste vehicles or the use freight operators who can demonstrate their commitment to TfL's Freight Operator Recognition Scheme (FORS) or similar. The Plan should reference TfL's Vision Zero Action Plan. *[TfL]*	Supporting text referencing the Direct Vision standard has been added.
	Not all storage and management of waste is required to take place in a building. Composting takes place in the open. For the avoidance of doubt, the plan should define a building or ensure that flexibility is permitted on a case by case basis; *[integrated Skills Ltd]*	The supporting text of Policy JWMP4 states: *'Enclosure of operations within a building,* ***where operationally feasible****, will be required as the best means of reducing noise, dust and odour.* ***In exceptional cases, if it is shown that this is not a practicable option, other mitigation such as acoustic screening and operational management measures will be required'***

Part of Plan	Summary of comment	Borough Response including action arising
		Therefore in certain circumstances, such as open windrow composting, it may be possible for proposals with operations which are not fully enclosed to be allowed. It should be noted Supporting text updated to note that the need for enclosure of operations is also prescribed via the Environmental Permitting process.
	Operations at EMR Silvertown, 6 Standard Industrial Estate cause noise nuisance from 7am Monday to Saturday - any development here opposed due to noise and disruption. How is noisy activity allowed from such an early hour; Object to development close to residential area; Noise levels and hours of operation have to be taken into consideration when building such facilities in built up areas. *[resident]*	Policy JWP4 is intended to ensure proposals for new development take account of the need to avoid noise nuisance by locating in suitable areas and providing appropriate mitigation. The Local Authority and/or the Environment Agency can take action regarding noise nuisance resulting from existing waste facilities. No action arising.
	Requirement for considering Biodiversity Net Gain is welcomed. *[Natural England]*	Noted. No action arising.
	Support requirement for the efficient use of water - this helps reduce the volume of wastewater treated at water recycling centres which saves energy. *[Anglian Water]*	Noted. No action arising.
	Support requirement for climate adaptation measures to ensure developments are resilient and resistant to flood risk and the use of sustainable drainage systems to manage surface water flood risk. *[Anglian Water]*	Noted. No action arising.
Policy JWP5: Energy from Waste		
	The policy should make clear that requirements set out in the policy would apply only to new EfW facilities, and not to existing permissions or operations	All policies of the Plan can only apply when an application for planning permission is made and therefore could not be applied to development that has already been granted planning permission. No action arising.
	Opposed to policy which might allow for burning waste. Support for policy but not convinced it will be effective in stopping waste that is not residual from being burned	EfW is an accepted form of waste management which can be deployed in certain limited

Part of Plan	Summary of comment	Borough Response including action arising
	as economic will mean operators will seek waste to manage. EfW undermines recycling and genuine low carbon electricity and heating. Disagree that increasing energy efficiency will mean less CO2 is produced as the energy could be produced by solar and wind instead. *[resident]*	circumstances as described by policy JWP5 which includes the need for maximum heat recovery and capture of non-biogenic gaseous carbon emissions. The London Plan also requires a minimum performance level of 400g of CO2 equivalent per kilowatt hour of electricity produced
	Need to recognise role of incineration in management of hazardous waste which may not always able to achieve commercially viable scales for energy or heat recovery. *[EA]*	Supporting text and text to policy added to recognise this issue.
	The policy does not reflect commercial or current policy and legislative realities – there are insufficient powers to require full segregation of reusable or recyclable items from mixed residual wastes, and post-collection sorting yields low-quality recyclate for which there is little market. suggest that the word "viably" should be inserted before the word "reused". *[ELWA]*	Text updated as suggested.
	Support for EfW as not all waste can be recycled and burning it for and energy is preferable to landfill. *[resident]*	Noted. No action arising.
	Regarding point 5 although heat and energy is stipulated, it is not a requirement to state in an application how this is achieved, so an extra point should be added for para 6.7 to address this. *[EA]*	Supporting text added to address this concern.
	Noted that no incinerators are proposed however this could be clarified to mention whether there are any within the plan area or not. When assessing the plan and its HRA it appeared to suggest that waste is aggregated within plan area for shipment out to incinerators (or Combined Heat and Power (CHP) facilities) but that no such facilities exist within the area. *[resident]*	There are currently no incinerators in the Plan area – this has been confirmed in additional supporting text.
	The waste hierarchy being the main drive of this plan (and dealing with waste as early on as possible) makes sense and should be the aspiration. This avoids incineration / landfill which should only be as a very last resort. *[resident]*	Noted. No action arising.
Policy JWP6: Deposit of Waste on Land		
	General support for JWP6. *[Various including resident]*	Noted. No action arising.

Part of Plan	Summary of comment	Borough Response including action arising
	Use of landfill sites outside the Plan area for waste arising in East London should be acknowledged and liaison is needed between East London and the authorities where the waste is received. *[East London Waste Technical Advisory Body]*	Noted. Liaison is taking place. Text of section 4 has been updated to reflect this.
	The deposit of waste on land for recovery purposes should match the requirements of the Environment Agency to avoid duplication of control. *[Integrated Skills Ltd.]*	The approach taken for planning and permitting reasons may not be the same as one is concerned with land use and the other is concerned with pollution control. No action arising.
Para 6.77	Should add flood defences as an engineering use for some inert waste. *[EA]*	Text added (see para 6.97)
	The word "reworking" in the policy is vague. Does this relate to redevelopment of former landfill sites for other uses or possible 'landfill mining' activities to re-access discarded materials that have become valuable. *[ELWA]*	This is explained in the supporting text – it means extraction to free up land for development and/or recovery of recyclable or recoverable materials.
	Risk associated with extraction of landfilled waste would have to be weighed against the risks of leaving such wastes where they are. *[ELWA]*	This is already effectively noted by the supporting text.
	Text should be added to confirm need for ongoing liaison with neighbouring areas and monitoring regarding landfill of inert excavation waste. *[Thurrock Council]*	Text included.
General		
	Broad support for the ELJWP *[Various]*	Noted. No action arising.
	A specific policy that sets out how proposals for the management of wastewater will be considered should be included in the Plan (E.g. NLWP) *[Thames Water]*	Policy (JWP2A) and supporting text setting out how proposals for the management of wastewater will be considered has been included in the Plan. Text elsewhere has been updated to clarify how the Plan relating to wastewater.
	Clarity is needed concerning how the Plan relates to the management of wastewater *[Anglian Water]*	See above.
	Plan is too long, complicated and verbose. *[resident]*	The Plan is a detailed technical document by necessity as it must set out all the issues facing the management of waste and related policy must be carefully drafted to ensure it can be

Part of Plan	Summary of comment	Borough Response including action arising
		implemented which may add to the apparent verbosity of the document. Efforts have been made to use plain England and a glossary and executive summary are provided to help with understanding of the Plan. A further check of the use of plan English has been undertaken and changes made where it is considered that the text could be simplified.
	Request for explanation of terms: 'safeguarding'; 'circular economy'; 'encroachment'; 'energy from waste'; 'deposit of waste on land' *[resident]*	These terms are explained in the Plan specifically 'safeguarding', 'circular economy', and 'energy from waste' are already included in the Glossary. 'encroachment'; 'Energy from waste'; 'deposit of waste on land' added to the glossary
	Tighter vehicle restrictions at household sites will mean that this will increase fly tipping. *[resident]*	Noted however this is not a land use issue. The comment has been referred to ELWA for its attention as the body responsible for the provision of household waste sites.
	Western Riverside Waste authority report note capacity gap for LACW and C&I waste in its area and an option could be for engagement with other boroughs and surplus capacity - engagement with East London boroughs would be beneficial for addressing the capacity gap for the London Borough of Wandsworth and the London Borough of Lambeth *[Western Riverside Waste Authority]*	Dialogue with London Borough of Wandsworth and the London Borough of Lambeth did not result in specific requests concerning capacity.
	Concern about waste collection and disposal in central Romford including Rom Valley Way to Roneo Corner, in particular overflowing trade waste bins in central Romford including meat waste in overflowing bins in Victoria Road. *[Romford Civic Society]*	Noted. Such issues should be reported to the Environmental Health team for action.
	Any public site locations are more easily accessible to the general public and thus less likely to result in fly tipping. It would be useful to assess currently identified fly tipping points to see if there is capacity for more locally placed sites or that any proposed sites may help to reduce this risk. *[Metropolitan Police Service]*	Sites are safeguarded and provided by the Plan to allow for the proper management of waste. Flytipping should be reported to the EA and the Borough.
	Planning policies in a plan should be based on a proportionate assessment of the need for sporting provision in its area. *[Sporting England]*	This matter is addressed in the Borough's Local Plans which would also need to be taken into

Part of Plan	Summary of comment	Borough Response including action arising
		account when considering proposals for waste management.
	No new sites being allocated so there should be no impact on National Grid assets. *[National Grid]*	Noted. No action arising.
7. Policies Map		
	Would be useful to show existing sites numbered on a map to allow cross reference to location plans of sites. *[Natural England]*	Due to the number of sites such a map would be illegible.
8. Appendices		
Appendix 1 – List of Safeguarded Sites		
	Not safeguarding certain waste sites may impact on the achievement of net self sufficiency in London. *[East of England Waste Technical Advisory Body]*	Data shows sites can be released without impact net self-sufficiency. No action arising.
	The list of safeguarding sites does not include some of the sites included in the BPP assessment of existing waste management capacity. *[EA]*	The list of safeguarded sites has been updated and now reflects the assessment of capacity.
	The London Teleport site should not be included for safeguarding because there is sufficient capacity for metal recycling in Newham and safeguarding to 2041 will result in significant adverse impact on local communities and the environment e.g. housing developments on the east side of Store Road and on Pier Road. *[Lester Harrison & Partners, Chartered Surveyors]*	The London Teleport Site benefits from permanent planning permission for waste and must operate within terms of the Environmental Permit enforced by the EA intended to ensure that unacceptable impacts do not arise from operation of the site
	The Heidelberg materials Dagenham wharf off Chequers Lane in Barking and Dagenham (TQ 49227 81902) has a permit for the processing of construction and demolition wastes and should be added to Appendix 1 (and 2) as a safeguarded site. *[Heidelberg Materials UK]*	Added to list of safeguarded sites

Part of Plan	Summary of comment	Borough Response including action arising
	Cemex site on land at Docks Estate, Choats Road, Dagenham, RM9 6LB should be identified as a safeguarding waste site given the extant planning permission and Waste Permit. The northern part of the Site is an existing waste recycling operation, processing returned concrete or construction and demolition waste to produce either single or grade aggregates. *[Cemex]*	Added to list of safeguarded sites
	The EfW facility in the London Sustainable Industries Park has an implemented planning permission for development of an energy from waste facility and should therefore be added to the list of safeguarded sites. *[Barking Riverside Limited]*	London Sustainable Industries Park added to list of safeguarded sites
	Veolia's operations at Coldharbour Lane, Rainham are negatively impacting the Momentum Logistics Park site. *[Henry Boot Developments (HBD) and Barings]*	Enforcement of the site's Environmental Permit by the EA should mean that impacts do not arise form operation of the site.
	Upminster Water Recycling Centre not listed in Appendix – this is an oversight as an encroachment buffer or identified waste consultation zone would be applicable for this type of waste site. *[Anglian Water]*	WWTs including Upminster Water Recycling Centre added to the list of safeguarded sites.
	The following safeguarded sites are also designated as safeguarded wharves: Barking and Dagenham - 60 River Road (Safeguarded Rippleway Wharf) - 12-14 River Road (Safeguarded Alexander Wharf) - Pinns Wharf (Safeguarded Pinns Wharf) Newham - Knights Road (Safeguarded Royal Primrose Wharf) - Plaistow Wharf (Safeguarded Peruvian Wharf) The status of these sites as safeguarded wharves must be highlighted in the ELJWP for water borne freight handling uses and their use encourage for river-related transportation uses. *[Port of London Authority]*	Information added to Chapter 2.
	The list of safeguarded sites is incomplete *[EA]*	The list of safeguarded sites has been updated to include additional sites
Appendix 2 – Maps of Safeguarded Sites		

Part of Plan	Summary of comment	Borough Response including action arising
	Appendix 2 should include: - Unit 11 Atcost Road - 5 and 10 Salamons Way - Perry Road RMS - York Road - Shed A and the Annex to Shed A; *[Integrated Skills Ltd.]*	5 and 10 Salamons Way, Perry Road (RMS) and Land at York Road added to list of safeguarded sites. Unit 11 Atcost Road not added to list of safeguarded sites as site does not have permission for waste use. Shed A and the Annex to Shed A to be released from safeguarding to facilitate redevelopment of site
2 Choats Road	The Primary Electrical Substation Site north of Choats Road off of Reef Road should be excluded from the location plan. Boundary of 2 Choats Road shown in Appendix 2 includes land which does not farm part of the existing waste site and should be excluded ownership. *[Southern Electric Power Distribution and Barking Riverside Limited]*	Substation removed from within boundary of 2 Choats Road on location map in Appendix 3.
Barking Waste Transfer and Recycling Facility, Ripple Road	Barking Waste Transfer And Recycling Facility, Ripple Road, IG11 0TT is in proximity to a nearby freight site and redevelopment is proposed. Additional details requested to allow thorough assessment of potential impacts and confirm associated risks and mitigation measures. *[Network Rail]*	This is an existing site with planning permission which will be safeguarded as such – it is not proposed in the Plan as a new location for waste development.
Marshgate Sidings, Pudding Mill Lane	This site is currently part of the larger masterplan development for the two Bow sites. There is spoil running through part of the site, and it has an environmental permit issued by the EA. Clarification requested on what the plan represents for the future of this site. *[Network Rail]*	Site is safeguarded, as an existing waste management facility, for future waste management uses.
	The Recycled Material Supplies Limited Physical Treatment Facility at Perry Road, Dagenham is missing from Appendices 1 and 2 (Safeguarded sites) *[Recycled Material Supplies Limited]*	Site map added and site included in list of safeguarded sites.
Appendix 3 – Sites with Potential for Release from Safeguarding		
Old Bus Depot, Perry Road	Support for consideration of potential release of the Old Bus Depot, Perry Road (Manns Waste Management) site from safeguarding as part of the ongoing transformation of the area. *[City of London Corporation]*	Noted. No action arising.

Part of Plan	Summary of comment	Borough Response including action arising
	Given policy requirements and evidence required for consideration of release of existing waste sites from safeguarding, sites included in Appendix 3 should be removed as their inclusion is not supported by such evidence. *[GLA]*	These sites are not proposed for release but included as those which may have potential for release in future. This helps ensures that the ELJWP is consistent with future Borough development aspirations. Note Appendix 3 in the Daft Plan has become Appendix 4 in the Reg 19 Submission Plan.
Appendix 4 – Replacement of Policies in the ELWP		
	No specific comments made on Appendix 4	No action arising.
A. Evidence Base		
Waste Needs and Capacity Assessments	Reliance on areas outside of London to manage inert waste. Management of inert waste from London has not been taken into account in the Cambridgeshire and Peterborough Minerals and Waste Local Plan. *[Cambridgeshire County Council]*	The London Plan recognises that the export of such waste to areas beyond London for management is likely to happen and this should be taken into account in the Cambridgeshire and Peterborough Minerals and Waste Local Plan.
	Evidence base reports including waste data are inaccurate and difficult to understand which undermines the Plan. Not possible to see how data and assumptions are derived. Liaison with neighbouring authorities cannot be meaningfully carried out until this is corrected. *[East of England Waste Technical Advisory Body]*	The data reports set out how findings have been derived. Reports have been checked and updated where the derivation of assumptions is unclear.
	The list of safeguarding sites does not include some of the sites included in the BPP assessment of existing waste management capacity.	The list of sites safeguarded by the Plan has been updated with the addition of a significant number of additional sites.
	CDE waste figures presented in the Plan need checking as don't appear to correspond with those in the Waste Needs and Capacity Assessments. There appear to be errors in the Construction, Demolition & Excavation Waste Arisings in East London to 2041 Report (2024). *[Integrated Skills Ltd, Heidelberg Materials UK]*	The report has been checked and updated as necessary.

Part of Plan	Summary of comment	Borough Response including action arising
	Table 9 in the report 'Assessment of Existing Waste Management Capacity (2024)' needs reworking with new supporting text to provide clarity on the figures and methodology used. *[Cambridgeshire County Council, Thurrock Council]*	The table has been checked and updated as necessary.
	Concern about cumulative impact of flows to Thurrock and how they impact upon the existing capacity of a range of waste facilities. Ongoing monitoring and assessment of flows should be undertaken to assess any more recent trends and ascertain that 2022 was not just an atypical year. *[Thurrock Council]*	SoCG with Thurrock being prepared. Data for 2022 checked against 2023 data (now released)
	Agree with findings that no additional land is needed for new waste management facilities, as there is sufficient capacity until 2041. *[Barings/Henry Boot Developments]*	Noted. No action arising.
'Assessment of Safeguarded Sites for Release' report	Section 21 is incorrect when it states the London Plan has already taken into account the ability of Boroughs to accommodate waste management capacity when the apportionments were calculated as this is a complex formula. *[EA]*	The basis of the apportionments and the "taking account" are not contradictory. All the ELJWP boroughs are expected to manage a greater tonnage than that which is predicted to arise (and has sufficient capacity to manage this) so the apportioned tonnages for East London do in fact cover that which is predicted to arise as stated. No action arising.
Circular Economy Topic Paper	No specific comments on the Circular Economy Topic Paper	No action arising.
Waste Management Topic Paper	Evidence base reports including waste data are inaccurate and difficult to understand which undermines the Plan. Not possible to see how data and assumptions are derived. Liaison with neighbouring authorities cannot be meaningfully carried out until this is corrected. *[Various local authorities and waste industry]*	The data reports set out how findings have been derived. Reports have been checked and updated where the derivation of assumptions is unclear. Separate targeted communication with neighbouring authorities has taken place with specific issues clearly explained as part of this dialogue.

Part of Plan	Summary of comment	Borough Response including action arising
Climate Change Topic Paper	No specific comments Climate Change Topic Paper	No action arising.
B. Integrated Impact Assessment		
	Objective 10 outlined in the Integrated Impact Assessment to not increase flood risk from any sources is vague, and while climate change is mentioned, the TE2100 Plan and required design adaptations resulting from climate change are not specifically listed *[EA]*	Noted
C. HRA		
	Agree with the assessment conclusions, providing that all mitigation measures are appropriately secured in any planning permission given. *[Natural England]*	Noted.
	Impacts on the beechwood habitats of the Epping Forest SAC should be mentioned. The Atlantic acidophilous beech forests which are Annex 1 habitats under the designation of the site as a Special Area of Conservation should be screened in for further assessment in terms of air quality. *[Natural England]*	Noted.

ELJWP

East London Joint Waste Plan

Consultation Protocol

Update to accompany Publication (Regulation 19) of the Submission Draft East London Joint Waste Plan

Final

13.02.25

Barking & Dagenham

Havering LONDON BOROUGH

Newham London

London Borough of Redbridge

Consultation Protocol for the Preparation of the East London Joint Waste Plan

Update to accompany Publication (Regulation 19) of the Submission Draft East London Joint Waste Plan

Prepared by **BPP Consulting**

Final
February 2025

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Contents

1. Introduction

This East London Joint Waste Local Plan Consultation Protocol describes the overall approach to consultation and communication that will be taken (and has taken place) during the preparation of the East London Joint Waste Plan (ELJWP). The document outlines the background and context for the preparation of the ELJWP and includes a programme of consultation activities. This is an updated version that also includes details of the current 'Regulation 19' consultation stage.

Every London Borough has a statutory responsibility to plan for future waste management within its area by preparing a Local Plan that includes policies on how and where waste should be managed. In East London the following four Boroughs adopted a joint waste plan (known as the East London Waste Plan) in 2012:

- London Borough of Barking & Dagenham
- London Borough of Havering
- London Borough of Newham
- London Borough of Redbridge

The East London Waste Plan contains planning policies against which the Boroughs assesses planning applications for development associated with the management of waste. The waste plan is in addition to each Boroughs' Local Plan which considers all other forms of development including housing.

Regulations require local plans to be reviewed and so the four East London Planning Authorities are now renewing the adopted ELWP and replacing it with the East London Joint Waste Plan (ELJWP). The ELJWP will plan for the management of all waste arisings in the area up to 2041. It will do this by setting a vision and objectives for the management of the waste produced in the area and by ensuring there is sufficient waste management capacity to manage the waste in ways that will meet the objectives of the Plan and help ensure its vision is realised. The Plan does not identify land for the development of new facilities, however existing waste management facilities are proposed to be safeguarded from redevelopment for other uses. To be aligned with the vision, and to meet the objectives, the Plan will consider how waste should be managed using a mix of technologies ranging from recycling and composting through to energy recovery and disposal. The safeguarded sites and associated policies of the Plan will enable the boroughs to meet their waste

management targets (including recycling) and their waste apportionment targets included in the London Plan.

The four local authorities have appointed BPP Consulting as lead consultants to assist with the preparation of the ELJWP. Land Use Consultants (LUC) has been appointed to prepare the Integrated Impact Assessment (IIA) and Habitat Regulations Assessment (HRA).

Background legal and policy context

The National Planning Policy Framework (2024) sets out requirements for producing a Local Plan including the need for consultation. Specifically, it states that Plan should:

- Be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals; and,
- be accessible through the use of digital tools to assist public involvement and policy presentation.

Consultation requirements are also set out at a local level in the Borough's Statements of Community Involvement. The legal requirements for plan making, including consultation, are set out in the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The Boroughs' Statements of Community Involvement (SCI) can be accessed electronically via the following links:

- London Borough of Barking and Dagenham SCI, 2020
- London Borough of Havering SCI, 2021
- London Borough of Newham SCI, 2022
- London Borough of Redbridge SCI, 2020

Initially the Boroughs are required to consult on what the ELJWP should cover, and they have done this by consulting on a draft plan that set out a draft vision, strategic objectives and policies. Following this the Boroughs are required to submit their final draft plan to the Secretary of State for independent examination. Before they submit the Plan, the Boroughs will publish it (known as the 'Submission Draft ELJWP') in order to give an opportunity for communities and other stakeholders to comment on whether the Plan is 'sound' and has been prepared in accordance with the relevant legislation. The Plan is currently at this stage.

At the examination an independent planning inspector will consider any representations made and may ask those who have made representations to appear at public hearings. Following the examination, the Inspector will issue a report on whether the Plan is sound and legally compliant. The Boroughs are not able to adopt and implement the Plan until the inspector has concluded that it is sound and legally compliant.

This Consultation Protocol includes a comprehensive consultation programme setting out how local residents, businesses and other stakeholders can take part in the development of the ELJWP. This programme takes account of, and is consistent with, the relevant legislation and Statements of Community Involvement prepared by each Boroughs. The consultation programme includes the key elements outlined below.

Communication methods

The following methods will be used to communicate how the ELJWP is being prepared.

1. A dedicated online consultation portal, hosted by the London Borough of Havering, that will act as a 'one stop shop' for consultation and communication with stakeholders and the wider public on the ELJWP. The website address for the online consultation portal is as follows: https://consultation.havering.gov.uk/planning/east-london-joint-waste-plan/

2. Publication of information about the ELJWP, the plan making process, and FAQs on the website.

3. Notification of the process by each Borough, in line with the Boroughs' SCIs, emailing stakeholders in its area using details held on the Boroughs' consultation databases.

4. Announcement of the process via the Boroughs' social media platforms (e.g. X (Twitter), Facebook, Instagram, YouTube channel)

5. Publication of hard copies of draft plans at each consultation stage for inspection at the Boroughs' main offices and libraries in some Boroughs (if required by individual Boroughs' Statements of Community Involvement).

6. Publicise in local newspapers or newsletters at key stages of the process (if required by individual Boroughs' SCI)

Consultation process

7. As part of the consultation on the draft Plan between July and September 2024 the following were arranged to ensure that all those interested were given additional opportunities to influence the content of the Plan:

    a An online joint launch event took place at the beginning of the draft plan stage.

    b Two drop-in sessions were held in each borough during the consultation period.

8. The following relate to both consultation on the draft Plan and publication of the Submission (Regulation 19) version of the Plan:

    a Opportunity for comment on the evidence base used to inform the content of the ELJWP.

    b Consultation comments received at all consultation stages are recorded on a project database, and a summary report produced, which will be made available for inspection on the project website. The report on the consultation on the draft ELJP (the 'Consultation Statement') is now available to view on the consultation portal. All comments received on the Submission (Regulation 19) version of the Plan will be published as received.

9. Alongside the Submission (Regulation 19) version of the Plan a formal 'statement of representation procedure' is required to be published that sets out exactly how and where documentation can be viewed and comments can made. The 'statement of representation procedure' is now available to view on the consultation portal.

10. It is important to note that the Boroughs collect and process personal information in order to provide a range of public services. The Boroughs will respect the privacy of individuals and endeavour to ensure personal information is collected fairly, lawfully, and in compliance with the General Data Protection Regulation and Data Protection Act 2018. The name of any person making a representation for the Submission (Regulation 19) version of the Plan will be published, as this is necessary to assist with the examination process, however any other personal details included within comments will be redacted before the comments are published.

Commitment to consultation

Engaging in the development of the ELJWP through consultation is crucial because:

- It ensures that the outcomes align more closely with the diverse views, aspirations, and needs of the wider community.
- Public involvement plays a vital role in fostering a dynamic, transparent, and participatory democracy.
- The process enhances the quality and efficiency of decisions by tapping into local knowledge, thereby reducing unnecessary conflicts and associated costs.
- Participants gain valuable insights into the needs of communities, the business sector, and the functioning of local government, contributing to their education.
- By establishing genuine connections with communities and providing them with a tangible role in decision-making, the consultation process helps promote social cohesion.

Aims

The principle aim of the communication and consultation programme is to deliver a "sound" ELJWP by ensuring that stakeholders and the wider public in East London are involved in its preparation. The Boroughs have sought, and will seek, involvement in three principle ways:

1. ***Engage:***
   - Provide information about the evolving ELJWP and its preparation.

2. ***Listen***
   - Provide opportunities for stakeholders to:
     - contribute their ideas, with confidence that they will be taken into account.
     - Participate actively in shaping proposals.
     - Feedback on draft plans.

3. ***Collaborate***
   - Providing feedback on comments made by stakeholders
   - Providing updates on progress and outcomes to allow stakeholders to stay informed about the process.

In addition, the programme aims to strengthen partnership working between the four East London Boroughs through co-ordinated communication across the authorities and with waste and planning professionals.

Objectives

The objectives of the communications and consultation programme are to:

1. Effectively engage with a diverse East London community and stakeholder group to raise awareness and foster understanding of major waste planning issues across East London;

2. contribute to meeting the statutory requirements for consultation set by government regulations, as well as the local requirements stipulated in the four authorities' Statements of Community Involvement;

3. achieve a coordinated programme of consultation across the four boroughs through effective joint working and communication;

Operating principles

In delivering the consultation and communication programme we will seek to abide by the following principles for community involvement which includes those set out in the Planning Advisory Services' Good Plan Making Guide, Principle 5, summarised below:

1. **The engagement plan should be an integral part of the project plan.** We will address the statutory requirements for publication and consultation on documents.

2. **Front loading of involvement**. We will provide opportunities for participation in identifying issues and debating options from the earliest stages. Community involvement will be focused at the points at which there is most potential to make a difference.

3. **The methods used to encourage involvement and participation should be relevant to their experience**. A wide range of methods and approaches will be used, tailored to the needs of different groups.

4. **Clearly articulated opportunities for continuing involvement**. The process will allow local communities to see how ideas have developed at the various stages, with effective feedback. There will be clear formal stages when involvement will take place, based on the statutory requirements, but as part of a continuous programme.

5. **Transparency and accessibility**. The processes will be clear, so that people know when they will be able to participate, and the ground rules for doing so.

6. **Planning for involvement**. Community involvement has been carefully planned in from the start of the process for plan preparation, so as to enable timely involvement.

7. **Encourage participants to explore the implications of their views rather than simply state a predetermined view or preference**

Consultation on the Submission Draft ELJWP (Regulation 19)

What is the 'Regulation 19' consultation?

The 'Regulation 19' consultation is the final opportunity to comment on the Submission Draft ELJWP before we send it to central government for examination by and independent inspector. The Regulation 19 consultation requires comments to focus on the **'legal compliance'** and **'soundness'** of the ELJWP.

This is the version of the plan that the Boroughs consider to be 'legally compliant' and 'sound' and will be submitted to the Planning Inspectorate for examination along with any comments received during the consultation. This consultation is therefore an opportunity for all stakeholders, including residents, to set out whether the ELJWP is sound and legally compliant. If it is considered that the Plan is not legally compliant and/or sound this is an opportunity to explain why and in particular how the EJWP should be changed to make it sound. All comments are considered by the Council and the Planning Inspector.

What is different about Regulation 19 compared to other stages of consultation?

The main difference between the Regulation 19 consultation and the previous stages of consultation is the statutory requirements.

Responses need to comment on whether the plan is sound or unsound based on the four tests of soundness as set out in the National Planning Policy Framework (NPPF). The NPPF states the plan is sound if it meets the following four tests of soundness:

1. Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development. This includes looking at whether the Boroughs are planning to meet identified needs for the management of waste, which include those set out in the London Plan, and whether we have worked with other waste planning authorities to do this. This is demonstrated in the ELJWP Duty to Cooperate Statement.

2. Justified: The plan contains an appropriate strategy, taking into account the reasonable alternatives, and is based on appropriate evidence. This includes

looking at the Integrated Impact Assessment to see how it assesses the ELJWP and possible alternative options for how waste might be managed in East London. It is also about looking at whether the ELJWP policy requirements are supported by the evidence[1].

3. Effective: The plan is deliverable over the plan period and is based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. This is demonstrated in the ELJWP Duty to Cooperate Statement, which will be accompanied by statement(s) of common ground. This includes considering whether the policies are deliverable and flexible.

4. Consistent with national policy: The Plan enables the delivery of sustainable development in accordance with national planning policy, where relevant. This includes looking at whether policies are consistent with the National Planning Policy Framework and the National Planning Policy for Waste.

Responses are also required to consider whether the Submission (Regulation 19) Local Plan is legally compliant. To ensure legal compliance the Local Plan should:

- be prepared in accordance with the Boroughs' Local Development Schemes (LDS). An LDS is a published work programme that sets out the timetable for the planning documents a council proposes to produce;

- comply with the government legislation in the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning Local Planning (England) Regulations 2012. These pieces of legislation set out what Local Plans should contain and how they should be prepared;

- undergo consultation in accordance with the Borough Statements of Community Involvement. Statements of Community Involvement set out the strategy and methods to be used when involving stakeholders, including communities, in the preparation and revision of plans and consideration of planning applications. The Statements of Community Involvement for each Borough were taken into account in the preparation of this Consultation Protocol;

- be accompanied by a sustainability appraisal. The Boroughs have produced an Integrated Impact Assessment, which incorporates the Sustainability Appraisal. The IIA has continuously assessed the Draft ELJWP as it has been

[1] The evidence is published alongside the Submission Draft ELJWP on the online consultation portal

prepared to check how it, and other alternative options, may impact social, economic and environmental factors within East London. The IIA aims to reduce and mitigate potential negative effects and seeks ways to deliver improvements and benefits;

- meet the requirements of the Habitat Regulations Assessment, which is a document created to identify aspects of an emerging Local Plan that would have potential to cause 'likely significant effect' on Natura 2000 (a network of nature protection areas in the European Union). This is included as part of the Integrated Impact Assessment;

- be in general conformity with the London Plan, which is the strategic plan for London prepared by the Mayor of London; and,

- provide evidence of working collaboratively, constructively, actively and on an ongoing basis with neighbouring authorities and prescribed bodies on cross-boundary strategic matters. This is demonstrated in the ELJWP Duty to Cooperate Statement.

2. Consultation Programme

The table below summarises who will be consulted at the various stages of plan preparation, how they will be consulted and who will be responsible for delivering the processes. In addition, an indicative timing for each consultation stage (N.B. these are estimates and are subject to change).

Stage	Purpose	Key tasks	Who will be consulted	Responsibilities	Indicative timing
Preliminary work on consultation and community involvement	To establish appropriate approaches and procedures to ensure effective stakeholder and community involvement in the ELJWP	Development of project website, on which all reports and information relating to the project will be issued	Open access website for use throughout consultation programme	Borough Planning Officers/web team(s); BPP Consulting	May – June 2024 Complete
		Each borough notifying all those stakeholders on their consultation databases of the start of the consultation using their preferred method of contact.	Borough consultation database consultees	Borough Planning Officers	Early July 2024 Complete
		Publicise website via Boroughs' social media platforms (E.g. Twitter, Facebook, Instagram, YouTube channel)	Open access social media	Borough Planning Officers	Early July 2024 Complete

Stage	Purpose	Key tasks	Who will be consulted	Responsibilities	Indicative timing
Launch of programme	To raise awareness of waste planning issues in East London and communicate the process of preparing the ELJWP	Joint online launch event	Public and stakeholders, through press releases and articles in Borough magazines	• Planning and logistics by Project Manager • Content by BPP Consulting	July 2024 Complete
Consultation on the scope of the Integrated Impact Assessment	To consult on the scope of the SA, in particular, key sustainability issues and the SA framework to be used for appraisal	Formal consultation on Scoping Report, in line with statutory requirements	Statutory consultees and others, in line with statutory requirements	Project Manager, Boroughs	March – April 2024 Complete
		Publish for consultation with Reg 18 ELJWP and IIA	Key stakeholder groups, including statutory bodies, other public agencies, industry representatives, environmental groups, academics	Project Manager, Boroughs	Jul – Sept 2024 Complete
Consultation draft ELJWP and accompanying	To consult statutory bodies and the wider public on the Draft Plan, its reasonable	Make hard copies of documents available for inspection at council offices and in other locations (if	Key stakeholder groups, including statutory bodies, other public agencies, industry representatives,	Borough Planning Officers	Jul – Sept 2024 Complete

Stage	Purpose	Key tasks	Who will be consulted	Responsibilities	Indicative timing
Integrated Impact Assessment report (Reg. 18)	alternatives and their significant effects. To involve statutory bodies and the wider public on waste management approaches and implications for sustainable development objectives.	required by individual Boroughs' SCIs).	environmental groups, academics		
		FAQs setting out contents of the draft plan	Public and stakeholders – available on the project website	Project Manager, Boroughs	Jul – Sept 2024 Complete
		Drop-in sessions (two in each borough)	Public and stakeholders, utilising advertising and consultee lists held by the four Boroughs and those that have expressed an interest directly.	Consultee databases held by four Boroughs • Planning and logistics and logging responses by BPP • Content and facilitation and acknowledgement and summary of contents by BPP	Jul – Sept 2024 Complete
		Questionnaire on project website for feedback.	Public and stakeholders	BPP Consulting	Jul – Sept 2024 Complete
Consultation on Submission ELJWP, accompanying Integrated Impact	To publish version of the Draft ELJWP, IIA and evidence base that will be submitted to Secretary of State (Submission Draft)	Formal consultation on Submission ELJWP and SA Report, in line with statutory requirements (six weeks). This includes publication of a 'statement of representation procedure' that sets out	Those on consultation databases, statutory consultees, local resident/community groups and others, in line with statutory requirements.	Project Manager, Boroughs	Mid 2025 (minimum 6 week period likely commencing in June)

Stage	Purpose	Key tasks	Who will be consulted	Responsibilities	Indicative timing
Assessment report and evidence base (Reg. 19)	and seek stakeholder views	exactly how and where documentation can be viewed and comments can made.			
		Make hard copies of documents available for inspection at council offices and in other locations (if required by individual Boroughs' SCIs).	Key stakeholder groups, including statutory bodies, other public agencies, industry representatives, environmental groups, academics	Borough Planning Officers	Mid 2025 (minimum 6 week period likely commencing in June)
Notification of Submission	To raise awareness of the submission of the ELJWP, IIA and evidence base to the Secretary of State for examination	Each borough formally notifying all those stakeholders on their consultation databases of the submission of the ELJWP in line with statutory requirements	Those on consultation databases, statutory consultees, local resident/community groups and others, in line with statutory requirements.	Project Manager, Boroughs	Late 2025 / early 2026
Notification of Examination	To raise awareness of the ELJWP examination	Each borough formally notifying all those stakeholders on their consultation databases of the ELJWP examination in line with statutory requirements	Those on consultation databases, statutory consultees, local resident/community groups and others, in line with statutory requirements.	Project Manager, Boroughs	Early-mid 2026

Stage	Purpose	Key tasks	Who will be consulted	Responsibilities	Indicative timing
Consultation on Main Modifications	To publish ELJWP Main Modifications resulting from the examination and SA Report and seek stakeholder views	Formal consultation on ELJWP Main Modifications and SA Report, in line with statutory requirements	Those on consultation databases, statutory consultees, local resident/community groups and others, in line with statutory requirements.	Project Manager, Boroughs	Mid 2026
Notification of Adoption	To raise awareness of of the adoption of the ELJWP	Formal notification of the ELJWP adoption in line with statutory requirements	Those on consultation databases, statutory consultees, local resident/community groups and others, in line with statutory requirements.	Project Manager, Boroughs	Late 2026

Feedback procedures

All representations made during the course of the consultation will be recorded in a database.

A consultation report setting out the issues raised and the Boroughs' response to the representations will be produced by BPP Consulting and made publicly available on the project website. N.B. A Consultation Statement has already been published which considers all the comments made on the Draft ELJWP at Regulation 18 stage.

All respondents will be notified regarding the availability of this report.

All respondents who make representations will also be notified of all opportunities for further involvement at later stages of the process e.g. independent examination.

We will seek to ensure that all reports are accessible to everyone. We will offer assistance to those who are blind or partially sighted or do not speak English fluently. This may include spoken or written translation in different languages, Braille, audio or large print format.

We will also seek to ensure that documents are appropriate for the audiences that the Boroughs seek to engage.

Responding to press/media enquiries

The Borough Project Manager will coordinate responses to press and media enquiries with advice from Borough communications teams, BPP Consulting and LUC as appropriate.

Further information

For further information please contact the Borough Project Manager, Cara Collier, London Borough of Havering, Cara.Collier@havering.gov.uk

ELJWP

East London Joint Waste Plan

Regulation 19 Submission Plan

Duty to Cooperate Statement of Compliance

Final Draft 2.0

Date: 18.02.25

Barking & Dagenham | Havering London Borough | Newham London | London Borough of Redbridge

Contents

Abbreviations

- DtC - Duty to Cooperate
- EA - Environment Agency
- EoEWTAB - East of England Waste Technical Advisory Body
- ELBs - East London Boroughs
- ELJWP - East London Joint Waste Plan
- GLA - Greater London Authority
- LP - London Plan
- LWPF - London Waste Planning Forum
- SEWPAG - South East Waste Planning Advisory Group
- WPA - Waste Planning Authority

1 Introduction

Purpose

1.1 This 'Duty to Cooperate Statement' has been produced to support the East London Joint Waste Plan 2025 to 2041 (ELJWP). It explains the approach and steps taken by the East London Boroughs of Barking & Dagenham, Havering, Newham and Redbridge (the East London Boroughs responsible for the ELJWP) to address the legal Duty to Cooperate (DtC) requirements associated with the preparation of the ELJWP. The statement identifies and describes ways in which ongoing collaborative and cooperative working has taken place with other organisations that are subject to the DtC.

1.2 This Statement has been prepared to accompany the publication of the 'Submission Draft' ELJWP in accordance with Regulation 19 of the plan making Regulations[1]. The Statement demonstrates that preparation of the ELJWP is being undertaken in accordance with the requirements of the DtC. This DtC statement is therefore intended to inform representations, made at the Regulation 19 stage, related to whether the Plan has been prepared in accordance with the DtC requirements.

1.3 In recognition of the ongoing nature of meeting the DtC it should be noted that, as detailed within this statement, engagement is ongoing with certain DtC 'bodies'. An updated version of this Statement, which reflects further engagement that occurs following publication of the ELJWP, will be prepared when the ELJWP is submitted to the Secretary of State for independent examination.

1.4 A separate Consultation Statement has been prepared which sets out how the Boroughs have engaged with the public, statutory consultees and other organisations when preparing the ELJWP.

1.5 This DtC Statement comprises five sections as follows:

- Section 1 (this section) provides an introduction;
- Section 2 explains what the Duty to Cooperate is;
- Section 3 summarises the strategic planning matters relating to the ELJWP;
- Section 4 summarises the bodies subject to Duty to Cooperate engagement; and,
- Section 5 details the Duty to Cooperate engagement undertaken and the related outcomes.

[1] Town & Country Planning (Local Planning) (England) Regulations 2012

2 What is the Duty to Cooperate?

Planning and Compulsory Purchase Act 2004 and Localism Act 2011

2.1 The Duty to Cooperate was introduced through the Localism Act 2011 as an amendment to the Planning and Compulsory Purchase Act 2004. It places a legal duty on all local planning authorities in England and a number of other public bodies to:

- engage constructively, actively and on an ongoing basis in the process of the preparation of development plan documents so far as they relate to a strategic matter.

2.2 Strategic matters are defined as sustainable development or use of land that has, or would have, a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for, or in connection with, infrastructure that is strategic and has, or would have, a significant impact on at least two planning areas. It also includes development categorised as a 'county matter' or which would have a significant impact on a county matter[2].

Town & Country Planning (Local Planning) (England) Regulations 2012

2.3 The Town & Country Planning (Local Planning) (England) Regulations 2012 set out the public bodies (known as 'prescribed bodies') that may be subject to the DtC in addition to the planning authorities in England[3]. They are as follows:

- Environment Agency (EA)
- Historic England (HE)
- Natural England (NE)
- Mayor of London
- Civil Aviation Authority (CAA)
- Homes England[4]
- Clinical Commissioning Groups (CCGs)[5]
- NHS England

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2 A 'county matter' is defined in The Town and Country Planning (Prescription of County Matters) (England) Regulations 2003. It is largely concerned with the use of land for the purposes of recovering, treating, storing, processing, sorting, transferring or depositing of waste and mineral extraction and its ancillary activities.
3 Prescribed bodies for the purposes of the duty to cooperate are contained in Part 2 of the Town & Country Planning (Local Planning) (England) Regulations 2012 as amended.
4 Homes England was previously the Homes and Communities Agency (HCA).
5 CCGs have replaced Primary Care Trusts (PCTs).

- Office of Rail and Road (ORR)
- Transport for London (TfL)
- Highways England (now National Highways)
- Integrated Transport Authorities
- Highway Authorities
- Marine Management Organisation (MMO)
- Local Enterprise Partnerships[6]
- Local Nature Partnerships.

National Planning Policy Framework (NPPF)

2.4 The National Planning Policy Framework (NPPF) provides direction on what may constitute strategic planning matters[7]. These are set out as follows:

- the homes and jobs needed in the area;
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of community facilities (such as health, education and cultural infrastructure); and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscapes and green infrastructure.

2.5 The NPPF also sets out the Government's expectations for meeting the DtC. It explains that *'effective strategic planning across local planning authority boundaries will play a vital and increasing role in how sustainable growth is delivered, by addressing key spatial issues including meeting housing needs, delivering strategic infrastructure and building economic and climate resilience. Local planning authorities and county councils (in two-tier areas) continue to be under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.'*[8]

2.6 Collaborative working in a broad sense involving private sector bodies, utility and infrastructure providers is another related feature for policy preparation encouraged by the NPPF. It should be targeted on tackling strategic planning

6 Local Enterprise Partnerships have been abolished.
7 NPPF (December 2024), paragraph 20
8 NPPF (December 2024), paragraph 24

priorities and the delivery of sustainable development and should also be carried out in consultation with local communities and relevant bodies including Local Nature Partnerships, the Marine Management Organisation, county councils, infrastructure providers and elected Mayors.[9]

2.7 Plan-making authorities are also expected to prepare and maintain one or more statements of common ground, to document the cross boundary matters that exist and the degree of progress in co-operation being made to addressing such matters.[10]

2.8 For a local plan to be adopted by the planning authority it first must be found sound at the independent examination stage. The soundness tests which local plans are assessed against includes 'positively prepared' and 'effective' tests which are intended to check that that local plans have been (a) informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; and (b) based on effective joint working on cross-boundary strategic matters, as evidenced by a statement of common ground. [11]

Planning Practice Guidance (PPG)

2.9 Further guidance on delivering the DtC is provided in the national Planning Practice Guidance (PPG). It makes it clear that the DtC is not a duty to agree. Although every effort to secure the necessary cooperation on strategic cross boundary matters should be made by the planning authorities concerned.

2.10 The PPG explains that the DtC forms part of the legal tests that are examined at the outset of the examination and failure to meet the DtC legal test means a Local Plan cannot be adopted. In addition, issues of cooperative and joint working to meet cross boundary strategic priorities are an important element of deciding whether a Local Plan is ‘sound’. Determining if the plan will be effective is a crucial element of the tests of soundness and a key measure of how cross boundary strategic priorities have been addressed.

2.11 The PPG makes clear there is no definitive list of actions that constitute effective cooperation under the DtC. However, it is expected that robust evidence of the efforts made to cooperate on strategic cross boundary matters is prepared, which may be set out in a statement. Evidence should include details about who has been involved in cooperative activities; what activities have taken place; when did they occur; and how have they influenced the preparation of the emerging Local Plan.

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9 NPPF (December 2024) paragraph 25
10 NPPF (December 2024) paragraph 28
11 NPPF (December 2024) paragraph 36

2.12 The PPG outlines several key ways in which local planning authorities are expected to meet the DtC as follows:

- Identify strategic matters: Authorities must identify matters that are considered strategic in nature and thus may require cooperation with other authorities and bodies.
- Engage early: Authorities should engage with relevant bodies to discuss strategic matters and potential solutions early in the plan preparation process.
- Document cooperation: Authorities must keep a record of the cooperation process, including meetings, correspondence, and agreements.
- Agree on outcomes: Authorities should aim to agree outcomes and actions with cooperating bodies.
- Monitor and Review: Authorities need to monitor and review the effectiveness of cooperation and make adjustments as necessary.

3 What are the strategic planning matters?

3.1 As explained in the July 2024 evidence base report entitled 'Identification of Strategically Significant Cross Boundary Waste Movements', the management of waste is a strategic matter because it has little regard for administrative boundaries, with waste arising in one Waste Planning Authority (WPA) area often being managed at facilities located in another. In addition, due to economies of scale, waste management facilities may have catchments that extend beyond the boundary of the Plan area within which it is situated. Such flows are recognised in relation to the disposal of waste and recovery of mixed municipal waste in particular in the National Planning Policy for Waste that expects waste planning authorities to:

> *"…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;".*

3.2 Hence the management of waste can be a cross boundary strategic matter, the planning for which may require co-operation between WPAs.

3.3 In the context of the East London Joint Waste Plan, strategic waste planning matters requiring particular attention are as follows:

- Sharing capacity – meeting the unmet needs of other London Boroughs
- Non-hazardous landfill
- Export of waste for management

3.4 These are considered in more detail below.

Sharing Capacity – Meeting the Unmet Needs of Other London Boroughs

3.5 The London Plan requires Boroughs to plan for a quantum of waste management capacity set out in 'apportionments'. In light of the fact that waste travels across Borough boundaries for management, the London Plan notes that Boroughs may pool their apportionments and plan jointly to meet the pooled apportionment[12].

3.6 Furthermore, the London Plan[13] expects Boroughs with existing waste management capacity which exceeds their management requirements (as prescribed by the London Plan), to offer to share the surplus with other Boroughs facing a shortfall in capacity when they are planning to meet the

12 Paragraph 9.8.6
13 Paragraph 9.8.6

waste management needs of their areas, before considering release of sites from waste use.

Non-Hazardous Waste Landfill

3.7 National policy, legislation and fiscal measures seek to minimise the amount of waste managed by landfill. The national Environmental Improvement Plan 2023 includes a commitment to explore options for the near elimination of biodegradable municipal waste to landfill from 2028. The London Environment Strategy includes an aim of zero biodegradable or recyclable waste to landfill by 2026.

3.8 In light of the general reduction in non hazardous waste being managed by landfill, fewer such facilities are being developed and those that remain, or are developed, have increasingly wide catchments where waste being managed at such sites is transported over greater distances. Such facilities therefore perform a strategic function. The amount of waste arising in East London being managed by landfill has reduced significantly, however there is likely to be a limited (and reducing) quantity of non hazardous waste for which disposal to landfill remains the only viable management option.

3.9 For a long time, non hazardous waste requiring landfill arising in areas beyond East London[14] has been managed at Rainham landfill site located in the London Borough of Havering. This site has had a wide catchment and the quantity of waste imported to this site from other areas has often exceeded that produced in East London which has been managed at this site. However, the void capacity of the site is now largely depleted and the site is expected to close within the Plan period.

3.10 Although the Plan allows for the development of new non-hazardous waste landfill capacity in East London, in light of the lack of opportunities for the development of such sites in East London over the Plan period, it is likely that the declining quantity of non-hazardous waste arising in East London that still requires management by landfill, will need to be managed at facilities located outside it. The East London Boroughs have therefore sought to establish where other capacity exists, or might come forward, that might meet East London's future needs for the management of non-hazardous waste requiring landfill through DtC engagement with host WPAs.

14 For the purpose of this report, and the East London Joint Waste Plan, 'East London' is taken as the area covered by the Boroughs of Barking & Dagenham, Havering, Newham and Redbridge.

Export of Wastes

3.11 Figure 1 below displays the balance between imports and exports of waste into and from East London by waste management method and waste type in 2022.

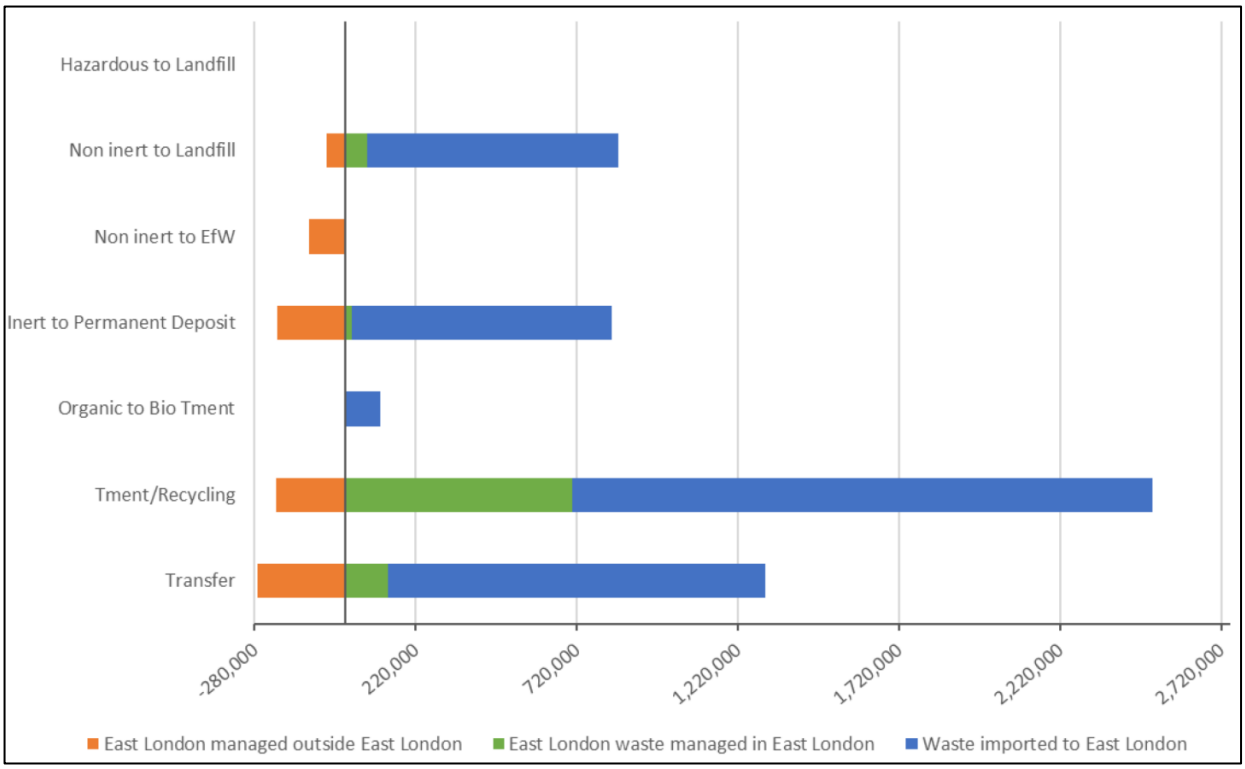

Figure 1: Waste import and export balance in East London 2022 by management method and waste type where known (tonnes)

3.12 Exports of other wastes of a certain 'strategic' quantum, may be routinely managed outside East London and therefore, notwithstanding the fact that there is a net in-flow of waste into East London and that there is surplus management capacity within East London, it is important to establish the resilience of these movements to ensure no additional management capacity needs to be planned for in the ELJWP.

3.13 In particular, hazardous wastes are produced in relatively limited quantities and require specialist management depending on their nature. This means that, due to economies of scale, fewer hazardous waste facilities exist and so such waste often travels considerable distances for management and, while some hazardous waste management capacity exists in East London, some hazardous waste produced in East London is managed outside of the Area.

3.14 In light of the above it is necessary to identify the key facilities receiving quantities of waste from East London deemed to be significant[15] and establish whether such movements, can be relied upon to continue over the Plan period. This is done by contacting the Waste Planning Authorities hosting these 'strategically significant' facilities. Details of the Waste Planning Authorities contacted are included in Section 4 below.

3.15 The ELJWP does not safeguard four existing waste management sites and so these have in effect been released for redevelopment. A review[16] of the sources and quantities of waste managed at these sites indicates that there is no area beyond East London with an apparent strategic reliance on these sites for the management of waste. For precaution, the East London Boroughs are in the process of writing to regions identified in this review, regardless of the strategic thresholds.

15 Establishing strategic movements of waste is informed by the guidelines for 'strategic' movements included in guidance prepared by the Chairs of the regional Waste Technical Advisory Boards in England.

16 See separate note – 'Sites Identified for Release in Reg 19 ELJWP', 18.02.25

4 Which organisations have been involved?

4.1 During the preparation of the ELJWP, as part of meeting their DtC requirements, the East London Boroughs have engaged with the organisations set out below. Full details of engagement activities are set out in section 5 of this report.

Waste Planning Authorities

4.2 Waste Planning Authorities with which East London may have a strategic relationship with in terms of waste management were identified in the 'Identification of Strategically Significant Cross Boundary Waste Movements' report. This report identified movements of waste arising in East London for management in other areas that are considered strategic based on:

- The quantity of waste transported from East London to a particular area in a particular year over a three year period;
- Whether a specific flow represented a significant proportion of total arisings of the particular waste type produced in the Plan area; and,
- Whether the specific flow was managed at a single facility or multiple facilities.

4.3 Consideration of the above factors determines how reliant East London may be on another Plan area for the management of certain amounts and types of waste and therefore whether this constitutes a strategic issue. The details of exactly how the factors are applied can be found in the report. The waste planning authorities listed below were contacted about the consultation, and those identified as having strategic movements (marked with * below) were contacted specifically via letter to obtain views on the importance of the identified movements and whether that movement would be able to continue over the period of the ELJWP[17]. See appendix 4 for example letter sent.

- Bedford
- Buckinghamshire
- Brentwood
- Bristol City
- Calderdale
- Cambridgeshire*
- Derbyshire
- Dorset

[17] Note that some of the WPAs identified in this list are in addition to those identified in the 'Identification of Strategically Significant Cross Boundary Waste Movements' report.

- East Sussex*
- Essex
- Gloucestershire
- Hertfordshire*
- Hampshire
- Kent*
- Kingston Upon Hull City
- Lancashire*
- LB Enfield*
- Leeds*
- Lincolnshire*
- Liverpool
- London Legacy Development Corporation
- Manchester City
- Medway*
- Milton Keynes
- North Lincolnshire*
- Northeast Lincolnshire
- Norfolk
- Northamptonshire*
- Oxfordshire
- Peterborough*
- Rotherham
- Salford
- Sandwell*
- Sefton
- Sheffield*
- Staffordshire*
- Stoke-on-Trent City
- Suffolk
- Surrey*
- Tameside
- Thurrock*
- Wakefield*
- Walsall
- West Sussex
- Wolverhampton
- Worcestershire

London Borough Councils

4.4 The London Boroughs of Barking and Dagenham, Havering, Newham and Redbridge have been working collaboratively on waste planning since the previous Joint Waste Plan in 2012. Cooperation and collaborative working was formalised in an Inter-Authority Agreement signed in 2023, committing to production of a new Joint Waste Plan. Details of this collaboration and achievements to date are laid out in section 5.

4.5 All London Boroughs and the City of London were contacted and invited to comment on whether they intend to rely on East London for the management of waste arising in their areas including to meet the management requirements relating to the Borough apportionments of Household and Commercial and Industrial Waste included in the London Plan.

Mayor of London

4.6 The Mayor of London (aka the Greater London Authority (GLA)) was engaged to discuss any emerging issues associated with the general conformity of the ELJWP with the London Plan and advice on the need for engagement with other Boroughs concerning the sharing of surplus waste management capacity in the East London area in order to meet waste management requirements in their areas (as described above) and the possible release of existing waste sites from protection from redevelopment (safeguarding).

4.7 The Mayor advised that all Boroughs should be contacted but in particular the following Boroughs invited to make specific requests for sharing capacity based on the Mayor's knowledge of how well those areas were able to meet their needs:

- London Borough of Tower Hamlets
- London Borough of Westminster
- London Boroughs within Western Riverside Waste Authority Area
- London Borough of Lambeth

Waste Technical Advisory Bodies

4.8 Waste Technical Advisory Bodies are regional groupings of waste planning authorities and other parties with an interest in waste planning such as the Environment Agency and the waste management industry. Their primary purpose is to facilitate cooperation and coordination on strategic waste management issues that cross administrative boundaries. As noted above, the Chairs of the Waste Technical Advisory Bodies have prepared guidance intended to assist waste planning authorities when discharging their Duty to Cooperate responsibilities.

4.9 In London, the Waste Technical Advisory Body is the London Waste Planning Forum (LWPF). The LWPF brings together all the London Boroughs and includes other organisations such as the Mayor of London, the Environment Agency, and representatives of the waste management industry. By working together, these organisations aim to develop and implement effective waste management strategies, support the circular economy, and ensure sustainable waste practices across London. More details are included in the LWPF terms of reference which is included in Appendix 1.

4.10 Other Waste Technical Advisory Bodies invited to comment on the draft ELJWP were:

- East of England Waste Technical Advisory Body (EoEWTAB)
- South East Waste Planning Advisory Group (SEWPAG)

4.11 These Waste Technical Advisory Bodies cover the two regions which neighbour greater London. EoEWTAB includes waste planning authorities which immediately neighbour the ELJWP area.

Other Strategic Waste Authorities

4.12 Other bodies were contacted which have a strategic responsibility for managing and/or planning of waste in a wider area. These bodies are listed below:

- East London Waste Authority (the Waste Disposal Authority for East London)
- Western Riverside Waste Authority
- North London Waste Authority
- West London Waste Authority
- South London Waste Partnership
- Greater Manchester Combined Authority

Other Prescribed Bodies

4.13 Section 2 of this report sets out the full list of ‘prescribed bodies’ (other than local planning authorities) that are specified as those with which local planning authorities may need to engage under the DtC. As well as the Mayor of London (as set out above), other ‘prescribed bodies’ specifically invited to comment on the draft ELJWP during the July-September consultation were as follows:

- Civil Aviation Authority
- Environment Agency
- Historic England
- Homes England
- Marine Management Organisation
- National Highways
- NHS (North East London Integrated Care Board)

- Natural England
- Network Rail
- Office of Rail and Road
- Transport for London
- London Local Nature Partnership

5 What cooperative activities have occurred?

5.1 This section of the statement presents a detailed log of all relevant cooperative activities that the Boroughs have participated in, linked to the strategic waste planning matters already described in section 3.

5.2 Within each table, individual engagement/cooperation activities are set out including information as to who was specifically involved; what took place; when this happened; and the outcome of the activity.

Strategic waste planning issue: Sharing Capacity – Meeting the Unmet Needs of Other London Boroughs		
DtC Activity: Cooperation on preparation of the East London Joint Waste Plan	**Partners:**	East London Boroughs of Barking & Dagenham, Havering, Newham and Redbridge
	Action(s):	Planning jointly for the future waste management of East London via the preparation of the East London Joint Waste Plan
	Outcome(s)	Preparation of a draft (Reg 18) ELJWP for consultation in Summer 2024. Publication of a Submission Draft (Reg 19) ELJWP.
	Date:	- Inter authority agreement signed September 2023 - Joint work on ELJWP and joint evidence base commenced 2023 - Draft Reg 18 Plan consultation – July to September 2024 - Publication of Regulation 19 Submission ELJWP – May 2025
DtC Activity: Routine membership of the London Waste Planning Forum and attendance at meetings	**Partners:**	All London Boroughs, ELWA , GLA, Environment Agency, SEWPAG, EoEWTAB
	Action(s):	The four London Boroughs are all members of the London Waste Planning Forum and attend meetings (held 3-4 times annually) and contribute to its activities which includes raising awareness of issues affecting waste planning in London and discussing approaches to address these issues. The LWPF is jointly chaired by planning officers from the East London Boroughs.
	Outcome(s)	General increased awareness of work on the East London Joint Waste Plan and other plans and issues affecting the planning for waste in East London.
	Date:	Various. The forum has been in existence since 2011. 2024 meeting dates: 19.03.2024; 01.08.2024; 19.11.2024
DtC Activity: Attendance at the London Waste	**Partners:**	All London Boroughs, ELWA, GLA, Environment Agency, SEWPAG, EoEWTAB
	Action(s):	Notification of progress on the East London Joint Waste Plan with estimated timeline for publishing the Reg 18 Draft ELJWP.
	Outcome(s)	Increased awareness of work on the East London Joint Waste Plan and likely timeline for consultation.

Planning Forum	**Date:**	8 November 2023.
DtC Activity: Attendance at the London Waste Planning Forum	**Partners:**	All London Boroughs, ELWA, GLA Environment Agency, SEWPAG, EoEWTAB
	Action(s):	Notification of work on the East London Joint Waste Plan including identification of surplus waste management capacity with invitation to other Boroughs to request reliance on surplus capacity for meeting waste management requirements in their areas. Reminder email sent 13 September 2024 to the LWPF about the consultation and surplus capacity.
	Outcome(s)	Increased awareness of work on the East London Joint Waste Plan and availability of surplus in East London for other Boroughs to rely on in their plan and policy making.
	Date:	1 August 2024.
DtC Activity: Consultation on Reg 18 Draft ELJWP	**Partners:**	All London Boroughs, neighbouring WPAs and other DtC prescribed bodies listed in Section 3.
	Action(s):	All London Boroughs and other DtC prescribed bodies listed in Section 3 were notified of the consultation on Reg 18 Draft ELJWP that took place during July-September 2024. Reminder emails were sent to all London Boroughs and the London Waste Planning Forum on 13 September 2024.
	Outcome(s):	Responses to the consultation were received from various organisations listed in Section 3. No issues were raised regarding compliance with DtC.
	Date:	29 July to 16 September 2024
DtC Activity: Receipt of response to consultation on Reg 18 Draft ELJWP	**Partners:**	Western Riverside Authority
	Action(s):	Response to consultation on Reg 18 Draft ELJWP stating that Boroughs within the Western Riverside Authority area may wish to consider sharing surplus waste capacity in East London
	Outcome(s):	ELBs follow-up correspondence with Boroughs within the Western Riverside Authority area revealed that no requirement to share capacity with East London.
	Date:	3rd October 2024
DtC Activity: Meeting with GLA (Mayor of London)	**Partners:**	Mayor of London
	Action(s):	Meetings with representatives of the GLA (obo Mayor of London) to discuss conformity of the ELJWP with the London Plan and in particular with regard to the release of certain existing waste management sites from protection from redevelopment by safeguarding. Draft SoCG shared with the GLA (11.02.2025) including the approach the East London Boroughs are intending to take in the Regulation 19 ELJWP on safeguarding sites, and assessing

		capacity requests from other London boroughs. The draft criteria for assessing surplus capacity requests shared with the GLA via the draft SoCG is set out in appendix 2.
	Outcome(s):	Advice received from the GLA on the need to invite London Boroughs to request reliance on surplus capacity in London for meeting waste management requirements in their areas. Text inserted in the Reg 19 Submission Draft ELJWP to acknowledge potential mechanisms for London boroughs with deficits to meet waste management capacity requirements via surplus capacity in East London.
	Dates:	Meeting dates in 2024; 09.01.2024; 12.03.2024; 07.08.2024; 09.09.2024; 28.10.2024
DtC Activity: Invitations sent to specific London Boroughs re sharing capacity	**Partners:**	London Boroughs of Tower Hamlets, Westminster, Lambeth, and Western Riverside Authority
	Action(s):	Invitations sent to specific London Boroughs with offer to request reliance on surplus capacity in East London for meeting waste management requirements in their areas.
	Outcome(s):	All the Boroughs written to, except Tower Hamlets, noted that they did not require surplus capacity in East London to meet their waste management capacity requirements.
	Date:	21st August 2024
DtC activity: Invitations sent to all London Boroughs re sharing capacity	**Partners:**	All London Boroughs
	Action(s):	Invitations sent to all London Boroughs with offer to request reliance on surplus capacity in East London for meeting waste management requirements in their areas.
	Outcome(s):	Increased awareness of availability of surplus in East London.
	Date:	13 September 2024 Follow-up email sent 19th February 2025 in case any Boroughs' circumstances had changed.
DtC Activity: Meetings with London Borough of Tower Hamlets to discuss sharing capacity	**Partners:**	London Borough of Tower Hamlets (LBTH)
	Action(s):	Online meetings between planning officers from the East London Boroughs and planning officers from London Borough of Tower Hamlets to discuss sharing East London surplus capacity to help LBTH meet its waste management capacity requirements.
	Outcome(s):	East London Boroughs submitted a response to Tower Hamlets Regulation 18 Local Plan (sent 18.01.2024) East London Boroughs submitted a response to Tower Hamlets Regulation 19 Local Plan (sent 28.10.2024) Tower Hamlets formally requested assistance from East London Boroughs with meeting London Plan Apportionment target (letter received 14.10.2024) Text inserted in the Reg 19 Submission Draft ELJWP to acknowledge potential mechanisms for London boroughs with

		deficits to meet waste management capacity requirements via surplus capacity in East London.
	Date:	Various dates; 2023; 25.04.2023; 11.12.2023 2024; 04.09.2024 2025; 30.01.2025
DtC Activity: Written correspondence concerning sharing capacity	**Partners:**	London Borough of Tower Hamlets
	Action(s):	Shared intended approach on sharing capacity with Tower Hamlets including the text proposed to be included in the Plan, and the criteria set to assess requests for capacity.
	Outcome(s):	Text inserted in the Reg 19 Submission Draft ELJWP to acknowledge potential mechanisms for London boroughs with deficits to meet waste management capacity requirements via surplus capacity in East London. Tower Hamlets advised they will produce a topic paper to address proposed criteria.
	Date:	28 January 2025
DtC Activity: Dialogue with West London boroughs concerning sharing capacity	**Partners:**	West London Boroughs
	Action(s):	Email from West London Boroughs informally requesting capacity and timeframes of ELJWP + West London Waste Plan (WLWP) production
	Outcome(s):	On going conversations including meeting on 18th October 2024. WLWP running behind ELJWP. West London Boroughs to confirm requirements for capacity (if any). Text inserted in the Reg 19 Submission Draft ELJWP to acknowledge potential mechanisms for London boroughs with deficits to meet waste management capacity requirements via surplus capacity in East London. Letter sent from the West London Alliance to East London Boroughs on 20 December 2024, confirming they should complete their needs based assessment in January 2025.
	Date:	20th September 2024 (start of email correspondence) / 18th October 2024 (meeting)
DtC Activity: Written correspondence concerning sharing capacity – London Borough of Lambeth	**Partners:**	London Borough of Lambeth
	Action(s):	Receipt of correspondence confirming no request to share surplus waste capacity in East London
	Outcome(s):	Confirmation that no additional engagement required with London Borough of Lambeth concerning sharing surplus waste capacity in East London

	Date:	16 September 2024

Strategic waste planning issue: Non-hazardous landfill		
DtC Activity: Routine membership of the London Waste Planning Forum and attendance at meetings	**Partners:**	Environment Agency, SEWPAG, EoEWTAB
	Action(s):	The four London Boroughs are all members of the London Waste Planning Forum and attend meetings (held 3-4 times annually) and contribute to its activities which includes raising awareness of issues affecting waste planning in London and discussing approaches to address these issues. The LWPF is jointly chaired by planning officers from the East London Boroughs and attended by representatives of the Environment Agency, SEWPAG, EoEWTAB
	Outcome(s)	General increased awareness of work on the East London Joint Waste Plan and other plans and issues affecting the planning for waste in East London.
	Date:	Various. The forum has been in existence since 2011. 2024 meeting dates: 19.03.2024; 01.08.2024; 19.11.24
DtC Activity: Letter to WPAs concerning export of waste to landfill capacity	**Partners:**	18 Waste Planning Authorities (sent general letter querying any issue with strategic movements) 7 Waste Planning Authorities (sent letter regarding export of waste to landfill)
	Action(s):	Letter sent to Waste Planning Authorities requesting confirmation of ability to receive waste for landfill from East London. See template letter at Appendix 3
	Outcome(s)	11 responses received. See Appendix 5 for summary of findings and outcomes from engaging authorities. Overarching summary of responses: • Non hazardous landfill capacity does exist in other areas but there may be challenges in the long-term. • Uncertainties around site closures and redevelopment necessitate robust cooperation and contingency planning.
	Date:	Between 22 and 30 August 2024; Landfill letters sent 30 August 2024 DtC letters sent 22 August 2024
DtC Activity: Consultation on Reg 18 Draft	**Partners:**	Thurrock Council
	Action(s):	Thurrock Council notified of the consultation on Reg 18 Draft ELJWP that took place during July-September 2024.

ELJWP	**Outcome(s)**	Response to the consultation received expressing concern with regard to management of waste arising in East London in Thurrock and derivation of data included in the draft ELJWP.
	Date:	29 July to 16 September 2024
DtC Activity: Meeting with Thurrock Council	**Partners:**	Thurrock Council
	Action(s):	Meeting with Thurrock Council to discuss its concerns regarding data included in the draft ELJWP as set out in response to the Reg 18 consultation.
	Outcome(s)	Explanation of waste management data included in the ELJWP and evidence base reports
	Date:	2nd September 2024
DtC Activity: Meeting with Thurrock Council	**Partners:**	Thurrock Council
	Action(s):	Meeting between representatives of London Borough of Havering and Thurrock Council to discuss various cross boundary matters including concerns regarding ELJWP as set out in response to consultation.
	Outcome(s)	Agreement to prepare a Statement of Common Ground for waste matters
	Date:	28th November 2024
DtC Activity: Preparation of a Statement of Ground	**Partners:**	Thurrock Council
	Action(s):	Draft Statement of Ground between the East London Boroughs and Thurrock Council concerning the cross boundary movement of waste between the areas sent to Thurrock Council for agreement.
	Outcome(s)	Awaiting response from Thurrock. (Followed up 13th February 2025).
	Date:	13 January 2025

Strategic waste planning issue: Export of Waste		
DtC Activity: Letter to WPAs concerning	**Partners:**	18 Waste Planning Authorities
	Action(s):	Letter sent to Waste Planning Authorities requesting confirmation of availability of capacity to accommodate waste from East London. See template letter at Appendix 4.

resilience of export of waste from East London	**Outcome(s):**	See Appendix 5 for summary of findings and outcomes from engaging authorities. Overarching summary of responses: • There are no planning barriers to the receipt of waste form East London at facilities in other areas. • Most facilities will be able to continue to receive waste from East London but some facilities are closing but quantum of capacity to be lost is not significant. • Many councils emphasise the principle of net self-sufficiency. • No specific need for Statements of Common Ground identified to address this matter, although Statement of Common Ground with Thurrock will cover cross boundary movements of waste and address concern raised about need to fully acknowledge extent of waste arising in London managed at certain facilities in Thurrock.
	Date:	Letters sent by email 22 August 2024. Responses received on various dates but not from all WPAs. WPAs not responded followed up on 24 September 2024.
DtC Activity: Consultation on Reg 18 Draft ELJWP	**Partners:**	Waste Planning Authorities – see list in Section 3.0
	Action(s):	WPAs notified of the consultation on Reg 18 Draft ELJWP that took place during July-September 2024.
	Outcome(s)	Replies received expressing concern regarding future management of inert waste from East London by landfill. See Appendix 1 of Consultation Statement for details.
	Date:	29 July to 16 September 2024

Other matters		
DtC Activity: Meeting with Thames Water	**Partners:**	Thames Water
	Action(s):	Discussed Thames Water's response on the Regulation 18 ELJWP.
	Outcome(s):	Added a wastewater specific policy in the Regulation 19 ELJWP and included Thames Water wastewater sites in the ELJWP safeguarded sites list.
	Date:	9 December 2024

6 Appendices

Appendix 1: London Waste Planning Forum Terms of Reference

London Waste Planning Forum

Terms of Reference

1 Aims

a) Provide a framework to support and coordinate waste planning in London
b) Enable authorities to engage and cooperate on strategic waste matters that cross administrative boundaries
c) Encourage a consistent approach to waste planning
d) Consider the implications of London's waste planning for neighbouring authorities
e) Advise on the implications of waste planning policy
f) Raise awareness of waste planning issues and share best practice

2 Activities

a) Considering future waste management needs in London
b) Act as a key stakeholder in the development and delivery of Mayor's Spatial Development Strategy (London Plan)
c) Making representations to central government, regulatory bodies and local government organisations on matters of concern
d) Discussing impacts of new EU and Government legislation and guidance
e) Taking up issues of concern to members
f) Maintaining webpages on waste planning in London to disseminate information
g) Sharing information and best practice
h) Offering support and training related to waste planning
i) Arranging visits to waste facilities

3 Membership

a) All waste planning authorities in London - WPAs in waste planning consortia may choose to be represented by one of the boroughs involved
b) The GLA, LWARB, London Councils and other London organisations dealing with waste
c) Environment Agency
d) Private sector involved with waste planning in London to be coordinated through ESA
e) Community and voluntary sector organisations involved with waste planning in London

f) Representatives from neighbouring regional waste planning fora (East of England and South East England)
g) Other government and non-governmental organisations including waste industry trade bodies and professional bodies as agreed from time to time by the LWPF

4 Conduct of activities

a) The Forum will elect a chair and secretary at the start of each municipal year
b) The chair and secretary will take steps to ensure that members can submit agenda items for meetings
c) Members will nominate a representative and do their best to attend all meetings
d) The Forum may set up subgroups of members which can also include outside representatives to work on defined issues within a defined timescales
e) The Forum may set out a work programme
f) The Forum will meet four times a year

5 Subscriptions

a) The Forum may raise a subscription from its members to fund its activities at a level to be agreed by the Forum

6 Timescale

a) These terms of reference will last for three years and will be reviewed at the start of each municipal year

Appendix 2: Proposed criteria for assessing surplus capacity requests

Any requests to share capacity made by London Waste Planning Authorities will be assessed on a case by case basis taking into consideration the waste management context of the ELJWP area and 'source' Plan area at the time, including:

1) The provision of suitable evidence that insufficient capacity exists in the source borough(s). This should be demonstrated using the same methodology as used to calculate waste capacity in the ELJWP and provision of relevant information which includes:

    a) Capacity within existing waste sites and how policy included in the source Borough's Local Plan requires new proposals to maximise capacity

    b) That all existing waste sites (including those safeguarded by EA permits via the London Plan) are being safeguarded subject to appropriate release criteria

    c) Whether any waste sites have been lost due to redevelopment in the source Borough since London Plan was adopted and how compensatory capacity has been provided

    d) Assessment of Strategic Industrial Locations and Locally Significant Industrial Sites to accommodate waste capacity and proposals to release such land for non-industrial uses

    e) Whether any applications for waste uses in the source Borough have been refused and if so the reasons for refusal

    f) Demonstrating that all options have been explored to identify suitable locations for further waste sites within the source borough(s) (consistent with national policy[18] and the London Plan) and other London boroughs to meet capacity requirements. This should be include the results of any call for waste sites and how conclusions not to allocate sufficient land to meet the requirements for which surplus is being sought were reached

2) The proximity of historic and existing significant flows of waste and availability of capacity for which capacity is being sought between, the source borough(s) and the ELJWP boroughs, including comparisons with any other London borough(s) that may have surplus capacity available.

[18] In particular see sections 4 and 5 of *National Planning Policy for Waste* (October 2014)

3) Any relevant changes to the London Plan 2021, in particular those affecting the sharing of capacity and quantities of waste that Boroughs are expected to plan for.

During the period of the ELJWP it is likely that the London Plan 2021 will be updated and any updates relating to the need for Boroughs to share capacity and meet apportionments will be taken into account in any assessment.

Appendix 3: Template letter sent to Waste Planning Authorities regarding of availability of Landfill Capacity

ELJWP
East London Joint Waste Plan

Dear Sir/Madam,

Duty to Cooperate - East London Waste Movement Enquiry

This enquiry is sent on behalf of the East London Boroughs (London Boroughs of Barking and Dagenham, Havering, Newham and Redbridge) to inform development of the emerging East London Joint Waste Plan.

As part of our ongoing Duty to Cooperate (DtC) engagement activity, we are writing with regard to waste movements between the East London Waste Planning Authority (WPA) areas and your Council's area. In particular your Council's area has been identified as having received quantities of inert or non-hazardous waste from at least one of the four East London boroughs in at least one of the most recent years for which data is available at the time of writing (2020-2022).

Waste movements from East London considered 'strategic', and therefore warranting consideration under the Duty to Cooperate, have been identified using the following three step process:

Step1: Quantities of East London waste being managed in a particular Plan area exceed the following guidelines (as agreed by National Waste TAB Chairs 'Duty to Cooperate on Waste – Practice Guide for Waste Planning Authorities in England):

- Non-hazardous waste: 5,000 tonnes per annum
- Inert waste: 10,000 tonnes per annum
- Hazardous waste: 500 tonnes per annum (increased from 100t); and

Step 2: Where that waste flow represented a fifth or more of the total amount of that waste type generated in East London; and/or

Step 3 :Where that waste went to a single or small number of facilities such that the dependency is greater than if it was distributed across a large number of locations.

Data informing the above has been obtained from the Environment Agency Waste Data Interrogator (WDI) 2022 and, where appropriate, cross checked with the Hazardous Waste Interrogator (HWI) 2022.

Our analysis of the available datasets indicate that the quantity of waste from East London managed in your Council's area was in excess of the significance guidelines set out in Step 1 above for at least one of the three principal waste streams. However, the quantity did not exceed the significance test identified in step 2 above, as the tonnage did not exceed more than 20% of the total of amount of that waste type that arose in the East London in that particular year, and/or it was managed at more than a small number of facilities. Therefore we are not writing to you regarding these particular flows.

London Boroughs of Barking and Dagenham, Havering, Newham and Redbridge

Continued overleaf

However, given that inert or non-hazardous waste from East London has been managed at facilities located in your Plan area in the past, and given the finite nature of landfill capacity within East London, we are writing to enquire about the future availability of the following capacity within your Plan area:

a. Non-hazardous landfill capacity; and
b. Permanent deposit to land for inert waste capacity.

In particular:

1. Do you anticipate such capacity being available within your Plan area up to 2041, and if so:

2. Is there any planning reason why such capacity would not be available to accept waste from East London?

We also welcome any other comment you may have in relation to cross boundary movements of waste between our authorities. Furthermore, we would welcome any representations from your Council on our Regulation 18 draft version of the East London Joint Waste Plan (ELJWP), which can be accessed here https://consultation.havering.gov.uk/planning/east-london-joint-waste-plan/.

We would be grateful for a response **by 16th September 2024.**

Should you have any questions please contact the East London Boroughs at eljointwasteplan@havering.gov.uk

Yours faithfully,

London Boroughs of Barking and Dagenham, Havering, Newham, and Redbridge

Appendix 4: Example of letter sent to Waste Planning Authorities regarding status of facilities Identified as receiving strategically significant amounts of waste from East London

ELJWP
East London Joint Waste Plan

Dear Sir/Madam,

East London Waste Movement Enquiry

This enquiry is sent on behalf of the East London Boroughs (London Boroughs of Barking and Dagenham, Havering, Newham and Redbridge) to inform development of the emerging East London Joint Waste Plan (2024).

As part of our ongoing Duty to Cooperate (DtC) engagement activity, I am writing with regard to waste movements between our respective Waste Planning Authority (WPA) areas as Wakefield is identified as having received strategic quantities of waste from at least one of the four East London boroughs in each of the most recent years for which data is available at the time of writing (2020-2022).

Waste movements from East London considered strategic have been identified through the following steps:

1. When the tonnage of East London waste going to a particular Plan area reported in the Environment Agency Waste Data Interrogator (WDI) 2022 cross checked with the Hazardous Waste Interrogator (HWI) 2022 exceeds the following thresholds (as agreed by National Waste TAB Chairs 'Duty to Cooperate on Waste – Practice Guide for Waste Planning Authorities in England):
    - Non-hazardous waste: 5,000 tonnes per annum
    - Inert waste: 10,000 tonnes per annum
    - Hazardous waste: 500 tonnes per annum (increased from 100t); and
2. Where that waste flow went to a single or small number of sites such that the dependency is greater than if it was distributed across a large number of sites.

Our analysis of the available datasets shows Wakefield as having received waste from East London in excess of the thresholds set out above for one of the three principal waste streams, and this tonnage going to a single facility.

The following table shows the destination sites in Wakefield which received more than 5,000 tonnes of non-hazardous waste from East London in 2022.

Table 1: Sites in Wakefield receiving 5,000 tonnes or more of Non-Inert Waste from East London (2022)

Facility WPA	Site Category	Site Name	Operator	Principal Waste Type 5,000t or more	Tonnes
Wakefield	Incineration	Ferrybridge 2	Enfinium Ferrybridge 2 Ltd	RDF	42,828
		Ferrybridge 1	Enfinium Ferrybridge 1 Ltd		6,803

Given the strategic nature of these flows, it is important for us to ascertain the continued availability of capacity at the receiving facilities identified, through to the end of the intended East London Joint Waste Plan period (til 2041).

Continued overleaf

We therefore request you respond on the following points:

1. Does Wakefield Council expect the facilities identified above to remain operational through to 2041?
2. Is Wakefield Council aware of any planning reasons that might mean the acceptance of wastes from East London cannot continue through to 2041, such as consent conditions and end dates; or if the site has been earmarked in local plans for redevelopment. If there is no planning reason the Council is aware of, please confirm that the site is safeguarded for the management of the type of waste shown.
3. Does Wakefield Council have any specific policies in its local plan concerning providing for the management of waste that arises from outside Wakefield?
4. Has Wakefield Council entered into any Statements of Common Ground, or whether correspondence with, other source WPAs concerning the continued availability of capacity at the facilities in question that might compromise continued access to capacity for East London's waste.

We also welcome any other comment you may have in relation to cross boundary movements of waste between our authorities. Furthermore, we would welcome any representations from Wakefield Council on our Regulation 18 version of the East London Joint Waste Plan (ELJWP), which can be accessed here https://consultation.havering.gov.uk/planning/east-london-joint-waste-plan/.

We would be grateful for a response by 10th September 2024. If a response is not received from you by the stated date, we shall assume there are no known issues with the continued movement of waste as set out in the Table above from East London to Wakefield to 2041.

Should you have any questions please contact the East London Boroughs at eljointwasteplan@havering.gov.uk

Yours faithfully,

London Boroughs of Barking and Dagenham, Havering, Newham, and Redbridge

Appendix 5: Summary of Findings of Duty to Cooperate Engagement with WPAs Regarding Waste Exports Including to Landfill

Cambridgeshire and Peterborough Councils

- **Findings:**
  - Witcham Meadlands Landfill to close by 2027 due to restoration requirements.
  - Local plan prioritises net self-sufficiency but included provisions for London waste until 2026.
  - Pressure on landfill capacity for construction and inert waste.
- **Outcome:**
  - Limited future capacity; East London advised to seek alternatives.

East Sussex County Council

- **Findings:**
  - Robertsbridge Gypsum Works expected to remain operational through to 2041.
  - Ripleys Property Holdings Ltd at East Quay, Newhaven is vacating, impacting ferrous metal waste management.
  - No specific policies in the local plan for waste from outside East Sussex, but adherence to South East Waste Planning Advisory Group's Statement of Common Ground.
- **Outcome:**
  - Alternatives for managing ~8,500 tpa of scrap metal need to be identified.

Essex County Council

- **Findings:**
  - Non-hazardous landfill void space likely to be exhausted by 2029 without new permissions.
  - Inert waste capacity sufficient until 2027 but reserved for local needs.
- **Outcome:**
  - Emphasised need for self-sufficiency in East London's waste planning.

Hertfordshire County Council

- **Findings:**
  - General support for Draft ELJWP but concerns raised about releasing under- utilised waste sites.
  - Highlighted London's reliance on the East of England for inert waste disposal.
- **Outcome:**

    - Suggested retaining safeguarded sites to meet future capacity demands.

Kent County Council

- **Findings:**
    - Identified facilities safeguarded but Shelford non-hazardous waste landfill limited to operations until 2036.
    - General recognition of waste movements between Kent and London.
- **Outcome:**
    - Acknowledge loss of capacity at Shelford Landfill post-2036.

Liverpool City Council

- **Findings:**
    - No non-hazardous landfill capacity available.
    - Limited inert capacity reserved for local needs; unlikely to accept waste from East London.
- **Outcome:**
    - Confirmed no viable capacity for East London's waste needs.

Medway Council

- **Findings:**
    - Potential redevelopment of Streetfuel site could impact waste capacity.
    - Slicker Recycling site safeguarded under draft local plan once adopted.
- **Outcome:**
    - Highlight uncertainty around Streetfuel capacity and recommend securing SoCGs.

Milton Keynes Council

- **Findings:**
    - Bletchley Landfill permitted until 2037; void space adequate for current needs.
    - Limited capacity for inert waste due to the expiration of related permissions.
- **Outcome:**
    - Encouraged prioritisation of waste treatment higher in the waste hierarchy.

North Lincolnshire Council

- **Findings:**

    - Facilities are expected to remain operational until 2041; no specific planning reasons identified that would prevent acceptance of waste from East London.
    - The site is proposed to be safeguarded for waste management use in the draft Local Plan, currently under Examination in Public.
    - No specific policies in the Local Plan address the management of waste from outside North Lincolnshire.
- **Outcome:**
    - No action required; the council did not identify any concerns or limitations regarding the acceptance of waste from East London.

Northamptonshire (West & North)

- **Findings:**
    - ENRMF landfill extended to operate until 2046.
    - Policy supports minimising waste movements but recognises market-driven cross-boundary flows.
- **Outcome:**
    - No immediate capacity concerns; East London encouraged to maintain cooperative dialogue.

Oxfordshire County Council

- **Findings:**
    - Sutton Courtenay and Finmere landfill sites to close before 2041.
    - Future waste needs of London must be addressed within the Plan area.
- **Outcome:**
    - Urged East London to identify alternative landfill options post-2031.

Sandwell Borough Council

- **Findings:**
    - Facilities identified are expected to remain operational through 2041.
    - No planning reasons identified that would prevent the continued acceptance of waste; key strategic waste facilities and employment areas are safeguarded for waste operations.
    - The authority is a net importer of waste and does not have specific policies addressing waste from outside Sandwell.
    - Sandwell is a member of the West Midlands Resource Technical Advisory Body (WMRTAB) and follows its thresholds for determining strategic waste movements. No Statements of Common Ground (SoCG) are required.
- **Outcome:**
    - Capacity for non-inert waste to be considered as part of the plan if needed.

Staffordshire County Council

- **Findings:**
  - Staffordshire County Council did not provide a definitive response about the operational status of the identified facility (‘Unit 22, Watling St, Business Park’) through to 2041.
  - No planning permissions for the identified facility have been granted by Staffordshire County Council.
- **Outcome:**
  - Further clarification may be required from Staffordshire County Council regarding the long-term operational status of the facility identified as receiving waste from East London.

Surrey County Council

- **Findings:**
  - Patteson Court non hazardous waste landfill set to close by December 2030.
  - No specific cross-boundary planning constraints currently identified.
- **Outcome:**
  - Plan for cessation of non hazardous waste landfill capacity at Patteson Court by 2030.

Thurrock Council

- **Findings:**
  - Multiple sites receiving significant waste from East London are of strategic importance.
  - Fort Road Biomass and Tilbury Green Power sites are critical for waste flows.
  - Concern regarding capacity shortfalls and cross-boundary impacts.
- **Outcome:**
  - Further engagement recommended, including a Statement of Common Ground (SoCG).

East London Joint Waste Plan

Sites Identified for Release in Reg 19 ELJWP

v2.0 18.02.2025

Introduction

The Regulation 18 Draft ELJWP included a list in Table 9 of sites identified as existing waste sites under the London Plan definition proposed to be released for redevelopment for non-waste uses through the Plan. These were listed on the basis that their continued safeguarding for use for waste would likely hinder wider planning & regeneration objectives . Release was justified on the basis that the each of the sites were identified in 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.

While the GLA response to the Regulation 18 draft (dated 10th October 2024) considered that pursuing the release of these sites through a plan-led approach may raise London Plan general conformity issues, the Boroughs remain of the view that their release for redevelopment is consistent with the expectation that release of such sites be through a plan-led approach as set out in Paragraph 9.9.2 of the London Plan 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."

As the existing surplus capacity in the Plan area would provide alternative management capacity for the waste that may have been managed at the sites included in Table 9, in effect compensating for their release, the Boroughs consider this is consistent with the approach set out in Para 9.9.3 of the London Plan. This 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 added)

It should be noted that Table 9 included in the Regulation 18 version of the Plan listed seven sites to be released from safeguarding. This listing has now been rationalised given that:

- three of sites have been granted planning consent for a change of use from waste following consultation and agreement to their release by the GLA development management function in the intervening period; and
- one site (Renwick Road) has been removed and reinstated as a safeguarded site following consultation with the occupier and landowner.

One site that was identified as a potential site for release in Appendix 3 of the Regulation 18 Plan (Old Bus Depot) has been added to the list presented in the Regulation 19 version of the Table.

Therefore, only four sites are now proposed to be released through the ELJWP preparation process.

These are listed in Table 1 overleaf, along with their status.

Table 1: Site Status Summaries

Borough	Site Name	Purpose of Release/ Proposed Use	Assessed Capacity (5-year peak, tonnes)		Planning Status	Permit Status	Status
			Apportioned Waste	CDEW			
Barking & Dagenham	Eurohub, Box Lane, (D B Cargo)	Castle Green Masterplan	0	313,538	Permitted development Part 8 Class A	Permit issued 17/07/2018	Sites to be released at landowner request as occupancy of waste uses to cease in 2025 and permits to be surrendered on vacation.
	Eurohub, Box Lane, Annex to Shed A (Titan Waste)		15,997	20,173	Granted permission by way of appeal against an Enforcement Notice. (granted 2021)	Permit issued 28/05/2019	
	Old Bus Depot, Perry Road (Manns Waste Management)	City Market relocation	22,128	56,647	Permanent Permission for Materials Reclamation Facility (granted 2009)	Permit Revoked	Applicant was due to vacate site by October 2023[1]
Newham	Connolleys Yard, Unit 5c Thames Road (Connolleys Metals)	Connaught Riverside Strategic Site	0	34,958	Use for the melting of scrap aluminium and the grading and recycling of other non-ferrous metals. (granted 1993)	Permit issued 07/03/2018	Site allocation in Reg 19 Local Plan Operation now relocated.

[1] Site is now subject to a validated planning application for change of use to non-waste. GLA response awaited.

Commentary

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

Table 2: Summary of Site Status

Site Name	Permanent Planning?	Permitted?	Active?
Eurohub, Box Lane, (D B Cargo)	N	Y	Y -to 2025
Eurohub, Box Lane, Annex to Shed A (Titan Waste)	Y	Y	Y -to 2025
Old Bus Depot, Perry Road (Manns Waste Management)	Y	N	N
Connolleys Yard, Unit 5c Thames Road (Connolleys Metals)	Y	Y	N

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

1. 1 Site in Castle Green (Barking & Dagenham) located at the Eurohub rail sidings operates under Permitted Development rights. The site permit is due to be surrendered when the occupier's lease expires in 2025. Given the lack of express planning consent for a waste use this site will fall outside the London Plan definition of existing waste site once the permit is surrendered.

2. 1 Site in Castle Green (Barking & Dagenham) located at the Eurohub rail sidings benefits from planning permission. The site permit is due to be surrendered when the occupier's lease expires in 2025. Given express planning consent for a waste use this site would remain within the London Plan definition of existing waste site even when the permit is surrendered. However, there is little merit in safeguarding the waste management capacity which is surplus to requirements once the site is vacated as it will impede the redevelopment aspirations of the Eurohub site as a whole.

3. 1 site located at the Old Bus Depot has planning permission but is not subject to a permit, as that was revoked by the Environment Agency and the site was required to be returned to pre-permit conditions in October 2023. Given express planning consent for a waste use this site falls within the London Plan definition of existing waste site. However, the Environment Agency has advised that the grant of a permit would be unlikely given the location of the site and proximity to local receptors. Given the remote prospect of gaining a permit for a future waste use this site can be considered as unsuitable and ought to be released.

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. Given express planning consent for a waste related use, this site 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 given the allocation of the site for mixed use development (under the Newham Local Plan site allocation S23 and emerging site allocation N2.SA3), the need to deliver housing on a part of the site allocation 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)

In order to ensure that release of the sites will not give rise to any strategic vulnerabilities for WPAs from which waste managed at any of the sites arises, a review of WDI data for a sample year 2021 when all sites reported has been undertaken. The results of this exercise are displayed in Table 3 below.

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

Source: WDI 2021

Origin WPA (WDI)	Eurohub, Box Lane, (D B Cargo)	Eurohub, Box Lane, Annex to Shed A (Titan Waste)	Old Bus Depot, Perry Road (Manns Waste Management)	Connolleys Yard, Unit 5c Thames Road (Connolleys Metals)
London (WPA Not codeable)	149,153	0	0	0
Various (less than 300t each)	0	2,632	0	0
ELWA & B&D	0	0	41,520	0
South East (WPA not codeable)	0	0	0	30,398

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 Connelley 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 Manns Waste Management 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.

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.

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ELJWP

East London Joint Waste Plan

Circular Economy Topic Paper

Update to accompany Publication (Regulation 19) of the Submission Draft East London Joint Waste Plan

17.02.25

Barking & Dagenham

Havering LONDON BOROUGH

Newham London

London Borough of Redbridge

Table of Contents

Abbreviations and Glossary

Abbreviations

CE	Circular Economy
DRS	Deposit Return Scheme
EPR	Extended Producer Responsibility
GHG	Greenhouse Gases
LA	Local Authority
LPA	Local Planning Authority
NPPF	National Planning Policy Framework
NPPW	National Planning Policy for Waste
RWS	Resources and Waste Strategy

Glossary

Anaerobic Digestion	A natural process comprising the breakdown of organic material in the absence of air. It is carried out in an enclosed vessel and produces biogas (methane) that may either be used to produce electricity or cleaned up and supplied to the gas grid.
Circular Economy	The circular economy means decoupling economic activity from the consumption of resources. It is based on three principles: Design out waste and pollution; keep products and materials in use; regenerate natural systems.

Climate Change	Climate change is a long-term change in the average weather patterns that have come to define Earth's local, regional and global climates.
Climate change adaptation	Adjustments made to natural or human systems in response to the actual or anticipated impacts of climate change, to mitigate harm or exploit beneficial opportunities.
Climate change mitigation	Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.
Extended Producer Responsibility	Extended Producer Responsibility is a policy approach under which producers are given a significant responsibility – financial and/or physical – for the treatment or disposal of post-consumer products.
Greenhouse Gases	A greenhouse gas is a gas which absorbs reflected solar energy. This has the effect of making the Earth's atmosphere warmer. Solar energy enters the Earth's atmosphere and reaches its surface. Some of that energy is reflected back into space, however greenhouse gases absorb this reflected energy back to the Earth. Carbon dioxide, methane and nitrous oxide are all greenhouse gases.
Local Plans	Prepared by local planning authorities, Local Plans guide decisions on future development proposals for an area. They set out policies to be used in decision making which are supported by a vision for how the local planning authority would like the area to develop.
Recycling	The collection and separation of materials from waste and subsequent processing to produce new products and materials.
Regenerative	Something that is able to or tending to regenerate—to regrow or be renewed or restored, especially after being damaged or lost.
Reuse	Reuse is the use of a product or material in its original form with minimal reprocessing (can be following repair), that would otherwise be managed as waste.

1. Executive Summary

1.1 This topic paper sets out background information that underpins proposed policies in the Regulation 18 East London Joint Waste Plan intended to ensure development comes forward in a manner that is more aligned with circular economy principles.

1.2 The topic paper considers and explains what a circular economy is, its benefits and its impact on the environment and climate change, and, in particular, how the East London Joint Waste Plan can help facilitate a move to a more circular economy.

1.3 It provides information and guidance on the circular economy and its implications for land use and the built environment.

1.4 The paper aims to inform stakeholders, including developers, architects, and the public, about the benefits and challenges of adopting circular economy principles in the built environment and its relevance to the preparation of the East London Joint Waste Plan.

1.5 It highlights the role of planning policy in facilitating the transition to a circular economy and provides recommendations for incorporating circular economy practices into development projects.

1.6 This document was drafted in July 2024 and so reflects Government policy and strategy at that time. The document will be updated in light of any changes to Government policy and strategy that are made prior to the publication of the Regulation 19 East London Joint Waste Plan (this is the final draft version of the Plan that will be submitted for independent examination).

2. Introduction

2.1 The implications of a traditional linear economy, which constantly takes, makes, uses and disposes of resources, are becoming clearer as the impacts of climate change and damage to the environment are realised both locally and globally. The 'circular economy' offers an alternative economic model that seeks to address these problems by avoiding and reducing the wasteful processes associated with growth in most of the world's economies.

2.2 The World Economic Forum's definition of a Circular Economy is as follows:

'A circular economy is an industrial system that is restorative or regenerative by intention and design. It replaces the end-of-life concept with restoration, shifts towards the use of renewable energy, eliminates the use of toxic chemicals, which impair reuse and return to the biosphere, and aims for the elimination of waste through the superior design of materials, products, systems, and business models.'

2.3 A circular economy is underpinned by the following three main principles:

1. Designing out waste and pollution as far as possible;

2. keeping products and materials in use for longer; and,

3. regenerating and recovering natural systems.

2.4 By adopting these principles, traditional economic objectives, opportunities and growth can still be achieved through innovation while the impacts of climate change and environmental damage can be reduced or, ideally, eliminated[1]. For example, in a 2021 report[2], the Green Alliance estimated that a move to a more circular economy in the UK would result in 450,000 jobs by 2035.

2.5 Greenhouse gas (GHG) emissions from the waste sector represent approximately 4% of total UK greenhouse gas emissions (see Climate Change Topic Paper) and are indirectly related to other sectors, for example, the refurbishment and construction of buildings accounts for 11% of the GHG emissions in major cities (which is in large part due to emissions associated with the production of construction materials such as cement, steel, aluminium and plastic) and 15% of these materials are wasted during the construction process and resources may be lost due to their disposal in landfill when a building is demolished[3]. These wasteful practices result in increased GHG emissions associated with the production of the building materials which arise from the extraction of raw materials and their conversion into products[4].

[1] https://www.ellenmacarthurfoundation.org/circular-economy/concept

[2] https://green-alliance.org.uk/resources/Levelling_up_through_circular_economy_jobs.pdf

2.6 This topic paper sets out background information that underpins proposed policies in the East London Joint Waste Plan (ELJWP) which are intended to ensure development comes forward in a manner that is more aligned with circular economy principles. The topic paper considers what a circular economy is, its benefits and its impact on the built environment and climate change, and, in particular, how planning policy in the East London Joint Waste Plan can help a transition to a more circular economy.

2.7 Adopting circular economy principles in the ELJWP is consistent with the London Plan 2021 that includes the following in Policy GG6 ('Increasing efficiency and resilience'):

'To help London become a more efficient and resilient city, those involved in planning and development must:…

A. seek to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero-carbon city by 2050…'

[3] https://www.ellenmacarthurfoundation.org/assets/downloads/Completing_The_Picture_How_The_Circular_Economy-_Tackles_Climate_Change_V3_26_September.pdf

[4] Acuff, K., & Kaffine, D. T. (2013). Greenhouse gas emissions, waste and recycling policy. Journal of Environmental Economics and Management, 65(1), 74-86.

3. Policy Background

National Policy

3.1 The UK government has published various policy and strategy documents which are aligned with the achievement of a more circular economy and the main ones are discussed below.

Environment Act 2021

3.2 The Environment Act 2021 includes powers to deliver the following:

- Extended producer responsibility to make producers pay for 100% of cost of disposal of products, starting with plastic packaging
- A Deposit Return Scheme for single use drinks containers
- Charges for single use plastics
- Greater consistency in recycling collections in England
- Electronic waste tracking to monitor waste movements and tackle fly-tipping
- Reductions in waste crime
- Introduction of new resource efficiency information (labelling on the recyclability and durability of products)
- Regulation of the shipment of hazardous waste
- Bans or restrictions on the export of waste to non-OECD countries

Resources and Waste Strategy, 2018

3.3 The 2018 Resources and Waste Strategy (RWS)[5] sets out current Government thinking on waste management in England, including how the country must minimise waste and manage it more effectively through maximising opportunities to generate value from material prevented from entering, and that extracted from, waste streams. RWS includes an illustration of the circular economy on page 8 (also included in the ELJWP).

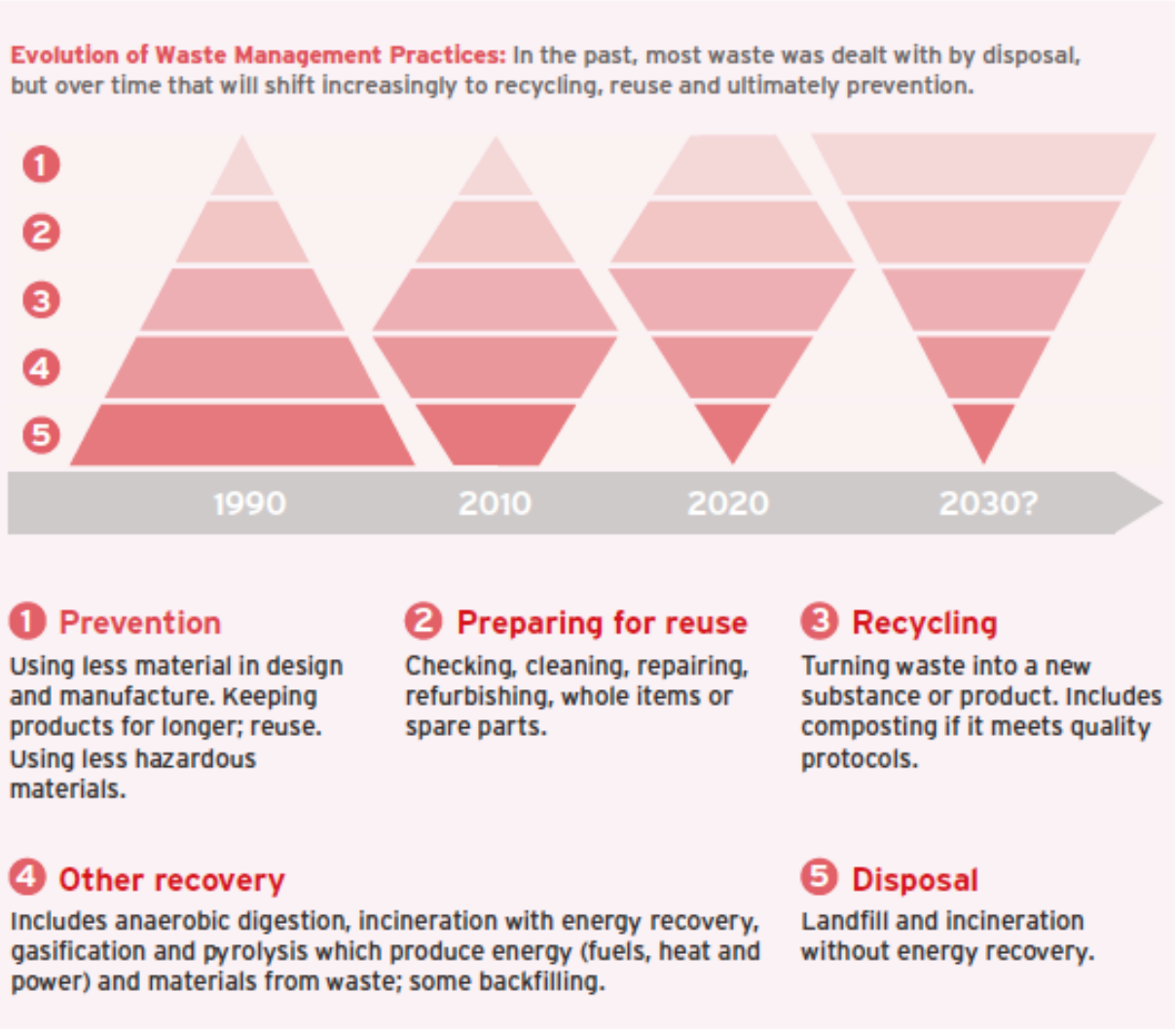
3.4 The RWS identifies five strategic ambitions:

1. To work towards all plastic packaging placed on the market being recyclable, reusable or compostable by 2025;
2. To work towards eliminating food waste going to landfill by 2030;
3. To eliminate avoidable plastic waste over the lifetime of the 25 Year Environment Plan (by 2042);
4. To double resource productivity by 2050; and
5. To eliminate avoidable waste of all kinds by 2050.

[5] Our Waste, Our Resources: A Strategy for England, DEFRA, 2018 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/765914/resources-waste-strategy-dec-2018.pdf

3.5 Since 2018, the Government has announced further targets and initiatives which are considered below.

3.6 The RWS identifies the waste hierarchy as a key principle to be applied when promoting a more circular economy. The waste hierarchy provides a framework on how to deal with waste efficiently and requires that waste is prevented from occurring in the first place and resources are reused and recovered as much as possible. Implementing the waste hierarchy is essential if resources are to be managed in a more efficient way and a circular economy is to be established. The RWS illustrates how England is moving towards the management of waste in accordance with the waste hierarchy as set out below



3.7 The RWS identified the construction sector as a key area where resource efficiency needs to be improved to maximise resource productivity and meet targets related to waste production and management. RWS noted that the construction industry is on the brink of fundamental change with the increasing adoption of innovative construction materials and techniques. The implementation of Extended Producer Responsibility (EPR) for certain materials used in the construction sector is seen as a particular way of improving resource use, though this has not yet been implemented.

3.8 As part of the RWS, DEFRA launched three consultations in 2019:

- Introducing a Deposit Return Scheme for drinks containers (DRS) in England, Wales and Northern Ireland;
- consistency in Household and Business Recycling Collections in England; and,
- reforming the UK packaging producer responsibility system by introducing EPR.

3.9 The aim of a DRS would be to reduce the amount of littering, increase recycling rates for related materials, improve collection of high quality materials in greater quantities and promote recycling through clear labelling and consumer messaging. Government has recently (April 2024) announced a revised timeline for DRS with implementation now programmed for October 2027[6].

3.10 The EPR scheme for packaging will require packaging producers to pay the full cost of managing packaging once it becomes waste[7]. The scheme will encourage producers to use less packaging (e.g. by 'light weighting') and use more recyclable materials, reducing the amount of hard to recycle packaging placed on the market. The main requirement of the EPR Regulations is that no one responsible for packing or filling products into packaging or importing packed or filled packaging into the United Kingdom, may place that packaging on the market unless it fulfils the 'essential requirements' and is within the heavy metal concentration limits. The essential requirements are as follows:

- Packaging must be manufactured in such a way that it can be reused or recovered;
- packaging must not contain any hazardous substances above the permitted levels;
- packaging must be marked with the appropriate identification codes; and, packaging must be designed and manufactured to meet the requirements of the essential requirements.

[6] https://www.gov.uk/government/publications/deposit-return-scheme-for-drinks-containers-policy-statements/deposit-return-scheme-for-drinks-containers-joint-policy-statement

[7] https://www.gov.uk/guidance/extended-producer-responsibility-for-packaging-who-is-affected-and-what-to-do

3.11 In 2023 the UK government confirmed that implementation of the EPR scheme had been delayed for a year until October 2025.

3.12 The consultation on consistency was concerned with measures to improve the quantity and quality of what is recycled by moving towards methods of waste collection which are more consistent across the country. It is anticipated that consistent collection will help increase recycling rates significantly above 50%, towards the much higher recycling rate of 65% (by 2035). The proposals consulted on were for all local authorities to:

- collect the same core set of dry recyclable materials from households
- have separate weekly food waste collections from households, including flats

3.13 In response to the consultation, in 2023, the UK government announced a new, but related, initiative called 'Simpler Recycling'. The initiative aims to reform the waste system by introducing a simpler, and 'common-sense' approach to recycling. The approach means that people across England will be able to recycle the same materials, whether at home, work, or school regardless of where they live. This will include weekly collections of food waste, for most households, by 2026[8]. It is not clear whether this will be taken forward following the general election of July 2024.

Waste (Circular Economy) (Amendment) Regulations 2020[9]

3.14 The Waste (Circular Economy) (Amendment) Regulations 2020 (*SI 2020/904*), transposed the EU's 2020 Circular Economy Package (2020 CEP) in England, and were made on 25 August 2020. These Regulations implement six amending EU Directives on waste management as follows:

- The Waste Framework Directive;
- packaging and packaging waste;
- landfill of waste;
- end-of life vehicles;
- batteries and accumulators and waste batteries and accumulators; and,
- waste electrical and electronic equipment.

[8] https://www.gov.uk/government/news/simpler-recycling-collections-and-tougher-regulation-to-reform-waste-system

[9] https://www.legislation.gov.uk/uksi/2020/904/made

3.15 The changes are intended to increase the prevention, reuse and recycling of waste e.g. by strengthening requirements for the separate collection of paper, metal, plastic or glass. The Regulations also put the Government commitments in the 2018 Resources and Waste Strategy to recycle 65% of municipal waste and to have no more than 10% of municipal waste going to landfill by 2035 into law.

3.16 The bulk of substantive changes to laws, regulations and administrative provisions made under the CEP affect two Directives:

- The Waste Framework Directive
- The Landfill Directive

3.17 Measures are to be taken to prevent waste generation and to monitor and assess the implementation of those measures. These measures must be included in waste prevention programmes prepared by 'appropriate authorities'[10].

3.18 Requirements for separate collection of waste are amended to provide more detail on the circumstances under which separate collection of waste is not necessary to ensure that waste undergoes preparing for reuse, recycling, or other recovery. Amendments to regulations are intended to ensure that waste collected separately for preparing for re-use or recycling is not incinerated (whether with or without energy recovery) or landfilled, except for waste resulting from subsequent treatment operations of the separately collected waste for which incineration or landfilling delivers the best environmental outcome in accordance with the waste hierarchy.

Waste Prevention Programme for England (2023)

3.19 The Waste Prevention Programme for England: 'Maximising Resources[11], Minimising Waste' is a cross-departmental Government programme that sets out priorities for managing resources and waste in line with the RWS. The programme aims to move towards a circular economy by keeping goods in circulation for as long as possible and at their highest value. This includes increasing the reuse, repair, and remanufacture of goods. The programme also aims to reduce the amount of waste produced in England and increase the amount of waste that is recycled.

3.20 The programme includes the following three cross-cutting themes:

1. Designing out waste: Including eco-design and consumer information requirements, and Extended Producer Responsibility schemes.

[10] The Waste (England and Wales) Regulations 2011, define "appropriate authorities" as "the Environment Agency, a waste collection authority, a waste disposal authority, a waste regulation authority or a local authority"

[11] https://www.gov.uk/government/publications/waste-prevention-programme-for-england-maximising-resources-minimising-waste

2. Systems and services: Including collection and take-back services, encouraging reuse, repair, leasing businesses and facilities.
3. Data and information: including materials databases, product passports (sets of data, unique to the specific product that can be accessed online and give detailed information on, for example, contained materials, components and history, to support improved outcomes such as higher quality recycling) and voluntary corporate reporting.

3.21 Based on available data on the amount of waste arisings or known carbon emissions from production, the programme identifies the following seven key sectors for action:

- Construction;
- textiles;
- furniture;
- electronics;
- vehicles;
- plastic and packaging; and,
- food.

3.22 The Programme specifically notes that planning has a role in waste prevention and includes the following:

'The Department for Levelling Up, Housing and Communities will continue to support local authorities to promote sustainable resource use through planning. The National Planning Policy for Waste requires that when determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that the handling of waste arising from the construction and operation of development maximises reuse and recovery opportunities, and minimises off-site disposal. Additionally, chapter 2 of the National Planning Policy Framework (NPPF) recognises the need for the planning system to consider the prudent use of natural resources and waste minimisation in the pursuit of sustainable development. The National Planning Policy Framework and the National Planning Policy for Waste are material considerations for local planning authorities when making decisions on planning applications and when preparing their local plans.'

3.23 The programme is required to be reviewed by the UK government every six years. The latest version of the programme was published on 28th July 2023.

National Planning Policy Framework

3.24 The NPPF does not currently include explicit references to the transition towards a circular economy but does state that 'planning policies and decisions must also reflect relevant international obligations and statutory requirements' (paragraph 2). This confirms that planning policy and decisions should be aligned with legislation and other policy e.g. the RWS. Furthermore, the central objective of the NPPF is sustainable development (summarised as 'meeting the needs of the present without compromising the ability of future generations to meet their own needs' (paragraph 7)) which is wholly consistent with circular economy principles.

3.25 The environmental objective of the NPPF calls for 'using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy' (paragraph 8) all of which can be helped by the transition to a circular economy. The other two objectives of the NPPF (economic and social) are interdependent and so must also be considered. Circular approaches to development are consistent with the economic objective of building a 'strong, responsive and competitive economy… to support growth, innovation and improved productivity'. The social objective focuses primarily on homes but aims for a 'well-designed and safe built environment' which circular economy practices can also help deliver.

3.26 The NPPF requires planning policy and decisions on planning applications to support the transition to a low carbon future, stating that the planning system should help 'shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure' (paragraph 157 - emphasis added). This provides clear direction regarding circular approaches in development by promoting reuse.

3.27 In its October 2023 response to the 'Climate Change Committee 2023 report to Parliament – progress in adapting to climate change'[12] , the Government reconfirmed its commitment to a fuller review of the NPPF, in line with the Net Zero Strategy[13], to 'make sure to make sure it contributes to climate change mitigation and adaptation as fully as possible'. The new government has confirmed its intention to prioritise a review of the NPPF as part of its planning reform agenda.

[12] https://www.gov.uk/government/publications/government-response-to-the-climate-change-committee-2023-adaptation-progress-report/government-response-to-the-climate-change-committee-2023-report-to-parliament-progress-in-adapting-to-climate-change

[13] The UK Net Zero Strategy is a government plan to achieve net-zero greenhouse gas emissions by 2050.

National Planning Policy for Waste

3.28 The NPPF should be read in conjunction with the National Planning Policy for Waste (NPPW) (2014) when considering planning for waste. The NPPW sets out the Government's ambition for a more sustainable and efficient approach to resource use and management. The NPPW sets the framework within which Waste Planning Authorities, including the four East London Boroughs, prepare Waste Local Plans and determine waste related planning applications.

3.29 While NPPW does include direct reference to the circular economy its policies support circularity[14] in a number of ways including the following:

1. Sustainable Waste Management: The NPPW promotes sustainable waste management by encouraging developments that facilitate the efficient use of resources, thereby reducing the generation of waste. It advocates for the provision of adequate waste management facilities that support recycling, composting, and other recovery operations.
2. Waste Hierarchy: This approach aligns with the circular economy by ensuring that waste is managed in the most environmentally beneficial way.
3. Design and Construction: The NPPW encourages developments to incorporate design and construction practices that minimise waste and promote the use of recycled and sustainable materials. It supports the use of sustainable building techniques that facilitate the deconstruction and reuse of building components at the end of their life cycle.
4. Infrastructure and Facilities: The policy supports the development of infrastructure and facilities that enable the collection, sorting, and processing of recyclable materials. It encourages the co-location of waste management facilities with other types of development to reduce transportation needs and promote efficiency.

National Model Design Code

3.30 The Government's National Model Design Code[15] is intended to set out clear design parameters to help local authorities and communities decide what good quality design looks like in their area. It helps ensure good quality design in areas by considering various aspects and is aligned with circular economy principles in the following ways:

1. Health and Wellbeing: The code emphasises the creation of safe, inclusive, and active environments, which can contribute to healthier communities and align with circular economy goals.
2. Green Infrastructure and Biodiversity: It encourages approaches to landscape and green spaces, including tree-lined streets. Biodiversity considerations are essential for sustainable development.

[14] 'Circularity' refers to the concept of keeping products and materials in circulation for as long as possible and at their highest value.

[15] https://www.gov.uk/government/publications/national-model-design-code

3. Environmental Performance: The code ensures that buildings and places contribute to net-zero targets, promoting sustainability and resource efficiency.
4. Layout and Infrastructure: It addresses the layout of new developments, including infrastructure and street patterns, which can impact resource use and waste management.
5. Quality Façades and Local Character: The code considers building façade's quality and local vernacular, heritage, and materials, fostering sustainable design.

The Waste Management Plan for England (2021)

3.31 The Waste Management Plan for England provides an overview of waste management in England including the policy landscape. The Plan was updated in 2021 to reflect changes made by the transposition of the EU Circular Economy Package into law in England which includes the requirement for specific legislation for arrangements for waste containing significant amounts of critical raw materials; and an assessment of existing waste collection schemes with a view to improving the separate collection. These additions support the circular economy by providing legislation for managing raw materials and improving the collection of separated waste making it easier for waste to be re-used and recycled.

3.32 The Ministerial Foreword to the Waste Management Plan for England 2021 includes the following:

'The government's overall approach to resources and waste is one of moving away from the current linear economic model of take, make, use, throw, towards a more circular economy which keeps resources in use for longer so that we can extract maximum value from them.'

Circular Economy Taskforce (November 2024)

3.33 In November 2024, the UK government formed an independent expert advisory group, the Circular Economy Taskforce, to develop a comprehensive circular economy strategy for England. This strategy aims to support economic growth, create green jobs, and accelerate progress toward net-zero emissions. The taskforce's work is expected to culminate in the publication of the strategy and accompanying roadmaps between summer and autumn 2025.

London

London Plan 2021

3.34 The London Plan 2021 takes a comprehensive and ambitious approach in seeking a transition to a circular economy. The approach includes specific policy intended to ensure that major new development is designed and constructed with circular economy principles in mind – this includes a requirement for the submission of Circular Economy Statements with proposals for development that is of such significance that it must be referred to the Mayor for determination ('Referrable development[16]). Circular Economy Statements are required to consider the whole lifecycle of a building, including construction, use and end of life. The Plan states:

'3.3.10 To minimise the use of new materials, the following circular economy principles (see also Figure 3.2) should be taken into account at the start of the design process and, for referable applications or where a lower local threshold has been established, be set out in a Circular Economy Statement (see Policy SI 7 Reducing waste and supporting the circular economy):

building in layers – ensuring that different parts of the building are accessible and can be maintained and replaced where necessary

designing out waste – ensuring that waste reduction is planned in from project inception to completion, including consideration of standardised components, modular build and re-use of secondary products and materials

designing for longevity

designing for adaptability or flexibility

designing for disassembly

using systems, elements or materials that can be re-used and recycled.

3.3.11 Large-scale developments in particular present opportunities for innovative building design that avoids waste, supports high recycling rates and helps London transition to a circular economy, where materials, products and assets are kept at their highest value for as long as possible. Further guidance on the application of these principles through Circular Economy Statements will be provided.

3.3.12 Figure 3.2 shows a hierarchy for building approaches which maximises use of existing materials. Diminishing returns are gained by moving through the hierarchy outwards, working through refurbishment and re-use through to the least preferable option of recycling materials produced by the building or demolition process. The best use of the land needs to be taken into consideration'

3.34 Guidance on the preparation of Circular Economy Statements has been published by the Greater London Authority[17].

3.35 In preparing Local Plans, the Boroughs are encouraged to require Circular Economy Statements for development that is of a scale below that of referrable development.

3.36 It is important to note that the Mayor has also set a target for London to be net zero carbon by 2030[18].

East London

Local Plans and Guidance

3.37 Each of the Boroughs in East London already include policies in their Local Plans requiring proposals for development to consider how the waste arising at the development will be managed. This includes making provision for the temporary storage of waste prior to its collection. A summary of local plan policy requirements is set out in the appendix to the Climate Change Topic Paper.

3.38 Some boroughs have also prepared guidance intended to assist architects in ensuring that waste management is taken into account in their designs for new housing development. A good example of this is the 'Waste Management Guidelines for Architects and Property Developers' prepared by the London Borough of Newham[19].

3.39 In some cases, the Boroughs' Climate Change Action Plans also reference the circular economy as a means of mitigating climate change, for example by minimising waste and making its management more sustainable.

3.40 Newham Council's 'Just Transition Plan' (December 2023) was prepared in response to its earlier Climate Change Emergency Statement (2019). The Plan takes a more holistic approach to climate change by considering matters other than decarbonisation. The Plan focuses on increasing equity, reducing emissions, and building long-term resilience[20] and promotes circular economy initiatives such as encouraging collaboration with local reuse and repair organisations.

London Borough of Barking and Dagenham Local Plan, 2024

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[16] 'Referrable development' includes developments with more than 150 residential units or over 30,000 square metres of floor space.

[17] https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance

[18] https://www.london.gov.uk/programmes-and-strategies/environment-and-climate-change/climate-change/zero-carbon-london/pathways-net-zero-carbon-2030

[19] https://www.newham.gov.uk/downloads/file/7057/waste-management-guidelines-for-architects-and-property-developers

[20] https://www.newham.gov.uk/council/just-transition-plan

3.41 The recently adopted, new Local Plan for Barking and Dagenham[21] sets out planning policy in the borough until 2037.

London Borough of Havering Local Plan (2016-2031)

3.42 The Local Plan for Havering sets out planning policy in the borough until 2031.

London Borough of Newham Local Plan (2018-2033)

3.43 The Local Plan for Newham sets out planning policy in the borough until 2033. In summer 2024, Newham consulted on its Regulation 19 draft Submission Local Plan.

London Borough of Redbridge Local Plan (2015-2030)

3.44 The Local Plan for Redbridge sets out planning policy in the borough until 2030.

[21] https://www.lbbd.gov.uk/planning-building-control-and-local-land-charges/planning-guidance-and-policies/local-plan

4. Circular Economy and Climate Change

4.1 While the primary focus of the circular economy is delivering benefits for the wider environment while providing greater security in resource supply and boosting the economy, it also has a crucial role to play in mitigating the causes of climate change. This is recognised in the Government's Net Zero Strategy[22] which includes a section on sustainable use of resources and notes: *'Net zero will mean maximising the value of resources within a more efficient circular economy.'*

4.2 A transition to a circular economy requires a decoupling of growth from consumption. By implementing policies which require a more circular approach, consumption and associated GHG emissions are reduced while growth is sustained.

4.3 As the use of renewable energy mitigates 55% of GHG emissions[23], current climate strategies often emphasise the need to decarbonise energy supplies and transport. However, while these emissions are an important concern, decarbonising these sectors alone will not be sufficient for the UK to meet its statutory target of net-zero emissions by 2050.

4.4 The remaining 45% of GHG emissions arises during the provision of goods, services and infrastructure required to meet society's needs e.g. vehicles, buildings, clothing and food (involving industrial, agricultural and land use processes). It is projected that through technological innovation and a shift in consumption patterns, two thirds of the GHG emissions from these sectors can be reduced by 205024. By increasing the use rate of goods and assets and recycling associated materials, GHG emissions resulting from their production will be reduced.

4.5 Together, building and construction are responsible for 39% of all carbon emissions in the world, with operational emissions (from energy used to heat, cool and light buildings) accounting for 28%. The remaining 11% comes from embodied carbon emissions, or 'upfront' carbon that is associated with materials as well as construction processes[25]. According to a report by the Environmental Audit Committee[26], the built environment is responsible for 25% of the UK's total greenhouse gas emissions. The report also states that emissions from the built environment must be reduced if the UK is to meet net zero by 2050.

4.6 Within cities, 11% of all GHG emissions arise from refurbishing and constructing buildings which utilise materials such as aluminium, steel and concrete, of which 15% is wasted during construction and potentially 100% of all materials lost to landfill when buildings are demolished[27].

[22] Net Zero Strategy: Build Back Greener, BEIS, October 2021

4.7 In East London over 2 million tonnes of Construction, Demolition and Excavation waste is produced each year[28]. Reducing wastage in accordance with circular economy principles reduces the demand for primary raw materials (including minerals) which in turn reduces the GHG emissions associated with their extraction and production of construction materials such as aluminium, steel, and concrete.

4.8 Refurbishing existing development rather than constructing new buildings may play a pivotal role in reducing carbon emissions within the construction industry. Approximately 40% of residential buildings in Europe were built before the 1960s, and many of these structures lack modern energy-saving technologies. Instead of demolishing and replacing them with modern buildings that incorporate energy efficiency measures, refurbishment can integrate such features while preserving the embodied carbon present in existing materials. However, retrofitting existing, and especially older buildings, to modern high energy efficient standards has significant challenges and is not a panacea. By prioritising consideration of the feasibility of refurbishment over new construction, it may be possible to transition to a circular economy and significantly reduce GHG from the construction sector.

4.9 The Green Construction Board published 'The Routemap for Zero Avoidable Waste in Construction in 2021' with support from Government[29]. This recommends steps that could be taken to reduce construction and demolition waste, including giving first consideration to the retention and reuse of existing resources and buildings.

4.10 Designing buildings with their deconstruction in mind (Design for Deconstruction (DfD)) can also help reduce carbon emissions. DfD includes:

- Designing buildings such that they can change their use over time – minimising the need for refurbishments and redevelopment and considering how or where buildings can be repurposed or their life extended;
- using systems and products that have long lifespans; and,
- ensuring that materials can easily be recovered for reuse at the end of a building's life.

[23]https://www.ellenmacarthurfoundation.org/assets/downloads/Completing_The_Picture_How_The_Circular_Economy-_Tackles_Climate_Change_V3_26_September.pdf

[24] https://climate.ellenmacarthurfoundation.org/

[25] World Green Building Council

[26] https://publications.parliament.uk/pa/cm5803/cmselect/cmenvaud/103/report.html

[27] Ellen MacArthur Foundation

[28] See Waste Topic Paper, July 2024

[29] https://www.constructionleadershipcouncil.co.uk/wp-content/uploads/2021/07/ZAW-Interactive-Routemap-FINAL.pdf

4.11 This approach reduces the amount of energy that would be required to produce new materials. Designing for deconstruction also contributes to lowering carbon emissions by minimising the quantity of waste and materials requiring transportation.

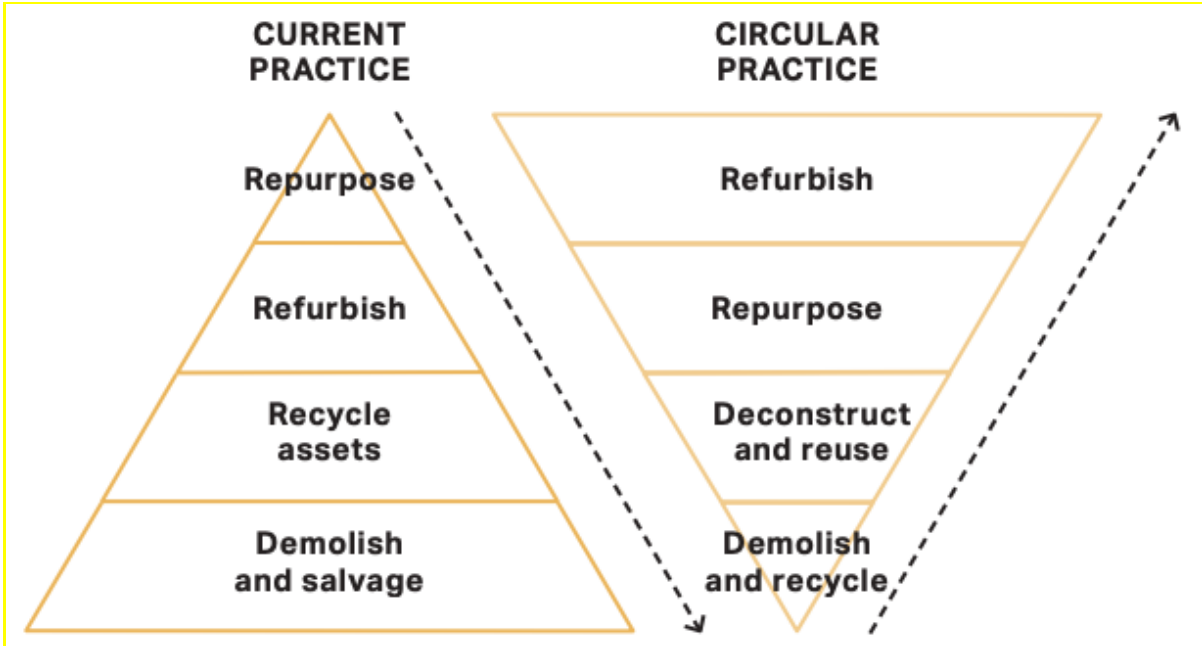
4.12 The separate ELJWP Topic Paper on Climate Change discusses the interaction between waste management climate change in more detail.

5. Circular economy, land use and the built environment - implications

5.1 Implementing circular economy principles in land use and development involves the following:

- Optimising Existing Infrastructure: Making better use of existing buildings and infrastructure by promoting sharing and reuse, reducing the need for new construction.
- Designing for Longevity: Creating new buildings that maximise their useful life by allowing easy adaptation to various purposes.
- Shift from Demolition to Deconstruction: Instead of demolishing buildings, focussing on deconstruction to reclaim materials for reuse, repair, and refurbishment.
- Resilient Materials: Using non-hazardous materials that withstand damage from use and weathering.
- Prefabrication to Reduce Waste: Minimising waste during construction through pre-fabrication techniques.
- Elimination of Hazardous Materials: Avoiding use of hazardous materials to simplify end-of-life management.
- Promoting Reuse and Recycling: Ensuring waste generated during development can be easily reused or recycled, for example by providing separate storage for recyclable materials.
- Regenerative Design: Creating long-lasting developments that work with natural processes – harnessing sustainable resources such as solar gain, water harvesting, and biodiversity net gain.
- Renewable Energy Use: Incorporating renewable energy sources during construction and building use.
- Efficient Land Use: Maximising land efficiency.
- Restoration of Derelict Land: Revitalising abandoned or neglected land.
- Shared Facilities: Providing developments with shared amenities (e.g., laundries) to avoid unnecessary replication of consumer goods.
- Circular Activities Space: Including facilities for sharing, hiring, repairing, and reusing.
- Low-Carbon Transport: Prioritising low-carbon shared/public transportation.
- Ecosystem Services Protection: Safeguarding and enhancing ecosystem services and natural capital.

5.2 The diagram below illustrates the changes in approaches needed within the development industry to achieve a more circular economy:



Source: Design for a Circular Economy Primer, GLA[30]

Challenges

5.3 While recovering and recycling materials like aluminium and plastic benefits the environment, the process can be costly and so, in some cases, it may be more practical and economical to purchase new primary products[31].

5.4 Currently, there is a lack of suitable products and incentives for developers and architects to fully embrace approaches aligned with achieving a circular economy. Taxes on the landfilling of waste can discourage some wasteful practices, however, further efforts are needed to promote product reuse and recovery in construction, such as implementing Extended Producer Responsibility (EPR) for construction materials.

5.5 Achieving a fully circular economy in development isn't always feasible, in particular, material recycling in construction has limits as some materials degrade, do not meet required specification standards for example regarding structural strength, and impurity removal becomes increasingly challenging with each use cycle.

5.6 Development in London often involves paying a premium for land and so properly handling waste in line with circular economy principles can be expensive due to the need for additional space to separate and store waste before reuse and recycling.

5.7 Sorting of waste can be time-intensive which has cost implications. Organising material collection and storage may also require additional administration. Monitoring material reuse and coordinating recyclate collection by different contractors is essential to avoid overburdening sorting and storage space.

5.8 Sustainable materials and reuse pose challenges for construction workers. New or innovative materials may lack widespread availability, meet technical standards, or be unfamiliar. Deconstruction can also be a technical challenge, especially when demolition remains more common than disassembly. Refurbishment of existing buildings will not always be feasible, or necessarily the best environmental option.

5.9 'Material banks' have been identified as necessary to ensure construction follows circular economy principles. Material banks provide a resource for recycled materials and materials available for reuse, however such banks do not currently exist at the scale required.

5.10 Designing new buildings according to circular economy principles will require expert input from architects and specialist contractors. And the availability of skilled individuals could also be a barrier unless proper training and guidance are available.

[30] https://www.london.gov.uk/sites/default/files/design_for_a_circular_economy_web_1.pdf

[31] https://www.circular.academy/circular-economy-critics-and-challenges/

6. How can planning policy help facilitate a circular economy

6.1 Policies in the Local Plans adopted by the East London Boroughs already encourage developers to embrace circular economy principles in new development.

6.2 The London Plan[32] requires Circular Economy Statements to accompany significant development proposals. These statements outline how new development will integrate circular economy practices in terms of layout, construction, and use. By requiring this, the policy ensures that applicants consider circular economy strategies during the design phase, maximising opportunities for thoughtful planning. The London Plan also requires Whole Life Carbon Assessments (WLCA) to be submitted with 'referrable development'. WLCAs set out how the lifetime carbon emissions associated with a building's construction, use and demolition and so there is overlap with Circular Economy Statements when the impact of materials use is assessed.

6.3 The need for Circular Economy Statements is reinforced by a report from the House of Commons Environmental Audit Committee[33]. The report examines ways to enhance the sustainability of the UK's built environment and included the following recommendation:

> *'circular economy statements including pre-demolition audits should be a requirement of planning applications which entail demolition of properties, as is already the case for certain applications which London boroughs are required to refer to the Mayor of London for consideration. The circular economy statement must explain why retrofit to match existing or new uses is not possible if demolition is proposed and be accompanied by a whole life carbon assessments of both new build and retrofit. This requirement should be introduced as soon as is practicable and not later than any package of reforms to the planning system which the Secretary of State for Levelling up, Housing and Communities is expected to introduce before the end of the current Parliament.'*

6.4 Applications for planning permission may also need to be accompanied by a 'site waste management plan'. Some Local Plans include policies which place obligations on developers to detail the amount and type of waste that will be produced, how it will be reused or recycled and how unauthorised disposal of waste will be prevented in a 'Site Waste Management Plan'.

6.5 Local Plans may also expect refurbishment and retention of buildings rather than demolition. The emerging Newham Local Plan refresh expects masterplanning in certain areas to consider refurbishment of existing residential development rather than its demolition.

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[32] https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

6.6 Waste Local Plans typically incorporate policies designed to prioritise waste management according to the waste hierarchy. By doing so, they encourage development that enables waste reuse, recycling (including composting), and contributes to the transition toward a circular economy. Additionally, in certain instances, managing biogenic waste—such as producing biogas through anaerobic digestion—may produce renewable energy. Waste Local Plans importantly provide for the development of recycling facilities and capacity, including for construction and demolition waste, and production of recycled aggregates for future use in construction. Policies in the Local Plans and the current East London Waste Plan have already supported the development of existing waste facilities in East London which are already contributing to the achievement of a circular economy (See the Topic Paper on Waste Management).

6.7 The draft East London Joint Waste Plan fully embraces the need for circular economy approaches to be taken into account in new development. In particular it includes the following:

- ***Draft Vision:***

'By 2041, the principles of the circular economy will be fully integrated into all forms of development within East London, resulting in reduced waste production and increased emphasis on repair, refurbishment and reuse including that associated with built structures….'

- ***Strategic Objectives:***

*'**Strategic Objective 1: Significantly Reduce Waste Production Overall***

Encourage the integration of circular economy principles and the adoption of best practice design and construction approaches, to achieve a significant reduction in waste production by 2041.'

Strategic Objective 2: All Built Development Will Contribute to the Achievement of a Fully Functioning Circular Economy by 2041

- *Promote the use of circular economy principles in design, construction and development in the built environment, emphasising reduced waste production and increased reuse and repair practices.*
- *Encourage development to consider and minimise waste during construction and operation, following the waste hierarchy in priority order.*
- *Enable delivery of development which will help establish a viable and easily accessible network of re-use, repair, and recycling services.*

[33] House of Commons Environmental Audit Committee, Building to net zero: costing carbon in construction, First Report of Session 2022–23, May 2022 https://committees.parliament.uk/work/1147/sustainability-of-the-built-environment/publications/

- *Foster a shift in perception such that waste materials are viewed as a valuable resource, ensuring sustainable waste management is integral to the development and use of all new development.*
- *Encourage development that prioritises the use of reused, reusable, recycled and recyclable materials and minimises the use hazardous materials which could result in the production of hazardous waste in construction projects in East London'*

- ***Policy:***

Policy JWP1: Circular Economy

A. Development that constitutes or incorporates activities compatible with the circular economy will be encouraged.

B. All development should follow the principles of a circular economy during construction and operation phases, which includes:

1. **Preserving and repurposing existing structures where practical and appropriate; or**
2. **demonstrating that repurposing existing built development is not practicable and/or consistent with Development Plan objectives and/or the best environmental option; and**
3. **reducing the generation of construction, demolition, and excavation waste and managing any such waste that arises from the development in accordance with the waste hierarchy and on the site of production where practicable; and**
4. **designing for flexibility and longevity, recyclability, repurposing and refurbishment; and,**
5. **using sustainable construction methods, including maximising the use of reused, recycled and recyclable materials and techniques that reduce waste and facilitate the deconstruction and reuse of building components.**

For major developments, this should be demonstrated through the submission of a Circular Economy Statement. All proposals should set out how waste arising from demolition (if applicable) and construction will be managed in a Site Waste Management Plan which, as appropriate, should incorporate a Pre-demolition Audit.

C. New development (not including minor householder applications) should include detailed consideration of waste arising from its occupation and/or use including how waste will be stored, collected and managed through a Recycling and Waste Management Strategy that demonstrates:

1. **Sufficient storage space will be provided to accommodate source separation and separate storage of recyclable materials; and,**
2. **Waste will be stored in accordance with 'Secure by Design' principles; and,**
3. **in flatted development and houses in multiple occupation, sufficient temporary on site storage, including for separated recyclables (including food waste) until it is collected; and,**
4. **storage and collection systems (such as dedicated spaces, storage areas, chutes, or underground waste collection systems) will ensure adequate and convenient access for all users and waste collection operatives, ease of maintenance and separation collection of recyclable materials and reusable items; and,**
5. **systems and infrastructure will be monitored and maintained including contingency arrangements for system/infrastructure failures; and,**
6. **for applications referable to the Mayor of London, temporary storage space for items for reuse.**

D. Where practical, major waste sites should incorporate facilities for visitors to allow educational opportunities relating to the circular economy.

ELJWP

East London Joint Waste Plan

Climate Change Topic Paper

Update to accompany Publication (Regulation 19) of the Submission Draft East London Joint Waste Plan

17.02.25

Barking & Dagenham

Havering LONDON BOROUGH

Newham London

London Borough of Redbridge

Table of Contents

Abbreviations and Glossary

Abbreviations

CfD	Contracts for Difference
CBDP	Carbon Budget Delivery Plan
CCC	Climate Change Committee
NAP	National Adaptation Programme
NPPF	National Planning Policy Framework
NPPW	National Planning Policy for Waste
NPS	National Policy Statement
SFRA	Strategic Flood Risk Assessment
SA	Sustainability Appraisal
SuDS	Sustainable Urban Drainage Systems
UKCP	United Kingdom Climate Projections

Glossary

Biogenic	Material within the waste stream that has been generated by the bio-cycle and was growing in the last hundred or so years. Examples include food, paper, garden waste, wood.
Carbon Offsetting	Carbon offsetting is a method of funding equivalent carbon dioxide saving elsewhere to compensate for emissions.
Carbon Sequestration	Carbon sequestration is the long-term storage of carbon dioxide. Sometimes called carbon dioxide removal (CDR), the practice involves capturing carbon dioxide from the atmosphere.
Circular Economy	The circular economy means decoupling economic activity from the consumption of resources. It is based on three principles: Design out waste and pollution; keep products and materials in use; regenerate natural systems.
Climate change adaptation	Adjustments made to natural or human systems in response to the actual or anticipated impacts of climate change, to mitigate harm or exploit beneficial opportunities.

Climate change mitigation	Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.
Combined Heat and Power (CHP)	The harnessing of both electricity and heat from power generating plants.
Greenhouse Gases	A greenhouse gas is a gas which absorbs reflected solar energy. This has the effect of making the Earth's atmosphere warmer. Solar energy enters the Earth's atmosphere and reaches its surface. Some of that energy is reflected back into space, however greenhouse gases absorb this reflected energy back to the Earth. Carbon dioxide, methane and nitrous oxide are all greenhouse gases.
Life Cycle Assessment (LCA)	Life Cycle Assessment involves an analysis of the impact a product or service may have on the world around it. It provides a framework for measuring the relative impact of different options and facilitating decision making.
Local Plans	Prepared by local planning authorities, Local Plans guide decisions on future development proposals for an area. They set out policies to be used in decision making which are supported by a vision for how the local planning authority would like the area to develop.
Marine Plans	Marine plans mange the seas around England by setting out the priorities and direction for future development within the plan area.
Municipal Solid Waste (MSW)	Commonly known as refuse or rubbish and is a waste type consisting of everyday items that are discarded by the public. It covers household waste and household-like commercial and industrial waste (e.g. from offices or hotels).
'R1' Recovery status	The definition in the revised Waste Framework Directive for a 'recovery' operation. For municipal waste incinerators this is based on a calculation of a plant's efficiency in converting tonnages of municipal waste to energy. Plants operating at or above the stipulated thresholds can be classified as 'recovery operations' for the purposes of the waste hierarchy. Incinerators operating below the threshold are classed as 'disposal'.
Strategic Flood Risk Assessment (SFRA)	Strategic Flood Risk Assessments help inform development decisions by considering the flood risk in a particular location. They identify opportunities to reduce the cause and impact of flooding and areas where development may be restricted, or additional management may be required to reduce the risk of flooding.
Sustainability Appraisal (SA)	Sustainability Appraisals assess whether planning policy documents promote sustainable development. SAs consider the social, environmental and economic aspects of sustainability.

1. Executive Summary

1.1 This topic paper sets out background information, legislation, policy and guidance on climate change to ensure that this is properly considered in preparation of the proposed policies in the Regulation 19 East London Joint Waste Plan.

1.2 Legislation and planning policy provides a framework within which local authorities are expected to respond to the challenges of climate change. Local planning authorities have a statutory duty to take climate change into account through the formulation and implementation of planning policy in Local Plans. The National Planning Policy Framework (NPPF) also requires that land use planning contributes to mitigating and adapting to climate change and the move to a low carbon economy. Plans are to take a proactive approach to mitigating and adapting to climate change taking account of the long-term implications for flood risk, coastal change, water supply, biodiversity & landscapes, and the risk of overheating from rising temperatures. Policies should ensure resilience of infrastructure.

1.3 Like the rest of the country, East London is expected to be affected by increases in the incidence and severity of drought, heatwaves, flood risk, water stress and pressures on existing infrastructure caused by climate change.

1.4 The management of waste results in emissions of greenhouse gases, which vary depending on the type of waste, how it is managed and transported. Changing approaches to waste management by a shift towards resource management and the circular economy is expected to result in reductions in greenhouse gas emissions.

1.5 The management of waste also needs to adapt to the impacts of climate change. Climate resilience can be built into waste infrastructure, for example by considering flood risk and water management, when identifying suitable sites. By reviewing the evidence of predicted climate change effects, it has been possible to identify the most likely impacts on waste management in East London.

1.6 The principal aim of this topic paper is to provide information that ensures that climate change is fully taken into account when planning for waste in East London, satisfying the requirements of national planning policy and taking account of the 'Climate Emergency' declared by all councils in East London.

2. Introduction

2.1 Climate change refers to a large-scale, long-term shift in the planet's weather patterns and average temperatures.[1] There is scientific consensus that the release of carbon dioxide and other greenhouse gases into the atmosphere contributes towards rising global temperatures which results in long term changes to the climate. These rising temperatures impact on seasonal variations in weather patterns and broadly in the UK this is resulting in warmer, wetter winters and dryer, hotter summers along with more extreme events[2].

2.2 This topic paper is, in part, a response to the 'Climate Emergency' recognised by all four councils in East London. Consensus on the urgency of climate change and the need to act promptly and collaboratively led to London Councils adopting the Joint Statement on Climate Change in December 2019. They agreed to: "act ambitiously to meet the climate challenge that the science sets out, and find political and practical solutions to delivering carbon reductions that also secure the wellbeing of Londoners."

2.3 This topic paper provides an overview of likely climate change impacts in East London and how the management of waste can, and should, mitigate and adapt to these. It is intended to underpin the development of updated planning policy on the management of waste in East London so that climate change is taken into account in future planning policy and decision making on planning applications.

[1] Met Office. 2020. *What is climate change?* https://www.metoffice.gov.uk/weather/climate-change/what-is-climate-change

[2] Met Office Hadley Centre, Environment Agency, Department for Environment, Food & Rural Affairs and Department for Business, Energy and Industrial Strategy. 2019. *UK Climate Projections: Headline Findings*. Crown copyright, Met Office. Available at: https://www.metoffice.gov.uk/binaries/content/assets/metofficegovuk/pdf/research/ukcp/ukcp-headline-findings-v2.pdf.

3. Context

How the climate is changing and expected to change in the future and the resulting impacts

3.1 Since the industrial revolution the average temperature of our planet has risen by around 1°C. This is considered to represent a rapid change. The effects of this change are already being felt. 2022 was the warmest year in the UK since 1884, 0.9°C above the 1991–2020 average. 2022 was the first year to record a UK annual mean temperature above 10°C. The decade 2013–2022 was on average 0.3°C warmer than the 1991–2020 average and 1.1°C warmer than 1961–1990; every one of the UK's ten warmest years has occurred since 2002. The decade 2013–2022 was on average as wet as 1991–2020 and 8% wetter than 1961–1990 for the UK overall. Over the 30 year period 1993–2022 sea level has risen by 11.4 cm and the rate of sea-level rise is increasing[3].

3.2 General climate change trends projected over the UK for the 21st century show an increasing pace of change to warmer, wetter winters and hotter, drier summers with an increase in the frequency and intensity of extreme events. The infographic below shows probable future climate outcomes for the UK.

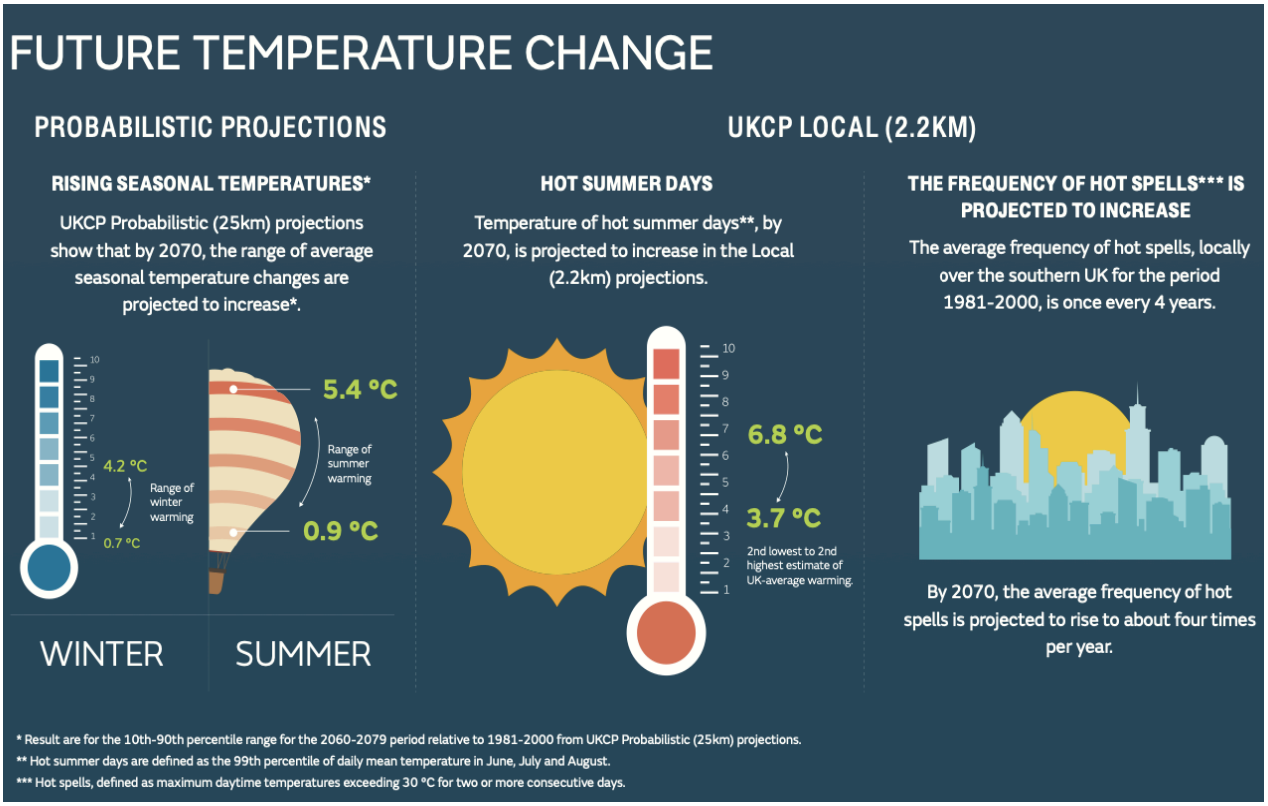

Figure 1[4]: Future Temperature Change

[3] State of the UK Climate 2022, https://www.metoffice.gov.uk/research/climate/maps-and-data/about/state-of-climate

[4] Met Office. 2019.

3.3 Table 1 sets out anticipated climate outcomes under a low and high emissions scenario.

Table 1: Summer and Winter Changes by the 2070's in central England

	Summer Rainfall Change	**Winter Precipitation Change**	**Summer Temperature Change**	**Winter Temperature Change**
Low Emission Scenario	41% drier to 9% wetter	3% drier to 22% wetter	No change to 3.3°C warmer	-0.1°C cooler to 2.4°C warmer
High Emission Scenario	57% drier to 3% wetter	2% drier to 33% wetter	1.1°C warmer to 5.8°C warmer	0.7°C warmer to 34.2°C warmer

Source: Met Office[5]

3.4 Figure 2 shows the correlation between atmospheric carbon dioxide and global average surface temperatures. This graph is based on data collected from Met Office, NASA and the US National Centres for the Environmental Information.

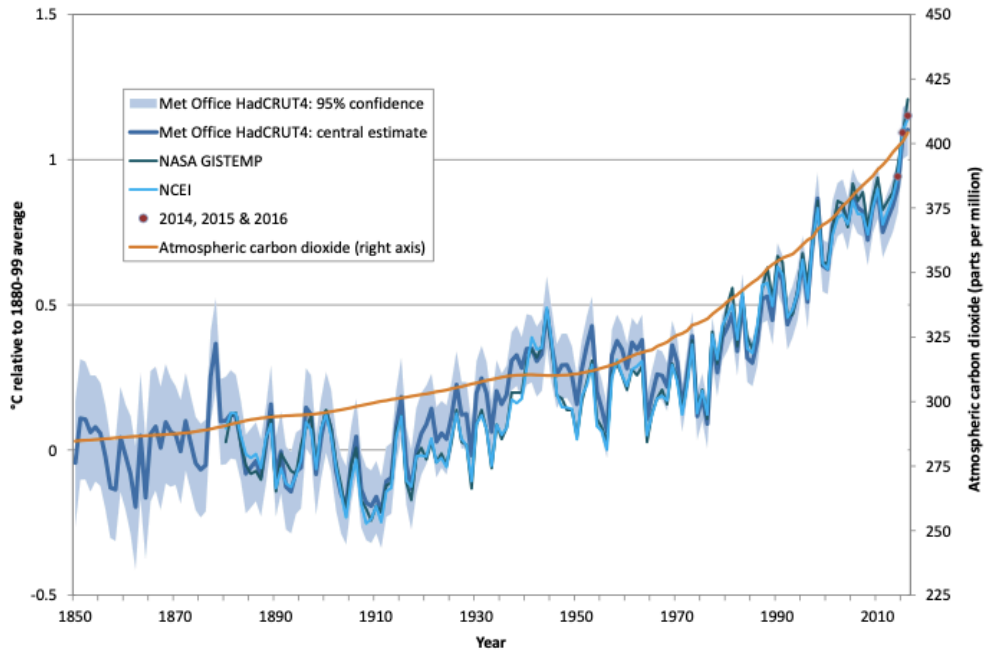

Figure 2[6]: Atmospheric carbon dioxide and global average surface temperatures 1850-2016

[5] Met Office. 2022. *UKCP18 Climate change over land.* Available from: chrome- April 2024 www.metoffice.gov.uk/binaries/content/assets/metofficegovuk/pdf/research/ukcp/ukcp18-infographic-headline-findings-land.pdf April 2024

East London

3.5 East London can be expected to be affected by increases in drought, heatwaves, water stress, flooding and flood risk, and pressures on existing infrastructure caused by rising temperatures.

3.6 A large area of East London is covered by Environment Agency Flood Zone 2 and 3 designations (medium and high probability of fluvial flooding) due to its low lying nature, particularly proximate to the Thames and tributaries. The Thames is a tidal river that is sensitive to future sea level rises and requires a complex system of barriers, defences and other measures to manage and prevent flooding. The UKCP18 projections show London is facing a probable sea level rise of 0.29m – 1.15m by 2100[7]. In addition, reduced summer rainfall is leading to more regular drought warnings and heatwaves are becoming more frequent[8] while increased incidence of extreme events, including intense rainfall, will increase surface water flooding.

Flooding along Green Street, Newham, 19th September 2014

Legislative and policy context regarding climate change that is relevant to the management of waste

3.7 International commitments on climate change have been transposed into national legislation and implementation of this has been enshrined into national, and, in turn, local policy. This section therefore reviews the current policy position in relation to climate change, and waste management in particular.

[7] Met Office. UK Climate Projections (UKCP). [online]. Available at: www.metoffice.gov.uk/binaries/content/assets/metofficegovuk/pdf/research/ukcp/ukcp18-infographic-headline-findings-marine.pdf website accessed April 2024

[8] www.london.gov.uk/sites/default/files/london_city_resilience_strategy_2020_digital_0.pdf

International

UNFCCC Paris Agreement – December 2015

3.8 The UK played a central role in securing the 2015 Paris Agreement. in which, for the first time, countries representing over 90% of global economic activity agreed stretching national emission reduction targets in a global effort to tackle climate change. The central aim of the Paris Agreement is to strengthen the global response to the threat of climate change by keeping a global temperature rise this century below 2°C above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5°C. Article 2(b) states that the Agreement aims to strengthen the global response to the threat of climate change by "increasing the ability to adapt to the adverse impacts of climate change and foster climate resilience and low greenhouse gas emissions development."

3.9 The Glasgow Climate Pact adopted at COP26 in 2021 included a package of agreements including to build resilience to climate change, curb greenhouse gas emissions and provide the necessary finance for this. Collectively parties agreed to work to reduce the gap between existing emission reduction plans and that required to limit global temperature rise to 1.5 degrees.

3.10 At COP29 in 2024 the UK government announced a new target to reduce greenhouse emissions by at least 81% on 1990 levels.

UN Sustainable Development Goals

3.11 The 2030 Agenda for Sustainable Development[9], adopted by all United Nations Members States in 2015, provides a shared blueprint with 17 Sustainable Development Goals (SDGs) which are calls to action, at its heart. These recognise that ending poverty and other deprivations must go alongside strategies that improve health and education, reduce inequality, and spur economic growth whilst also tackling climate change.

3.12 SDGs concerned specifically with waste management and climate change are:

- *SDG 12. Responsible consumption and production: ensure sustainable consumption and production patterns*
- *SDG 13. Climate action: take urgent action to combat climate change and its impacts*

3.13 The link between the SDGs and waste management is expressly recognised in the government's Resources and Waste Strategy (see below).

United Nations Environment Programme- Emissions Gap Report 2023

3.14 This Emissions Gap Report is the 14th edition in a series that brings together many of the world's top climate scientists to look at future trends in greenhouse gas emissions and provide potential solutions to the challenge of

[9] United Nations, 2020. *Sustainable Development Goals: Sustainable Development Knowledge Platform*. https://sustainabledevelopment.un.org/?menu=1300

global warming. The report finds that there has been progress since the Paris Agreement was signed in 2015. Greenhouse gas emissions in 2030, based on policies in place, were projected to increase by 16 per cent at the time of the agreement's adoption. Today, the projected increase is 3 per cent. However, predicted 2030 greenhouse gas emissions still must fall by 28 per cent for the Paris Agreement 2°C pathway and 42 per cent for the 1.5°C pathway.

3.15 Fully implementing unconditional Nationally Determined Contributions (NDCs) made under the Paris Agreement is modelled as putting the world on track for limiting temperature rise to 2.9°C above pre-industrial levels this century. Fully implementing conditional NDCs would lower this to 2.5°C.

3.16 The report calls for all nations to accelerate economy-wide, low-carbon development transformations. Countries with greater capacity and responsibility for emissions will need to take more ambitious action and support developing nations as they pursue low-emissions development growth.

EU Waste Framework Directive

3.17 The retained Waste Framework Directive (WFD) sets requirements for the management of waste including application of the 'waste hierarchy'. The Waste Hierarchy is explained in more detail below.

Waste hierarchy

3.18 The waste hierarchy ranks waste management options according to what is considered to deliver the best environmental outcome. National and international policy emphasises the importance of the waste hierarchy in guiding decisions on the sustainable management of waste and of driving the management of waste up the hierarchy unless life cycle assessment shows it not to deliver the best environmental outcome. The waste hierarchy is therefore central to informing decisions on waste management options and is illustrated in Figure 3 below.

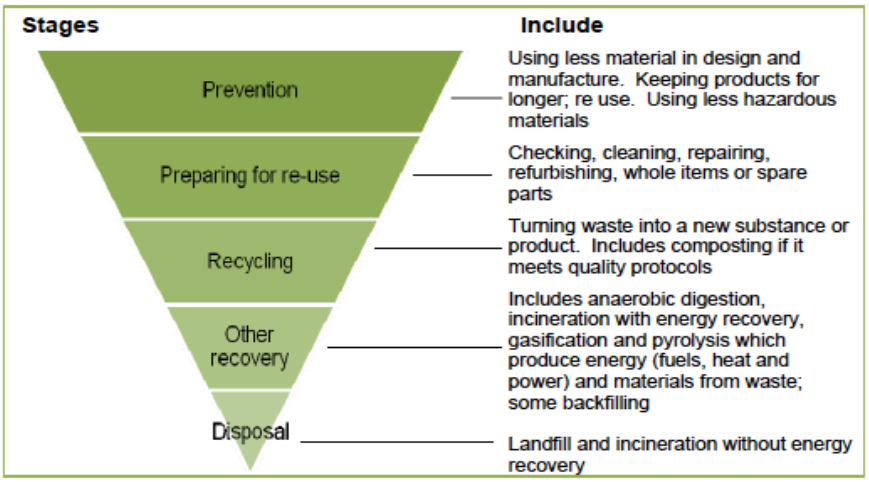

Figure 3: The Waste Hierarchy[10]

EU Landfill Directive

3.19 The retained EU Landfill Directive sets out requirements for the location, management, engineering, closure and monitoring of landfills. The Landfill Directive includes national targets for the reduction in the landfilling of biodegradable municipal waste.

National

Climate Change Act 2008

3.20 The UK was the first country to introduce long-term, legally-binding national legislation to tackle climate change through the 2008 Climate Change Act. The Act provides the UK with a legal framework including a 2050 target for emissions reductions, five-yearly 'carbon budgets' (limits on emissions over a set time period which act as stepping stones towards the 2050 target), and the development of a climate change adaptation plan.

3.21 The Act also introduced a requirement that the Government regularly assess the risks to the UK of the current and predicted impact of climate change every five years (Section 57(3) of Climate Change Act 2008); to set out climate adaptation objectives and to set out proposals and policies for meeting these objectives.

Planning and Compulsory Purchase Act 2004 (as amended)

3.22 Local planning authorities are bound by the legal duty set out in Section 19 of the 2004 Planning and Compulsory Purchase Act, as amended by the 2008 Planning Act, to ensure that, taken as whole, plan policy contributes to the mitigation of, and adaptation to, climate change. This is a matter that is specifically tested at the independent examination of Local Plans.

The Waste (England and Wales) Regulations 2011

3.23 The Waste (England and Wales) Regulations 2011 transposed the obligation to comply with the waste hierarchy, included in the WFD, into English law. It places an obligation on any entity which has control of waste to take "all such measures available to it as are reasonable in the circumstances to apply the waste hierarchy as a priority order. However, they may depart from the priority order where this is justified by life-cycle thinking on the overall impacts of the generation and management of the waste so as to achieve the best overall environmental outcome.

[10] Defra, 2011. *Guidance on applying the Waste Hierarchy.* https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69403/pb13530-waste-hierarchy-guidance.pdf

3.24 When considering the overall impacts, the following considerations must be taken into account:

a) the general environmental protection principles of precaution and sustainability;
b) technical feasibility and economic viability;
c) protection of resources;
d) the overall environmental, human health, economic and social impacts.

National Planning Policy Framework

3.25 The National Planning Policy Framework (NPPF) (December 2024) includes specific policy on climate change which relates to all forms of development. It is a key mechanism by which the government seeks to meet its obligations under the Climate Change Act at a local level. While the NPPF does not specifically relate to waste, that being addressed specifically by the stand-alone policy document National Planning Policy for Waste, the policies on climate change do apply to development associated with waste management.

3.26 The NPPF requires that local plans are to 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. It requires that "…policies should support appropriate measures to ensure the future health and resilience of communities and infrastructure to climate change impacts…" (Paragraph 162).

3.27 The NPPF requires developments to be planned in ways that:

a. avoid increased vulnerability to the range and impacts arising from climate change
b. can help to reduce greenhouse gas emissions, such as through location, orientation and design.

3.28 In determining planning applications, local planning authorities should expect new developments to:

a. Comply with any new development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant that this is not feasible or viable; and
b. take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

3.29 In relation to flood risk, the NPPF requires that "…*inappropriate development in areas of flooding should be avoided*" (paragraph 170) and "…*strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources*" (paragraph 171).

3.30 Plans should reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical change to the coast. In coastal areas, planning policies and decisions should take account of the UK Marine Policy Statement and marine plans as well.

National Planning Policy for Waste

3.31 The National Planning Policy for Waste (NPPW) was published in 2014. It is to be read in conjunction with the NPPF, the Waste Management Plan for England (2013) and National Policy Statements for Waste Water (2012) and Hazardous Waste (2013). All local authorities are expected to have regard to its policies when planning for waste management. It is also a material consideration in planning decisions for waste management facilities.

3.32 The NPPW considers that positive planning will deliver 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.

3.33 When identifying suitable sites and areas for new or enhanced waste management facilities, the NPPW requires local authorities to recognise the need for a mix of types and scale of facilities, and that adequate provision must then be made for waste disposal (Section 4 – identifying suitable sites and areas).

3.34 When determining planning applications, the NPPW expects applications to waste planning authorities to demonstrate that waste disposal facilities not in line with the Local Plan, will not undermine the objectives of the Local Plan through prejudiced movement up the waste hierarchy (Section 7).

3.35 On energy production from waste NPPW states:

"Where a low carbon energy recovery facility is considered as an appropriate type of development, waste planning authorities should consider the suitable siting of such facilities to enable the utilisation of heat produced as an energy source in close proximity to suitable potential heat customers." (Section 4 – Identifying suitable sites and areas)

National Planning Practice Guidance

3.36 The Planning Practice Guidance (PPG) chapter on climate change (Paragraphs 001 - 012) provides additional guidance on the operation of the NPPF and NPPW.

3.37 Local Plans are to address climate change and enable the delivery of sustainable development in accordance with policies in the NPPF. These include the requirement for local authorities to adopt proactive strategies to mitigate and adapt to climate change (paragraphs 162 – 182) in line with the provisions and objectives of the Climate Change Act 2008.

National Agenda for Carbon Reduction

3.38 The Committee on Climate Change (the CCC) is an independent statutory body established under the Climate Change Act 2008. Its purpose is to advise the UK Government and Devolved Administrations on emissions targets and

report to Parliament on progress made in reducing greenhouse gas emissions and preparing for climate change against the Climate Change Act obligations.

3.39 In May 2019 it published Net Zero – The UK's contribution to stopping global warming. The CCC recommended a new emissions target for the UK of net-zero greenhouse gases by 2050. In relation to waste this means:

- Eliminate food waste from households as far as possible and separate food waste collections to be provided wherever possible in addition to reducing, reusing and recycling other waste.
- After 2025 no biodegradable waste should be sent to landfill. This will require regulation and enforcement, with supporting actions through the waste chain, including for example mandatory separation of biodegradable waste from remaining waste.

Second National Infrastructure Assessment 2023

3.40 The Second National Infrastructure Assessment (NIA) 2023 was prepared by the National Infrastructure Commission and makes recommendations to government on the UK's infrastructure needs. Key areas for improvement identified includes the following:

- *without further delay, implement and provide clear guidance on how the collection reforms, known as 'simpler recycling', packaging extended producer responsibility scheme and deposit return scheme will work*
- *by 2026, develop individual recycling targets for all local authorities and provide financial support for transitional costs*
- *expand the single use plastics ban to cover a wider range of hard to recycle plastic items*
- *introduce a measurement system, from 2025, on the composition and waste treatment destinations for commercial and industrial waste in England. Where the market is not likely to deliver improved recycling of this waste, government should develop future policies to increase recycling rates further.*
- *with immediate effect, local authorities should not sign or renew long term contracts for waste services relying on energy from waste without credible plans for carbon capture and storage*
- *local authorities with existing long term contracts should transition away from unabated energy from waste at end of contract, or at break clauses where possible*
- *government should deliver its commitment to bring energy from waste into the Emissions Trading Scheme in 2028.*

3.41 The most beneficial waste infrastructure pathway options to reduce GHG emissions arising from waste management include increasing organic waste recycling through the segregation of food and other biodegradable waste; increased plastics recycling via kerbside collection; and higher recycling of a variety of organic and dry recyclable materials.

A Green Future: Our 25 Year Plan to Improve the Environment (2018)

3.42 The 25 Year Environment Plan, amongst other matters, sets out how the UK is to tackle the effect of climate change. A key target is mitigating and adapting to climate change. The Plan sets out how the government will go about its goal of mitigating and adapting to climate change. Three key areas are identified:

- *Continuing to cut greenhouse gas emissions including from land use, land use change, the agricultural and waste sectors and the use of fluorinated gas*
- *Making sure that all policies, programmes and investment decisions take into account the possible extent of climate change the century; and*
- *Implementing a sustainable and effective second National Adaptation Programme*.

3.43 Chapter 4 sets out the Plan's strategy for increasing resource efficiency and reducing pollution and waste. Resource efficiency is important for mitigating and adapting to climate change because it reduces the amount of carbon dioxide and other greenhouse gases released into the atmosphere as a consequence of manufacturing and supply chains and associated uses of resources. In 2022 energy supply in the UK emitted 82.2MtCO2e, while transport emitted 112.5MtCO2e and business 61.9MtCO2e[11]. Increasing resource efficiency can help reduce the greenhouse gases released through business, manufacturing, supply chains and transport and support the move towards a circular economy. The Environment Plan identifies the need to look at the whole life-cycle of products from production to usage as well as end of life. i.e. how they are managed as waste.

3.44 A key goal and target of the Plan is increasing resource efficiency and reducing pollution and waste (Chapter 4). This is to be achieved by:

- Working towards zero avoidable waste by 2050.
- Working towards eliminating avoidable plastic waste by end of 2042.
- Meeting all existing waste targets – including those on landfill, reuse and recycling – and developing ambitious new future targets and milestones.
- Seek to eliminate waste crime and illegal waste sites over the lifetime of the Plan, prioritising those of highest risk. Delivering a substantial reduction in litter and littering behaviour.
- Significantly reducing and, where possible, preventing all kinds of marine plastic pollution – in particular material from land.

Environmental Improvement Plan 2023

[11] Department for Business, Energy & Industrial Strategy and National Statistics. *2022 UK Greenhouse Gas Emissions, Provisional Figures*. chrome-https://assets.publishing.service.gov.uk/media/6424b8b83d885d000fdade9b/2022_Provisional_emissions_statistics_report.pdf Accessed April 2024

3.45 The Environmental Improvement Plan[12] (EIP) is the first revision of the 25 Year Environment Plan and sets out measures and commitments on resource efficiency and climate change including:

- work with business to implement packaging extended producer responsibility from 2024 so that polluters pay to recycle packaging
- introduce a deposit return scheme for plastic and metal drinks containers from October 2025 to drive higher recycling rates
- implement consistent recycling between different councils, to boost recycling rates
- ban the supply of single-use plastics like plastic plates and cutlery from October 2023. We will also explore options further, including with stakeholders, for the potential for technological innovation in the production of coffee cups, and behavioural science in how they are used.
- update on our progress and plans to reach net zero
- publish a Land Use Framework in 2023, setting out how we will balance multiple demands on our land including climate mitigation and adaptation
- publish the third National Adaptation Programme (NAP3) in 2023 that will set out our 5 year strategy to build the UK's climate resilience
- continue our role as a global leader in tackling climate change, biodiversity loss and land degradation and push for an integrated approach to international action

3.46 The 2024 annual review of progress[13] identified the introduction of the statutory waste prevention programme which brings together a range of measures backed by funding which will help to keep products and materials in circulation for as long as possible and at their highest value. It also highlights that in 2023, UK territorial emissions:

- reduced 5.4% in terms of total greenhouse gas emissions relative to 2022, amounting to a 52.7% reduction relative to 1990
- reduced 6.6% in terms of CO2 only emissions relative to 2022, amounting to a 49.8% reduction relative to 1990

Mission Zero- Independent review of net zero

3.47 An Independent Review of Net Zero was commissioned in September 2022, to consider how the UK could better meet its net zero commitments, taking account of global changes. It was commissioned also to consider how the UK might deliver its own net zero targets in a manner that was both more affordable, more efficient, and in a pro-business and pro-enterprise way.

[12] https://assets.publishing.service.gov.uk/media/64a6d9c1c531eb000c64fffa/environmental-improvement-plan-2023.pdf

[13] https://www.gov.uk/government/publications/environmental-improvement-plan-annual-progress-report-2023-to-2024/environmental-improvement-plan-annual-progress-report-2023-to-2024#improving-our-use-of-resources

3.48 The following key points were identified in relation to products and waste:

- A circular economy can benefit in multiple ways.
- Many people are taking action to reduce greenhouse gas emissions from the things they consume.
- People need to understand the benefits of moving to a circular economy and need clear advice to inform their purchasing decisions.
- A proposed public engagement strategy should be used to communicate the value of a circular economy and consumers' roles in it.
- Reducing waste saves people money and reduces emissions.
- Repairing products should be affordable.
- Accessing repairs should be easy.
- Clear, nationwide collection and recycling is key.

Committee on Climate Change- Progress Reports to Parliament

3.49 The Progress in reducing UK emissions- 2023 report to Parliament noted that the continued growth in the use of Energy from Waste (EfW) plants is undermining efforts to reduce emissions within the waste sector. In addition, incoming reforms to recycling collections and packaging should improve recycling rates and divert waste from EfW and landfill, but stronger signals and policies to limit further EfW growth, divert biodegradable waste from landfill and prioritise waste prevention, are needed. This is largely unchanged from their 2022 assessment as they continue to wait for key waste policies to be implemented.

3.50 The key messages are:

- *Energy from Waste:* EfW emissions are already higher than the Government's Carbon Budget Delivery Plan (CBDP) anticipates and EfW capacity is set to increase in the coming years. A comprehensive systems approach to control and reduce EfW emissions is urgently needed, including a moratorium on additional EfW capacity until a review of capacity needs has been completed.
- *Recycling:* Improving England and Scotland's stalled recycling rates is key to reducing dependence on EfW and landfill – implementation of planned reforms to recycling and packaging must not be delayed.
- *Landfill:* The Government has indicated that additional policies will be needed to meet the aim of preventing biodegradable waste from going to landfill, still the largest source of emissions in the sector. Clarity on these policies is needed urgently.
- *Carbon capture and storage:* Good progress has been made in developing plans to support the first EfW facilities to install carbon capture technology as part of the industrial carbon capture and storage (CCS) cluster programme – but a more strategic approach to decarbonising the fleet is needed.

- *Overall strategy:* More generally, greater strategic coordination of plans to decarbonise the waste sector is needed, including much greater emphasis on waste prevention, clarity on future residual waste capacity needs, the suitability of incentives and interactions with other sectors such as waste as a feedstock for Sustainable Aviation Fuels.

3.51 The Climate Change Committee 2024 report to Parliament on progress in reducing emissions[14] identifies that the waste sector saw good initial progress in reducing emissions from 41.9 million tonnes of carbon dioxide equivalent ($MtCO_{2e}$) in 2008 to 25.9 $MtCO_{2e}$ in 2013, almost exclusively from reduced methane emissions from landfill as a result of the introduction of the Landfill Tax in 1996. However, it also highlights that landfill methane capture has been lower than expected and there has been insufficient progress on recycling and composting, and energy from waste emissions have substantially increased, meaning progress on reducing waste emissions has stalled more recently.

Waste Management Plan for England (2021)

3.52 The Waste Management Plan for England sets out the government will preserve material resources by minimising waste, promoting resource efficiency and moving towards a circular economy in England. It sets out the government will minimise the damage caused to our natural environment by reducing and managing waste safely and carefully, and by tackling waste crime.

3.53 The Plan considers current and future actions in line with the 25 Year Environment Plan. It is our blueprint for eliminating avoidable plastic waste over the lifetime of the 25 Year Environment Plan, doubling resource productivity, and eliminating avoidable waste of all kinds by 2050.

3.54 The Plan works towards eliminating food waste to landfill by 2030. This Plan builds on the Resource and Waste Strategy for England (2018) by exploring policies to eliminate all biodegradable waste from entering landfill by 2030.

Environmental Permitting legislation

3.55 The Environment Agency has updated their Environment Permit application forms to incorporate consideration of climate change adaptation. The Environment Agency has also issued more general guidance on climate change adaptation in environmental permitting and water resources planning[15].

[14] Climate Change Committee (July 2024) Progress in reducing emissions – 2024 Report to Parliament https://www.theccc.org.uk/publication/progress-in-reducing-emissions-2024-report-to-parliament/

[15] https://www.gov.uk/government/collections/environment-agency-and-climate-change-adaptation

Environmental Services Association – A net-zero greenhouse gas emissions strategy for the UK recycling and waste sector

3.56 The ESA is the trade association for the waste industry. Its strategy identifies how to achieve net zero as a sector by 2040. It identifies key priorities for the sector as: investing in recycling infrastructure to make recycling more efficient; decarbonising non-recyclable waste treatment by removing organics from landfill by 2030 and plastics from energy recovery facilities and deploying carbon capture utilisation and storage; and transitioning vehicles and fuel use to zero emission sources.

Local & Regional

London Plan

3.57 The London Plan forms part of the Development Plan in London and includes a number of policies relating to climate change mitigation and adaptation, including:

- Policy GG6 Increasing efficiency and resilience:
  - *Seeks to improve energy efficiency & low carbon circular economy;*
  - *Ensure building and infrastructure are designed to adapt to climate change through water efficiency, reduce impacts from flooding, and avoid urban heat island effect;*
  - *Create environment resilient to impact of emergencies.*

- Policy SI2 Minimising greenhouse gas emissions:
  - *Major development should be zero carbon – be efficient, use local energy, maximise renewable energy;*
  - *Major development proposals to include detailed energy strategy to demonstrate how zero carbon target will be met;*
  - *Minimum on-site reduction of at least 35% beyond Building Regulations, including through offsetting if cannot be delivered on-site;*
  - *Major development should minimise carbon emissions from any part of the development including plant or equipment;*
  - *Development referrable to the Mayor should calculate whole-life cycle carbon emissions.*

- Policy SI3 Energy infrastructure:
  - *Energy masterplans for large-scale development*

- Policy SI4 Managing heat risk:
  - *Minimise urban heat island effect*
  - *Major development to demonstrate through energy strategy how potential for over-heating will be achieved following 'cooling hierarchy'.*

- Policy SI5 Water infrastructure
  - *Development should achieve water consumption reduction targets and incorporate water saving & recycling measures*

- Policy SI7 Reducing waste and supporting the circular economy
  - *Requires resource conservation, waste reduction, increasing re-use and recycling, and reduction in waste for disposal to be achieved through:*
  - *Promote more circular economy;*
  - *Encourage waste minimisation and prevention;*
  - *Zero biodegradable waste to landfill by 2026;*
  - *Meet or exceed 65% municipal waste recycling by 2030;*
  - *Meet or exceed 95% C&D waste re-use, recycling or recovery, and 95% excavation waste put to beneficial use;*
  - *Design developments with adequate space for storage and collection of recyclable waste;*
  - *Referable applications to include Circular Economy Statement demonstrating how materials will be re-used and recycled, how demand for materials will be reduced and buildings designed for disassembly and re-use, on-site waste management, adequate space for storage and collection, management of waste in line with the waste hierarchy.*

- Policy SI 12 Flood risk management:
  - *Development plans to use London Regional Flood Risk Appraisal, Strategic Flood Risk Assessments and Local Flood Risk Management Strategies to identify where risk exists and seek to reduce these;*
  - *Development to ensure flood risk minimised and mitigated;*
  - *Contribute to delivery of Thames Estuary 2100 Plan;*
  - *Utilities to be designed to remain operational under flood conditions and buildings designed for quick recovery following a flood;*
  - *Protect flood defences;*
  - *Deploy natural flood management methods.*

- Policy SI 13 Sustainable drainage:
  - *Identify areas with surface water management issues and reduce risks;*
  - *Development to achieve greenfield run-off rates and manage water as close to source as possible;*
  - *Apply drainage hierarchy – use rainwater as resource, rainwater infiltration to ground, rainwater attenuation in green infrastructure, rainwater discharge to watercourse, controlled discharge to sewer or drain, controlled discharge to combined sewer;*
  - *Resist proposals for impermeable surfacing;*
  - *Drainage to deliver multiple benefits.*

London Council's 'Resilient and Green' Action Plan

3.58 In June 2020, London Councils established the 'Resilient and Green' Working Group to develop and Action Plan.

3.59 In developing the action plan, they have addressed each of the main adaptation risks to the UK, namely overheating, flooding, water scarcity, trade and food security, pests and diseases and loss of natural capital. They shaped the action plans with the following understanding of boroughs' role in each area:

- *Overheating:* statutory duty to address overheating in building and public realm through Local Plans and planning decisions/ development control, management of social housing and housing for vulnerable residents, management and/ or control of green and blue infrastructure, management and/ or control over highways;
- *Flooding:* statutory duty to complete a Strategic Flood Risk Assessment and to avoid development in flood-prone areas, and to prepare a Flood Risk Management Plan, delivery of flood risk projects, working collaboratively to manage increasing tidal flood risk due to rising sea levels, management and/ or control of green and blue infrastructure, management and/ or control over highways;
- *Water scarcity:* reducing water demand through Local Plans and planning decisions/ development control, community water saving projects and leadership, liaison with water companies over water supply and demand management;
- *Trade and food security:* local authorities do not have a substantive role in how trade and food security are affected by (global) climate change, and these risks are therefore not addressed in this action plan;
- *Pests and diseases:* statutory duty around food safety regulation, statutory duty to deliver public health functions in relation to disease surveillance and management, management and/ or control of green and blue infrastructure. In this plan, actions relating to pests and diseases have been placed within the natural capital and ecological emergency section, given the large crossover between the two;
- *Loss of natural capital:* statutory duty to conserve and enhance biodiversity and the natural environment through Local Plans and planning decisions/ development control, management and/ or control of green and blue infrastructure, Local Nature Recovery Strategies which will include planning for biodiversity net gain and green infrastructure more generally.

Climate Action Plans

London Borough of Barking and Dagenham Inclusive Growth 2022 to 2026[16]

Priorities for a net zero cleaner, greener borough are:

- *Retrofitting homes (make changes to existing buildings so that energy consumption and emissions are reduced)*
- *zero carbon businesses and supply chains**
- *energy efficient businesses and industries**
- *reducing waste through reusing , recycling and repair*

[16] https://www.lbbd.gov.uk/council-and-democracy/plans-and-priorities/inclusive-growth-2022-2026

- *shift to active travel and low emission vehicles*
- *using nature to remove emissions*

London Borough of Havering Climate Change Action Plan

- *Continue education and awareness-raising on waste prevention.*
- *Include requirement in contracts with external contractors for waste management services that they undertake measures to minimise their carbon emissions. (e.g. disposal, sorting, recycling, transport)*
- *Monitor of fuel consumed and estimate of CO2 emissions of contractors.*
- *Identify departments which have significant contributions to Council waste production on waste prevention and streams and (through paper, catering, recycling. opportunities for grounds maintenance, etc.), and develop and implement ways to reduce waste. Reduce waste Investigate impact of changes to cleaning regime on waste & recycling in Council facilities.*
- *Continue increasing number of home composters sold. Introduce site-based compost units to schools/flats for largescale food waste composting.*
- *Investigate and support opportunities for waste-to energy facilities.*
- *Investigate opportunities for the Council to find more cost effective ways to manage and reduce waste. Investigate recycling facilities for non-corporate council buildings e.g. libraries, children's' centres etc*
- *Investigate opportunities for Parks, Cemeteries and Highways to find more cost-effective ways to manage and reduce waste.*

London Borough of Newham Climate Emergency Action Plan

- *Move to Weekly Recycling and associated management of "contamination" and excess waste*
- *Borough wide roll out Communication Campaigns Ecobot Recycling Character*
- *Recycling Improvement Projects and Activities*
- *Introduce boundary collection and remodel refuse collection rounds*
- *Create an identifiable "brand" for all communications around waste and recycling that residents recognise.*
- *Minimise the reliance on written instructions. The character will be used in "cartoon" style messaging to enable pictorial demonstrations of how to recycle and minimise waste, helping overcome language barriers.*
- *Reduce Waste and Increase Re-use by:*
    - *Decreasing the number of free collections each household receives for bulky waste to two per household per year, alongside signposting residents to reuse options like Homestore and Reclaim at the Lane and Freecycle.*

- *Promote circular economy initiatives and work with local reuse and repair organisations.*
- *Restricting waste: Identifying households that have a larger bin and do not have six or more residents and switching bins for the standard*

London Borough of Redbridge Climate Change Action Plan

- *Extend the wheelie bin roll-out across the borough.*
- *Engage with ELWA to understand opportunities for increasing re-use at Chigwell Road Reuse and Recycling Centre (RRC).*
- *Subject to successful trials, implement specific sacks/containers for flats above shops.*
- *Develop a recycling improvement plan for the borough.*
- *Introduce a containerisation or restriction of residual waste for all suitable properties in Redbridge.*
- *Using the findings from the 2019 Waste and Recycling Survey review the barriers to waste reduction and recycling in the borough.*
- *Working with ELWA identify opportunities for increasing re-use at Chigwell Road RRC.*
- *Develop a detailed waste and recycling communications plan for the period until 2027.*
- *Lobby ELWA to increase recycling offer in the borough. Mar-23 Reduce Redbridge's residual waste arising per household to less than 65kg per household per year.*
- *Develop and integrate a waste reduction plan for the borough.*
- *Reduce avoidable food waste disposed of as residual waste by 10% against 2016/2017 levels.*
- *To have worked successfully with ELWA to enable the introduction of separate food waste collections to all street level properties in Redbridge.*
- *Review current recycling offer in schools and commercial waste to further levels of recycling.*
- *Eliminate single use items for all London Borough of Redbridge offices and buildings.*

Local Plans

3.60 All of the Borough Councils in East London have an adopted Local Plan. A summary of the relevant policies is included in Appendix A.

4. How Waste Management Contributes Towards Climate Change

Emissions from waste management

Overview

4.1 National statistics[17] indicate that greenhouse gas emissions from waste management in 2021 in the UK were 18.8 million tonnes of carbon dioxide equivalent ($MtCO_2e$). In 2022 emissions from waste management represented 5% of total emissions. This has declined from 64.9$MtCO_2e$ in 1990 (8% of total emissions).

4.2 In 2020, the majority of greenhouse emissions were from landfill (12.8 $MtCO_2e$, 73%), wastewater treatment (2.7 $MtCO_2e$, 15%), incineration (0.3 $MtCO_2e$, 1.7%), composting (0.9 $MtCO_2e$, 5%), Mechanical Biological Treatment (MBT) (0.8 $MtCO_2e$, 4.5%) and anaerobic digestion (0.2 $MtCO_2e$, 1.1%). See Figure 4 below.

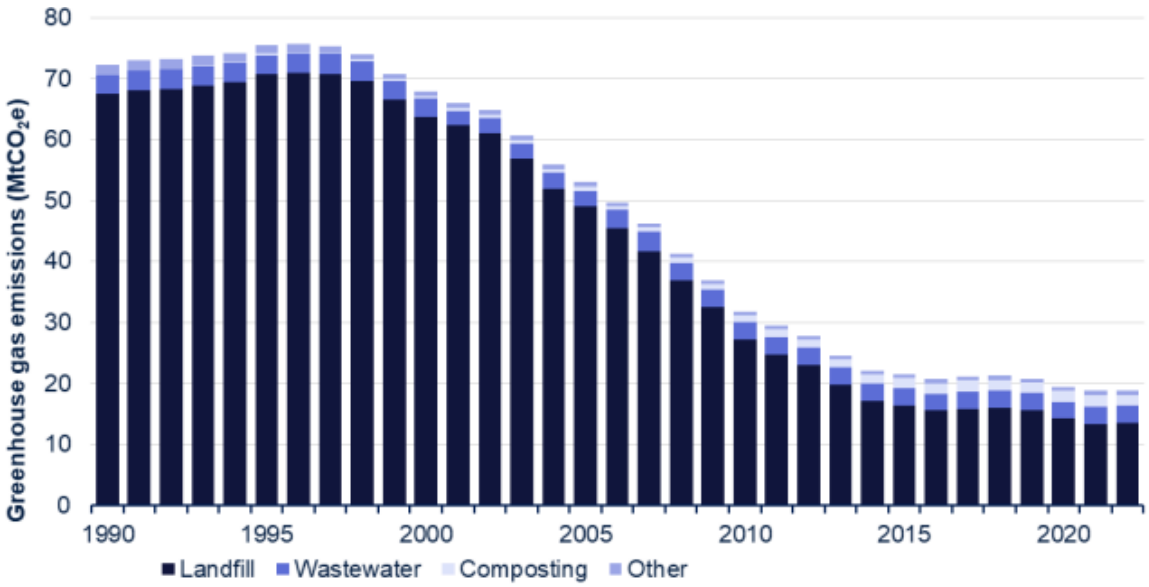

Figure 4 - Greenhouse gas emission from waste 1990 to 2022($MTCO_2e$)

Waste re-use

4.3 After prevention of waste generation in the first place (the top priority in the waste hierarchy) the preparation for re-use of products and materials, such as domestic appliances and clothing arising from household waste stream and bricks and timber from construction and demolition, can also be effective in reducing greenhouse gas emissions by reducing the demand for new raw materials to be extracted, transported, processed, and used in manufacture of new products, and in turn treated or processed when the products and materials become waste.

[17] https://www.gov.uk/government/statistics/final-uk-greenhouse-gas-emissions-national-statistics-1990-to-2022

4.4 Re-use also includes repair of existing goods and infrastructure such as roads and buildings.

4.5 Land-use associated with re-use includes the following:

- Storage and distribution e.g. reclamation yards and depots
- Light industrial e.g. vehicle repair workshops
- Retail e.g. second hand clothes shops

Recycling and composting

4.6 Recycling reduces the demand for and need for the extraction of virgin materials, and the associated carbon emission burden. Recycling still normally requires an energy input to convert waste materials into different products e.g. smelting old cans to produce steel, and if this energy comes from burning fossil fuels carbon dioxide will be generated. However, on balance recycling generally reduces greenhouse gas emissions. This is illustrated in the table below.

Table 2: An indication of energy and resource savings that can be achieved by recycling waste[18]

Recycled material	Greenhouse gas	Energy	Water	Air	Materials
Paper/card	Recycling 1 tonne newspaper saves 900kg of CO2 equivalent	Consumes up to 70% less energy compared to use of new pulp (depending on transport distances)	Saves at least 300,000 litres of water	Reduces emissions to air by up to 95%	Avoids the need to fell 7 mature spruce trees
Glass	Recycling halves the CO2 emissions. Recycling 1 tonne saves 300kg CO2 equivalent	Saves 50% of the energy over new glass	Reduces water discharges by 50%	Reduces emissions to air by 20%	Saves raw materials (saves 1.2 tonnes per tonne recycled)
Steel	Recycling 1 tonne saves 1800kg CO2 equivalent	Uses up to 74% less energy	Uses 40% less water	Reduces emissions to air by about 30%	Saves raw materials (each tonne recycled saves 1.5 tonnes of iron ore
Aluminium	Recycling 1 tonne saves 9800kg CO2 equivalent	Uses 95% less energy compared to new aluminium	Reduces water discharges by 97%	Reduces emissions to air about 95%	Saves raw materials (each tonne recycled saves 8 tonnes of bauxite and 4 tonnes of chemical products)

[18] Adapted from 'More from Less', Hampshire County Council

4.7 The composting of garden and kitchen waste produces carbon dioxide as part of the aerobic decomposition process. At a commercial scale, in-vessel composting, and anaerobic digestion of biodegradable waste (including sewage) produces methane and carbon dioxide, however because the digesters or vessels are sealed and enclosed, the 'biogas' (methane and carbon dioxide) can be collected, treated, and then used as a fuel. This may displace the use of fossil fuels to produce electricity and/or heat, and also means that only carbon dioxide, which is a less potent greenhouse gas than methane, is released after combustion of the biogas. National guidance includes specific support for anaerobic digestion.

'Other Recovery'

4.8 Where waste cannot be practicably recycled, composted or re-used, it may be subject to treatment through a range of technologies that primarily focus on utilising the energy value of the residual waste stream. To be classed as 'other recovery', the production of energy using waste must achieve a minimum efficiency to ensure that the calorific value of the waste is being harnessed effectively rather than the waste simply being disposed by incineration with minimal energy recovery.

4.9 Incineration of mixed waste with energy recovery is an established technology; normally this involves capturing the heat and converting it into electricity. Sometimes such plants also capture the surplus heat following power production and distribute this offsite for use as space heating; this type of plant is referred to as combined heat and power plant (CHP).

4.10 Supply of electricity from a waste recovery facility can displace electricity generated using fossil fuels, and where the feedstock to the EfW plant is of biogenic origin the carbon emissions that might have arisen from the displaced source may be deemed to have been avoided. However, where the feedstock is of fossil origin, such as non-biodegradable plastic, then the avoided emission benefit is not gained. Where such plants supply heat for space heating purposes, it too may result in avoided emissions if the displaced heat source was of fossil origin, such as gas.

4.11 Incineration of biodegradable waste materials prevents the release of methane into the atmosphere that would occur if that waste was sent to landfill and the gas was not captured effectively. However, the management of biodegradable waste by anaerobic digestion to produce a useable biogas is a more effective carbon reduction route.

4.12 Advanced thermal treatment technologies, including pyrolysis and gasification, are used to convert the calorific value of waste into a gas (syngas) which may then be used as a flexible fuel. While carbon dioxide will be released upon combustion of the syngas, an avoided carbon benefit may be gained if fossil fuels are displaced.

4.13 Certain energy recovery technologies qualify under the UK Government's Contracts for Difference (CfD) scheme which is the main mechanism for supporting low-carbon electricity generation replacing the Renewable

Obligation Certificate support system. The CfD scheme has stricter qualifying criteria so a more limited range of energy from waste technologies may benefit, with a focus on advanced thermal technologies, biomass with CHP and anaerobic digestion.

4.14 A recent government review of residual waste management infrastructure capacity and needs[19], particularly energy from waste, has concluded that further developments must be able to demonstrate that making use of the heat they produce is viable and that they can be built carbon capture ready, in accordance with the government's 'decarbonisation readiness' requirements once they come into force. While not planning policy, the statement of intent by government will be given weight in planning decisions.

Landfill

4.15 Waste produced by most households and many businesses contains organic matter such as kitchen and garden waste, and paper and card which biodegrade. When organic matter biodegrades in the presence of air, carbon dioxide is released. Under certain conditions when organic matter biodegrades in the absence of air, the greenhouse gas methane is produced. Weight for weight, methane is 25 times more damaging than carbon dioxide as a greenhouse gas[20].

4.16 Currently around 25% of total waste in the UK (and in East London) is landfilled[21] and 40% of the UK's 14.8 million tonnes of food waste ends up in landfill.[22] This generates a significant proportion of UK methane emissions. Methane emissions from landfill are not directly measured, however it is estimated emissions from landfill account for 35% of all UK methane emissions[23], which equals about 3% of UK greenhouse gas emissions[24].

4.17 Figure 5 below is taken from the Committee on Climate Change's factsheet on Waste and shows projected reductions in greenhouse gas emissions from reducing biodegradable waste sent to landfill in accordance with targets in the retained EU Landfill Directive plus some further potential reductions if more

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[19] https://www.gov.uk/government/publications/residual-waste-infrastructure-capacity-note/residual-waste-infrastructure-capacity-note

[20] HM Government, 2018. *Our Waste, Our Resources: A Strategy For England*. Page 19. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/765914/resources-waste-strategy-dec-2018.pdf

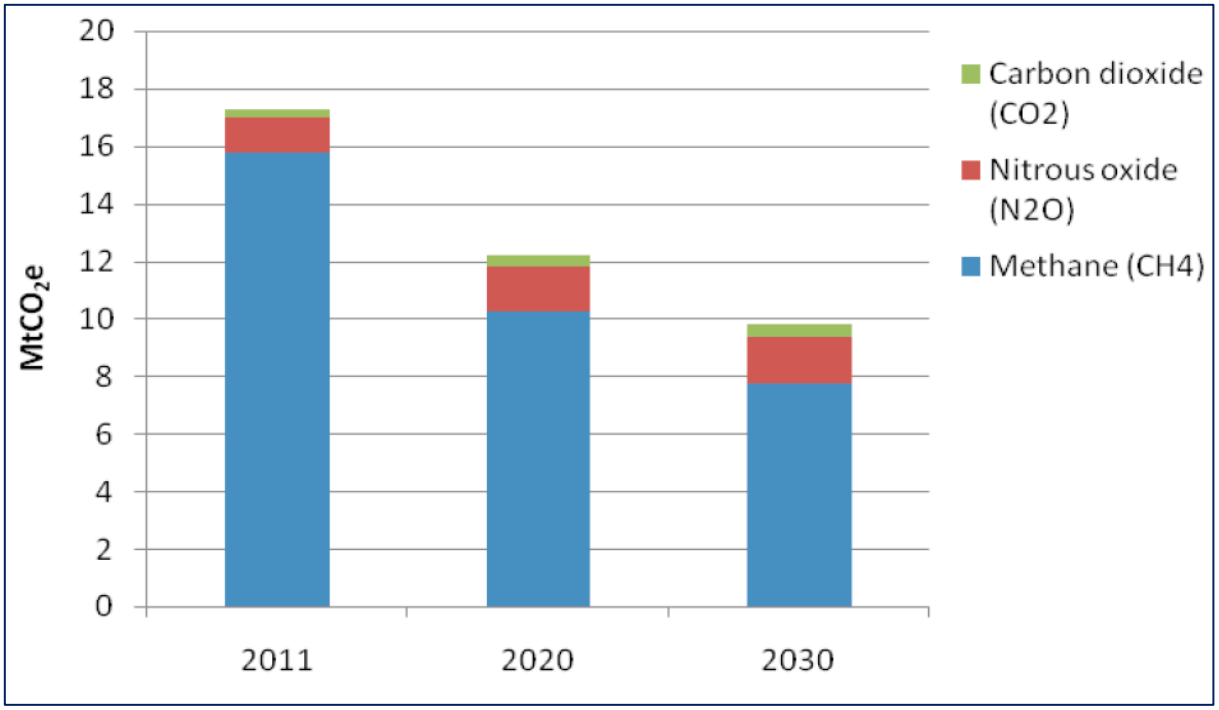
[21] Department for Environment, Food & Rural Affairs, 2020. *UK Statistics On Waste*. p. 12, Table 8. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/874265/UK_Statistics_on_Waste_statistical_notice_March_2020_accessible_FINAL_rev_v0.5.pdf

[22] Vision 2020, 2019. *UK Roadmap To Zero Food Waste To Landfill*. Available at: https://www.vision2020.info/assets/pdf/Vision_2020_roadmap.pdf

[23] Assets.publishing.service.gov.uk. 2020. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/48424/5556-methane-factsheet.pdf

[24] Theccc.org.uk. 2020. Available at: https://www.theccc.org.uk/wp-content/uploads/2013/04/Waste-factsheet.pdf

waste is diverted. This shows that by 2030, emissions from waste management could fall to 10 million tonnes of CO_2 equivalent.



Source: Committee on Climate Change Factsheet: Waste, 2013[25]

Figure 5. Projected emissions from waste management 2011 – 2030

Landfill Gas Utilisation

4.18 Well managed and regulated landfills, such as those currently operating in East London, which accept biodegradable wastes, are engineered to control the release of methane, enabling its capture and use as a fuel. Most commonly this is in the form of electricity production using gas engines located on the landfill site. Captured methane may also be converted into a gaseous fuel used for road vehicles. Burning the methane does produce carbon dioxide, but this has a much lower global warming potential than methane and where its use displaces fossil fuels avoided emissions benefits are gained. However, the Climate Change Committee recently has highlighted that capture of landfill methane has not been as high and effective as anticipated and so continues to contribute a large proportion of greenhouse gas emissions from the waste sector.

4.19 The landfilling of non-biodegradable waste, such as plastic, does not result in the generation of greenhouse gases as those materials do not decompose to produce methane. However proper management of such wastes provides an opportunity to mitigate indirect emissions because if they are recycled, new

[25] Committee on Climate Change, 2013. *Waste Factsheet*. https://www.theccc.org.uk/publication/carbon-footprint-and-competitiveness/waste-factsheet/

primary resources do not have to be extracted and new materials produced which results in the avoidance of the use of additional energy associated with these activities[26].

Transportation of waste

4.20 The relationship between waste and climate change is wider than just the use of different technologies or management methods. The transportation of waste can also generate greenhouse gases. The level of greenhouse gas emissions is largely dependent on the amount of road borne waste movements currently largely driven by fossil fuels.

4.21 Measures that may be taken to reduce greenhouse gas emissions from transport include the following:

- Reduced no. and length of vehicle movements. This can be achieved by:
    - Ensuring final fate facilities are proximate to sources of waste
    - Bulking up waste at transfer stations to facilitate a reduced no. of movements
- Use of non fossil derived energy sources e.g., renewable electricity, biogas;
- Use of rail transport, particularly where electrically powered and the electricity comes from non fossil fuelled sources.; and,
- Use of water transport - offer significant carbon reduction benefits tonne for tonne.

4.22 As an example, the waste management company Biffa in its Sustainability Strategy 2020-2030, has set out an ambition to cease using fossil-fuelled HGVs by 2030. It intends to achieve this as follows:

- Trialling new technologies, including electric collection vehicles. Electric Refuse Collection Vehicles (RCVs) are being trialled in Manchester.
- Developing an alternative fuel strategy to establish best means for operations.
- Developing rail transport capabilities. Currently 27% of specialist waste types, destined for landfill, are transported by rail. Biffa claims this has resulted in a 75% reduction in transport emissions in comparison to road haulage.
- Improving waste collection density (the number of stops made by RCVs in a given area) with an aim to increase route efficiency by a further 20% by 2030. In the last four years Biffa claims to have improved its collection density by 11%.

[26] It has been suggested that the deposit of plastics, in particular in a landfill, may be preferable from a greenhouse gas emissions mitigation point of view to its immediate conversion to carbon dioxide when burnt as a fuel. However, disposal of such material means that new raw material needs to be extracted and processed to replace the lost materials which will, in themselves, involve the use of energy.

5. How the Management of Waste can Mitigate Climate Change

5.1 Climate change mitigation is defined in the NPPF as: *"Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions."*

5.2 The modes of production of greenhouse gases associated with waste are as follows:

- Production of waste;
- Treatment and management of waste; and,
- Transport of waste.

5.3 Key principles when considering how the management of waste may contribute towards climate change mitigation are:

- The waste hierarchy;
- Life cycle assessment; and
- A circular economy approach.

Life Cycle Thinking & Assessment

5.4 Generally, applying the waste hierarchy should lead to waste being dealt with in the most beneficial way. However, the Waste Framework Directive allows for the use of Life Cycle Thinking (LCT) to justify deviation from the waste hierarchy on a case-by-case basis.

5.5 Within the concept of LCT, Life Cycle Assessment (LCA) is a structured and internationally standardised method that quantifies all relevant emissions, resources consumed/depleted, and the related environmental and health impacts associated with delivery of any good or service. When LCT/LCA are applied to waste management services, typically the assessment focuses on a comparison of different waste management options. So, for example, an LCA considers the direct impacts of the operations on the environment (e.g. stack emissions from an incinerator) and the indirect benefits of recovering materials and energy from the waste (e.g. through combined heat and power and ferrous metal recycling) vs the use of the materials for recycling.

5.6 These impacts and benefits are then expressed through indicators for different environmental impact categories – such as climate change, water consumption or toxicity (referred to as environmental burdens).

5.7 The UK government has produced guidance to assist in the selection of options for the management of different waste, drawing on the best available LCA research at the time[27]. This concludes that for most materials, the waste hierarchy ranking applies. However, for the materials below, the evidence suggests that certain waste management options which are not consistent with the waste hierarchy order are better for the environment:

[27] Guidance on applying the waste hierarchy, DEFRA, 2011
www.gov.uk/government/publications/guidance-on-applying-the-waste-hierarchy

- For food, anaerobic digestion is environmentally better than composting (and other recovery options);
- for garden waste and for mixtures of food waste, anaerobic digestion followed by composting is environmentally better than composting alone;
- for lower grade wood such as particle or chip board, energy recovery options are more suitable than recycling.

5.8 The outcome of the evidence review was summarised in Figure 6 reproduced below.

5.9 It should be noted that the LCAs reviewed were produced a decade or so ago, and there may be more recent studies that indicate other outcomes as technologies evolve and operating conditions change.

5.10 A number of LCA models have been developed to compare waste management options. In the UK the Environment Agency funded the development of one such model known as WRATE (waste and resources assessment tool for the environment) in 2007. WRATE calculates the potential impacts arising from all processes in the waste management system including the collection, transportation, transfer, treatment, disposal and recycling of materials. The model takes account of the construction and operation of infrastructure and vehicles, and offsets this burden against the avoided burdens associated with materials and energy recovery.

Paper and Card	Food	Garden Waste	Textiles	Wood	Glass	Metals	Plastics±	WEEE	Tyres	Residual 'black bag'
Prevention	Prevention	Prevention	Prevention	Prevention	Prevention	Prevention	Prevention	Prevention	Prevention	Prevention
Preparation for re-use			Preparation for re-use	Preparation for re-use	Preparation for re-use	Preparation for re-use	Preparation for re-use	Preparation for re-use	Re-treading	
Recycling	Anaerobic Digestion	Anaerobic Digestion (dry)[2]	Recycling	Recycling; energy recovery♦ (preferable to recycling for lower grade materials)	Recycling in a remelt process	Recycling	Closed loop recycling	Recycling (esp. suitable for metals and high quality plastic)	Recovery: use in road surfaces	Solid recovered fuel derived from MHT or MBT, where it replaces coal*
	Composting; other energy recovery technologies	Composting; other energy recovery technologies			Other recycling		Other recycling		Energy recovery in cement kilns	Energy Recovery, all technologies (Heat Only)
Energy recovery♦ (esp. suitable for short fibres or contaminated materials)			Energy recovery♦		Energy recovery♦	Recycling after energy recovery	Energy recovery♦	Energy recovery♦ (esp. suitable for non-hazardous mixed plastic)	Energy recovery through pyrolysis	Energy Recovery, all technologies (CHP)
									Other recovery (eg drainage fill & sea defences)	Energy Recovery, all technologies (Electricity Only)
									Gasification /incineration with EfW	MBT or MHT outputs used as fuel (but do not replace coal) or *
Disposal	Disposal	Disposal	Disposal	Disposal	Disposal	Disposal	Disposal	Disposal	Microwave treatment	Disposal

*the impact of CHP technology, which can improve the efficiency of each of these options, is not illustrated here

± the hierarchy may be different for some forms of bio-based plastics

♦'energy recovery' covers a range of technologies, some of which will be more environmentally beneficial than others. Future versions will differentiate between technologies as more scientific evidence becomes available.

*2009 AEA – Report to the Welsh Assembly Government: *Modelling of Impacts for Selected Residual Waste Plant Options using WRATE*

Figure 6. Best environmental options for management of different materials

Circular Economy

5.11 The circular economy aims to redefine growth by decoupling economic activity from the consumption of finite resources, and designing waste out of the system[28]. The circular economy model is based on three principles:

- Design out waste and pollution
- Keep products and materials in use
- Regenerate natural systems

5.12 Approaches such as industrial symbiosis (where synergies between activities can be exploited such as the use of a waste or by-product of an industry by another) can be particularly beneficial.

5.13 More information on the circular economy can be found in the separate topic paper about the circular economy.

Management of Waste

5.14 As shown above while there are some exceptions, the waste hierarchy offers a guide to reduce the production of greenhouse gases.

5.15 Driving waste up the hierarchy should yield the following benefits in terms of emissions reduction:

Diversion from Disposal to Other Recovery or Recycling

- Reducing methane emissions where biodegradable waste is diverted from landfill,
- Gaining some avoided emission benefit from the calorific value of non-biogenic waste where it is diverted from incineration with no or inefficient energy recovery[29];

Diversion from Other Recovery to Recycling

- Gaining greater 'avoided emission' benefit by exploiting the material value of biogenic and non-biogenic waste substituting for virgin materials and its associated emission burden, rather than its value being exploited only once as a fuel regardless of the efficiency of energy recovery

Diversion from Recycling to Reuse

- Extending the life of products and hence reducing the need to manufacture new replacement product (avoiding the associated emissions from

[28] Ellen MacArthur Foundation. 2020. *What is a Circular Economy?*. Available from: https://www.ellenmacarthurfoundation.org/circular-economy/concept [25 March 2020].

[29] Energy recovery that fails to meet the minimum standard required by the R1 formula (see glossary).

production as well as the avoided burden from virgin material extraction)[30]; and

Prevention

- Avoid the creation of the waste in the first place through such actions as 'servitisation' i.e. replacing products with services. This would avoid emissions of production, and subsequent management, although may carry its own emissions burden if the energy used to support delivery is not sourced from entirely renewable sources.

5.16 In reality maximising the carbon reduction benefits involves moving the management of wastes as close to the top of the hierarchy as possible rather than moving it up on a tier by tier basis. That is to say applying it in priority order from the top down, rather than from the bottom up. The carbon benefits will also vary according to:

- The materials actually under consideration, for example biogenic vs non biogenic materials,
- the application to which a material is put, for example anaerobic digestion of organic waste to produce a biogas that may substitute for diesel as a fuel in HGVs vs composting to produce a soil enhancer; and
- the level of waste transportation associated with the management of waste at different levels of the hierarchy e.g. waste management by recycling will likely involve greater transportation than by more local energy from waste.

5.17 Given the complexity of the issue a systematic framework is required to allow analysis of options in their local context. This is where lifecycle assessment comes in.

Transportation of Waste

5.18 While transport of waste is another source of carbon emissions, most LCA models have shown that the transport of waste represents a relatively small contribution to the overall emissions arising from the waste management chain and so may not in itself be a key determinant to the selection of a particular management method. This has been shown to be the case even where long distance transport of recyclate to the Far East is involved[31].

[30] Some of the carbon benefit of reuse may be offset by the poor energy efficiency of domestic appliances that are kept in use vs their early replacement.

[31] Gentil, E Boldrin, A, & Potter, A (2008): Carbon Footprinting of Second-life Materials Using Life Cycle Thinking South-East Regional Assembly https://waste-management-world.com/a/carbon-footprinting

Climate Change Committee Recommendations

5.19 In December 2020, the Climate Change Committee (CCC) published its Sixth Carbon Budget[32] that considered measures required to achieve the UK Government target net zero carbon emissions by 2050. The UK Government accepted the report's key recommendation of a 78% reduction in UK territorial emissions between 1990 and 2035 which essentially brought the UK's previous target of 80% reduction by 2050 forward by 15 years[33]. At COP29 the UK government announced a new target to reduce greenhouse gas emissions by 81% (on 1990 levels) by 2035.

5.20 The Committee's Sixth Carbon Budget noted that emissions associated with waste management accounted for 6% of UK GHG emissions in 2018. While they have fallen to 63% of 1990 levels, due to a reduction in biodegradable waste being landfilled, in recent years emissions have stopped falling due to a plateau in recycling and significant growth in carbon emissions from the fossil sourced component (i.e. oil based plastics) of Energy from Waste plant feedstock.

5.21 Broadly, the Committee's Budget concludes that the management of waste in accordance with the waste hierarchy is consistent with the achievement of reductions in carbon emissions and includes the following specific recommendations:

- A ban on landfilling biodegradable waste by 2025;
- recycling increasing to 70% by 2030;
- additional focus through the chain from manufacturing to the consumer to reduce the amount of waste; and,
- All energy from waste facilities plants to be fitted with Carbon Capture and Storage (CCS) by 2040.

5.22 In its June 2023 report, 'Progress in reducing emissions 2023 Report to Parliament', the CCC summarised its findings in regard to the progress made within the waste management sector to reducing emissions as follows:

'Greater strategic coordination of plans to decarbonise the waste sector is needed including: much greater emphasis on waste prevention, clarity on future residual waste capacity needs, and the suitability of incentives and interactions with other sectors such as waste as a feedstock for Sustainable Aviation Fuels. Energy from Waste (EfW) emissions are already higher than the Government's CBDP[34] anticipates and EfW capacity is set to increase in the coming years. A comprehensive systems-approach to control and reduce EfW emissions is urgently needed, including clarity on carbon pricing. We

[32] The Sixth Carbon Budget The UK's path to Net Zero Committee on Climate Change December 2020 Presented to the Secretary of State pursuant to section 34 of the Climate Change Act 2008

[33] UK enshrines new target in law to slash emissions by 78% by 2035, Government Press Release, April 2021

[34] CBDP = Carbon Budget Delivery Plan

recommend a moratorium on additional EfW capacity until a review of capacity requirements has been completed and an updated assessment of residual waste treatment capacity requirements published.'

5.23 The most recent 2024 (18 July) report[35] includes the following on waste management:

'the waste sector saw good initial progress, with emissions falling from 41.9 MtCO2e in 2008 to 25.9 MtCO2e in 2013. This was towards the upper end of our projected reductions and came almost exclusively via a reduction in methane emissions from landfill, caused by the 1996 Landfill Tax. However, when comparing to targets set by the Government in 2012, landfill methane capture rates have been lower than expected, there has been insufficient progress on recycling and composting, and energy from waste emissions have substantially increased, meaning progress in reducing waste emissions has stalled more recently.'

5.24 The report recommends addressing rising energy from waste emissions as a priority action.

Environmental Services Association Net Zero Strategy[36]

5.25 In 2021 the Environmental Services Association published a Net Zero Strategy[37] that includes the following targets:

- Start fitting Carbon Capture, Utilisation and Storage (CCUS) technologies to EfW facilities from 2025, with all plants fitted with CCUS where feasible by 2040.
- Ensure that all new EfW plants are built with CCUS fitted or are CCUS-ready from 2025 onwards.

National Infrastructure Commission Recommendations

5.26 In May 2024, the National Infrastructure Commission published its latest review of infrastructure in England[38]. The review summarises the position on waste management as follows:
'…Significant delays to key reforms have created uncertainty and prevented the necessary investment in new and improved recycling capacity. Recent initiatives have provided more clarity, and the government should now sustain this momentum as it moves to implement its collection and packaging reforms. It should also create stronger incentives to invest in recycling infrastructure by

[35] https://www.theccc.org.uk/wp-content/uploads/2024/07/Progress-in-reducing-emissions-2024-Report-to-Parliament-Web.pdf

[36] The Environmental Services Association (ESA) is the trade association for the waste management industry in the UK.

[37] http://www.esauk.org/application/files/7316/2496/7294/ESA-Net-Zero-Exec-Summary.pdf

[38] Infrastructure Progress Review 2024

sending a clear signal on the future of energy from waste in a circular economy.'

5.27 The following is included amongst the reports' recommended priorities for actions for government: *'…bans future energy from waste capacity that does not include carbon capture and storage…''…delivers on its commitment to bring energy from waste into the Emissions Trading Scheme from 2028'*

5.28 In relation to the latter recommendation, in June 2024, the Government consulted on how it should expand the UK Emissions Trading Scheme (ETS) to include energy from waste (EfW)[39]. The following four objectives are proposed in relation to the implementation of ETS for EfW:

- Give greater certainty on the delivery of emissions reductions in line with the UK and devolved nation carbon budget and net zero targets.
- Support wider waste policies and drive decarbonisation of waste management, particularly:
    - The extended producer responsibility scheme;
    - increasing higher levels of high-quality recycling; and,
    - investment in technology such as CCS.
- Maintain a level playing field by covering a broad range of thermal treatment technologies (including advanced conversion technologies).
- Reduce the risk of any perverse incentives, particularly related to increases in landfill and waste exports.

[39] UK Emissions Trading Scheme scope expansion: waste

6. How the Management of Waste Can Adapt to Climate Change

Introduction

6.1 Even with ambitious measures and actions to reduce greenhouse gas emissions, further climate change is inevitable. Therefore, adaptation to the potential effects of climate change is needed alongside mitigation. The effects of climate change may be physical (weather events and their effects) and behavioural (changes in consumption and waste generation) which may impact on waste management services.

6.2 Climate change adaptation is defined in the NPPF as follows: *"Adjustments made to natural or human systems in response to the actual or anticipated impacts of climate change, to mitigate harm or exploit beneficial opportunities."*

6.3 Decision-making on the basis of historic climate is no longer robust as the past is not an indication of future climate. In addition, planned adaptation is likely to be more effective than last minute reactive adaptation.

National Risk Assessment and Adaptation Guidance

6.4 The 2017 UK Climate Change Risk Assessment (CCRA)[40] identifies the top areas of inter-related climate change risks for the UK as:

- **Flooding & coastal change** risks to communities, businesses and infrastructure
- Risks to **health, wellbeing and productivity** from high temperatures
- Risks of shortages in the **water supply** for, agriculture, energy generation and industry as well as the public
- Risks to **natural capital**, including ecosystems, soils and biodiversity
- Risks to domestic and international **food production and trade**

6.5 The direct climate change-related threats considered to be of most relevance to waste planning and management are:

- increases in the probability and severity of flooding,
- exposure to high temperatures and heatwaves and
- shortages in water.

6.6 While the assessment is at UK level, these risks apply equally to East London.

6.7 The level of disruption to business will depend on the vulnerability and resilience of infrastructure including energy, telecoms and transport. There may be knock-on effects on supply chains and distribution and on staff (with business and reputational damage) with reduced productivity and potentially reduced access to capital.

[40] UK Climate Change Risk Assessment, DEFRA, 2017. https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2017

6.8 Levels of flood risk (fluvial, surface and groundwater) will be location and site specific. Managing risk from flooding may be possible and affordable in some locations, while in some areas risks and costs of management will increase.

6.9 The Committee on Climate Change Adaptation Sub-Committee[41] set out measures that the UK is undertaking by delivering the National Adaptation Programme (NAP). These are fairly high-level and generic, and do not specifically address waste management.

6.10 These are summarised in the following table (Table 3).

[41]Committee on Climate Change, 2017. *How the UK is preparing.* https://www.theccc.org.uk/tackling-climate-change/preparing-for-climate-change/how-the-uk-is-preparing/

Table 3 - Summary of UK Climate Change Risk Assessment and National Adaptation Programme of relevance to waste management

Potential Climate Change effect	CCRA Potential impact	Risks and Impacts for East London Waste Management	NAP (Planning; Business & Industry)
Increased frequency & severity of flooding (fluvial, coastal, surface, groundwater, sewer)	Coastal infrastructure, especially ports, at risk from rising sea levels and storms.	Risk to exports of material [for recycling]	NPPF requirements for local plans and decisions to take account of climate change including ensuring resilience of communities and infrastructure. Assess cumulative impacts of flood risk. Minimise new building in areas at high flood and erosion risk. Invest in flood and coastal defences Ensure land use decisions reflect the level of current and future flood risk. Greater use of natural flood management solutions including Sustainable Urban Drainage Systems (SUDS) Design property and infrastructure to be resilient to withstand flooding and be able to recover quickly
	High waves accelerate erosion	Damage to property	
	Infrastructure near rivers esp. bridges, cables and pipelines will become vulnerable	Disruption to power supply at waste facilities	
	Increased frequency and severity of flooding of buildings/property in risk areas	Disruption to material supply and export from facilities Damage to property and disruption to operations to waste facilities and supply chain in flood prone areas.	
	Disruption to communities and services	Impact on personnel availability & productivity. Also impact on access to waste set out. Generation of waste from flood damaged property	
	Risk of buckling railway track, sagging of electricity cables, softening road tarmac, over	Disruption to material supply and movement to and from waste facilities	

Potential Climate Change effect	CCRA Potential impact	Risks and Impacts for East London Waste Management	NAP (Planning; Business & Industry)
Changes in temperature and rainfall	heating signalling causing disruption to transport		
	Water demand exceeding supply [and implications for permitting and abstraction licensing]	Availability of water for waste treatment processes that require water including that related to dust suppression.	Encourage water saving and reducing wastage Strengthening resilience of supply
	Embankment failures and landslides, resulting in damage and disruption	Disruption to material supply and movement to and from facilities	
	Overheating of buildings and public transport	Productivity of workers – may be reduced through operation design Increased risk of odours from material – may be reduced through building and process design, handling and storage, and sheeting/enclosed transport Increased risk of dust generation – may be reduced through dust management measures	Green infrastructure
	Longer growing season	Increased green and garden waste generation requiring management	
Increased wind speeds and storms	Overhead power cable damage and disruption	Security of power supply to and from waste facilities	

Potential Climate Change effect	CCRA Potential impact	Risks and Impacts for East London Waste Management	NAP (Planning; Business & Industry)
	Transport disruption – fallen trees, high sided vehicles	Disruption to material supply and movement to and from facilities	

Adaptation to Climate Change by Waste Management

6.11 The UK Climate Impacts Programme 'Adaptation Wizard'[42] provides a step-by-step process through which organisations can assess vulnerability to climate change and potential adaptive responses. This approach provides a logical way of considering vulnerabilities, risks and responses. The key stages are:

- **Assess current vulnerability:**
  - Experience of how previous weather events have affected the organisation (or site, service etc),
  - How it coped
  - Adaptive capacity, and
  - Consideration of thresholds which, if exceeded, would cause unacceptable consequences.
- **Assess future climate vulnerability**:
  - Considering how the climate is likely to change (as described previously)
  - The main direct and indirect impacts likely,
  - The risks these will pose and
  - What are the priorities that require a response. The types of risks will vary but include those to infrastructure, operations, legal and regulatory changes, and financial. The Wizard provides examples of impacts on business functions[43] and sectors[44] which are relevant to waste management both as a function and service.
- **Adaptation options:**
  - Identifying the range of options (accepting risk, offsetting damage, avoiding or reducing exposure, identifying new opportunities, building capacity to adapt) and whether these are temporary or permanent, managerial of technical, strategic or local
  - Evaluate options on effectiveness, efficiency, flexibility, no/low regrets etc
  - Develop implementation plan and implement selected appropriate adaptation

6.12 This exercise does not include an assessment of the current vulnerability to weather events of the waste management service or facilities within East London, as this requires knowledge, experience, and input from the operators. This would help focus attention on priorities for adaptation and the response.

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[42]UKCIP, 2020. *Getting* started. https://www.ukcip.org.uk/wizard/getting-started/

[43]UKCIP, 2020. *Business functions.* https://www.ukcip.org.uk/wizard/future-climate-vulnerability/bacliat/business-functions/

[44] UKCIP, 2020. *Sector* Examples. https://www.ukcip.org.uk/wizard/future-climate-vulnerability/bacliat/sectoral-examples/

6.13 Taking account of the national and regional climate projections, and the national CCRA and NAP, and applying this logical approach, the following potential impacts on waste management in East London, and potential adaptation responses, have been identified in Table 4 below.

6.14 In addition, as identified in the CCRA, there may be 'cascade' effects where there are inter-dependencies on other sectors, and a number of vulnerabilities and impacts coincide, which need to be considered. This may include:

- Transport: Damage and disruption to roads and railways (flooding, embankment failures, signage and signalling etc.) which would disrupt waste collection, movement of materials to and from waste management facilities and availability of staff. Contingency plans, including alternative routes, contingency outlets or increased storage, may be required.
- Energy: Disruptions to power and gas supply if cables and pipelines are damaged, for example by storms. Opportunities to use local heat and power networks, potentially through co-location of facilities, may help improve resilience of supply
- Water: Shortages in periods of drought or implementation of abstraction licenses may reduce availability for processes and site management. Water efficiency, on-site storage rainwater harvesting and greywater recycling would help to reduce reliance on external supplies.

6.15 Waste management should not, therefore, be considered in isolation. A strategic approach, across the four boroughs working with other public and private service providers is required.

Table 4 Risk Assessment & Adaptation Options for waste management

Climate Variable	Likely impacts	Potential effect	Risk & vulnerability	Adaptation Response Options
Temperature	Hotter mean and summer temperatures	Heat stress	• Poor working conditions, health & safety of operatives • Increased odour from waste decomposition at households, out for collection, in transit, and on site • Increased dust arising and blow • Demand for water for processes and site management e.g. dust suppression • Reduced efficiency of composting • Increased fire risk from stored materials	• Site layout and design, covering/enclosure of facilities and operations where possible, to reduce effect of heat on processes and personnel, and reduce odour and dust risk • Dust suppression on plant and within site • Source separation of biodegradable waste for home composting or separate collection • Fire Prevention & Response Plans
	Milder winters	Less frost/snow longer growing season	• Potential for less disruption to service and transport • Increased vermin and odour into winter • Increased amount of green/garden waste requiring collection & management	• More vigilant controls on site operations especially with regard to controls on vermin and odour • Review of garden waste arisings, management capacity and collection arrangements
Precipitation & humidity	Wetter winters Intense rainfall events	High river & groundwater levels	• Flooding (fluvial, groundwater, surface, sewer) of sites, facilities and infrastructure with associated disruption to processes • Flooding and damage to transport infrastructure, disruption to collection, supply, processing and export of materials from facilities	• Avoidance of flood zones 2 & 3 (*as per NPPF – see section 6*) and for location of new facilities/development • Flood resilient and resistant site and facility design e.g. raising of services and vulnerable uses above flood level. • Flood Management Plans for sites and facilities demonstrating safe

			• Increase risk of pollution if site drainage systems get overwhelmed. • Increased waste arising from flood damage • Erosion of caps and bunds, increased leachate(landfill)	operation, storage and containment of materials in event of flooding • Sizing of drainage systems with climate change contingency and retention arrangements if required. • Contingency plans for waste collection, delivery and export including collection routes avoiding flooded areas • Monitoring of site integrity and leachate • Monitoring of sites
	Drier Summers	Water shortages Subsidence	• Abstraction licensing reducing supply • Disruption to processes requiring water • Integrity of landfill caps and bunds	• Water efficiency in processes and site management including rainwater harvesting and recycling of greywater for use on site
Storminess	Extreme events	Intense rainfall & surface flooding High winds	• Surface water/flash flooding • Increased litter blow from street collection and sites • Increase risk of pollution if site drainage systems get overwhelmed. • Reliability of collection frequency/service	• Incorporation of adequate and sustainable drainage and flood storage on site where feasible • Sizing of drainage systems with climate change contingency and retention arrangements if required. • Enclosure of sites & secure boundary treatment
Sea level rise		Coastal erosion and flooding	• Flooding and damage to facilities, infrastructure, communities • Disruption to transport, collections, and export	• Avoid location of facilities in areas that may be at risk of coastal flooding and erosion

Components of the Waste Management System that may be Affected and Adaptation Options

6.16 All components of waste management may be affected by climate change and need to plan to adapt[45]. This is outlined in Table 5 below.

Table 5. Climate Adaptation Options for Waste Management

Waste management component	Vulnerability & Impacts	Adaptation option
Collection	• Increased odour from biodegradable waste • Increased green waste generation • Health & safety of operatives	• Increase frequency of collection • Increase management capacity from provision of larger wheelie bins through to larger sites noting that composting requires a minimum time period to occur. • Timing of collections/Shifts
Civic Amenity/Recycling sites	• Surface water flooding • Changes in types of waste – increased garden waste • Increased odour from biodegradable waste • Dust nuisance • Fire risk	• Site layout, access & drainage • Containment of materials in skips • Frequency of emptying containers • Sweeping and dousing • Fire Prevention & Response Plans
Built facilities	• Flood risk – surface, and depending on location fluvial or groundwater • Increased odour and dust • H&S of operatives • Water availability • Fire risk – stored materials	• Site drainage and layout with built in contingency capacity. • Flood resilient design – raising services and vulnerable uses above flood level, • Dust suppression • Enclose/cover storage and processes • Water efficiency & recycling for processes and site management • Fire Prevention & Response Plans
Open air facilities (esp. composting)	• Increased arisings of green waste • Efficiency of compost process	• Monitor & review green waste capacity requirements for composting & AD

[45] The various climate change impacts will not necessarily occur at the same time or with the same frequency, although the evidence indicates that the severity and frequency of impacts is likely to increase overall.

	• Increased odour/bioaerosols due to slowing down of processes (if material dries out) so greater exposure time	• Separation distances >250m from receptors to be maintained
Landfill	• Erosion of caps and bunds • Changes in leachate volumes and concentrations	• Regular site monitoring • Alternative management solutions

Adaptation Conclusions

6.17 The first stage in considering specific vulnerabilities of the waste management service and specific assets and sites[46], is a review of recent past experience of impacts of weather events to consider the vulnerability, the effectiveness of responses undertaken, and the capacity to adapt (physical, organisational, financial). This would then inform a more detailed assessment of future vulnerabilities and recommendations for adaptation measures.

6.18 However, reviewing the evidence of predicted climate change effects, it has been possible to identify the most likely impacts on waste management in East London. This has also enabled initial consideration of potential vulnerabilities and adaptation options and opportunities. Further, more detailed consideration of these, and appraisal of options and their feasibility and cost, is needed.

6.19 Adaptation responses will be necessary at various levels. Site specific assessments of vulnerabilities and adaptation options, reflecting the specific site/facility characteristics.

6.20 Increased winter rainfall and frequency of extreme weather events, particularly heavy rainfall, is likely to be the most significant potential impact that requires adaptation, as this can have rapid and catastrophic consequences on business activity and infrastructure.

6.21 There is a great deal of national and local planning policy and guidance on assessment and avoidance of flood risk. However, existing sites (and services) will also require adaptation and resilience measures. Detailed national guidance[47] on measures to improve resilience of buildings tends to focus on residential properties, but the principles can be taken to apply to all built development.

[46] UKCIP, 2020. *Current Climate Vulnerability.* https://www.ukcip.org.uk/wizard/current-climate-vulnerability/

[47] CLG & Environment Agency, 2007. Improving the Flood Performance of New Buildings – Flood Resilient *Construction* https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7730/flood_performance.pdf

6.22 Generic adaptation options are identified above as a basis for considering what may be undertaken. The feasibility and cost (including potential cost of not undertaking them i.e. associated regret) needs to be considered drawing on local knowledge and experience, in order to determine which may be taken forward.

7. Role of Waste Planning in Mitigation of, and Adaptation to, Climate Change

Introduction

Mitigation:

7.1 Measures include energy efficiency and increasing the use and supply of renewable and low carbon energy and heat, including identifying opportunities for development to draw energy from decentralised systems and co-location of potential heat customers and suppliers[48].

7.2 In terms of transport, the NPPF also expects that planning should manage patterns of growth and focus significant development in locations which are or can be made sustainable through limiting travel or using sustainable modes, to help reduce overall emissions. It recognises that opportunities for sustainable solutions will vary between urban and rural areas[49].

7.3 National Planning Policy for Waste requires disposal of waste and recovery of mixed municipal waste in line with the proximity principle (thus reducing the distance material will be transported). It sets out locational criteria to be used in plan preparation and testing site allocations which include relevant factors to climate change mitigation and adaptation including:

a) Water quality, resources and flood risk: These are likely to be exacerbated by climate change due to changing rainfall patterns and extreme events and storms (adaptation response);

b) Land instability: Which may be affected by wetter winters and extreme rainfall events, and hotter drier summers (adaptation response);

f) Traffic and access: Modes and distance travelled will affect greenhouse gas emissions (mitigation response)

g) Air emissions including dust: Exacerbated by hotter drier summers and prolonged hot dry periods (adaptation response);

h) Odours: Exacerbated by hotter drier summers (adaptation response);

i) Vermin: Potentially exacerbated by milder winters (adaptation response);

k) Litter: Potentially exacerbated by storms and wind (adaptation response);

Adaptation:

7.4 Adaptation responses include ensuring future resilience of properties, businesses and infrastructure. New development should be planned for in ways that avoid increased vulnerability to impacts. When new development is planned in vulnerable areas, care should be taken to ensure risks can be managed through suitable adaptation measures[50].

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[48] NPPF Paragraph 165(c)

[49] NPPF Paragraph 110

[50] NPPF Paragraph 164(a)

7.5 The NPPF and Planning Practice Guidance set out in some detail how to plan for flood risk[51], which applies to all development types including waste management. The key principle is to avoid development in areas of high probability of flooding where possible, and if development in these areas is demonstrated to be necessary, to ensure that it is flood resistant and resilient.

7.6 Plans are required to take a sequential risk-based approach to location of development in flood risk areas which take into account climate change effects (on probability and severity of flooding). The 'sequential test' steers development to areas at lowest flood risk, informed by Strategic Flood Risk Assessments (SFRAs). If development has to be located in areas at higher flood risk (Flood Zones 2 and 3), the 'exception test' to demonstrate whether there are wider sustainable development benefits that outweigh the flood risk, or that the development will be safe for its lifetime without increasing risk elsewhere[52].

7.7 In terms of flood risk and its assessment, landfill and sites used for management of hazardous waste are classified as 'more vulnerable' types of development, and so generally are not compatible with or appropriate in Flood Zone 3a (high probability of flooding) unless it passes the Exception Test. Other waste treatment is considered as 'less vulnerable' which is generally compatible and appropriate in all areas apart from 3b (functional floodplain).

7.8 Planning Practice Guidance (PPG)[53] sets out examples of adaptation measures as:

- Considering future climate change risks when allocating sites to ensure risks are understood over the development's lifetime
- Promoting design responses to flood risk and coastal change for the lifetime of the development
- Considering availability of water and water infrastructure.

7.9 It advises that mitigation and adaptation measures may be integrated, for example, through designing buildings with natural ventilation, through district heating networks, and provision of green infrastructure. It also recommends adopting low or no-risk options that deliver multiple benefits, and building in flexibility to allow future adaptation.

7.10 Further, informal, guidance is provided in the Town & Country Planning Association/RTPI guide on climate change[54] which builds on NPPF and PPG.

Role of Waste Planning

[51] NPPF Paragraphs 170-182

[52] NPPF Paragraphs 172-180

[53] PPG Paragraphs ID 6-003 to 6-006-20140306

[54] TCPA/RTPI, 2018. *Climate Change – A Guide for Local Authorities.*

7.11 Planning can address mitigation and adaptation in two main ways – steering the spatial distribution of development, and controlling and influencing its type, design, layout and operation. This applies to all types of development, including waste management. Waste planning can also direct and control the type and quantity of waste being managed, and the management method, at given facilities.

Spatial distribution - mitigation:

7.12 The spatial strategy can influence greenhouse gas emissions, for example through:

- Reducing the need for transport of collected waste to treatment facilities, particularly by road, including through location of facilities proximate to major sources of waste (consistent with the proximity principle where it involves the management of mixed municipal waste in particular), and encouraging use of low carbon transport modes through locating development where transport by water or rail may be viable;
- Encouraging co-location of synergistic waste management developments that offer opportunities to share energy or resources or simply allows waste to be converted to a final product in proximity to its source/point of origin or market;
- Encouraging synergies between waste management facilities and other existing or planned development, for example through combined heat and power and offtake of heat from energy-from-waste facilities with distribution through local heat networks to serve commercial, leisure or residential demand.

Spatial distribution – adaptation:

7.13 The spatial strategy can influence adaptation, for example through:

- Identifying and avoiding inappropriate waste development in areas of current vulnerability particularly to all types of flooding, water resource availability and water quality guided by the sequential approach outlined previously
- Identifying and avoiding inappropriate waste development in areas of future vulnerability due to climate change, particularly where all types of flooding may be more frequent and severe, where water resource availability may be reduced, and water quality may deteriorate (with implications for abstraction and discharge licensing)
- Identifying and avoiding waste development in areas vulnerable to other climate change effects, particularly sea level rise and coastal erosion, and unstable land.

Development type, design, layout and operation - mitigation:

7.14 Planning policy provides the basis for development management decisions, with determination of applications to be in accordance with the development plan unless material considerations indicate otherwise. Planning policy can control and influence the type, design, layout and (through conditions) operation of development to some degree, which can help to mitigate climate change, for example:

- Implementing the waste hierarchy, to minimise landfill (and associated emissions of methane in particular from biodegradable waste) and enable greater resource efficiency through maximising recycling and

recovery of materials and energy. Promoting the lowest carbon solution available, through identifying and enabling development of appropriate facilities reflecting hierarchy priorities and assessed needs;
- Design and operation of built waste management facilities to maximise energy efficiency of the building, its fabric and operations;
- Encouraging and enabling use of renewable and low carbon energy sources including that produced on-site where relevant and also through development of and connection to district heating/local networks.
- Electric vehicle charging points or biogas production for use in vehicles or supply into the gas grid.

Development type, design, layout and operation – adaptation:

7.15 Planning policy can control and influence the type, design, layout and (through conditions) operation of development to some degree, which can help to adapt to climate change:
- Flood resistance (e.g. barriers) and resilience (e.g. services and floor levels raised above projected flood level; containment of materials within part of site; location of vulnerable uses within site away from areas liable to flood risk),
- Enclosure of processes to reduce escape of odour, dust and litter, and maintain healthy conditions for personnel given predicted extremes
- Incorporation of water efficiency measures including recycling of water in processes and plant, and on site management e.g. dust suppression
- Incorporation of water storage on site – through sustainable drainage schemes where feasible or through tanks and flow restriction (informed by drainage assessments to reduce run-off to greenfield standards)
- Conditions controlling operation and control of site e.g. dust management plans, flood management plans, emergency evacuation plans.

Application in East London

Adopted East London Waste Plan

7.16 The adopted Joint Waste Development Plan, and supporting documentation and evidence[55], do not currently incorporate explicit consideration of existing and future vulnerability, and of mitigation and adaptation to climate change.

7.17 Policy W5 *General Considerations with regard to Waste Proposals* sets out what information is required in support of planning applications. This includes measures relevant to mitigation of and adaptation to climate change, including to mitigate, minimise and avoid adverse impacts and compensate for loses including:
(ii) production of greenhouse gases
(iii) development on sites likely to be at greater risk of climate change over the lifetime of the development;
(iv) increase in pressure on resources with climate change;

[55] https://www.havering.gov.uk/downloads/file/3944/adopted_joint_waste_dpd

(vi) drainage and risk of flooding;
(vii) water consumption and water management;
(viii) groundwater and hydrogeology;
(x) demonstration of sustainable construction and drainage;
(xii) opportunities for sustainable transport.

7.18 Policy W5 therefore covers many of the actions required to mitigate and adapt to climate change of planning applications. However, it does not include a great deal of detail on how compliance can be demonstrated. This may be through climate change appraisals accompanying applications which identify specific mitigation and adaptation measures. Policy or text in the new Plan could make this explicit and signpost measures that should be considered.

7.19 While new sites for waste management are unlikely to be required to be identified and allocated in the new Plan, spatial factors such as flood risk, should be applied in assessing sites for de-allocation and release from waste safeguarding and their suitability for alternative use and development.

Conclusion and Recommendations

7.20 Planning has a critical role in determining the scale, type, and spatial distribution of waste management development. It can also influence the design, layout and operation (in conjunction with environmental permitting) of waste management facilities. In doing so it can require and enable both the mitigation of, and adaptation to, climate change of the sector.

7.21 A degree of pragmatism needs to be applied when considering options and what planning can achieve, balanced in particular against commercial and practical realities including the opportunities presented by making best use of existing capacity at existing facilities.

7.22 There is strong and clear national planning policy and guidance on climate change mitigation and adaptation, with which development plans need to be consistent.

7.23 The adopted Joint Waste Plan Policy W5 already requires consideration of the key issues and ways in which waste development can contribute to mitigation and adaptation in East London. The local plans of the boroughs also include policies requiring climate change mitigation and adaptation.

7.24 Climate change mitigation and adaptation considerations are embedded throughout the new East London Joint Waste Plan reflecting current requirements, knowledge, and best practice as described in this report. These are summarised below:

- ***Draft Vision:***

'By 2041, the principles of the circular economy will be fully integrated into all forms of development within East London'

'Waste management facilities will be located to protect and enhance communities and the natural environment, and be resilient to climate change.'

'Net zero in waste management will have been achieved in East London through an understanding, and reduction, of lifecycle carbon impacts and incorporating renewable energy in waste management and transportation'

- ***Strategic Objectives:***

  - Strategic Objective 1: Significantly Reduce Waste Production Overall
  - Strategic Objective 2: All Built Development Will Contribute to the Achievement of a Fully Functioning Circular Economy by 2041
  - Strategic Objective 3: Appropriately Locate Waste Management Capacity
  - **Strategic Objective 5: Achieve Net Zero Waste Management**
    - Attain net zero in waste management by 2041 by ensuring that whole lifecycle carbon impacts are taken into account in proposals for the management of waste.
    - Provide waste management capacity that minimises greenhouse gas production and supports the development of a low carbon economy and decentralised energy.
    - Promote development which allows for the exclusive use of renewable energy sources in waste management operations and transportation.
  - Strategic Objective 7: Minimise Transportation and Establish Alternative Infrastructure
    - Minimise the transportation of waste by locating facilities as close as possible to its source
    - Safeguard and establish alternative energy efficient transport infrastructure, including River Thames wharves, to allow movement without reliance on fossil fuel-powered HGVs.

  - Strategic Objective 8: Restrict Landfilling to Exceptional Circumstances

- ***Policies:***
  - JWP1: Circular Economy
  - JWP2: Safeguarding and Provision of Waste Capacity
  - JWP3: Prevention of Encroachment
  - JWP4: Design of Waste Management Facilities
  - JWP5: Energy from Waste
  - JWP6: Deposit of Waste on Land

Appendix A – Summary of Climate Change Related Policies in the Adopted East London Joint Waste Plan and other Local Plans in East London

The following tables sets out planning policies in the East London Joint Waste Plan and borough Local Plans in East London which are intended to ensure that development adapts to and/or mitigates climate change. These policies cover matters such as design, the use of energy, transport, flooding, water use and waste management.

East London Adopted Joint Waste DPD

Policy	Summary of requirement
Policy W1 Sustainable Waste Management	Requires the waste planning authority to work in partnership with the general public and the business community in the ELWA area to provide information and advice and raise awareness. Development is required to reuse construction, excavation and demolition waste during new developments, such as the Thames Gateway, with on-site recycling and use of recycled aggregate wherever possible and encourage use of sustainable transport modes where the movement of waste is necessary.
Policy W3 Energy Recovery	Incorporation of energy recovery and treatment facilities within major developments.
Policy W4 Disposal of inert waste by landfilling	Landfill only permitted where waste cannot be re-used and it is essential for restoration of land.
Policy W5 General considerations with regard to waste proposals	Proposals must demonstrate lack of alternative facility more proximate to non-apportioned waste arising. Applications must demonstrate mitigation and avoidance of adverse impacts from emissions of greenhouse gases, risk from climate change, drainage and flood risk, water consumption, transport impact

Borough Local Plan (inc. link to website)	Policy (no. and title)	Summary of requirement
Barking and Dagenham *https://www.lbbd.gov.uk/sites/default/files/2024-10/B%26D_LocalPlan_A4_SEP24_digital.pdf* Barking and Dagenham Emerging Local Plan 2020-2037	Strategic Policy SP2	(g) adopt Circular Economy principles in design – reduce resource use and embodied carbon throughout the lifecycle of a development and aim to achieve net zero waste.
	Strategic Policy SP6: Green & Blue Infrastructure	Protect and enhance quality of natural environment including biodiversity & green spaces and links.
	Strategic Policy SP7: Securing a clean, green and sustainable borough	Encourage innovative approaches to tackling climate change, reduce pollution, flood risk, heat risk and promote sustainable infrastructure. Major development to be net zero carbon and employ low carbon technologies to minimise greenhouse gas emissions, and encourage connection to District Energy networks. Minimise risk of internal over-heating. Reduce flood risk through use of Sustainable Drainage Systems and address cross-border risks. Zero biodegradable waste to landfill by 2026.
	Policy DMSI 1: Sustainable design & construction	Incorporate sustainable design & construction relating to scale, nature, orientation, layout and form. Incorporate sustainability principles, materials and low carbon technologies.
	Policy DMSI 2: Energy, heat and carbon emissions	Major development to contribute to meeting and exceeding target of carbon neutrality by 2050 by maximising energy efficiency and carbon reduction and net zero buildings. Major developments accompanied by Energy Assessment demonstrating how development is designed in accordance with energy hierarchy. If net zero cannot be achieved on-site, financial contribution to carbon offsetting required. Development should prioritise decentralised energy and adhere to heat hierarchy. Incorporation of low carbon and renewable energy required. Overheating risk to be minimised through design, layout, orientation, materials and incorporation of green infrastructure.

Borough Local Plan (inc. link to website)	Policy (no. and title)	Summary of requirement
	Policy DMSI 6: Flood risk and defences	Development to deliver neutral impact or reduction in flood risk through design. Flood Risk Assessments required. Protect flood defences and raise these to required standards on TE2100, and safeguard land for future raising of defences.
	Policy DMSI 7: Water management	Utilise permeable surfaces, and SuDS. Aim for greenfield run-off rates and manage run-off water as close to source as possible. Reduced water consumption required
	Policy DMSI 8: Demolition and operational waste	Develop construction waste management plan to reduce, re-use, recycle and recover waste to mitigate environmental impact. Consider use of river for waste transport where appropriate. Strategy for operational waste minimisation, collection and recycling to be incorporated into development. Major residential developments to incorporate high quality on-site storage and collection systems such as underground storage and vacuum systems.
	Strategic Policy SP8: Planning for integrated and sustainable transport	Sustainable transport of freight to reduce highway congestion and environmental impacts.
Havering https://www.havering.gov.uk/info/20034/planning/183/planning_policy/2 Local Plan adopted 2021 and covers the period 2016-2031.	Policy 32: Flood management	Avoid flood risk and manage residual risk by applying Sequential Test and if necessary Exception Test. Strategic Flood Risk Assessment is starting point. Surface water flooding reduced through reducing surface water run-off through SuDS and applying London Plan drainage hierarchy achieving greenfield run-off rates.
	Policy 35: Waste management	Support provision of space in development for storage for waste and recyclables, separate collection of re-usable and recyclable materials, include on-site waste management which minimises need for transfer. All major development to include waste management plan.
	Policy 36: Low carbon design and renewable energy	Optimise energy efficiency in buildings and support low carbon and renewable energy developments. Major development to include energy assessment to demonstrate how targets for carbon dioxide emissions reduction will be met.

Borough Local Plan (inc. link to website)	Policy (no. and title)	Summary of requirement
		Contribution to offsetting required to secure carbon savings. Major development to prioritise connection to decentralised energy networks and integrate CHP on site.
	Policy 39: Secondary aggregate	Applicants to minimise primary aggregate and resources and waste through design, good practice and recycling of construction materials containing minerals. Maximise recovery from CDE waste through on-site re-use and recycling
Newham *https://www.newham.gov.uk/planning-development-conservation/planning-policy-local-plan/2* Newham Local Plan adopted 2018 and covers the period until 2033.	Policy SC1: Environmental resilience	Design, construction and operation of development to respond to climate change effects including extreme weather, geohazard, water scarcity and warmer temperatures. Development to be resource efficient. Promote local production, labour and procurement. Design to implement SuDS hierarchy and deliver benefits to biodiversity, pollution control and flood risk reduction. All development to incorporate water efficiency, demonstrate over-heating risks have been addressed, and landscaping to consider climate change effects of higher temperatures and water scarcity.
	Policy SC2: Energy and Zero Carbon	All development to minimise and reduce carbon emissions following energy hierarchy. Decentralised energy networks will be a central component of growth in the Arc of Opportunity. Development to maximise natural and waste energy sources. All major development to be supported by Energy Strategy/Assessment including prioritising connection to heat networks.
	Policy SC3: Flood Risk & Drainage	Development to avoid increasing flood risk and be informed by SFRA. Flood Risk Assessments required in line with national policy. Development located in areas at lowest risk of flooding demonstrated by sequential Test and if necessary Exceptions Test. Development set back from flood defences. Development in FZ2&3 to be flood resilient. All development to incorporate SuDS to reduce surface run-off and in Critical Drainage Area achieve greenfield run-off and include Surface Water Drainage Strategy.
	Policy INF3: Waste & Recycling	Follow waste hierarchy, prioritise rail and water transport, observe Proximity Principle dealing with waste as close to source as possible. Development to include on-site handling and storage to meet needs and include innovative approaches to sustainable waste management. Major development to be accompanied by Site Waste Management Plans

Borough Local Plan (inc. link to website)	Policy (no. and title)	Summary of requirement
	Policy INF4: Utilities Infrastructure	Expansion of decentralised energy networks and use of innovative energy technologies (including waste energy) encouraged to reduce fossil fuel use and emissions. All energy sources >50Mwe to provide connection to heat networks. Major development to prioritise connection to heat network.
Redbridge https://www.redbridge.gov.uk/planning-and-building/planning-policy/local-plan/ Redbridge Local Plan adopted 2018 and covers the period 2015-2030	Policy LP19: Climate Change Mitigation	Promotion of zero carbon development – all development to reduce carbon dioxide emissions through applying energy hierarchy. All major development to demonstrate how London Plan targets for carbon dioxide emissions have been met. Location of development to minimise need to travel by car and to support decentralised energy networks.
	Policy LP20: Low Carbon and Renewable Energy	Major developments to demonstrate accordance with energy hierarchy through energy assessments. Protect existing decentralised energy networks and support their expansion. Support district heating schemes and on-site renewable energy. Major development to consider feasibility of CHP, make financial contribution to programme for carbon reduction, ensure design is district energy network connection ready.
	Policy LP21: Water and Flooding	Development to avoid increasing flood risk, safeguard flood plain where water can flow and be stored, direct vulnerable land uses away from areas of highest flood risk as identified in SFRA and to comply with Sequential and Exceptions Tests. Site specific flood risk assessments for sites meting NPPF/PPG criteria. Require flood resistant and resilient measures to be incorporated into design in areas prone to flooding. Utilise SuDS to achieve greenfield run-off rates and deliver wider benefits for biodiversity and water quality. Resist impermeable surfacing and culverting of watercourses

Borough Local Plan (inc. link to website)	Policy (no. and title)	Summary of requirement
	Policy LP22: Promoting Sustainable Transport	Direct development generating high transport demand to highly accessible locations, facilitate safe reliable and efficient movement of freight.
	Policy LP24: Pollution	Waste facilities to mitigate impact on environmental considerations by fully enclosing facilities.
	Policy LP2: Promoting High Quality Design	Development to incorporate sustainable design and construction including best practice in energy efficiency and climate change mitigation.
	Policy LP32: Sustainable Design & Construction	All development to contribute towards mitigation of the effects of climate change. Promote zero carbon development including adherence to energy hierarchy, show how London Plan targets for carbon emissions will be achieved, reduce travel by car, promote decentralised energy networks, re-use existing buildings, optimise resource efficiency. Adopt climate change adaptation measures including green infrastructure and protection of green space, use permeable surfacing and SuDS, green roofs, minimise water consumption, measures to reduce overheating. Promotion of sustainable design & construction through seeking BREEAM Excellent ratings in new non-domestic buildings >1000m^2.

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ELJWP

East London Joint Waste Plan

Waste Management Topic Paper

Update to accompany Publication (Regulation 19) of the Submission Draft East London Joint Waste Plan

19.02.25

Barking & Dagenham

Havering LONDON BOROUGH

Newham London

London Borough of Redbridge

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Abbreviations and Glossary

Abbreviations

CHP	Combined Heat and Power
DEFRA	Department for Food & Rural Affairs
EA	Environment Agency
EfW	Energy from Waste
ELWA	East London Waste Authority
EWC	European Waste Catalogue
HIC	Household, Industrial, and Commercial (Waste)
HWRC	Household Waste Recycling Centres
LACW	Local Authority Collected Waste
LCA	Lifecycle assessment
LLW	Low Level Radioactive Waste
LP	London Plan
LPA	Local Planning Authority
MBT	Mechanical Biological Treatment
MSW	Municipal Solid Waste
NPPF	National Planning Policy Framework last updated on 19 December 2023
NPPW	National Planning Policy for Waste last updated on 16 October 2014
PPG	Planning Practice Guidance
RWS	Resources & Waste Strategy (2018)
WDI	Waste Data Interrogator
WDF	Waste Data Flow
WPA	Waste Planning Authority

Glossary

Apportionments	Tonnages of HIC waste allocated to each Borough through the London Plan for provision of qualifying management capacity.
Anaerobic Digestion	A process to manage organic matter including green waste and food waste broken down by bacteria in the absence of air, producing a gas (biogas) and nutrient rich solid or liquid (digestate). The biogas can be used to generate energy either in a furnace, gas engine, turbine or to power vehicles, and digestate can be applied to land as a fertiliser.
Asset Management Plans	Plans produced by water companies setting out business plan for next five-year period. These are submitted to Ofwat for scrutiny prior to adoption.
Biogenic	Material within the waste stream that has been generated by the bio-cycle and was growing in the last hundred or so years. Examples include food, paper, garden waste, wood/timber.
Circular Economy	The circular economy means decoupling economic activity from the consumption of resources. It is based on three principles: Design out waste and pollution; keep products and materials in use; regenerate natural systems.
Combined Heat and Power (CHP)	The harnessing of both electricity and heat from power generating plants in this case incinerators burning waste.
Commercial Waste	Waste from factories or premises used for the purpose of trade or business, sport, recreation or entertainment.
Composting	A process in which biodegradable waste (such as green waste and kitchen waste) is broken down in aerobic conditions by naturally occurring micro- organisms to produce a material suitable for use as a soil improver.
Department for Food & Rural Affairs	The UK Government department responsible for developing national waste management policy.
Deposit Return Schemes	Scheme to incentivise return of single-use drinks containers for recycling.
East London Boroughs	The London Boroughs of Barking & Dagenham, Havering, Newham and Redbridge that are collaborating to produce a joint waste plan for East London as waste planning authorities for their respective areas.
East London Waste Authority	The statutory Waste Disposal Authority (WDA), responsible for the disposal of LACW collected by or on behalf of the London Boroughs of Barking & Dagenham, Havering, Newham and Redbridge.
Energy from Waste	The conversion of the calorific value of waste into energy, normally heat or electricity through applying thermal treatment of some sort. May also include the production of gas that can be used to generate energy.

Environment Agency	The body responsible for the regulation of waste management activities through issuing permits to control activities that handle or produce waste. It also provides up-to-date information on waste management matters and deals with other matters such as water issues including flood protection.
Environmental Permits	A regulatory document that sets out legally enforceable parameters within which regulated waste management facilities must operate, issued by the Environment Agency.
Extended Producer Responsibility	Scheme to introduce management obligations on entities that put household packaging waste and packaging onto the UK market.
European Waste Catalogue	Comprehensive listing of wastes, divided into 20 chapters, most of which relate to the type of industry that produced the waste, although some are based on materials and processes. Each waste type is assigned a unique six-digit code. The EWC is transposed into UK law through The List of Wastes (LOW) Regulations.
Foul sewer	A system of underground pipework maintained by the local statutory sewerage undertaker that carries used and dirty water to a wastewater treatment plant for cleansing.
Gasification	A thermal process that converts carbonaceous materials into gases, such as syngas, that may be used for energy production or chemical synthesis.
Household, Waste	Waste from households collected through kerbside rounds, bulky items collected from households and waste delivered by householders to household waste recycling centres and "bring recycling sites". along with waste from street sweepings, and public litter bins.
Household Waste Recycling Centres	A waste management facility provided by ELWA, where members of the public living in East London may take their household waste for management.
Inert waste	Waste which is neither chemically nor biologically reactive and will not decompose or will only do so very slowly. Examples of this are soils, concrete, and bricks.
Life Cycle Assessment (LCA)	Life Cycle Assessment involves an analysis of the burden provision of a product or service makes on planetary resources and systems. It provides a framework for measuring the relative impact of different waste management options to facilitate decision making.
Local Authority Collected Waste	Waste collected by or on behalf of a local authority. Includes household waste and business waste and non-household fractions such as construction and demolition waste delivered to HWRCs.
Local Plans	Prepared by local planning authorities, which in this case are each of the East London boroughs. Local Plans guide decisions on any future development proposals for an area. They set out policies to be used in decision making which are

	supported by a vision for how the local planning authority want the Plan area to develop.
Local Planning Authority	Local council with responsibility for determining planning applications and producing local plans. In this case the East London Boroughs.
(The) London Plan	The Spatial Development Strategy for Greater London produced by the Mayor. Latest version is 2021.
Low Level Radioactive Waste	Radioactive waste that contains relatively low levels of radioactivity. Includes items such as scrap metal, paper and plastics and smaller amounts come from medical and research facilities.
Mechanical Biological Treatment	A waste facility that combines a sorting facility with a form of biological treatment such as composting, bio-drying or anaerobic digestion
Municipal Waste (MSW)	A term that covers household waste and household-like commercial and industrial waste (e.g. from offices or hotels) regardless of its fate.
Non-hazardous waste landfill	A landfill permitted to accept non-inert (biodegradable) wastes e.g. municipal and commercial and industrial waste and other non-hazardous (including inert) wastes. Some may also accept certain hazardous waste if a special cell is constructed.
Non-inert waste	Waste which is either chemically or biologically reactive and will decompose over time. All waste other than inert waste (see entry) and hazardous waste.
Ofwat	The Water Services Regulation Authority, or Ofwat, is the body responsible for economic regulation of the privatised water and sewerage industry in England and Wales.
Planning Practice Guidance	Guidance published by central Government to support plan making and development management decision making. Applicable across England.
Pyrolysis	Thermal process to promote the decomposition of organic (carbon-based) materials which, occurs in the absence or near absence of oxygen, and it is thus distinct from combustion (burning).
'R1' Recovery status	The definition in the revised Waste Framework Directive for a 'recovery' operation requires municipal waste incinerators to demonstrate a plant will achieve a minimum threshold of efficiency in converting municipal waste to energy. Plants operating at or above the stipulated thresholds can be classified as 'recovery operations' for the purposes of the waste hierarchy. Incinerators operating below the threshold are classed as 'disposal'.
Waste Data Interrogator	Environment Agency compiled dataset for waste accepted and removed from sites provided by operators of facilities subject to environmental permits for waste activities.

Waste Data Flow	Online data portal for use by English local authorities to report on LACW management data to central Government (DEFRA).
Waste Disposal Authority	A local authority responsible for managing the waste collected by councils acting as waste collection authorities and the provision of household waste recycling centres. In this case ELWA
(The) Waste Hierarchy	Priority listing of management methods for waste set out in the Waste Framework Directive, transposed into UK law. To be applied in priority order i.e. from the top down.

1 Executive Summary

1.1 This document provides an introduction to waste management in East London. This version has been updated to support the Regulation 19 Draft East London Joint Waste Plan (ELJWP). It provides background information and justification for the approach and policies related to waste management included in the ELJWP. The document references several key documents that have informed the preparation of this topic paper, including assessments of existing waste management capacity and forecasts for different types of waste arising in East London.

1.2 The main types of waste produced in the East London Joint Waste Plan area are:

- Local Authority Collected Waste (LACW)
- Commercial and Industrial Waste (C&I waste)
- Construction, Demolition and Excavation Waste (C, D & E)
- Hazardous Waste
- Wastewater and Sewage Sludge

1.3 Local Authority Collected Waste (LACW) consists of waste collected by, or on behalf of, a local authority and includes household waste, bulky waste, street sweepings, and green waste. In 2022/23, 0.42 million tonnes of LACW was generated in East London, with 0.19 million tonnes managed through incineration with Energy from Waste (EfW), 0.13 million tonnes recycled or composted, and only 117 tonnes managed through disposal to landfill[1].

1.4 Commercial and Industrial waste (waste produced by business and industry) does not have readily available data on tonnages generated in East London. Projected tonnages are collectively accounted for in the London Plan (2021) apportionments of household, industrial, and commercial waste (HIC) to 2041 that each Borough is expected to plan for.

1.5 Construction, Demolition, and Excavation Waste (C, D & E) consists mainly of inert materials such as soils, stone, concrete, brick, and tile, as well as non- inert elements like wood, metals, plastics, and plasterboard. Different types of C, D & E waste require different forms of management, such as recycling or deposit on land for beneficial purposes e.g. landscaping and engineering works (depending on the nature of the waste). It has been estimated that 2.2 million tonnes of C, D & E waste was generated in East London in 2023, with 36% arising from construction and demolition activity and 64% from excavation works.

1 The difference between the individual values and the total is principally made up by moisture loss at the two MBT plants that operate under the ELWA contract for managing LACW arising in East London.

At least 74% of the excavation waste was managed through recovery routes, while at least 72% of C&D waste was managed in this way.

1.6 In East London hazardous waste arises mainly from construction and demolition activity, vehicle maintenance and/or dismantling activity, and healthcare. It is estimated that nearly 71,000 tonnes of hazardous waste was produced in East London in 2023. Due to the relatively small amounts of hazardous waste and the need for specialist facilities, this waste may travel further afield for management and there is no policy expectation that it is to be managed within a specific Plan area.

1.7 Wastewater and the sewage sludge that results from its treatment is managed by Thames Water and Anglian Water. Wastewater treatment capacity is planned for in 'Asset Management Plans', and a major upgrade is underway at Beckton Sewage Treatment Works to address changing needs and provide for growth, resilience and consent compliance to a design horizon of 2036.

1.8 Agricultural waste arisings in East London are small, with quantities requiring offsite management assessed as being so low as to not require specific provision of management capacity.

1.9 Low-level radioactive waste (LLW) is mainly produced from hospitals, research establishments, and the nuclear industry. It is likely that very little LLW is produced in East London, and any resulting LLW will continue to be managed via existing arrangements.

1.10 Waste management facilities in East London generally require planning consent for a waste use granted by each Borough as Local Planning Authority (LPA) and Environmental Permits granted by the Environment Agency (EA). There are currently around 100 such sites in East London, managing waste.

1.11 In summary, this document provides an overview of the different types of waste generated in East London and the existing waste management infrastructure. It highlights the need for planning policies to encourage the management of waste in accordance with the waste hierarchy and the importance of considering specific waste characteristics for appropriate management technologies.

2 Introduction

2.1 This Topic Paper presents the background evidence on waste management in East London that underpins the Regulation 19 Draft ELJWP (2025). The Topic Paper includes justification for the approach and policies relating to waste management, which is in addition to that included as supporting text in the Plan.

2.2 The preparation of this Topic Paper, has been informed by the London Plan 2021 and the following evidence base documents:

- Assessment of Existing Waste Management Capacity in East London (February 2025 Update)
- Baseline & Forecast for Construction, Demolition & Excavation Waste Arising in East London to 2042 (January 2025 Update)
- Baseline & Forecast for Hazardous Waste Arising in East London to 2042 (January 2025 Update)
- East London Joint Waste Plan, Identification of Strategically Significant Cross Boundary Waste Movements, (February 2025); and

2.3 This paper sets out the current position in East London with regards to waste arisings, current management arrangements and existing management capacity and so underpins policies included in the Regulation 19 draft of the new joint waste plan for East London.

3 Existing waste management

3.1 The legal definition of waste, set out in section 75(2) of the Environmental Protection Act 1990, is "*any substance or object which the holder discards, or intends or is required to, discard*". The key concept relates to the producer or holder's intention regardless of whether the material or item may have a value to the recipient.

3.2 The main types of waste produced in the East London Waste Plan area are:

- Local Authority Collected Waste (mainly household waste) (LACW);
- Commercial and Industrial Waste (waste from businesses and industry) (C&I waste);
- Construction, Demolition and Excavation Waste (C, D & E W);
- Hazardous Waste from various sources; and,
- Wastewater and Sewage Sludge.

3.3 The principal objective of planning for the management of waste[2] is to protect the environment and human health by:

- preventing or reducing the generation of waste;
- where its production is unavoidable, reducing the adverse impacts of its generation and management; and
- reducing the overall impacts of the use of resources from which waste may arise and improving the efficiency of such use.

By paying regard to the above objectives, the overall burden of the waste created by society should reduce and the value it contributes back to the economy maximised.

Waste Datasets

Environment Agency Waste Data Interrogator (WDI)

3.4 The Waste Data Interrogator is the Environment Agency dataset that reports annual tonnages and types of waste accepted and removed from sites with environmental permits for waste management activities. The WDI is the principal dataset used to account for waste arising within particular Plan areas. It uses the classification of waste set out in the European Waste Catalogue (EWC) and relies on data supplied by operators of permitted

2 See The Waste (England and Wales) Regulations 2011(as amended) and The Waste (Circular Economy) (Amendment) Regulations 2020.

facilities.

Defra Wastedataflow (WDF)

3.5 Wastedataflow is an online data portal for use by English local authorities to report on LACW management data to central Government (DEFRA). Data submitted is used to report on national LACW management performance.

Local Authority Collected Waste

3.6 Local Authority Collected Waste (LACW) consists of waste that comes into the control of, the local authority i.e. the council in whose borough it arises. LACW collected by, or on behalf of, the East London Boroughs includes household waste collected from homes (residual, dry mixed recycling and food waste), bulky waste and other waste delivered to Household Waste Recycling Centres (HWRCs) provided by each Borough, street sweepings, green waste from the maintenance of public parks and open spaces, and a small quantity of clinical waste[3]. LACW can also include waste collected from businesses, known as 'trade waste', if a business specifically requests the local authority to collect it. Waste collected by a private contractor from businesses is known as 'Commercial and Industrial Waste.

3.7 The LACW produced in East London is managed under a contract let and overseen by the East London Waste Authority (ELWA) - an entity that performs the waste disposal authority function of the four Boroughs[4]. In 2022/23 0.42 million tonnes of LACW was generated in East London. Of this, 0.39 million tonnes arose from households. Of the total, 0.19 million tonnes was managed through incineration with Energy from Waste (EfW), 0.13 million tonnes was recycled or composted, with very little managed through disposal to landfill. The above data is based on returns submitted by ELWA to central Government via an online reporting portal known as WasteDataFlow.

3.8 ELWA adopted a Joint Strategy for the management of East London's LACW in 2022, covering the period 2027-57[5]. This Joint Strategy sets out the strategic aims and aspirations for resources and the management of LACW, for which the Partner Authorities have responsibility, between 2027 and 2057. The Strategy covers the period after the end of the current long-term contract for

[3] Household clinical waste is not deemed hazardous unless a particular risk has been identified (based on medical diagnosis).
[4] https://eastlondonwaste.gov.uk/
[5] A Joint Strategy for East London's Resources and Waste 2027 –2057 https://eastlondonwaste.gov.uk/files/_uploads/Joint%20Strategy%20for%20East%20Londons%20Resources%20and%20Waste%202027%20to%202057.pdf

waste treatment services (2002 to 2027). The Joint Strategy recognises that action to deliver improvements in the management of LACW needs to start as soon as possible to achieve future performance aspirations. Steps that the Partner Authorities are taking to improve performance in the intervening years, including development of an East London Waste Prevention Programme and Borough Reduction and Recycling Plans that are submitted to the Mayor of London for scrutiny. These Programmes and Strategies have also informed the development of the ELJWP. It should be borne in mind that while most visible, LACW only forms part of the total quantity of waste arising in East London that requires management.

Commercial & Industrial Waste

3.9 While national planning policy identifies Commercial and Industrial waste as a separate waste stream to LACW, in the London Plan it is combined with LACW and collectively referred to as household, industrial and commercial waste, or 'HIC waste' for short. These waste types are grouped together as there are similarities between their characteristics, particularly that element of commercial waste classed as 'municipal' alongside LACW, and hence they may be managed through similar types of waste management facility.

3.10 Data for tonnages of C&I waste generated in East London is not readily available due to the lack of clear definition in the available datasets[6]. Therefore, it is not possible to establish the management profile of this stream with the same degree of certainty as for LACW. However, for the purposes of planning for this waste stream, the London Plan apportionments determine the future combined need for the management of HIC waste within East London through to 2041.

Construction, Demolition and Excavation Waste

3.11 C, D & E waste comprises waste arising from the construction and demolition activities, including excavation undertaken prior to construction. It consists mainly of inert materials such as soils, concrete, brick and tiles. Non-inert elements are also present in this waste stream such as wood/timber, metals, plastics, plasterboard, and green waste from site clearance works plus residual food wastes from canteens that construction workers attend. Hazardous waste

[6] The EWC categorises municipal waste under a single Chapter, Chapter 20, and this includes both LACW and waste arising from businesses. Differentiating between the data for C&I waste arisings and LACW reported in the Environment Agency Waste Data Interrogator, involves a complex process, and one that has not been taken in this case as the London Plan apportionments define the management requirements, or 'need', to be met through the Plan for these waste types combined together.

(see below) may also be present particularly when development takes place on brownfield sites that have been affected by historical contamination such as former industrial sites like the land redeveloped for what is now the former Olympic Park.

3.12 Different types of C, D & E waste require different forms of management. For example, hard inert materials (such as concrete, brick and road planings arising from demolition and road maintenance) can be converted into materials which may be used to substitute for primary minerals in construction activities. Soft materials such as soils and sub-soils can be deposited for beneficial purposes such as the restoration of minerals workings (i.e. quarries) and engineering projects such as flood prevention schemes and acoustic bunds. The non-inert component such as metals and plasterboard may if separated be recycled back into products through manufacturing facilities. Ultimately there is very little C, D & E waste that cannot be recycled or recovered in some way.

3.13 The production of C, D & E waste is influenced by large-scale infrastructure and development projects such as the Thames Tideway Tunnel, as well as commercial and residential developments, which means that peaks and troughs in its production are often observed with arisings not necessarily following a consistent trend. In light of this the London Plan does not apportion quantities of C, D & E waste for management to individual Boroughs, but Boroughs are still required to plan for the management of this waste stream.

3.14 In 2022 it is estimated that 2.2 million tonnes of C, D & E waste was generated in East London[7]. Of this 36% arose from construction and demolition activity while 64% arose from excavation works. This difference is significant because the London Plan sets separate targets for the management of excavation waste, from those applied to construction and demolition waste. At least 74% of the excavation arising was managed through recovery routes while at least 72% of C&D was managed through recovery. The remainder in both cases was managed through transfer stations from where it would be transferred on to an unknown final fate.

3.15 Given it is a bulky and heavy waste type, C, D & E waste does not tend to travel significant distances from its source.

[7] *Baseline & Forecast for Construction, Demolition & Excavation Waste Arising in East London to 2042 Update* BPP Consulting January 2025

Hazardous Waste

3.16 Hazardous wastes are categorised as those that are harmful to human health, or the environment, either immediately or over an extended period of time. In East London, hazardous waste arises mainly from: Construction and demolition activity, vehicle maintenance and/or dismantling activity and healthcare. Types of hazardous waste include contaminated soils, infectious clinical waste and waste oils.

3.17 It is estimated that nearly 71,000 tonnes of hazardous waste was produced in East London in 2023[8]. The term 'hazardous waste' covers a wide range of waste types which each may require management at specialist facilities, such as hazardous waste landfills and high temperature incinerators. Given they generally arise in relatively small amounts, due to economies of scale, such facilities are often developed to manage quantities greater than that arising in a single Plan area. Therefore, this waste may travel further afield for management than most other waste types. For example, around 1,200 tonnes of soil and stones containing dangerous substances in 2022 was sent to a treatment site in Sandwell (West Midlands) for management, some 150 miles away from East London.

Wastewater and Sewage Sludge

3.18 Wastewater generally comprises effluent from homes and industrial and commercial premises and in some case surface water runoff from roads and other hard surfaces discharged to the foul sewer system from where it is channeled to wastewater or sewage treatment works for treatment[9]. Output of this treatment is sewage sludge that may, if it meets certain parameters, be applied to land as a fertiliser in accordance with the *Sludge (Use in Agriculture) Regulations 1989* and associated best practice guidance. Sludge applied in this manner falls outside the normal regulatory regime for waste. Alternatively, the sludge can be treated either through anaerobic digestion or incineration. The cleaner effluent may be discharged to a watercourse in accordance with a discharge consent granted by the Environment Agency.

3.19 In East London, wastewater and the resulting sewage sludge are managed by Thames Water and Anglian Water. Wastewater treatment capacity is planned for in ‘Asset Management Plans’. The water companies use information in the public domain to forecast when upgrades to wastewater treatment facilities will be required.

[8] *Baseline & Forecast for Hazardous Waste Arising in East London to 2042 Updated* BPP Consulting January 2025
[9] These works can provide a valuable function in managing wastes other than wastewater, that arise in liquid and sludge form such as septic tank emptyings that serve properties not connected to the foul sewer.

3.20 Beckton Sewage Treatment Works, located in the London Borough of Newham, is the key facility serving East London, being Thames Water's, and the UK's, largest sewage treatment works. To address changing need, a major upgrade is underway so it can receive wastewater from the new Thames Tideway Tunnel and provide for growth in housing in East London.

Agricultural Waste

3.21 Given the relatively small amount of land subject to cultivation in East London arisings of agricultural waste are small, with quantities requiring offsite management particularly low. The Environment Agency dataset, the WDI, indicates there is very little agricultural waste produced in East London requiring the provision of off-site management facilities.

Low level radioactive waste

3.22 Radioactive waste is any material that is either radioactive itself or is contaminated by radioactivity and for which no further use is envisaged. Radioactivity can pose health risks when organisms are exposed to elevated levels, and while potentially hazardous radioactive waste is not included in the definition of hazardous waste and is therefore accounted for separately. Most radioactive waste is produced from nuclear power stations and from the manufacture of fuel for these power stations. This is referred to as 'nuclear waste.' Radioactive waste also arises from nuclear research and development sites and Ministry of Defence sites. No such sites exist in East London.

3.23 Radioactive waste also arises from medical, industrial and research establishments such as hospitals and universities. This is sometimes referred to as 'non-nuclear waste'. Being of a low level of radioactivity this may be referred to as low level radioactive waste (LLW), or even very low level radioactive waste (VLLW).

3.24 LLW consists mainly of paper, plastics and scrap metal items that have been used in hospitals, research establishments and the nuclear industry. It is likely that very little LLW is produced in East London, and according to the Environment Agency public register, one organisation holds three permits covering two locations in Havering to keep and use radioactive materials in East London. Any resulting LLW will likely continue to be managed via existing arrangements.

4 Waste Management Facilities

4.1 There is a multiplicity of ways in which waste may be managed. Much depends on the specific characteristics of the waste itself as this can determine its suitability for management through the application of different technologies. For example, only waste that may degrade when subject to biological processes is suitable for management through organic waste treatment technologies such as mechanical biological treatment, anaerobic digestion and composting. Similarly, only waste capable of combustion should be subjected to thermal treatment processes such as incineration, gasification or pyrolysis. The cleanliness of waste materials can play a major role when it comes to considering its suitability for onward recycling through reprocessing plants such as paper mills and glass factories. This in turn may be heavily influenced by the collection methods used and the facilities provided at the point where the waste arises.

4.2 In general, facilities where waste is managed require express planning consent for a waste use. In addition, they also generally require Environmental Permits that in England are granted by the Environment Agency.

Existing Waste Management Estate in East London

4.3 The ELJWP area has a range of permitted waste management facilities that handle waste both from within and beyond East London. Data for 2022 indicates there are around 100 sites in East London currently managing waste under environmental permits granted by the Environment Agency. Figure 1 shows the distribution of the existing waste management facilities in East London.

4.4 The principal types of waste management facilities within East London are as follows:

- Non-hazardous landfill including silt lagoons
- MBT plants (x2)
- C, D & E waste recycling facilities
- HIC waste recycling facilities
- Metal recycling sites
- HWRCs (x4).

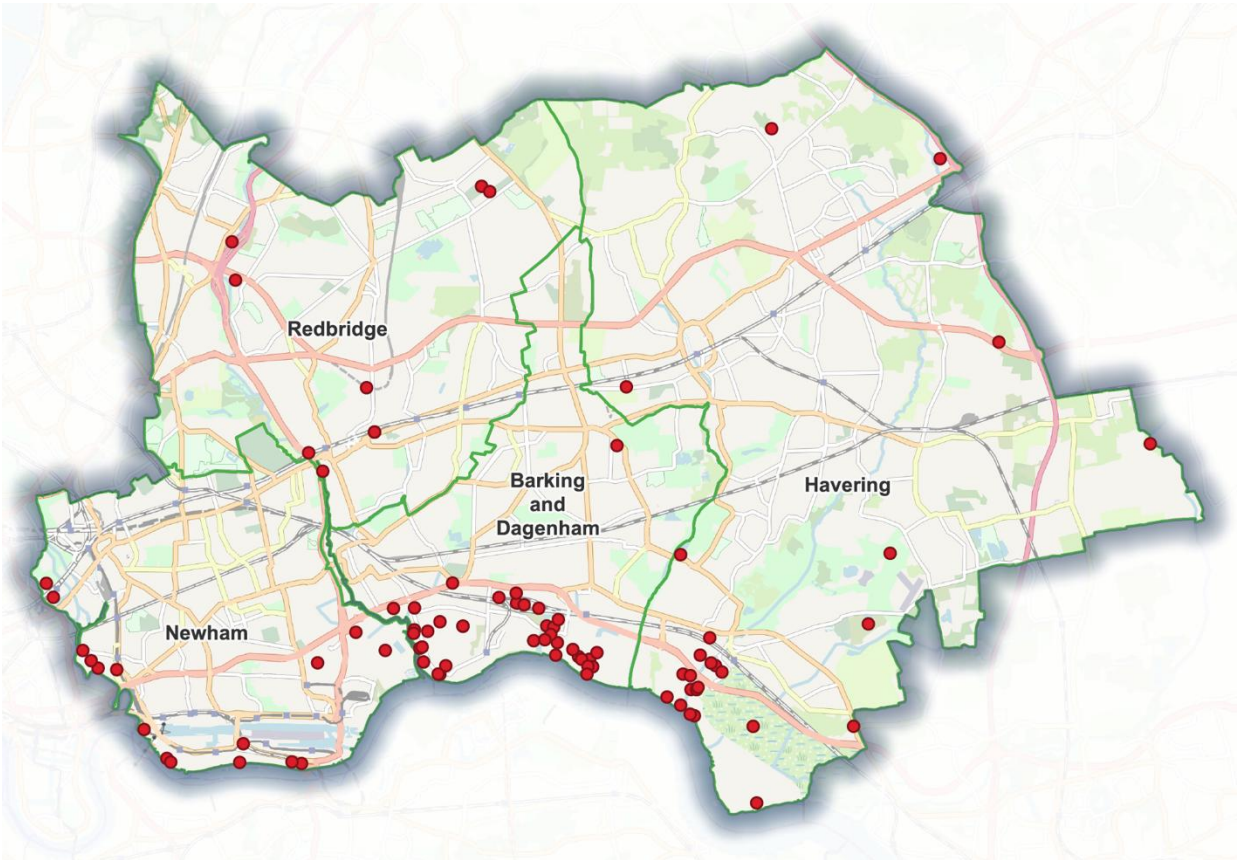


Figure 1: Map of Permitted Waste Sites in East London

5 The Policy Context

5.1 The policy context within which the ELJWP has been prepared is set out in Figure 2 below.

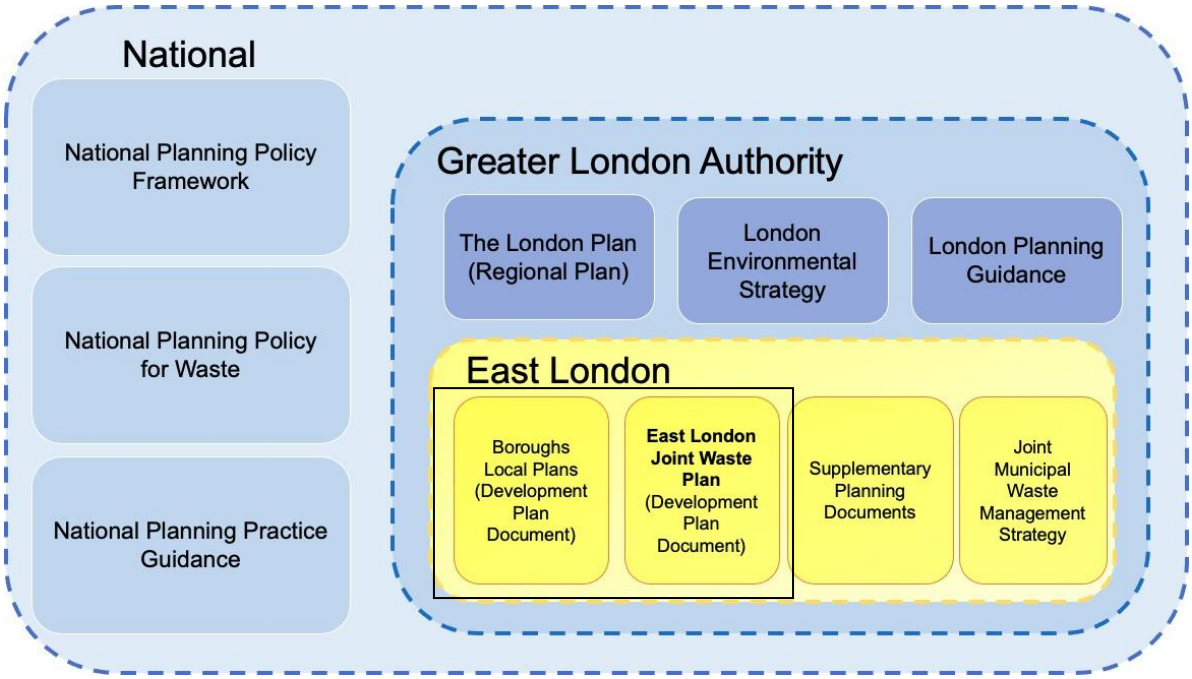


Figure 2 – The ELJWP Within the Wider Policy Context

National Policy

5.2 The key objective of national policy for managing waste [10]is to protect the environment and human health by:

- preventing or reducing the generation of waste;
- where its production is unavoidable, reducing the adverse impacts of its generation and management; and
- reducing the overall impacts of the use of resources from which waste may arise and improving the efficiency of such use.

The National Planning Policy for Waste 2014 (NPPW))[11], associated Planning Practice Guidance (PPG) and the Resources and Waste Strategy for England 2018 (RWS)[12] set the policy context for waste management in England. Whilst the National Planning Policy Framework (NPPF) does not contain policies

[10] See *The Waste (England and Wales) Regulations 2011(as amended)* and *The Waste (Circular Economy) (Amendment) Regulations 2020.*

[11]https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf

[12] https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england This was published under the 2016 to 2019 May Conservative government.

specific to waste, its principles are relevant. The Waste Management Plan for England[13] signposts policies concerning waste management in England in particular those included in the RWS as a route to demonstrating compliance with Waste Framework Directive requirements. This was updated in 2021 and such is considered to be the most current expression of Government policy on the subject.

5.3 Both NPPW and RWS require application of the Waste Hierarchy in priority order as one of the key principles of achieving sustainable waste management. The 'Waste Hierarchy' sets out different ways of dealing with waste as shown in Figure 3 below. 'Prevention' is the preferred option with 'Disposal' at the bottom being the option of last resort.

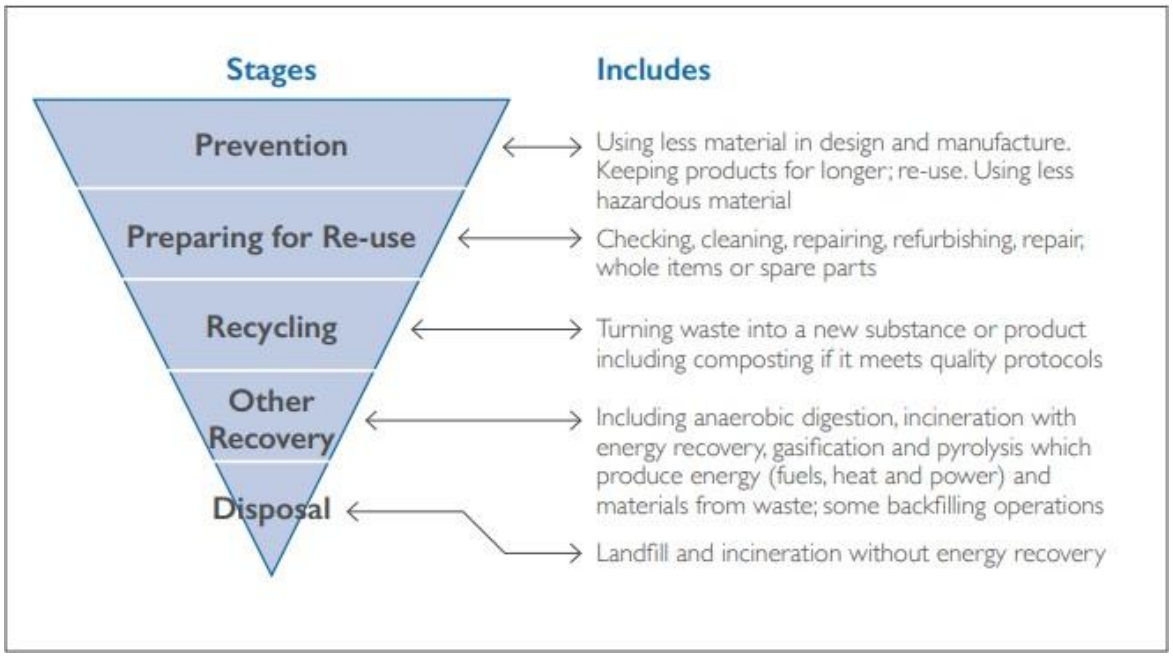


Figure 3 The Waste Hierarchy[14]

5.4 The RWS remains the national strategy for waste management in England, including how the country is to minimise waste and manage it more effectively through maximising opportunities to generate value from material that is both prevented from entering, and extracted from, the waste stream.

[13] https://www.gov.uk/government/publications/waste-management-plan-for-england-2021

[14] Source: *National Planning Policy for Waste*, MHCLG, 2014. It should be noted that the most recent Govt publication showing the hierarchy included anaerobic digestion in the recycling tier.

5.5 The RWS identifies five strategic ambitions:

- To work towards all plastic packaging placed on the market being recyclable, reusable or compostable by 2025;
- To work towards eliminating food waste to landfill by 2030;
- To eliminate avoidable plastic waste over the lifetime of the 25 Year Environment Plan;
- To double resource productivity by 2050; and
- To eliminate avoidable waste of all kinds by 2050.

5.6 The RWS is also concerned with ensuring that society's approach to waste aligns with the following circular economy principles:

- design out waste and pollution;
- keep products and materials in use; and
- regenerate natural systems.

Circular Economy

5.7 The role waste management plays in the material cycle that is central to creating a more circular economy is illustrated in Figure 4 below.

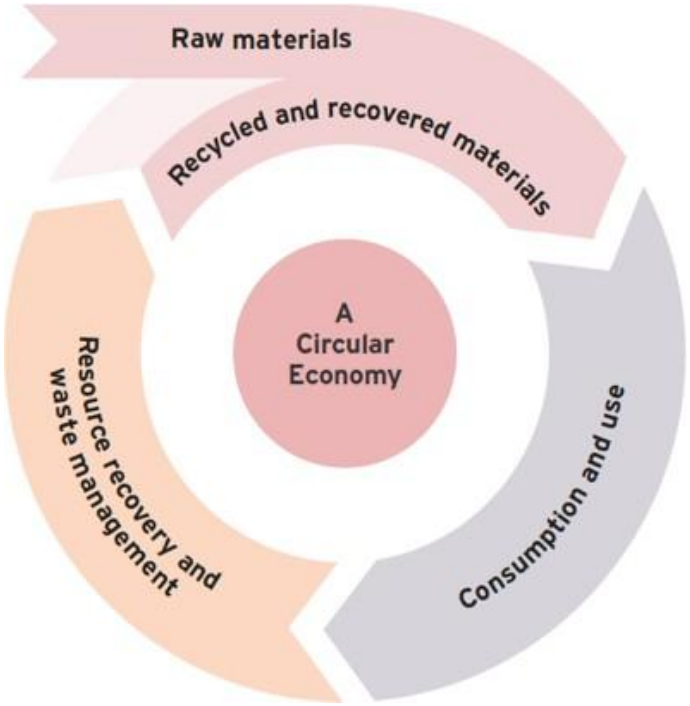


Figure 4 Circular Economy[15]

[15] Source: Resources and Waste Strategy, DEFRA, 2018

5.8 The Circular Economy can also aid in tackling the climate emergency. When applied to the built environment, circular economy principles significantly reduce greenhouse gas emissions by avoiding extraction of raw materials, reducing production of construction materials, retaining embodied carbon and eliminating waste. In July 2023 the Sunak Conservative Government published its waste prevention plan titled 'Waste prevention programme for England: Maximising Resources, Minimising Waste'. This is considered in detail in the separate topic paper on Circular Economy.

Environment Act 2021 Targets

5.9 The Environment Act 2021 requires the Government to set long-term, legally- binding environmental targets[16], including those for resource efficiency and waste reduction. In response to this requirement the Government in power at the time set the following targets in its Environmental Improvement Plan 2023, which build on the targets in the RWS set out previously. These are as follows:

- eliminate avoidable waste by 2050 and double resource productivity by 2050;
- explore options for the near elimination of biodegradable municipal waste to landfill from 2028;
- eliminate avoidable plastic waste by 2042; and,
- halve 'residual' waste (excluding major mineral waste) produced per person by 2042.

5.10 The target for the reduction in residual waste is enshrined in The Environmental Targets (Residual Waste) (England) Regulations 2023 which came into force on 30 January 2023. The target is for the reduction of residual waste (excluding major mineral wastes) on a kg per capita[17] basis by 50% by 2042 from 2019 levels (574 kg per capita). Accordingly, the residual waste long-term target is that by the end of 31 December 2042 the total mass of residual waste for the calendar year 2042 does not exceed 287 kg per capita. Routes through which waste is managed as residual are:

- sent to landfill in the United Kingdom;
- put through incineration in the United Kingdom;
- used in energy recovery in the United Kingdom; or
- sent outside the United Kingdom for energy recovery.

[16] https://www.gov.uk/government/publications/environment-bill-2020/august-2020-environment-bill- environmental-targets
[17] Per head of population in England

5.11 The residual waste reduction targets are expected to be achieved through a combination of waste prevention and increased recycling rates. Government modeling has shown recycling rates may need to reach 75% by 2042. This is expected to be achieved through a combination of measures including the introduction of Extended Producer Responsibility initiatives for certain products and materials, and a deposit return scheme relating to packaging waste, and the adoption of a simpler approach to recycling involving the statutory requirement for the separate collection of at least five materials: glass; metals; plastics; paper; and, food waste, from all households and business premises by 2028. Where source separated materials need to be bulked up and/or treated (e.g. food waste) this may require provision of additional waste management facilities.

5.12 Alongside separate collection and extended producer responsibility initiatives for household and business waste, the Routemap for Zero Avoidable Waste in Construction was launched in 2021[18]. To achieve zero avoidable waste by 2050, this includes the following targets:

- By 2040 eliminate all but hazardous C&D waste entering landfill.
- By 2040 reduce soil to landfill by 75% based on 2020 level and reduce to zero by 2050 unless required for landfill operation purposes.

Other targets may be set for construction waste reduction and recovery including cost reduction through designing out waste and material optimisation.

5.13 In addition to the above measures relating to construction, the NPPW requires that when determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that the handling of waste arising from the construction and operation of development maximises reuse and recovery opportunities, and minimises off-site disposal. Additionally, Chapter 2 of the National Planning Policy Framework (NPPF) recognises the need for the planning system to consider the prudent use of natural resources and waste minimisation in the pursuit of sustainable development. The National Planning Policy Framework and the National Planning Policy for Waste are material considerations when decisions on planning applications are being made and when local planning authorities are preparing local plans.

5.14 In light of the aforementioned targets and initiatives over the forthcoming plan period, a substantial shift towards a more sustainable waste management system is anticipated. This entails a heightened focus on recovering value from a wider range of materials and reducing the amount/proportion of waste

[18] https://www.constructionleadershipcouncil.co.uk/news/zero-avoidable-waste-routemap-launch/

buried or burnt. This may require additional and different waste management facilities, coupled with source/supply chain initiatives that extend beyond the scope of waste management planning as currently understood/applied. The composition of waste requiring management is also expected to change over time, as it has done in the past.

Climate change

5.15 The production and management of waste needs to consider impacts on climate and how practices need to adapt in light of anticipated changes to the climate. This is considered in detail in the separate topic paper on Climate Change.

Net self sufficiency

5.16 Self-sufficiency in terms of waste, as outlined in Article 16 of the EU Waste Framework Directive[19], refers to the principle that each Member State of the European Union should aim to manage and dispose of its own waste within its borders, to the extent possible. This encourages Member States to take responsibility for their own waste and is designed to reduce the need for cross boundary waste movements, which can create inequalities between countries and 'waste tourism'. The principle applies at national level to England & Wales as a whole.

5.17 The principle of self-sufficiency has been adapted for local waste planning purposes to establish how much management capacity should be provided in each waste Plan area, Through the addition of the term 'net', this recognises that movements of waste occur between waste Plan area, as waste management is not generally limited by administrative boundaries. Movements can be beneficial for optimising the waste management system where economies of scale apply. This means there is no expectation that each tonne of waste produced in a particular Plan area is to be managed within that Plan area. Rather that, overall, there should be a balance of provision. The objective of net self- sufficiency is therefore to ensure that there is sufficient capacity to manage the tonnage of waste equivalent to that predicted to arise within a Plan area. The degree to which a Plan area is net self-sufficient can be established by comparing the available capacity within the Plan area with the projected capacity requirements[20]. A snapshot of the position for East London is presented in Figure 5, based on actual reported movements in 2022.

[19] https://eur-lex.europa.eu/eli/dir/2008/98/oj

[20] The London Plan applies the principle of net self sufficiency to waste management across London (see later section).

5.18 It should be noted that Figure 5 presents:

1. a snapshot in time for a single year; and
2. is not necessarily a true representation of net -self-sufficiency as actual inputs to facilities in 2022 may not be reflective of potential capacity of sites operating in East London (in most cases inputs will be lower than actual site capacity).

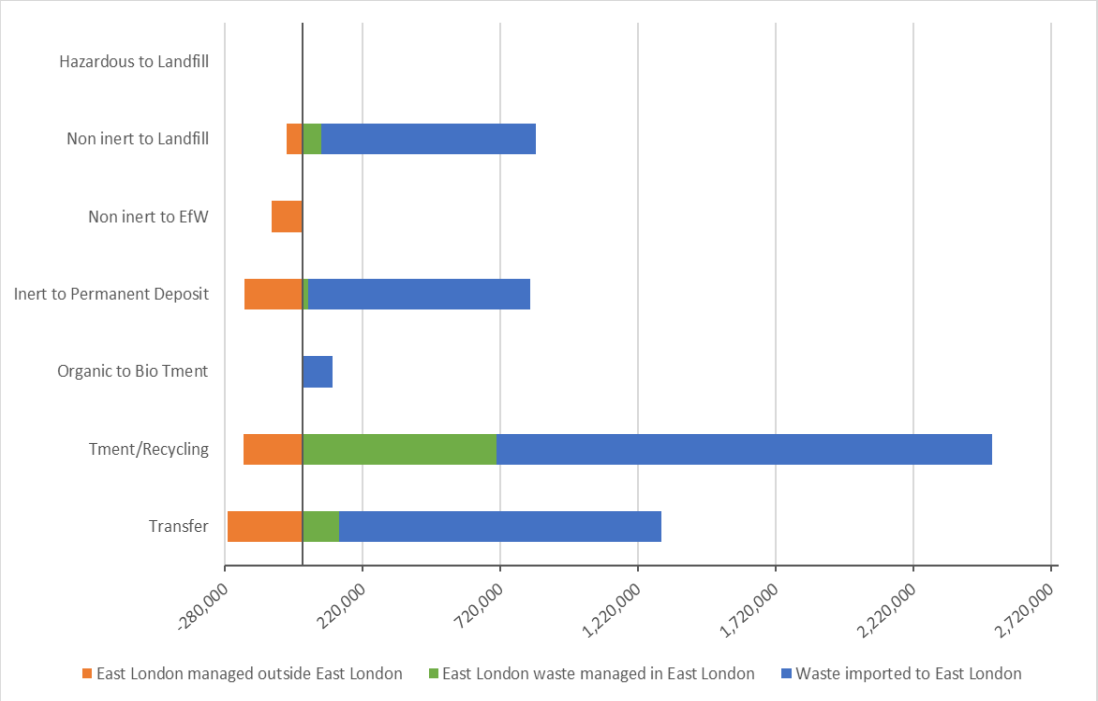


Figure 5 Waste import and export balance in East London 2022 by management method and waste type where known (tonnes)

The Proximity Principle

5.21 The disposal and the recovery of mixed municipal waste in particular is also subject to the proximity principle[21] . This seeks to ensure that mixed municipal waste collected from private households be disposed of, or recovered, in one of the nearest appropriate installations. This is to be by means of the most appropriate methods and technologies, in order to ensure a high level of protection for the environment and public health.

5.22 This is intended to result in the establishment of an integrated and adequate network of installations for the disposal and recovery of mixed municipal waste collected from private households across the country. The requirement also extends to where the collection includes similar types of waste collected from non-household sources (e.g. waste from offices and retail premises).

[21] As transposed in English law through *The Waste (England and Wales) Regulations 2011* as amended.

5.23 This principle is to be applied when decisions are taken on the location of facilities for the management of mixed municipal waste collected from private households and similar waste (see above) for disposal or recovery. This is reflected in NPPW that expects waste planning authorities to:

> *"...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;".*

5.24 NPPW requires local planning authorities with responsibility as Waste Planning Authority for their area, to include policies in their development plans which set out an overall strategy for the pattern and scale of waste development, ensuring sufficient provision is made for infrastructure for waste management, and energy that may be produced (including heat).

Waste Movements

5.25 Data shows that waste is routinely transported between East London and other Waste Planning Authority (WPA) areas both within London and without. This cross-boundary movement is typical of the way in which waste is managed in general, as it has little regard for administrative boundaries. Flows of waste from East London which may be strategic to the management of waste over the Plan period have been identified[22]. This identified a total of 16 permitted facilities receiving potentially strategically significant quantities of waste in 2022, spread across a total of 12 WPA areas. These host WPAs were contacted as part of the consultation on the Regulation 18 Draft ELJWP to confirm that such flows may continue over the plan period.

Regional Policy – The London Plan

5.26 There are thirty-three-administrative areas within London: twelve inner boroughs, twenty outer boroughs, and the City of London. Newham is the only inner London borough within the ELJWP area.

5.27 The administrative geography of London is overseen at a regional level by the Greater London Authority (GLA) which produces amongst other policy documents, The London Plan and the London Environment Strategy (LES). The London Plan provides strategic planning policy for the whole of London and how certain matters, including waste, should be addressed by Boroughs in preparing their Development Plan documents.

[22] See East London Joint Waste Plan, Identification of Strategically Significant Cross Boundary Waste Movements, BPP Consulting, February 2025

Apportionments

5.28 The London Plan states that London should manage as much of its waste within its boundaries as practicable, aiming to achieve net self-sufficiency by 2026 in all waste streams except for excavation waste[23]. To meet this aim, the London Plan 2021 forecasts arisings of Local Authority Collected Waste (referred to as household waste) plus Commercial and Industrial waste (C&I waste) for London as a whole through to 2041, then split down on a Borough level. These forecasts are used as a basis to apportion quantities of this waste for management to each Borough so that the overall goal of managing the equivalent of 100 per cent of London's HIC waste within London (i.e. net self-sufficiency) by 2026 (Policy SI 8) is achieved. The quantities arrived at are referred to as the London Plan apportionments ('LP apportionments' for short).

5.29 The Borough level LP apportionments were generated by the GLA through a process that included assessment of existing capacity in each Borough along with a number of other factors considered to influence the ability of a particular Borough to provide requisite HIC waste management capacity. The types of capacity considered to count towards the management of apportioned waste (hereinafter referred to as 'qualifying capacity') is defined in Paragraph 9.8.4 of the London Plan as follows:

- energy recovery in London;
- production of solid recovered fuel (SRF) and refuse derived fuel (RDF) in London;
- sorting or bulking for re-use or recycling including anaerobic digestion. The reuse or recycling may take place within or outside London providing the capacity is located within London; and
- reuse or recycling including anaerobic digestion within London.

5.30 London Plan arisings and forecasts for the East London Boroughs are set out below in 1 below. The London Legacy Development Corporation (LLDC) does not have a separate waste apportionment through the London Plan 2021, and therefore waste management within the LLDC's jurisdiction that falls within the ELJWP area is accounted for by the apportionment assigned to the London Borough of Newham.

[23] Excavation waste is excluded from the London Plan net self-sufficiency target as it is more difficult for London to provide sites for its management or beneficial use due to the land area occupied by such management facilities (footnote 164 of London Plan).

Table 1 London Plan Forecast HIC Waste Arisings & Apportionments for the East London Boroughs

Borough	Forecast HIC Waste Arising		LP Apportionments	
	2021	2041	2021	2041
Barking & Dagenham	214,000	230,000	505,000	537,000
Havering	229,000	249,000	370,000	393,000
Newham	244,000	260,000	383,000	407,000
Redbridge	196,000	216,000	151,000	160,000
Total	***883,000***	***955,000***	***1,409,000***	***1,497,000***

5.31 Table 1 shows the apportionments for East London are significantly higher than the Plan area's actual projected arisings. Hence East London is expected to make a substantial contribution towards London meeting the 2026 net self- sufficiency target.

5.32 The London Plan also sets out management targets for waste generated in London in Policy SI 7 Reducing waste and supporting the circular economy. These targets reflect those in the London Environment Strategy (LES) as follows:

- zero biodegradable or recyclable waste to landfill by 2026
- meet or exceed the municipal waste recycling target of 65 per cent by 2030
- meet or exceed the targets for each of the following waste and material streams:
  - construction and demolition – 95 per cent reuse/recycling/recovery
  - excavation – 95 per cent beneficial use (with 100% inert put to use)

5.33 In addition, in connection with hazardous waste management capacity, paragraph 9.8.18 of the London Plan identifies *"..a need to continue to identify hazardous waste capacity for London ...in co-operation with other Plan areas."'*

5.34 The London Plan requires boroughs to allocate sufficient land and identify waste management facilities to provide capacity in their plans to manage the tonnages of waste apportioned and for those waste streams not apportioned by the London Plan but still subject to the management targets set out in London Plan policy.

Circular Economy

5.35 The London Plan includes a requirement for 'referable applications'[24] to be submitted with a 'Circular Economy Statement' that demonstrates how the development will come forward in a manner which is consistent with achieving a circular economy. This includes how much waste the proposed development

[24] Referable applications include those for developments providing 150 residential units, other types of development of 20,000sq.m in central London or 15,000sq.m outside Central London, developments 25m high adjacent to the Thames or 30m high elsewhere in London.

is expected to generate and where it will be managed. The GLA has published further guidance on the content of Circular Economy Statements.

5.36 The London Plan requires boroughs to *"…allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste*". This is in line with the NPPW which requires waste planning authorities to *"…identify sites and/or areas for new or enhanced waste management facilities*". The London Plan identifies existing waste management sites, Strategic Industrial Locations, Locally Significant Industrial Sites and safeguarded wharves as suitable for new waste facilities.

Safeguarding

5.37 The London Plan seeks to safeguard all existing waste sites so they are retained in waste use. The London Plan defines 'existing waste sites' as those with planning permission for waste use or those subject to an Environment Agency environmental permit for waste management.

5.38 In the event that an existing waste site is subject to an application for development for a non waste use, the London Plan requires compensatory capacity to be provided unless the capacity is demonstrated to not be required to meet London's needs as a whole. Compensatory capacity must be at or above the same level of the waste hierarchy of that which is lost, and that any loss of hazardous waste treatment capacity must be replaced with similar. Existing waste sites may only be released without compensatory capacity being provided if it can be demonstrated that there is sufficient capacity elsewhere in London and the target of achieving net self-sufficiency is not compromised. This is to be achieved through a plan led approach.

5.39 The London Plan supporting text indicates that boroughs with surplus capacity should share this with boroughs facing a shortfall before considering release of sites from safeguarding protection. The London Plan also acknowledges that it may not always be possible for boroughs to meet their apportionment within their boundaries and in these circumstances the *'transfer of apportioned waste'* may be agreed upon between donor and receiving boroughs. This may be achieved through specific commitments included in the host authority's local waste plan.

Housing design

5.40 Furthermore, the London Plan includes policy (Part G of Policy D4 Housing quality and standards) that requires housing to be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) food waste as well as residual waste.

6 Future requirements for waste management capacity

6.1 In order to establish how much waste management capacity may be needed over the Plan period, an assessment of existing permitted waste management capacity available within East London against the requirements of the London Plan has been undertaken[25]. The findings of the study are set out below:

Management Capacity for Apportioned Waste

6.2 It is estimated that there is currently 2,560,000tpa of permitted capacity in East London capable of managing apportioned waste. This is more than sufficient to manage the London Plan apportioned forecast arisings of 1.5million tonnes in 2041. A sensitivity analysis was undertaken to account for the possible loss of MBT capacity after 2027 when the current treatment contract for the management of LACW let by ELWA terminates, and this showed that even with this loss, a capacity shortfall is not predicted to materialise over the Plan period.

6.3 The surplus capacity for the management of apportioned waste at 2041 is estimated to range between c.0.63 Mtpa (without MBT) and c.1.0Mtpa.

Management Capacity for C, D & E Waste

6.4 Based on an extrapolation of the baseline value for C, D & E waste arisings from East London in 2023 of 2.2 million tonnes, it has been estimated up to 2.6 million tonnes might arise in 2041. Comparing this to an estimate of existing C, D & E waste management capacity of c3.2 million tonnes reveals an estimated capacity surplus of approximately 0.99 million tonnes p.a.

Management Capacity for Hazardous Waste

6.5 Based on an extrapolation of the baseline value for hazardous waste arisings from East London in 2023 of 71,200 tonnes, it has been estimated a slightly lower tonnage of 72,400 may arise in 2041. Comparing this to an estimate of existing hazardous waste management capacity of c54,000 tonnes reveals a shortfall in capacity over the Plan period of c18,400tpa. However given the diverse nature of hazardous wastes, there is no policy expectation that individual Plan areas be net self sufficient for the management of hazardous waste forecast to be produced, rather that existing capacity be safeguarded and additional capacity be sought in co-operation with other Plan areas.

[25] *East London Joint Waste Plan, Assessment of Existing Waste Management Capacity*, Updated BPP Consulting, February 2025

6.6 Therefore the indicated presence of a shortfall should not be a barrier to release of other sites, or impose a requirement to provide for additional capacity through allocation in the ELJWP.

6.7 This study therefore confirms that no shortfalls in waste management capacity over the Plan period are predicted that warrant inclusion of specific land allocations in the ELJWP.

Permanent Deposit of Waste to Land Capacity

Non inert Waste Landfill Capacity

6.8 East London hosts the last remaining merchant non-hazardous waste landfill still operating in London, that of Rainham located in LB Havering. The site has operated since the 1970s and has accepted waste from East London, the wider London area and from outside London. This is illustrated in Figure 6 which shows reported input tonnages by origin for the 2018-2023 period.

Figure 6 Inputs to Rainham Landfill 2018-2023

However the planning consent for Rainham Landfill expired in 2024, and on closure, any waste or residues requiring disposal by landfill would need to be exported for management at landfills outside London.

Providing for Waste From Beyond the Plan Area

6.9 When planning for waste, the NPPW expects WPAs to assess whether the unmet needs of other WPA areas could be met within their own areas. In light of the identified surplus in capacity for the management of waste apportioned to Boroughs through the London Plan and forecast to arise from other sources, as part of the preparation of the ELJWP, the East London Boroughs have invited other Boroughs, that may be unable to manage waste arising within their own areas to consider whether the surplus in east London might offer an opportunity for their unmet needs to be met.

Appendix 1: Non Hazardous Landfill Assessment

The purpose of this note is to consider how residual waste arising in East London identified as requiring management at non hazardous waste landfill might be provided for over the Plan period (to 2041).

Defining Residual Waste Requiring Non Hazardous Waste Landfill

While residual waste is defined in *The Environmental Targets (Residual Waste) (England) Regulations 2023* for the purpose of monitoring the national residual waste reduction target, this definition only identifies it by the particular fates it goes to i.e. it is either sent to landfill, put through incineration or used in energy recovery, and so is not actually characterised as such, other than by excluding major mineral wastes which are largely inert waste categories from construction, demolition, excavation and mining activities.

For the purposes of this exercise residual waste requiring non hazardous waste landfill is taken to be composed of materials that are either:

- Not suitable for combustion, being of low calorific value, such as trommel fines which are residues of the sorting of skip waste; which must meet the loss on ignition test to be landfilled as inactive waste under the Landfill Tax regime; or
- is difficult to recycle or reduce, such as fibreglass bathroom suites and other bulky items (not contianing PoPs which must now be destroyed throiugh incineration);

so disposal to non-hazardous waste landfill is still considered to be the only viable management option in the short to medium term.

Projected Non Hazardous Waste Landfil Requirement for Waste Arising in East London

The predicted requirement of non hazardous landfill capacity in East London is set out in the table below. This data is derived from the ELJWP CDEW Forecasts report[26] and an assessment of diversion potential for HIC waste based on high levels already being achived for LACW.

[26] *Construction, Demolition & Excavation Waste Arising in East London to 2041* Regulation 19 Consultation Draft BPP Consulting January 2025

Predicted Requirement of Non Hazardous Landfill Capacity in East London

Year	Annual Non-inert Waste Landfill Requirement		
	Non-inert C+D waste plus non-inert excavation waste to landfill (Table 17 ELJWP CDEW Forecasts)	2% reducing to 1% of London Plan HIC Forecast	Total tonnes per annum
2024	1,774	17,812	19,586
2025	1,774	17,326	19,100
2026	1,774	16,840	18,614
2027	1,774	16,354	18,128
2028	1,774	15,868	17,642
2029	1,774	15,382	17,156
2030	1,774	14,896	16,670
2031	1,774	14,410	16,184
2032	1,774	13,924	15,698
2033	1,774	13,438	15,212
2034	1,774	12,952	14,726
2035	1,774	12,466	14,240
2036	1,774	11,980	13,754
2037	1,774	11,494	13,268
2038	1,774	11,008	12,782
2039	1,774	10,522	12,296
2040	1,774	10,036	11,810
2041	1,774	9,550	11,324
Totals	31,932	246,258	278,190

Based on the above, the total projected non hazardous waste landfill requirement for East London over the Plan period is estimated to be c280,000 tonnes i.e c0.28Mt.

ELJWP Non Hazardous Waste Landfill Capacity

The Environment Agency Remaiaing Landfill Capacity Dataset identifies two non-hazardous waste landfill sites in East London having available void at the end of 2023 as follows:

1. Rainham Landfill (1.2Mm3) and
2. The Silt Lagoons at Wennington Marshes (2.3Mm3)

Given:

1. Rainham landfill is subject to a planning permmission that has now expired; and
2. the limited range of waste types that may be received at the Wennigton Marshes Silt Lagoons; and
3. The lack of apparent interest and opportunities for the development of additional non hazardous waste landfill capacity in East London

it is predicted there will be a need for some residual waste arising in East London to be disposed at non-hazardous waste landfill sites outside East London over the Plan period.

Non Hazardous Waste Landfill Capacity Beyond East London

The projected requirement for non hazardous waste landfill identified in the ELJWP evidence reports has been compared with the availability of void at non hazardous landfills located within former planning regions adjoining East London. The remaining void in these areas has been derived from a review of the Environment Agency dataset for remaining landfill void at the end of 2023 as set out in the table below.

Remaining Void At Non Hazardous Landfills Located Within Former Planning Regions Adjoining East London

Former Planning Region	WPA	Site Name	End Dates [27]	Void m3 (end of 2023)
East of England	**Bedford**	Elstow South (Stewartby)	tbc	2,500,000
	Cambridgeshire	Buckden Landfill Site	tbc	780,383
		Grunty Fen Landfill Site	tbc	232,449
		March Landfill Site	tbc	963,629
		Milton Landfill	tbc	112,147
		Thalia Waste Management Park	tbc	1,597,401
		Witcham Meadlands Landfill	2027	190,000
	Essex	Bellhouse Landfill Site	tbc	1,312,968
		Elsenham Landfill	tbc	814,141
		Pitsea Landfill	tbc	100,000
		SRC Martells Quarry		1,327,973
	Norfolk	Blackborough End Landfill (Green Land)	tbc	2,246,686
		Feltwell Landfill Site	tbc	1,204,035
	Suffolk	Folly Farm Landfill	tbc	547,270
		Masons Landfill	tbc	2,334,739
	Thurrock	Ockendon Area II & III Landfill	tbc	3,288,928
South East	**Buckinghamshire**	Calvert Landfill Site	tbc	6,593,996
		Land at Meadhams Farm Brickworks	tbc	215,420
		Springfield Farm Landfill	tbc	8,384,985
	Hampshire	Blue Haze Landfill	tbc	362,395
	Kent	Shelford Landfill Site	2037	852,931
	Milton Keynes	Bletchley Landfill Site	2037	5,682,929
	Oxfordshire	Dix Pit Landfill Site	tbc	182,617
		Sutton Courtenay	2030	1,774,966
	Surrey	Redhill Landfill	2030	2,242,522
Grand Total				**45,990,965**

[27] Information to be sought from host WPAs during Regulation 19 consultation.

The above Table shows that at the end of 2023 there was c46Mm3 of void (which equates to c.39 million tonnes of non-hazardous waste after 15% inert waste for restoration) available within Waste Planning Authorities located in the two former planning regions adjacent to East London.

The landfill sites located in the adjacent WPAs offering the most substantial amount of capacity have been mapped in Figure 1.

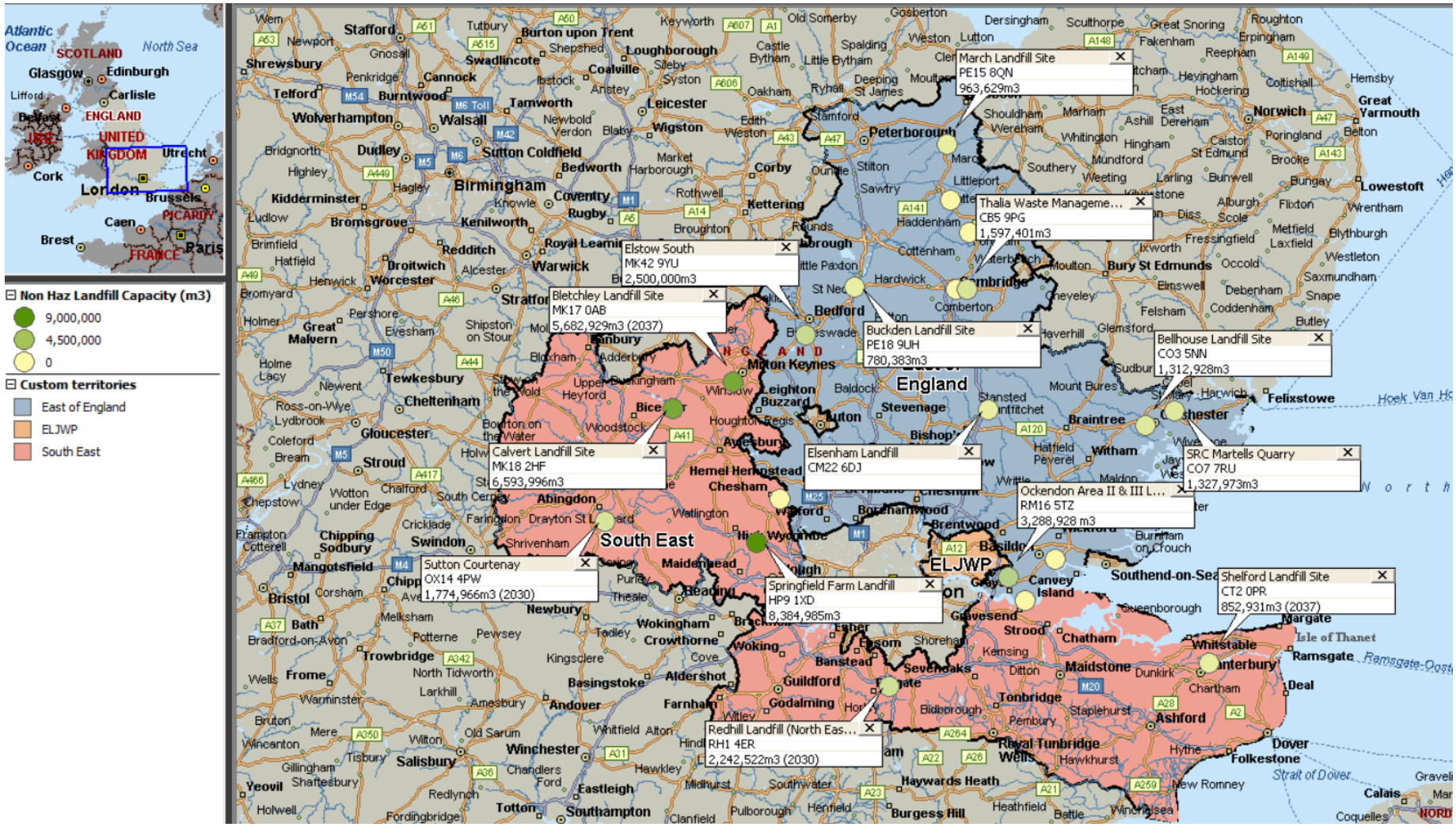
To confirm the possibility of landfill capacity in these areas being available for the management of waste from East London, letters were sent to each waste planning authority to which 5,000 tonnes of non-hazardous waste had been sent for management in 2022 in August 2024 requesting the following information:

1. Do you anticipate such capacity being available within your Plan area up to 2041, and if so:
2. Is there any planning reason why such capacity would not be available to accept waste from East London?

Responses to the letters revealed that where non hazardous waste landfill sites existed, none were prohibited from the acceptance of waste from East London in principle, but some end dates would limit the availability for the full Plan period.

It should be noted that in light of its response to the Regulation 18 Draft ELJWP and subsequent meetings, an SoCG with Thurrock Council is being prepared, a draft of which was sent for to Thurrock Council inviting comments on 13 January 2025. At the time of writing no response has been received.

In light of the responses received to the initial request for information it is not currently envisaged that further SoCGs will be necessary.


Non Haz Landfill Capacity (m3)
9,000,000
4,500,000
0
Custom territories
East of England
ELJWP
South East
March Landfill Site
PE15 8QN
963,629m3
Thalia Waste Manageme...
CB5 9PG
1,597,401m3
Elstow South
MK42 9YU
2,500,000m3
Bletchley Landfill Site
MK17 0AB
5,682,929m3 (2037)
Buckden Landfill Site
PE18 9UH
780,383m3
Bellhouse Landfill Site
CO3 5NN
1,312,928m3
Calvert Landfill Site
MK18 2HF
6,593,996m3
Elsenham Landfill
CM22 6DJ
SRC Martells Quarry
CO7 7RU
1,327,973m3
Ockendon Area II & III L...
RM16 5TZ
3,288,928 m3
Sutton Courtenay
OX14 4PW
1,774,966m3 (2030)
Springfield Farm Landfill
HP9 1XD
8,384,985m3
Shelford Landfill Site
CT2 0PR
852,931m3 (2037)
Redhill Landfill (North Eas...
RH1 4ER
2,242,522m3 (2030)
England
South East
ELJWP

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East London Joint Waste Plan

Assessment of Existing Waste Management Capacity

Report: Reg 19 Consultation Draft

Version: 2.2

Issued: February 2025

BPP Consulting Document Control

Project: East London Joint Waste Plan

Report: Assessment of Capacity Refresh

Version Description: Post Consultation Draft

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Version No.	Version Description	Author	Date	Reviewed	Date
1.0	Draft for Client review	Ella Mills (Data Analyst)	08.02.2024	Alan Potter (Partner)	09.02.2024
2.1	Reg 18 Consultation Draft	Ella Mills (Data Analyst)	09.07.2024	Alan Potter (Partner)	25.07.2024
2.2	Reg 19 Consultation Draft	Ella Mills (Data Analyst)	23.01.2025	Alan Potter (Partner)	11.02.2025

Document Control

Version No.	Version Description	Date	Changes
1.1	Post Client Review	14.02.2024	Site entry adjusted to reflect advice of Newham regarding sites with temporary planning permissions and sites that have been granted change of use from waste. Resulting capacity surplus values adjusted to reflect this and findings updated.
1.2	Post Client Review	20.03.2024	Receipt of some permits from the Environment Agency led to changes in capacity. Text, tables and resulting capacity surplus values adjusted to reflect this and findings updated.
1.3	Post Client Review	29.03.2024	Receipt of Permit details from ELWA led to changes in Table 2 site capacity. Additional consented capacity added to Table 4. Text and tables adjusted to reflect this. Resulting capacity surplus values adjusted to reflect this and findings updated. Appendices organised by Borough.
1.4	Post Client Review	24.04.2024	Receipt of Permit details from the Environment Agency led to changes in capacity for some sites listed in Appendix 3. Text, tables and resulting capacity surplus values adjusted to reflect this and findings updated.
2.1	Reg 18 Consultation Draft	09.07.2024	Addition of depletion profiles for East London permanent deposit to land capacity. Omission of capacity for EWS to be released. Text, tables and resulting capacity surplus values adjusted to reflect this and findings updated.
2.2	Reg 19 Consultation Draft	21.01.2025	Depletion profiles for East London non hazardous landfill requirement adjusted for reduction from 2% to 1% HIC waste. Update of safeguarded sites capacity using WDI 2023 data. All baselines updated to reflect most recent data available (2023). Deletion of S Walsh Frog Island site on advice of LB Havering.

Abbreviations and Glossary of Terms

Abbreviations

C & I	Commercial & Industrial Waste
C, D & E / CDEW	Construction, Demolition & Excavation Waste
DEFRA	Department for Environment, Food and Rural Affairs
EA	Environment Agency
ELJWP	East London Joint Waste Plan
ELWA	East London Waste Authority
EWC	European Waste Catalogue
HWI	Hazardous Waste Interrogator
LACW	Local Authority Collected Waste
MRF	Material Recycling (Reclamation) Facility
MSW	Municipal Solid Waste (aka LACW)
nPPG	national Planning Practice Guidance
NPPW	National Planning Policy for Waste
RBG	Royal Borough of Richmond
RDF	Refuse Derived Fuel
WDI	Waste Data Interrogator
WNA	Waste Needs Assessment
WPA	Waste Planning Authority

Glossary of Terms

Term	Definition
Apportionment	The amount of waste from household and commercial/industrial sources allocated to each London Borough to manage through extant version of The London Plan.
East London Borough	The four East London Boroughs that are party to the ELJWP as follows: • Barking & Dagenham • Havering • Newham • Redbridge -
East London Waste Authority	The single Waste Disposal Authority for East London formed by the four East London Boroughs.
Environment Agency	The body responsible for the regulation of waste management activities through issuing permits to control activities that handle or produce waste. It also provides up-to-date information on waste management matters and deals with other matters such as water issues including flood protection advice.
Environmental Permit	Permit issued by the Environment Agency authorising specific activities that may take place on a particular site involving certain types of waste within specified limits.
Existing waste site	Defined in Para 9.9.1 The London Plan as land with planning permission for a waste use or a permit from the Environment Agency for a waste use.
Hazardous Waste	Waste requiring special management under the Hazardous Waste Regulations 2005 due to posing potential risk to public health or the environment (when improperly treated, stored, transported or disposed). This can be due to the quantity, concentration, or characteristics of the waste. Prior to 2005 such waste was classed as 'special' under the Special Waste Regulations 1996.
Materials Recycling Facility (MRF)	A facility for sorting recyclable materials from the incoming waste stream.
Recovery	Processes that recover value from waste such as recycling, composting or treatment to recover energy.
(The) Plan Area	The geographical area administered by the East London Boroughs.
Qualifying Capacity	Paragraph 9.8.4 of the London Plan 2021 specifies waste management capacity that qualifies as contributing towards meeting the Borough level apportionments for the management of waste in London as follows: ▪ waste is used for energy recovery ▪ the production of solid recovered fuel (SRF), or it is high-quality refuse-derived fuel (RDF) meeting the Defra RDF definition as a minimum which is destined for energy recovery ▪ it is sorted or bulked for re-use (including repair and re-manufacture) or for recycling (including anaerobic digestion) ▪ It is reused or recycled (including anaerobic digestion).
Recovery	Subjecting waste to processes that recover value including recycling, composting or thermal treatment if energy is recovered.
The London Plan	The extant version of The London Plan. In this case the version adopted in 2021.
Waste Planning Authority (WPA)	The local authority responsible for waste development planning and control. In this case the four East London Boroughs.
Waste Transfer Station	A facility where waste is received and bulked up for onward management with little or no processing.

Contents

Table of Tables

1. Executive Summary

1.1 This report provides an updated assessment of how the existing waste management capacity in East London meets the management requirements for:

- the quantities of household, commercial and industrial waste (HIC) apportioned to the four Boroughs by the London Plan 2021 (LP apportionments); and
- Construction, Demolition and Excavation (C, D & E) waste and hazardous waste forecast to arise in East London to 2041.

1.2 The methodology applied replicates that used to generate capacity data that underpinned the West London Waste Plan adopted in July 2015 following examination, where the methodology was subject to scrutiny and its outputs found sound by an independent Inspector.

Findings

1.3 A comprehensive review of capacity data has revealed the following:

Management Capacity for Apportioned Waste

1.4 There is sufficient capacity to manage the LP apportioned forecast arisings to 2041.

1.5 A sensitivity analysis has been undertaken to account for the possible loss of Mechanical Biological Treatment (MBT) capacity after 2027 and even when the total loss of capacity at the MBT plants is factored in there is sufficient capacity.
The surplus capacity at 2041 ranges between c1.12Mtpa and c0.68Mtpa (after loss of MBT).

Management Capacity for C, D & E Waste

1.6 There is sufficient capacity to manage the forecast C, D & E waste arisings to 2041.
The surplus capacity at 2041 is c1.19Mtpa.

Landfill Management Capacity for Residual non-inert waste

1.7 Under the scenario where the planning consent at Rainham Landfill does not constrain its life and capacity was reserved solely to receive East London waste, it is predicted there would be sufficient non-inert waste landfill capacity throughout the entire Plan period (2041) to serve the projected needs of the Plan area.

Management Capacity for Inert Waste

1.8 There is a predicted annual shortfall in management capacity for inert excavation waste of c290,500 tonnes emerging in 2026 rising to c568,500 tonnes at 2041.
The cumulative inert excavation waste management capacity requirement is c8.1Mt by 2041.

Management Capacity for Hazardous Waste

1.9 There is insufficient capacity to manage the forecast hazardous waste arisings to 2041. However, there is no policy expectation that individual Plan areas be net self sufficient for the management of hazardous waste forecast to be produced.

Where surpluses of capacity have been identified, existing waste sites contributing towards managing waste subject to LP apportionment and C, D & E waste may be released for non waste use without the Plan area's ability to meet the forecast management requirements being compromised.

2. Purpose

2.1 This report provides an updated assessment of how the existing waste management capacity in East London meets the management requirements for:

- the quantities of household, commercial and industrial waste (HIC) apportioned to the four Boroughs by the London Plan 2021 (LP apportionments);
- arisings of C, D & E waste and hazardous waste forecast to arise in East London to 2041.

2.2 East London is taken to comprise the following London Boroughs:

- Barking & Dagenham;
- Havering;
- Newham; and
- Redbridge

2.3 (hereinafter referred to as "the East London Boroughs").

Principal Data Sources

2.4 The principal data sources used to generate this capacity assessment are:

- Waste Data Interrogator (WDI)
- Environment Agency (EA) Permit Registers
- Borough Planning Registers

Each source is considered in more detail below.

Waste Data Interrogator

2.5 Operators of all sites subject to environmental permits relating to the management of waste in England are required to submit returns to the Environment Agency setting out the quantities, types and origin of waste received and, where applicable, destination and fate of waste removed. These returns are collated by the EA and reported in a national dataset known as the WDI. The WDI is released approximately nine months after the end of the calendar year to which the data relates. The 2023 WDI (version 1 released September 2024), for the calendar year 2023, was the most current version available at the time of producing this assessment.

Environment Agency Permit Registers

2.6 All extant environmental permits granted by the EA are listed on a searchable online database accessed here *https://environment.data.gov.uk/public-register/view/index*. The resulting list can be downloaded by local authority. Therefore, the listing for each borough was downloaded and combined into a single dataset. A request was also made for actual copies of the permits . These were used to determine maximum permitted capacities where they were bespoke.

Borough Planning Registers

2.7 Each planning authority keeps a register of all planning applications and permissions granted. *Each of the four London Borough's planning registers were* searched for relevant planning permissions and background documents on a site-by-site basis to inform this assessment.

3. Policy Context

The London Plan

3.1 The London Plan 2021 forecasts arisings of Local Authority Collected Waste (LACW) (referred to as household waste) plus Commercial and Industrial (C&I) waste for London by Borough to 2041. These forecasts are used as a basis to allocate quantities of this waste for management to each Borough so that the overall goal of managing the equivalent of 100 per cent of London's waste within London (i.e. net self-sufficiency) by 2026 (Policy SI 8) is achieved[1]. The allocation has been derived through a process that includes assessment of existing capacity in each Borough along with a number of other factors that are considered to determine the ability of a particular Borough to provide additional management capacity[2]. The quantities arrived at are referred to as the London Plan apportionments (LP apportionments for short).

3.2 The types of capacity considered to count towards the management of apportioned waste (hereinafter referred to as "qualifying capacity") is listed in Paragraph 9.8.4 of the London Plan:

- energy recovery in London;
- production of solid recovered fuel (SRF) and refuse derived fuel (RDF) in London;
- sorting or bulking for re-use or recycling including anaerobic digestion. The reuse or recycling may take place within or outside London providing the sorting and bulking capacity is located within London; and
- reuse or recycling including anaerobic digestion within London.

3.3 The London Plan 2021 also sets out management targets for waste generated in London in *Policy SI 7 Reducing waste and supporting the circular economy* as follows:

- ensure that there is zero biodegradable or recyclable waste to landfill by 2026
- meet or exceed the municipal waste recycling target of 65 per cent by 2030[3]
- meet or exceed the targets for each of the following waste and material streams:
  - construction and demolition – 95 per cent reuse/recycling/recovery
  - excavation – 95 per cent beneficial use, with all inert excavation waste [4].

In addition in connection with hazardous waste management capacity Paragraph 9.8.18 of the London Plan identifies "*..a need to continue to identify hazardous waste capacity for London."* within the context of the main requirement being for sites for regional facilities to be identified. Boroughs are therefore expected to *"...work with neighbouring authorities to consider the necessary facilities when planning for their hazardous waste."*

3.4 The above requirements set the policy framework within which this capacity assessment exercise has been undertaken.

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[1] The London Plan specifically excludes excavation waste from the aim of overall net self-sufficiency on the following basis: " *The particular characteristics of this waste stream mean that it will be challenging for London to provide either the sites or the level of compensatory provision needed to apply net self-sufficiency to this waste stream*." (Para 9.8.1)

[2] The methodology applied is set out in *London Plan Waste Forecasts and Apportionments Task 4 – Updating the apportionment method Methodology Report* (SLR/LUC August 2017).

[3] London Plan Footnote 163: municipal waste being household waste and other waste similar in composition to household waste. This includes business waste collected by local authorities and by the private sector.

[4] London Plan Footnote 164.

4. Methodology

4.1 The following methodology was employed to identify the contribution that existing waste management sites in East London may make for the current and future management of waste subject to the London Plan apportionment, C, D & E waste and hazardous waste.

Stage 1: Preliminaries

4.2 The EA WDI has been used initially to identify waste sites in East London that were accepting waste under an environmental permit in any one year, over the 9 year period 2016-2023.

Step 1: Data Cleansing

4.3 Checks of the EA WDI dataset found 28 sites[5] had not reported any inputs for the most recent 3 year period. Of these, 10 sites have not been considered further as their inputs were considered to be insignificant (less than 500tpa). 18 inactive sites were also excluded on a precautionary basis that they may no longer exist [6]. One vehicle breaking site that received less than 4 tonnes in 2022 was also not considered further.

4.4 As advised by Newham Council, two sites were subject to temporary planning permissions that had actually expired[7] and two sites have been granted planning permission to change the use from waste[8]. Therefore capacity at these sites was excluded.

4.5 31 sites are not being counted towards capacity on the basis that they are either to be released in the Plan or are not considered lawful under planning these were also deducted from the total.

4.6 This left 71 sites for further investigation. The remaining 71 sites fall within the facility type and site category shown in Table 1.

[5] These sites are not proposed to be safeguarded through the ELJWP as they made a nil contribution towards capacity.

[6] Only 5 of the 18 inactive sites were subject to an environmental permit at the time of writing.

[7] One of these sites at Mohawk Wharf was subject to an environmental permit at the time of writing and would therefore still be classed as an existing waste site according to the London Plan definition. Four other sites are subject to temporary planning permissions due to expire in the next five years.

[8] One of these sites at Unit 4, Charles Street was subject to an environmental permit at the time of writing and would therefore still be classed as an existing waste site under the London Plan definition.

Table 1: Permitted Waste Sites in East London by Facility Type & Category

	Site Category							
Facility Type	**Incinerator**	**Landfill**	**Metal Recycling Site**	**To Land**	**Storage**	**Transfer**	**Treatment**	**Total**
Anaerobic Digestion	-	-	-	-	-	-	2	**2**
Biological Treatment	-	-	-	-	-	-	3	**3**
CA Site	-	-	-	-	-	4	-	**4**
Car Breaker	-	-	1	-	-	-	-	**1**
Clinical Waste Transfer	-	-	-	-	-	1	-	**1**
Clinical Waste Transfer / Treatment	-	-	-	-	-	-	1	**1**
Deposit of waste to land (recovery)	-	-	-	3	-	-	-	**3**
Haz Waste Transfer	-	-	-	-	-	5	-	**5**
Haz Waste Transfer / Treatment	-	-	-	-	-	-	1	**1**
Inert LF	-	2	-	-	-	-	-	**2**
Inert Waste Transfer	-	-	-	-	-	3	-	**3**
Material Recycling Facility	-	-	-	-	-	-	3	**3**
Metal Recycling	-	-	8	-	-	-	-	**8**
Non Haz Waste Transfer / Treatment	-	-	-	-	-	-	4	**4**
Non-Hazardous LF	-	2	-	-	-	-	-	**2**
Non-Haz Waste Transfer	-	-	-	-	-	16	-	**16**
Physical Treatment	-	-	-	-	-	-	10	**10**
Sewage Sludge Incinerator	1	-	-	-	-	-	-	**1**
Temporary storage installation	-	-	-	-	2	-	-	**2**
Vehicle depollution facility	-	-	1	-	-	-	-	**1**
Grand Total	**1**	4	**10**	**3**	**2**	**28**	**23**	**71**

Step 2: Initial screen for non qualifying capacity

4.7 Sites identified as landfill and deposit to land were removed as they have a finite life. Storage sites were also excluded as only waste transfer will take place and this does not constitute qualifying capacity under the LP apportionments or contribute towards the LP management targets. One site classed as a sewage sludge incinerator was excluded as it only manages sewage sludge which is covered under separate policy requirements. Neither type of capacity count towards qualifying capacity for the management of waste subject to apportionment. In total 10 sites were excluded at this stage. The assessment of capacity of these sites is included in Section 6 of this report.

4.8 This left 61 operational permitted sites for further investigation.

Consideration of Waste TransferStations

4.9 The London Plan identifies sites undertaking waste transfer as a different form of site to that where waste is actually managed. This is because historically waste was only bulked up for disposal elsewhere at such sites. However examination of data for inputs and outputs of such sites shows that in recent years some processing (or management) does actually take place at many sites classed as waste transfer sites (WTS) under the Environment Agency permit classification scheme. As this activity is included as qualifying capacity, capacity at these sites has been considered further below.

Step 3: Identify sites managing predominantly C, D & E waste and hazardous waste

4.10 Data for the latest year for which inputs were reported in the WDI were interrogated and split by the predetermined basic waste category set in the WDI as follows:

- household industrial & commercial waste (HIC);
- inert (predominately, but not exclusively) C, D & E waste; and
- hazardous waste.

4.11 Sites dedicated to the acceptance of C, D & E waste and hazardous waste were separated as there are separate management requirements[9] and in the case of C, D & E waste, capacity does not count towards the apportionments.

4.12 The percentage input of each waste type listed above was determined on a site-by-site basis. Where the input exceeded a threshold of 85% for either non-hazardous C, D & E waste or hazardous waste, these sites were screened out on the basis that they are dedicated to the management of non-apportioned waste. The following was found:

- 23 sites had inputs of 85% or more of non-hazardous C, D & E waste; and
- 4 sites had inputs of 85% or more of hazardous waste.

These sites are listed in Appendix 1 and 2 respectively and their capacity is assessed in Sections 3 and 4 of this report.

4.13 This left 34 operational permitted sites managing waste subject to the London Plan apportionment for further investigation of their capacity. 7 sites are operated under the ELWA contract and are listed in Table 4. The remaining 27 were assessed as follows. Where a site received inputs of HIC waste plus other wastes, but the other waste only represented 15% of the input or less, these inputs were taken to be incidental to the principal operation involving the management of HIC waste and all available capacity was assumed to be available for the management of HIC. This is considered in Step 7.

[9] While HIC hazardous waste is counted in the apportionment it is dealt with separately in this report and a separate report *ELJWP East London Hazardous Waste Forecasts to 2041.* BPP Consulting July 2024.

Stage 2: Establishing Maximum Site Capacity

Step 4: Site by Site Assessment

4.14 The following data and information has been reviewed on a site by site basis:

1. Input data presented in the WDI over the most recent 5-year period for which data was available, 2019-2023. The 5-year peak input was then identified (as per London Plan advice). To allow for the possibility that the peak input value is not an absolute limit, a 15% 'freeboard' was added to the peak input values obtained[10]. This adjustment is intended to reflect the maximum realistic throughput of a facility.
2. Planning consents issued by each borough council were reviewed where available[11] to identify any capacity limitations relating to annual throughput.
3. Permits issued by the Environment Agency were reviewed where available/provided. Where a site benefits from a bespoke permit with limits set according to the specific activities, the permitted limit has been applied. However, where it benefits from a Standard Rules permit, which have predefined banded input limits that do not necessarily correspond to the actual capacity of the individual sites, the permit limit has not been used.

4.15 A sequential approach was adopted to establish what the maximum design capacity of each site might be, as follows[12]:

1. Where actual inputs (5 year WDI peak) plus 15% were within a +/-50% difference to consent/ permit limits, the consent/ permit limit was taken in preference;
2. Where actual inputs (5 year WDI peak) plus 15% are significantly different (+/-50%) from capacity limits specified in the bespoke permit or planning consent the actual input (5 year WDI peak) plus 15% value was used.
3. Where a maximum value was not provided by the consent or bespoke permit, the actual input (5 year WDI peak) plus 15% was used.

[10] As per adopted West London Waste Plan evidence base . The 15% freeboard was not added to sites with management capacity with an upper limit defined by the technology itself such as AD, MBT or EfW.

[11] Some sites such as established scrapyards, may be subject to Certificates of Lawfulness, Established Use Certificates (post 1964) or Existing User Rights (pre-1964 & post 1947). These may not specify capacity and even where they do case law indicates they ought only to be regarded as benchmarks and are not equivalent to rigid planning conditions.

[12] The percentage difference is the difference between two values divided by the average of two values multiplied by 100. This calculation helps to understand how significantly close two values are.

Step 5: Accounting for sites under ELWA control

4.16 The four East London boroughs have established a single waste disposal authority in the form of the East London Waste Authority (ELWA). Seven permitted sites are currently operated under the ELWA contract by Biffa (formerly Renewi). Table 2 below lists these sites and their assessed capacities. The two sites hosting the MBT facilities also host WTS. However, the WDI reports inputs to both operations under a single permit in both cases. To distinguish between the capacity types, the inputs have been split on the following basis: all inputs of mixed municipal waste were taken as being managed through the MBT facilities (as residual waste), while inputs of other wastes were taken to have been managed at the WTS (being unsuitable for MBT). The inputs over 5 years of these wastes have been assessed to find the peak input plus the 15% "freeboard" except for the MBT facilities whose peak input has been taken to be the absolute technical capacity limit as set in the permit. The assessed recovery rate achieved at each site are all 100%. That is to say no waste leaving any of the sites is reported as going for disposal.

Table 2: Sites under ELWA Contract and their Assessed Capacity

Facility Type	Site Name	Peak 5 yr input	Permitted Capacity (Bespoke Env Permit)	% Difference between Peak Input +15% and consented/ permitted capacity	Preferred Capacity[13]
HWRC	Chigwell Road	18,723	28,600	-42%	28,600
	Gerpins Lane	29,693	115,500	-118%	29,693
	Jenkins Lane	56,784	80,000	-34%	80,000
	Frizlands Lane	31,532	n/a		31,532
Transfer (Recycling)	Ilford	15,936	20,000	-23%	20,000
MBT	Frog Island Waste Management Facility	181,011	192,000	+19%	192,000
	Jenkins Lane Waste Management Facility	210,338	217,000	+77%	217,000
Transfer for Recovery	Frog Island Waste Management Facility	46,544	n/a	-	46,544
	Jenkins Lane Waste Management Facility	5,192	n/a	-	5,192
Total					**650,561**

4.17 Table 2 shows a total of c650,500 tonnes of capacity is available for the management of LP apportioned waste at the sites under the control of ELWA.

[13] Peak or permitted limit taken in absence of ELWA alternative value.

Step 6: Additional Sites

4.18 As the most recent WDI relates to 2023, and additional sites may have been granted permits since then, the site listing drawn from the WDI was compared with the listing for all sites subject to a permit granted by the Environment Agency at November 2024. This identified some sites subject to an environmental permit but for which no inputs were reported in the WDI from 2015-2023. These are listed in Table 3 below.

Table 3: Permitted Sites in East London with no input entry in the WDI

Site Name	Operator	Permit Type	Permit Limit[14]	Consented Capacity	Capacity Type
5, Eastbury Road	Terra Firma Pipeline Ltd	S0811 No 11: Inert & excavation Waste TS + treatment	*74,999*	-	CDE
Unit 5 Eastbury Road	Terra Firma Pipeline Ltd	A14: Transfer Station taking Non-Biodegradable Wastes	-	-	CDE
Grove Farm Brentwood	South East Metals Ltd	SR2021 No 11 Small metal recycling facility	*5,000*	-	CDE/ C&I

4.19 Furthermore, the East London Boroughs provided a listing of planning permissions granted since 2019. Cross reference of this listing to the site listing drawn from the WDI identified 5 additional sites. These are shown in Table 4 below.

Table 4: Additional sites with Planning Permission but no entry in the WDI

Site Name	Description	Permit Limit (tpa)	Consented Capacity (tpa)	Notes
London Sustainable Industries Park North, Dagenham	Construction of a building and associated plant and infrastructure to generate energy from residual waste	180,000	200,000[15]	Residual Waste from HIC sources
London Teleport Site Pier Road, Newham	Change of use to metal recycling facility	n/a[16]	c70,000[17]	Metal recycling from HIC sources
Rainham MRF	Extension of time to 2026 and phased redevelopment	-	c200,000 tonnes per annum (additional 40ktpa)	Municipal waste, pending GLA Phase 2 review
(Olleco) Hindmans Way	Construction of a new industrial unit to store, clean and filter waste cooking oils in preparation for onward shipment and further processing offsite,	-	50,000	HIC management
Rainham Silt Lagoons	The treatment of imported waste to produce recycled aggregate; and the export of waste soils for beneficial use	750,000	500,000 plus 20,000 (beneficial use)	C, D & E waste Time limited to 2050

[14] Permit limits taken from SR permits to be treated with caution.

[15] Capacity increased from 180,000 tpa to 200,00tpa by permission 18/01501/FUL.

[16] Registered T9 permitting exemption.

[17] Promoted as a relocation of LCM Ltd operation at No 6 Factory Road (now occupied by EMR).

4.20 Table 4 also shows three sites providing additional qualifying capacity for managing apportioned waste as follows:

- London Sustainable Industries Park: providing an additional 200,000 tpa of residual waste other recovery capacity which would count towards meeting the LP apportionments. While the plant itself is yet to be built out, substantial piling and drainage has been undertaken on the site and development has therefore been taken by Barking and Dagenham (B&D) Council to have commenced[18].
- London Teleport Site Pier Road providing up to an additional 70,000 tpa of metal recycling capacity which would count towards meeting the LP apportionments.
- Rainham MRF providing an additional 40,000 tpa of recycling capacity. However, it should be noted that given the capacity assessment has already counted it as providing 209,000 tpa of recycling capacity, this capacity has not been added.
- Hindmans Way providing 50,000 tpa of waste cooking oil treatment capacity which would arise from the HIC waste stream and hence count towards meeting the LP apportionments.

The above sites are to be safeguarded through the ELJWP as existing waste sites.

4.21 The additional consented treatment capacity at Rainham Silt Lagoons has been counted towards the capacity for the management of C, D & E waste, considered later in this report. This too will be safeguarded through the ELJWP as an existing waste site.

4.22 Furthermore, a number of sites that benefit from planning permission that operate under a permitting exemption were identified. These are shown in Table 5 below.

Table 5: Additional sites with permitting exemptions

Site Name	Operator	Description	Tonnage
5 Salamons Way	May Glass Recycling Ltd	Change of Use to store and treat waste glass	5,000
10 Salamons Way	Stokevale Ltd	Change of Use of land to storage of waste glass and UPVC and treatment of glass to produce cullet.	30,000

Table 5 shows 2 sites providing additional qualifying capacity for apportioned waste of 35,000 tonnes.

[18] The original planning application planning permission 13/01134/FUL has been amended a number of times, most recently in 2023 when application 23/01239/NONMAT was granted allowing for the deployment of alternative technologies to gasification for energy from waste.

Stage 3: Screening out Non-Qualifying Capacity

Step 7: Accounting for CDEW & Hazardous Waste Management Capacity

4.23 Some sites report receiving multiple waste streams. As the LP apportionment is specific to HIC waste, capacity at sites that received a mixture of HIC waste plus C, D & E waste and/or hazardous waste were seperated. The percentage inputs of each waste stream (using the most recent year WDI data entry per site) reported was applied to the preferred maximum capacity value on a site-by-site basis. Where the percentage input for either C, D & E waste or hazardous waste or both in combination fell below 15%, all capacity has been taken to count towards apportioned HIC waste. This is on the basis that management of 15% or less is considered incidental to the principal waste use.

Step 8: Assessing Landfill Diversion Rates Achieved

4.24 As the definition of capacity for waste considered to be qualifying capacity for the purposes of meeting the LP apportionments includes capacity for transfer that results in the waste going for onward recycling or reuse, capacity used solely for transfer for onward disposal is excluded by omission. Therefore capacity at such sites has been discounted applying the following approach:

1. For certain types of sites, such as metal recycling sites (MRS), it has been assummed that all the capacity contributes towards the diversion targets.
2. For specialist treatment plant (the two AD facilities) the same was taken to be the case. Capacity at waste water treatment works (WwTW) was excluded.
3. For the remaining sites, the actual diversion rates achieved as indicated by the WDI output data was used on a site by site basis. Where fates were indicated as 'landfill', 'transfer' or 'unknown' the values were taken to be counted towards disposal. Where they were reported as going on for 'recovery', 'treatment' or 'incineration' they were counted towards diversion capacity. This was undertaken using the last 5 years of output data reported in the WDI to take the maximum recovery rate the site had achieved. Appendix 3 shows the result of these calculations.

4.25 This exercise generated a value for capacity for the management of HIC waste subject to the LP apportionment of c1.61 million tonnes per annum. When the c650,500 tonnes per annum of capacity provided by the sites operating under contract with ELWA, and the capacity of at least 320,000 tonnes per annum offered by the additional sites as set out in paragraph 4.19 plus the 35,000tpa of sites in Table 5 is also counted, a total of **c2,619,500 tonnes per annum of capacity is identified**. This value was then compared with the quantities of apportioned waste whose management the Boroughs are expected to provide for, as set in the London Plan 2021 as shown in Table 6 below.

Table 6: Combined apportionment for East London boroughs compared to Estimated Apportionment Capacity in East London (after release of sites)

	2021	2041
Apportionment Forecast	1,409,000	1,497,000
Capacity	2,619,508	2,619,508
Difference	**+1,210,508**	**+1,122,508**

4.26 Table 6 shows there is sufficient capacity to manage the apportionment forecast arisings to 2041 with over 1.1M tonnes of 'surplus' capacity in 2041.

Sensitivity for loss of MBT Capacity

4.27 Currently c391,000 tonnes[19] of residual LACW (classed as 'mixed municipal waste') is managed via MBT plants located at Frog Island and Jenkins Lane respectively. These have been assessed to provide just under 0.4 million tpa of qualifying capacity by virtue of the conversion of residual LACW into RDF, following extraction of some recyclable materials.

4.28 It is understood that ELWA will be retendering its residual waste management contract from December 2027. It is entirely possible that the post 2027 residual management solution will not involve the continued use of MBT. This presents the possibility that the MBT capacity will no longer be available and therefore ought not be counted from 2028 onwards. While some options being considered by ELWA will involve retention of some capacity at at least one site (Jenkins Lane), the implications of the total loss of this capacity plus the transfer for recycling/recovery capacity at Frog Island (46,544 tonnes) for the Plan area continuing to meet the LP apportionment has been considered in Table 7 on a precautionary basis.

Table 7: Combined apportionment for East London boroughs compared to Estimated Apportionment Capacity in East London (MBT Sensitivity)

	2021	2041
Apportionment Forecast	1,409,000	1,497,000
Capacity minus MBT post 2027	2,619,508	2,181,615
Difference	**+1,210,508**	**+684,615**

4.29 Table 7 shows there is sufficient capacity to manage the collective LP apportionments to 2041 for the four East London Boroughs even when the total loss of capacity at the MBT plants and associated transfer for recovery facility at Frog Island is factored in. This is considered to be a worst case scenario.

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4.30 This means that capacity at existing waste sites to be safeguarded through the emerging ELJWP contributing towards managing apportioned waste amounting to up to 684,500 tpa is available to cover the release of other existing waste sites for non-waste use (see for example Appendix 3 of the Regulation 18 Plan) without the Plan area's ability to meet the LP apportionments being compromised, even with the loss of the MBT capacity at some point in the forthcoming Plan period. Some of this surplus could also be made available to meet unmet needs of other London boroughs outside East London should their request satisfy the stipulated criteria.

[19] Peak input of mixed municipal waste managed at Frog Island and Jenkins Lane as set out in Table 2.

5. Assessing C, D & E Waste Management Capacity

5.1 As mentioned in Step 3, sites managing 85% or more C, D & E waste were concluded as being dedicated to the management of C, D & E waste. These sites and their assessed capacities are shown in Appendix 1. These sites contribute c2,399,000 tonnes of C, D & E waste management capacity, once capacity at the sites to be released through the Plan is deducted. When combined with the c266,500 tonnes of recovery capacity for C, D & E waste shown in Appendix 3 plus the additional consented capacity identified in Table 4 of c520,000 tpa, a total capacity of c3,185,500 tpa exists.

5.2 A separate report[20] updated the baseline arising value for non-hazardous C, D & E waste in 2023 at c2,203,500 tonnes. A static forecast has been adopted and compared with the capacity as shown in Table 8 below.

Table 8: Forecast non-hazardous C, D & E waste arisings for East London compared to Estimated non-hazardous C, D & E waste Management Capacity in East London (after release of sites)

	2026	2031	2036	2041
Forecast Arisings (Table 13 of CDE waste report)	2,203,591	2,203,591	2,203,591	2,203,591
Capacity (para 5.1 above)	3,185,500	3,185,500	3,185,500	3,185,500
Difference	+981,909	+981,909	+981,909	+981,909

5.3 Table 8 shows there is sufficient capacity to manage the forecast C, D & E waste arisings to 2041**.**

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5.4 The surplus capacity at existing waste sites of c0.98M tpa for managing C, D& E waste for recovery would be available to release further existing waste sites within the Plan area (see for example Appendix 3 of Regulation 18 ELJWP), and/or to meet unmet needs of other London boroughs outside East London should their request satisfy the stipulated criteria.

[20] Table 13 of ELJWP *C, D & E Waste Arising in East London to 2041*. BPP Consulting January 2025

6. Permanent Deposit to Land Depletion Profiles

Non inert Waste Landfill Capacity

6.1 While there is no obligation in planning policy for East London to achieve net self-sufficiency for non-inert waste management alone, the management of mixed municipal waste by disposal or recovery is subject to the proximity principle and hence consideration has been given to the sufficiency of the remaining consented non-inert landfill capacity within East London. This approach recognises that the proximity principle encourages each WPA to plan for the disposal and recovery of mixed municipal waste on a more localised basis[21].

6.2 Landfill does not count as qualifying capacity under the London Plan and the Mayor wants London to be a "zero waste city" which means no biodegradable or recyclable waste from any source should go to landfill after 2026. The London Plan states the following in connection with possible future provision of landfill capacity within the Capital:

"Although no further landfill proposals in London are identified or anticipated within the Plan period, if proposals do come forward for new or extended landfill capacity or for land-raising, boroughs should ensure that the resultant void-space has regard to the London Environment Strategy."

6.3 The only operational non-inert merchant landfill capacity in East London is provided by Rainham Landfill, located in the London Borough of Havering. This site has been operating since at least the late 1970's taking waste from all over London and further afield. The site also hosts a number of other waste management facilities including a road sweepings recycling depot, a MRF and a wood chipping facility. The current planning consent for the landfill operation expired at the end of 2024.

6.4 Table 9 considers an alternative scenario whereby the landfill is not subject to a time constraint and the void is used solely for East London's non inert waste requiring landfill predicted to arise over the Plan period. This is based on forecast arisings of C, D & E waste processing residues plus some intractable wastes from the HIC waste stream for which landfill will remain the only viable management solution. It has been assumed that this will start at 2% of HIC waste forecast to arise in East London by the London Plan, falling progressively to 1% by 2041.

[21] Waste Management Plan for England (DEFRA, January 2021)

Table 9: Depletion Profile of Non-inert Landfill void (Rainham) under scenario where life of Rainham extended to 2041 or beyond and void conserved for East London waste only(tonnes)

1	2	3	4	5	6	7
Year	Annual Non-inert Waste Management Requirement			15% inert input for restoration/ operational purposes	Theoretical void for East London non-inert waste	Shortfall
	Non-inert C+D waste plus non-inert excavation waste to landfill (Table 17 ELJWP CDEW Forecasts[22])	2% reducing to 1% of London Plan HIC Forecast	Total non-inert inputs			
2024	1,774	17,812	19,586	2,938	599,211[23]	0
2025	1,774	17,326	19,100	2,865	579,625	0
2026	1,774	16,840	18,614	2,792	560,525	0
2027	1,774	16,354	18,128	2,719	541,912	0
2028	1,774	15,868	17,642	2,646	523,784	0
2029	1,774	15,382	17,156	2,573	506,143	0
2030	1,774	14,896	16,670	2,500	488,987	0
2031	1,774	14,410	16,184	2,428	472,317	0
2032	1,774	13,924	15,698	2,355	456,133	0
2033	1,774	13,438	15,212	2,282	440,436	0
2034	1,774	12,952	14,726	2,209	425,224	0
2035	1,774	12,466	14,240	2,136	410,498	0
2036	1,774	11,980	13,754	2,063	396,258	0
2037	1,774	11,494	13,268	1,990	382,504	0
2038	1,774	11,008	12,782	1,917	369,236	0
2039	1,774	10,522	12,296	1,844	356,940	0
2040	1,774	10,036	11,810	1,771	345,130	0
2041	1,774	9,550	11,324	1,699	333,806	0

6.5 Table 9 shows that under this fill scenario Rainham provides sufficient non-inert waste landfill capacity to the end of the Plan period (2041) and beyond.

6.6 However, if Rainham closes, in accordance with its current planning permission, the permitted void space will not be fully utilised. Void space at the end of 2023, as reported by the Environment Agency was 1.1 M cubic metres while fill rates are in the order of 310,00 tonnes per annum, with the vast majority of waste (>90%) coming from outside East London. At current fill rates the site would be completed by the end of 2026. On closure, all non-hazardous waste residues requiring landfill produced within East London would need to be disposed at sites outside the Plan area. It is considered reasonable to offset this future requirement against the capacity that Rainham has provided historically for the management of waste from outside East London.

6.7 There are also separate Silt Lagoons at Rainham (operated by Land & Water Remediation Ltd) that is also classed as non-hazardous landfill capacity and the EA remaining landfill void dataset for 2023 identifies these as having 2,290,540 m3 remaining void. The extent to which this site may actually offer non-hazardous landfill capacity is considered overleaf.

[22] *East London CDE Waste Forecasts to 2041* v2.1 22.01.2025 BPP Consulting (2025).

[23] Starting capacity value for 2025 obtained by taking EA remaining landfill void at end of 2023 minus inputs in 2023 minus 15% for inert inputs for restoration purposes to take account of the void that would have been used in 2024.

6.8 A review of the inputs to the Rainham Silt Lagoons 2019-2023 reveals that the site only received a specific waste type classed as non-hazardous (premixed wastes with EWC 19 02 03) plus substantial quantities of waste classed as inert/ C + D (soils and stones EWC 17 05 04 and dredging spoil EWC 17 05 06). In estimating the proportion of non-hazardous landfill capacity in East London available for inert waste[24], it is considered the capacity at the Silt Lagoons can be included on the following basis:

- Establishing the average ratio between inputs of 19 02 03 (non-hazardous waste) and the waste classed as excavation waste (soils, stones and dredging waste) (inert waste) over 5 years. This produced a 45:55 ratio,
- Splitting the remaining void value, of 2,290,540m^3, (in accordance with the 45:55 ratio), with 45% taken as capacity for inert excavation waste which equates to 1.55 M tonnes[25]. An average of the inputs to the Silt Lagoons of inert waste over the last 4 years, as reported in the WDI, was then deducted to account for the void that will have been filled in 2023. This gave a starting capacity of 1,274,494 tonnes. Table 10 below presents the predicted depletion profile of the deposit to land sites in East London accepting inert waste.

Inert Waste Management

6.9 The London Plan sets a target for all inert excavation waste being put to beneficial use i.e. not disposed of without a specific purpose. Table 10 assumes that the use of inert excavation waste in recovery to land and landfill restoration would be classed as beneficial use.

[24] Given the specific nature of non-hazardous waste inputs and nature of the site, the non-hazardous waste landfill capacity offered by the silt lagoons has been taken to not be available for merchant non-hazardous waste.

[25] 1,030,743m3 void converts to 1,546,115 tonnes by applying x1.5 inert waste placed density factor

Table 10: Predicted Depletion Profile of Capacity for Deposit of Inert Waste on Land in East London (tonnes)
Highlighted red cells indicate expected closure of site

Year	Annual Inert Waste Management Need (all inert waste sent to landfill or recovery Table 17 ELJWP CDE Forecasts[26])	Recovery to Land[27]	Inert Landfill		non-hazardous landfill capacity for restoration	non-hazardous landfill	Total Inert Deposit Capacity	Predicted Annual Surplus/ Shortfall[28]	Cumulative Shortfall
		Central Park Dagenham	East Hall Farm Inert Landfill[29]	Wennington Quarry Inert Landfill[30]	Rainham Landfill at 15%[31] of inputs[32] (value deducted from Column 5 Table 9)	Silt Lagoons, Rainham and Wennington Marshes[33]			
2024	570,491	4,794	314,887[34]	238,336[35]	205,476	1,274,494	2,037,987		0
2025	570,491	0	194,887	0	202,538	997,519	1,394,944	72,552	0
2026	570,491	0		0	199,673	720,544	920,217	-290,651	-290,651
2027	570,491	0			196,881	443,568	640,449	-290,724	-581,375
2028	570,491	0			194,162	166,593	360,755	-290,797	-872,171
2029	570,491	0			191,516	0	191,516	-401,251	-1,273,423
2030	570,491	0			188,942		188,942	-567,918	-1,841,340
2031	570,491	0			186,442		186,442	-567,991	-2,409,331
2032	570,491	0			184,014		184,014	-568,063	-2,977,394
2033	570,491	0			181,659		181,659	-568,136	-3,545,531
2034	570,491	0			179,378		179,378	-568,209	-4,113,740
2035	570,491	0			177,169		177,169	-568,282	-4,682,022
2036	570,491	0			175,033		175,033	-568,355	-5,250,377
2037	570,491	0			172,970		172,970	-568,428	-5,818,805
2038	570,491	0			170,980		170,980	-568,501	-6,387,306
2039	570,491	0			169,062		169,062	-568,574	-6,955,880
2040	570,491	0			167,218		167,218	-568,647	-7,524,526
2041	570,491	0			165,446		165,446	-568,720	-8,093,246

[26] *East London CDE Waste Forecasts to 2041* v2.1 22.01.2025 BPP Consulting (2025).
[27] Recovery to Land remaining capacity calculated using the total permitted capacity minus annual WDI inputs.
[28] Derived by taking the inputs to each of the capacity types away from the annual inert waste management need value. Note that there is a forecast shortfall from 2026 even when there appears to be sufficient capacity due to controlled use of void such as annual deposit limits.
[29] Site input limited to 120,000 tonnes of infill pa to 2026 as per planning application P0271.14.
[30] Inputs started in 2018 according to EA WDI dataset. Site limited to 300,000 tonnes of infill pa and limited to 9 years (2027) as per Environmental Permit Application.
[31] 15% of non-hazardous landfill void taken as what is expected to be occupied by inert fill for site restoration purposes.
[32] Void (m3) multiplied by 1.5 factor to convert to inert waste (tonnes) minus inert inputs in 2023 to account for the void filled in 2024.
[33] Assumed depletion based on 5-year average inputs of inert waste.
[34] Starting capacity takes EA remaining landfill void at end of 2023 minus inputs in 2023 to take account of the void used in 2024.
[35] As footnote 29.

6.10 Table 10 shows that an annual shortfall in management capacity for excavation waste of c290,500 tonnes is predicted to emerge at 2026 rising to c568,500 tonnes in 2041. This gives a cumulative capacity requirement of c8.1 million tonnes over the Plan period assuming no new projects involving permanent deposit to inert waste to land come forward and are consented in East London.

6.11 Table 10 assumes that the planning consent for Rainham Landfill will be extended and void conserved such that it provides capacity for East London's waste to completion. If Rainham closes in accordance with its current planning permission the tonnage of inert excavation waste produced within East London shown as managed at the site in Table 10 would either need to be managed at the other sites identified in Table 10 or exported outside the Plan area for beneficial use from 2025 onwards to be in accordance with the London Plan.

6.12 It should be noted that currently not all non-hazardous residues requiring landfill and inert excavation waste produced within East London is actually managed within East London and it may be that other sites may be capable to receive additional waste from East London. Further investigation through Duty to Cooperate (DtC) engagement with WPAs hosting sites identified as having capacity has been undertaken to establish the position.

7. Assessing Hazardous Waste Management Capacity

7.1 Sites managing 85% or more hazardous waste were taken to be dedicated to the management of hazardous waste. These sites and their assessed capacities are shown in Appendix 2. Note that virtually all inputs to the 4 sites were hazardous waste of HIC origin. These sites contributed c30,500 tonnes of waste management capacity. Combined with the c23,500 tonnes of recovery capacity for the management of hazardous waste available at sites also managing non-hazardous waste of various types shown in Appendix 3 (virtually all sites managed hazardous HIC waste) gives a total c54,000 tonnes of management capacity for hazardous HIC waste. It should be noted that the London Plan actually includes hazardous waste from HIC sources within the apportionments, so the 54,0000tpa identified as dealing with hazardous waste from HIC sources could also be counted towards the LP apportionments if needed.

7.2 A separate report[36] updated the forecasts for hazardous waste expected to arise in East London through to 2041, taking a baseline value in 2023 of c76,500 tonnes. The forecast arisings values are compared with the assessed capacity as shown in Table 11 below.

Table 11: Forecast hazardous waste arisings for East London compared to Estimated hazardous waste Management Capacity in East London

	2026	2031	2036	2041
Total	**76,566**	**76,566**	**74,411**	**72,400**
Capacity	54,000	54,000	54,000	54,000
Difference	**-22,566**	**-22,566**	**-20,411**	**-18,400**

7.3 Table 11 shows there is a predicted deficit in capacity within the Plan area to manage the forecast hazardous waste arisings throughout the Plan period. However given the diverse nature of hazardous wastes, there is no policy expectation that individual Plan areas be net self sufficient for the management of hazardous waste forecast to be produced. Rather that existing capacity be safeguarded and additional capacity be sought in co-operation with other Plan areas. This is set out in the London Plan as follows:

i) "The main requirement is for sites for regional facilities to be identified. Boroughs will need to work with neighbouring authorities to consider the necessary facilities when planning for their hazardous waste." (paragraph 9.8.18)

7.4 Therefore the indicated presence of a shortfall should not be a barrier to release of other sites, or impose a requirement to provide for additional capacity through allocation in the ELJWP.

[36] *East London Hazardous Waste Data Update 2025* v2.1 22.01.2025 BPP Consulting (2025).

Appendix 1: Site by Site Breakdown of Management Capacity Contribution to C, D & E Waste (85% threshold)

Site n/a= not available, Sites to be released excluded

Borough	Site Name	Operator	CDEW % input	Peak Input (2019 - 2023) +15%	Permit Limit[37]	Consented Capacity	% Difference between Peak Input +15% & consented/ permitted capacity	Preferred Value
Barking & Dagenham	12-14 River Road (Alexander Wharf)	ELG (Haniel) Metals Ltd	89%	23,831	n/a	n/a		23,831
	2 Chequers Lane	MMS Supplies Ltd	100%	40,802	n/a	n/a		40,802
	2 Choats Road	S U C Exc UK Ltd	100%	84,731	n/a	n/a		81,352
	Alfreds Way, Barking	Creek Metals Ltd	99%	27,091	n/a	n/a		27,091
	Creek Road Waste Management Facility	Workrate Ltd	91%	26,986	65,000	n/a	-83%	26,986
	Dagenham Dock Aggregate Recycling Facility	Hanson Quarry Products Europe Ltd	100%	42,555	250,000	n/a	-142%	42,555
	40 A&B Media Park	SH & WS Company Ltd	100%	6,998	n/a	n/a		6,998
	Neptune Recycling	Neptune Contract Services Ltd	85%	33,301	n/a	n/a		33,301
	Perry Road Recycling Facility	Recycled Material Supplies Ltd	100%	286,196	250,000	n/a	+14%	250,000
	Thunderer Road	Neptune Contract Services Ltd	93%	124,573	n/a	n/a		124,573
Havering	35 Nelmes Way	Albright Transfer Station Ltd	100%	112,726	75,000	n/a	+40%	75,000
	Grove Farm	R J Skip Hire Ltd	94%	12,468	n/a	n/a		12,468
	Rainham Recycling Facility	Brett Aggregates Ltd	100%	137,678	n/a	n/a		137,678
	Plot 22 Albright Industrial Estate	Excel Waste Management Ltd	96%	14,421	100,000	75,000	-135%	14,421
Newham	Canning Town Depot	Pulse Environmental Ltd	99%	53,078	150,000	n/a	-95%	53,078
	Knights Road, E16 2AT	JRL Environmental Ltd	100%	73,436	n/a	n/a		73,436
	Marshgate Sidings	D B Schenker/D B Cargo	100%	266,062	700,000	n/a	-90%	700,000
	Marshgate Sidings	S Walsh & Son Ltd	100%	208,493	350,000	n/a	-51%	208,493
	Oasis Park, Stephenson Street, Canning Town	I O D Skip Hire Ltd (Powerday)	98%	73,953	350,000	100,000[38]	-30%	100,000
	Plaistow Wharf	Keltbray Environmental Ltd	100%	357,841	n/a	200,000	+57%	357,841
Redbridge	Unit U, Pegasus Works	N R M Metal Recycling Ltd	100%	9,127	n/a	n/a		9,127
							Total	**2,399,031**

[37] Using bespoke permit limit. Italicised entries are taken from Standard Rules permits which are considered to be less reliable so are provided for information only.

[38] 23/00760/FUL granted to increase the processing capacity of the facility from 60,000 tonnes to 100,000 tonnes of waste per annum on average.

Appendix 2: Site by Site Breakdown of Management Capacity Contribution to Hazardous Waste (virtually all hazardous HIC waste management capacity) (85% threshold)

Borough	Site Name	Operator	% Haz input	Peak Input (2019-2023) +15%	Permit Limit	Consented Capacity	% Difference between Peak Input +15% & consented/ permitted capacity	Preferred Value
Havering	Car Breakers Yard, 2 Oaks, Broxhill Road, Havering	Randall, John t/a Randalls Car Dismantlers	100%	690	n/a	n/a	-	690
	Unit 7, Albright Industrial Estate, Ferry Lane	C T Wakefield & A Wakefield t/a Pier Metals		1,001[39]	n/a	n/a	-	1,001
	Ferry Lane South WTF	Adler & Allan Limited	98%	14,717	n/a	82,490	-139%	14,717
	Rainham Clinical Waste Treatment Centre	Sharpsmart Ltd	-	14,096	30,000	n/a	-72%	14,096
							Total	**30,504**

[39] Peak input from 2018 retained given the variability in inputs over the 6 year period reported through WDI (2018-2023).

Appendix 3: Site by Site Breakdown of Management Capacity Contribution to Apportionment Sites to be released excluded.

Site Category	Borough	Site Name	Operator	Peak Input (2019-2023) +15%	Permit Limit[40]	Consented Capacity	% Difference between Peak Input +15% and consented/ permitted capacity	Preferred Value	Capacity for Apportioned Waste	Capacity for Hazardous Waste	Capacity for C, D & E Waste	Recovery Rate	Recovery Capacity for Apportioned Waste	Management Capacity for Hazardous Waste	Management Capacity for C, D & E Waste
MRS	Barking & Dagenham	72-76 River Road	S Norton & Co Ltd	176,455	[41]	n/a	-	176,455	146,457	0	29,997	100%	146,457	0	29,997
		Perry Road	HKS Dagenham Ltd	69,480	n/a	n/a	-	69,480	69,480	0	0		69,480	0	0
	Newham	Remet Canning Town Cody Road	The Remet Company Ltd	81,836	75,000	n/a	+9%	75,000	12,060	6,056	56,883		12,060	6,056	56,883
		EMR Silvertown, Unit 6, Standard Industrial Estate	EMR formerly operated by London City Metals Ltd	71,666[42]	*74,999*	n/a	-	71,666	71,666	0	0		71,666	0	0
	Havering	Off Crow Lane	Crow Metals Ltd	30,463	30,000	n/a	2%	30,000	25,436	4,320	245		25,436	4,320	245
AD[43]	Barking & Dagenham	Hitch Street AD Plant	ReFood UK Ltd	218,309	160,000	n/a	-	218,309	218,309	0	0		218,309	0	0
		Organic Waste Treatment Facility, Dagenham Dock	East London Biogas Ltd	77,184	75,000	n/a	+3%	75,000	75,000	0	0		75,000	0	0
Treat'nt		Dagenham Dock MRF Choats Road	Euro Closed Loop Recycling Ltd/Veolia	14,540	75,000	n/a	-135%	14,540	14,540	0	0	76%	11,099	0	0
		Halyard Street Dagenham	Cemex U K Materials Ltd	16,802	100,000	n/a	-142%	16,802	4,158	0	12,644	100%	4,158	0	12,644
		Kingsbridge Road	G & S Tyre Services Ltd	1,922	*74,999*	n/a	-	1,922	1,922	0	0	100%	1,922	0	0

[40] Using bespoke permit limit. Italicised entries are from Standard Rules permits so are provided for information only.

[41] Site operates under 2 permits - one SR 75,000 and one bespoke.

[42] It has been assumed that inputs to this site will remain at the same level as when the site was operated by LCM Ltd.

[43] No 15% freeboard has been included for these sites as their capacity is set by their design and retention time.

Site Category	Borough	Site Name	Operator	Peak Input (2019-2023) +15%	Permit Limit[44]	Consented Capacity	% Difference between Peak Input +15% and consented/ permitted capacity	Preferred Value	Capacity for Apportioned Waste	Capacity for Hazardous Waste	Capacity for C, D & E Waste	Recovery Rate	Recovery Capacity for Apportioned Waste	Management Capacity for Hazardous Waste	Management Capacity for C, D & E Waste
Treat'nt	Havering	Centenary Works	F J Church & Sons Ltd	25,947	n/a	n/a	-	25,947	25,947	0	0	100%	25,947	0	0
		Frog Lane, Off Marsh Way, Rainham,	Andrews Waste Management	171,786	*75,000*	75,000	+78%	171,786	111,659	0	60,128	20%	22,127	0	11,915
		Rainham Clinical Waste Treatment Centre[45]	Sharpsmart Ltd	14,096	30,000	n/a	-72%	14,096	2,396	11,699	0	99%	2,361	11,529	0
		Rainham MRF Coldharbour Lane	Veolia	209,269	n/a	n/a	-	209,269	209,269	0	0	100%	209,269	0	0
Transfer	Barking & Dagenham	54-60 River Road Barking	Cory Barking Operations Ltd	229,446	480,000	550,000	-71%[46]	229,446	184,128	0	45,311	100%	184,128	0	45,311
		75 - 77 Chequers Lane	R White Waste Management Ltd	103,153	170,256	n/a	-49%	170,256	47,616	0	122,640	70%	35,561	0	86,441
		Barking Transfer Station	Shukco/Suez	165,186	182,500	n/a	-10%	182,500	182,500	0	0	100%	182,500	0	0
		Barking Waste Transfer And Recycling Facility	Biffa Waste Services Ltd	113,954	n/a	n/a	-	113,954	113,954	0	0	95%	108,712	0	0
		Renwick Road Rail Hub		200,381	300,000	n/a	-40%	300,000	300,000	0	0	0%	0	0	0

[44] Using bespoke permit limit. Italicised entries are from Standard Rules permits so are provided for information only.

[45] The site is capable of accepting 100% hazardous waste.

[46] Using the permit limit.

Site Category	Borough	Site Name	Operator	Peak Input (2019-2023) +15%	Permit Limit[47]	Consented Capacity	% diff between Peak Input +15% and consented/ permitted capacity	Preferred Value	Capacity for Apportioned Waste	Capacity for Hazardous Waste	Capacity for C, D & E Waste	Recovery Rate	Recovery Capacity for Apportioned Waste	Management Capacity for Hazardous Waste	Management Capacity for C, D & E Waste
Transfer	Barking & Dagenham	Perry Road, Off Chequers Lane	Edwards Waste Paper Ltd	83,410	75,000	75,000	11%	75,000	75,000	0	0	0%	0	0	0
	Newham	Recycling & Recovery Centre, Unit J Prologis Park	Bywaters (Leyton) Ltd	168,161	n/a	n/a	-	168,161	168,161	0	0	100%	168,161	0	0
		Waste Transfer Station, Silvertown	Williams Environmental Management Ltd	2,679	n/a	n/a	-	2,679	528	2,152	0	64%	338	1,377	0
	Havering	New Road, Wennington	B & P Scrap Co Ltd	21,696[48]	75,000	n/a	-79%	21,696	21,696	0	0	100%	21,696	0	0
		Unit 13 Swift Business Park, Creek Waye	Citron Hygiene UK Ltd	419	n/a	5,000	-169%	419	344	79	0	17%	58	12	0
		Unit 7, Albright Industrial Estate	G & S Waste Management Ltd	29,521	*74,999*	n/a	-	29,521	12,521	0	17,000	100%	12,521	0	17,000
	Redbridge	45-47, Roebuck Road, Hainault Business Park	G & B Compressor Hire Ltd	10,127	n/a	n/a	-	10,127	4,295	0	5,832	100%	4,295	0	5,832
		Ley Street Depot, Ilford	Redbridge Council	686	n/a	n/a	-	686	686	0	0	100%	686	0	0
												Total	**1,613,947**	**23,294**	**266,268**

[47] Using bespoke permit limit. Italicised entries are from Standard Rules permits so are provided for information only.

[48] Peak input from 2018 retained given the site has a permit for 75,000 tonnes capacity.

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East London Joint Waste Plan

Baseline & Forecast for Hazardous Waste Arising in East London to 2041

Report: Regulation 19 Consultation Draft

Version: 2.1

Issued: January 2025

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Project: East London Joint Waste Plan

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2.1	Reg 19 Consultation Draft	Ella Mills (Data Analyst)	22.01.2025	Alan Potter (Partner)	22.01.2025

Contents

Table of Tables

1. Purpose

1.1 The report updates the forecast of hazardous waste estimated to be produced in East London during the period of the East London Joint Waste Plan (ELJWP) and forms part of the evidence base of the Plan.

1.2 For the purpose of this exercise East London is taken to comprise the following London Boroughs:

- Barking & Dagenham;
- Havering;
- Newham; and
- Redbridge

(hereinafter referred to as "the East London Boroughs").

Principal Data Source

1.3 The principal data source used to generate the updated hazardous waste baseline was the Environment Agency Hazardous Waste Interrogator (HWI).

1.4 Legislation requires that the relevant waste regulation authority[1] be notified when hazardous waste is moved. The notification takes the form of a consignment note that details the quantities and destination of the waste. This means that the following movements of hazardous waste are recorded and reported to the relevant regulatory body:

- From producer sites directly to disposal/treatment facilities;
- from producer sites to transfer facilities for bulking up and onward management; and,
- from treatment facilities to final disposal sites.

1.5 This data is then aggregated by the Environment Agency and made available in the HWI that is published on an annual basis with a delay of approximately nine months.

Advice on Data

1.6 The principal source of advice with respect to the use of data to inform production of a plan evidence base is the national Planning Practice Guidance (nPPG)[2]. This states that:

"*Assessing waste management needs for Local Plan making is likely to involve:*

- *understanding waste arisings from within the planning authority area, including imports and exports*
- *identifying the waste management capacity gaps in total and by particular waste streams*
- *forecasting the waste arisings both at the end of the period that is being planned for and interim dates*
- *assessing the waste management capacity required to deal with forecast arisings at the interim dates and end of the plan period."*

Paragraph: 022 Reference ID: 28-022-20141016

[1] For England this is the Environment Agency.
[2] available at https://www.gov.uk/guidance/waste

1.7 The nPPG includes a section entitled "Using data to monitor and forecast waste needs", which articulates the following principles for waste planning authorities to adopt when using data to plan for waste management:

- *Make clear assumptions on how data were handled, as well as their impact (including on forecasting)*
- *Provide data to an appropriate level of significance, based on their explicit assumptions. In practice, data quoted to more than 2 or 3 significant figures will not be helpful and spurious accuracy stemming from precise figures should be avoided*
- *Plan for a range of each type of waste rather than a specific single figure."*

Paragraph: 036 Reference ID: 28-036-20141016 Revision date: 16 10 2014

Data Presentation

1.8 In order to respect the need to avoid "spurious accuracy", the following approach has been taken:

1. Where actual tonnage data has been accessed, this has been used in the computations.
2. Where data has been subject to computation, this has been included to 3 significant figures.
3. Where percentages have been used to generate data, the percentages are presented as whole numbers, however the computations actually use the full value. This means that values presented may not always precisely correspond to the values computed when applying the percentage value presented in this report.
4. Final values discussed in the text are rounded to the nearest 500.

2. Methodology

2.1 Hazardous waste arisings in East London in 2022 presented in the Regulation 18 Consultation draft of this report were estimated using the HWI. The resulting data are reproduced in Table 1 below.

Table 1: Hazardous Waste arisings from East London in 2022
Source: BPP Consulting 2024 [3] Table 2

Borough	Tonnes	%
Barking & Dagenham	11,763	20%
Havering	11,847	20%
Newham	31,502	55%
Redbridge	2,633	5%
Total	**57,745**	

2.2 Table 2 below shows hazardous waste arisings from East London in 2023 derived from the same source:

Table 2: Hazardous Waste arisings from East London in 2023
Source: HWI 2023 (Environment Agency)

Borough	Tonnes	%
Barking & Dagenham	22,317[4]	29%
Havering	10,381	14%
Newham	41,106[5]	53%
Redbridge	2,762	4%
Total	**76,566**	

2.3 Table 2 shows a total of c76,500 tonnes of hazardous waste was produced in East London in 2023. Hence reported hazardous waste arisings have increased by c19,000 tonnes when compared with 2022 arising of c57,500 tonnes.

2.4 Tables 1 and 2 also shows that the distribution of waste arisings across the East London Boroughs has changed from 2022 to 2023 with a greater proportion arising in LB Barking & Dagenham and a lesser proportion arising in LB Havering. To understand if there has been a change in the composition of hazardous waste arisings, the principal arisings of hazardous waste by source in East London for 2022 and 2023 are presented in Table 3.

[3] *East London Joint Waste Plan Hazardous Waste Baseline and Forecast to 2041* Consultation Draft v2.0 25.07.2024 BPP Consulting (2024).

[4] Significant increase from 2022 value. This was found to be due to an increase in fluff light fraction classed as hazardous as discussed in para 2.7

[5] An increase from 2022 value due to an increase in hazardous soils and stones by c6,500 tonnes and other construction materials by c5,000 tonnes. .

Table 3: Principal Hazardous Waste Arisings in East London 2022 vs 2023
Source: HWI 2022 & 2023 (italicised values are adjusted)

Hazardous Waste Type/Source	2022	2023	Difference
C, D & E Waste	25,936	38,464	+12,528
Vehicle Maintenance inc End of Life Vehicle (ELV) components	8,480	*3,480*[6]	*-5,000*
Waste Electrical and Electronic Equipment (WEEE)	5,635	5,640	+5
Solid wastes from gas treatment	3,435	2,445	-990
Infectious Clinical Waste	3,117	3,463	+346
Oil/Water Separator Waste	1,873	2,384	+511
Sludges	1,198	1,104	-94
Wastes containing other dangerous substances	1,057	<500	-883
Liquid waste	609	686	+77
Packaging, Absorbents, Wiping Cloths	569	1,193	+624
Fly ash	<500	513	+446
Fluff light fraction[7]	0	6,753	+6,753
Total	**54,915**	**71,189**	**16,274**

2.5 Table 3 shows that the three principal waste streams arose from construction activity, vehicle maintenance and WEEE in both years. Fluff light fraction became a significant additional waste in 2023 (see text below). Observations are as follows:

i) Hazardous C, D & E waste arisings have increased by c16,500 tonnes from 2022 levels. This was primarily due to an increase in 2023 of hazardous soils and stones of c8,500 tonnes and hazardous mixed C+D wastes by c5,000 tonnes compared to 2022 levels[8]. This is believed to arise from an increase in construction on historically contaminated sites in 2023. Given it is not possible to predict when such sites will be redeveloped each year, it is suggested to use the average of hazardous C, D & E waste arisings between 2022 and 2023 of c32,000 tonnes as a starting point to forecast from.

ii) All the fluff light fraction (c10,000 tonnes) from the source site (HKS Dagenham) was reported as non-hazardous in 2022. In 2023 this has reduced to c2,500 tonnes of this waste type, with c6,500 tonnes now classed as hazardous. It appears there was a switch part way through 2023. Given this fluff arises from the fragmentising of ELVs and other metal items such as domestic appliances, the input value for ELVs to the site of c5,000 tonnes from London (uncodeable) in 2023 has been deducted from the total vehicle maintenance/ELV value above, to avoid double counting essentially the same waste.

iii) There has been virtually no change in WEEE arisings and the remaining eight waste streams show less variation between 2022 and 2023.

[6] Adjusted value as per text above.

[7] This waste type is a mirror entry in the EWC and hence may be classed as either hazardous or non-hazardous.

[8] These values total more than the difference shown in Table 3 because there were also decreases in some C, D & E waste types in 2023.

3. Forecasting Hazardous Waste

3.1 The 2013 National Policy Statement for Hazardous Waste[9] remains the most current review of hazardous waste arisings in England. It states that arisings of hazardous waste are expected to increase for the following reasons:

- Continuing consumer demand for consumer durables containing hazardous materials.
- Increasing use of producer responsibility schemes, such as those provided for WEEE which require the separate collection of WEEE resulting in more hazardous items being removed from the mixed municipal waste stream, being collected separately as hazardous waste.
- Changes to the list of hazardous properties in the revised Waste Framework Directive and changes to the European Waste List, leading to increases in the amount of waste classed as 'hazardous'. There are still uses in which components that become hazardous waste may be unavoidable for the foreseeable future. For example, the use of oil in internal combustion engines.

3.2 It should also be noted that the identification of persistent organic pollutant (POPs) bearing materials such as furniture may also lead to an increase in reported hazardous arisings. See for example, the Environment Agency's guidance on furniture that might contain POPs being unsuitable for landfilling[10].

3.3 Given the variability between principal arisings of hazardous waste between 2022 and 2023, and the National Policy Statement for Hazardous Waste advice that hazardous waste is expected to increase in the short-term but can be expected to stabilise over time, the following growth forecasts are proposed for various hazardous waste streams:

- Hazardous C, D & E waste held constant to 2031 before applying a minus -1.38% growth per annum (applied in the previous 2022 update) to the mean hazardous C, D & E waste arisings of c32,000 tonnes as discussed in para 2.5 (i). This is because hazardous C, D & E waste can be expected to fall as over time historical land contamination (source of contaminated soils) is remediated and legacy asbestos present in the building stock is removed.
- Vehicle maintenance waste (including End of Life Vehicle (ELV) components) are generally classified as hazardous due to the presence of oil which is used in internal combustion engines but less so in electric motors. Hence it can be expected to fall with the transition to electric vehicles. However, some of the current conventional vehicle stock will remain in use beyond 2035 but the gradual shift can be expected to depress any growth in arisings in this sector. Therefore, this waste stream has been held constant over the Plan period.
- WEEE held constant over the Plan period given little change between 2022 and 2023.
- Fluff light fraction held constant over the Plan period.
- The remaining other wastes have been held constant given that little variability in arisings has been observed historically.

3.4 The growth forecasts based on these assumptions are presented in Table 4.

[9] National Policy Statement for Hazardous Waste: A framework document for planning decisions on nationally significant hazardous waste infrastructure Defra June 2013

[10] Environment Agency on GOV.UK website: Identify and dispose of waste containing persistent organic pollutants March 2015

Table 4: Forecast Hazardous Waste Arisings in East London
Source: Baseline Arisings discussion above

Hazardous Waste Type/Source	Plan Milestone Year				
	2023	2026	2031	2036	2041
Construction, Demolition & Excavation	32,200	32,200	32,200	30,045	28,034
Vehicle Maintenance inc ELV	3,480	3,480	3,480	3,480	3,480
WEEE	5,640	5,640	5,640	5,640	5,640
Subtotal	*41,320*	*41,320*	*41,320*	*39,165*	*37,154*
Other wastes[11]	35,246	35,246	35,246	35,246	35,246
Total Projected Arisings	**76,566**	**76,566**	**76,566**	**74,411**	**72,400**

3.5 Table 4 shows that applying the forecast assumptions results in a fall in the quantity of hazardous waste arisings in East London from the 2023 baseline arisings value of c76,500 tonnes to c72,500 tonnes in 2041.

[11] Including those arising at less than 100 tonnes per annum.

4. Profiling the Existing Hazardous Waste Management Methods

4.1 The management routes for East London's hazardous waste arisings in 2022 and 2023 is set out in Table 5 below using the fate categorisation in the HWI.

Table 5: East London Hazardous Waste Management Routes 2022 & 2023
Source: HWI 2023

Year	Recycling	Recovery[12]	Landfill	Transfer
2022	10%	64%	16%	8%
2023	13%	68%	4%	16%

4.2 Table 6 shows that of the total hazardous waste managed in 2022 and 2023:

- between 10% and 13% was recycled (rising);
- between 64% and 68% was recovered (rising);
- between 4% and 16% was landfilled (falling); and
- between 8% and 16% was transferred on for an undetermined final fate (rising).

The destinations of hazardous waste arising in East London outside East London has been assessed in the strategic waste flows report[13].

[12] Includes transfer for onward recovery. Recovery captures recycling and energy recovery amongst other activities.

[13] *East London Strategically Significant Cross Boundary Waste Movements* PCR v2.0 26.07.2024 BPP Consulting (2024).

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East London Joint Waste Plan

Construction, Demolition & Excavation Waste Arising in East London to 2041

Report: Reg 19 Consultation Draft

Version: 2.1

Issued: January 2025

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Project: East London Joint Waste Plan

Report: Construction, Demolition & Excavation Waste Arising in East London to 2041

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Version No.	Version Description	Author	Date	Reviewed	Date
1.0	Draft for Client review	Alan Potter (Partner)	09.07.24	Ian Blake (Partner)	10.07.24
2.0	Reg 18 Consultation Draft	Ella Mills (Data Analyst)	25.07.2024	Alan Potter (Partner)	25.07.2024
2.1	Reg 19 Consultation Draft	Ella Mills (Data Analyst)	22.01.2025	Alan Potter (Partner)	22.01.2025

Document Control

Version	Change	Effect
2.1	Tonnages coded under 17 05 08, (track ballast) and 19 12 09 (minerals such as sand), reallocated to construction & demolition rather than excavation waste, as composed of hard material suited to recycling. This was offset by 20 02 02 (soils and stones from municipal sources) being reallocated to the excavation waste category.	The amount/proportion of waste classed as C&D waste in Tables 2-5 has changed relative to excavation waste.
	The forecasting section moved to follow management route profiling section for clarity.	None
	Values in Tables for unattributed waste reworked to exclude tonnages of waste classed under EWC Chapter 01 (mining waste), 08 (sludges containing ceramics), 15 (glass packaging), and 16 (glass from industrial processes) and EWC code 19 12 05 (glass from treatment of waste) included in the WDI category inert/C+D but not considered to be true C, D & E waste. Furthermore, values in Table 8 exclude waste managed at sites classed as processing and storage as these are double counted. In addition, a double count was identified in Table 16, this has now been corrected.	The assessed overall baseline arising value has fallen by c1,035,500 tonnes.
	Conclusion about London Plan targets added	Clarity on Plan Area performance
	Baseline update to use best avilable data, i.e. 2023 plus taking the mean value of London uncodeable C, D & E waste between 2022 and 2023.	The assessed overall baseline arising value has increased to c2,203,500 tonnes.

Contents

Table of Tables

1. Purpose

1.1 The report updates the forecast of Construction, Demolition and Excavation (C, D & E) estimated to be produced in East London during the period of the East London Joint Waste Plan (ELJWP) and forms part of the evidence base of the Plan.

1.2 For the purpose of this exercise East London is taken to comprise the following London Boroughs:

- Barking & Dagenham;
- Havering;
- Newham; and
- Redbridge

(hereinafter referred to as "the East London Boroughs").

Principal Data Sources

1.3 The principal data source used to generate this C, D & E waste baseline update is listed below:

Waste Data Interrogator

1.4 Operators of all sites subject to Environmental Permits relating to the management of waste in England are required to submit returns to the Environment Agency (EA). These returns set out the quantities, types and origin of waste received and, where applicable, destination and fate of waste removed across a calendar year. These returns are collated by the EA and reported in a national dataset known as the Waste Data Interrogator (WDI). The WDI is released approximately nine months after the end of the calendar year to which the data relates. The WDI (version 2 released January 2023) for the calendar year 2022, was the most current version available at the time of producing this assessment.

Advice on Data

1.5 The principal source of advice with respect to the use of data to inform production of a plan evidence base is the national Planning Practice Guidance (nPPG)[1]. This states that:
"Assessing waste management needs for Local Plan making is likely to involve:

- *understanding waste arisings from within the planning authority area, including imports and exports*
- *identifying the waste management capacity gaps in total and by particular waste streams*
- *forecasting the waste arisings both at the end of the period that is being planned for and interim dates*
- *assessing the waste management capacity required to deal with forecast arisings at the interim dates and end of the plan period."*

Paragraph: 022 Reference ID: 28-022-20141016

[1] available at https://www.gov.uk/guidance/waste

1.6 The nPPG includes a section entitled " Using data to monitor and forecast waste needs", which articulates the following principles should waste planning authorities adopt when using data to plan for waste management:

- *Make clear assumptions on how data were handled, as well as their impact (including on forecasting)*
- *Provide data to an appropriate level of significance, based on their explicit assumptions. In practice, data quoted to more than 2 or 3 significant figures will not be helpful and spurious accuracy stemming from precise figures should be avoided*
- *Plan for a range of each type of waste rather than a specific single figure."*

Paragraph: 036 Reference ID: 28-036-20141016 Revision date: 16 10 2014

Data Presentation

1.7 In order to respect the need to avoid "spurious accuracy", the following approach has been taken:

1. Any actual tonnage data accessed has been used in the computations.
2. Where data has been subject to computation, this is included to 3 significant figures.
3. Where percentages have been used to generate data, the percentages are presented as whole numbers, however the computations actually use the full value. This means that values presented may not always precisely correspond to the values computed when applying the percentage value presented in this report.
4. Final values discussed in the text are rounded to the nearest 500.

2. Methodology

2.1 C, D & E waste arising in East London in 2022 presented in the Regulation 18 Consultation draft of this report are reproduced in Table 1 below.

Table 1: C, D & E Waste Arisings in 2022
Source: BPP Consulting 2024[2] Table 2

Category	Type	Tonnes	%
C&D	Inert	209,928	22%
	Non-inert	180,492	19%
	Hazardous	341	<1%
Excavation	Inert	545,815	57%
	Non-inert	15,630	2%
	Hazardous	11,535	1%
Total C, D & E waste		**963,741**	

2.2 Table 2 shows C, D & E waste arisings from East London in 2023 applying the same method.

Table 2: C, D & E Waste arisings from East London in 2023
Source: WDI 2023 (Environment Agency)

Category	Type	Tonnes	%
C&D	Inert	170,691	19%
	Non-inert	114,336	13%
	Hazardous	1,242	0%
Excavation	Inert	590,153	67%
	Non-inert	0	0%
	Hazardous	12	<1%
Total C, D & E waste		**876,464**	

2.3 Table 2 shows a total of c876,500 tonnes of C, D & E waste was produced in East London in 2023. Hence reported C, D & E waste arisings attributed to East London have decreased by c87,500 tonnes when compared with the 2022 arisings value of c963,500 tonnes.

2.4 As hazardous arisings are addressed in a separate report[3], the hazardous component of each waste type has been excluded from the management profile and forecasts sections. This results in the arising value for non-hazardous C, D & E waste[4] from East London of c875,000 tonnes in 2023.

[2] *Evidence Base for the East London Joint Waste Plan for the East London Boroughs of Barking & Dagenham, Havering, Newham, and Redbridge*. Anthesis Final Report (2022).

3. Profiling the Existing C, D & E Waste Management Methods

3.1 The management routes for non-hazardous C, D & E waste arisings attributed to the East London boroughs in 2023 is set out in Table 3 below.

Table 3: Non-hazardous C, D & E Waste attributed to East London Waste Management Profile 2023

Category	Waste Type	Recycling	Recovery	Landfill	Transfer	Mobile Plant	Subtotals
C&D	Inert	166,529	0	347	3,815	0	170,691
	Non-inert	71,810	18,238	65	24,252	0	114,366
	Subtotal C&D	238,339	18,238	412	28,067	0	285,057
Excavation	Inert	204,977	0	*237,303*[5]	133,551	14,322	590,153

3.2 As the London Plan targets for management of this waste stream are set by waste type, the management profile shown in Table 3 has been converted into percentages using the 2023 subtotal arisings values of c285,000 tonnes and c590,000 tonnes respectively as shown in Table 4.

Table 4: Non-hazardous C, D & E Waste attributed to East London Waste Management Profile 2023[6]

Category	Waste Type	Recycling	Recovery	Landfill	Transfer	Mobile Plant
C&D	Inert	58%	0%	<1%	1%	0%
	Non-inert	25%	6%	<1%[7]	9%	0%
	Subtotal C&D	**84%**	**6%**	**<1%**	**10%**	**0%**
Excavation	Inert	35%	40%[8]	0%	23%	2%

3.3 The management profile for non-hazardous C&D waste is as set out below:

- 84% was managed through recycling facilities;
- 6% was recovered (either through incineration or recovery to land);
- <1% was managed at permitted landfills (possibly for use in restoration or operational needs);
- 10% was managed at intermediate sites (transferred) prior to going on to its final fate; and
- none was managed via mobile plant (normally for recycling or reuse).

[3] *East London Hazardous Waste Forecasts to 2041 Update 2022* BPP Consulting (2024).

[4] The term "non-hazardous C, D & E waste" encompasses all C, D & E waste that isn't hazardous i.e. that which is inert plus that which is non-inert but not hazardous.

[5] As this tonnage is inert, and void at non-hazardous landfill will be conserved and hence inert input minimised, it is assumed to be used for restoration or operational purposes and therefore classed as recovery. For this reason it is counted within the recovery % in the profile in Table 4.

[6] Total of subtotal values may exceed 100% due to rounding of individual values.

[7] Does not include residues from processing of mixed skip waste (EWC 17 09 04) classed under EWC code 19 12 12 that may be landfilled as inactive waste under the Landfill Tax regime but would not be classed as inert under environmental permitting.

[8] Including tonnage sent to landfill as per footnote 5 above.

3.4 The management profile for non-hazardous excavation waste is as set out below:

- 35% was managed through recycling facilities;
- 40% was recovered (through recovery to land and use in non-inert landfill);
- none was disposed at permitted landfills (all non-inert);
- 23% was managed at intermediate sites (transferred) prior to going on to its final fate; and
- 2% was managed via mobile plant (normally for recovery or reuse).

3.5 This compares with the following targets set in the London Plan for C, D & E waste generated in London in *Policy SI 7 Reducing waste and supporting the circular economy*:

- meet or exceed the targets for each of the following waste and material streams:
  - construction and demolition – 95 per cent reuse/recycling/recovery within London on balance i.e. net self sufficiency.
  - excavation – 95 per cent beneficial use overall and 100% of inert excavation beneficial used.[9]

[9] London Plan Footnote 164.

4. Forecasting C, D & E Waste

4.1 In order to discern any trends in C, D & E waste arisings and to establish whether the 2023 baseline is a robust to forecast from, the 2023 values is compared with historical values for non-hazardous C, D & E waste arisings from East London. These are displayed in Tables 5 below.

Table 5: Non-hazardous C, D & E Waste arisings from East London 2019-2023
Source: WDI (Environment Agency)

	Waste Type	2019	2020	2021	2022	2023	Mean Value
C&D	Inert	158,326	214,840	133,779	209,928	170,691	177,513
	Non-inert	165,461	177,822	194,754	180,492	115,334	166,773
Excavation	Inert	885,248	961,347	541,805	545,815	590,153	704,874
	Non-inert	25,765	9,974	0	15,630	0	10,274
Total Non-Hazardous C, D & E waste		1,234,800	1,363,982	870,337	951,865	876,178	1,059,432
Growth Rate p.a		**-**	**10.46%**	**-36.19%**	**9.37%**	**-7.95%**	**-6.08%**

4.2 Table 5 shows that non-hazardous C, D & E waste arisings fluctuated over the 5-year period. Arisings increased in 2020 before decreasing to below 2019 levels in 2021 and experiencing a smaller increase in 2022 followed by another decrease in 2023. Although the principal impact of the Covid-19 pandemic was during 2020, arisings increased by +10.46% in 2020. Overall the growth trend was negative at c6%..

4.3 Given the high variability of arisings over the 5-year period, it is suggested to take an average (mean) of the arisings of each waste type as a baseline to project forward to the end of the Plan period. This is presented in Table 6 below.

Table 6: 2019-2023 Mean Non-hazardous C, D & E Waste arisings in East London by type
Source: Table5

Category	Waste Type	Tonnes	Totals
C&D	Inert	177,513	344,285
	Non-inert	166,773	
Excavation	Inert	704,874	715,147
	Non-inert	10,274	
	Total C, D & E waste	**1,059,432**	

4.4 Table 6 shows that applying an average (mean) to the C, D & E waste arisings over the period 2019 to 2023 produces an arising value of c1.1M tonnes for use as a baseline to forecast from.

4.5 The nPPG states when looking to forecast C, D & E waste:

"*Waste planning authorities should start from the basis that net arisings of construction and demolition waste will remain constant over time as there is likely to be a reduced evidence base on which forward projections can be based for construction and demolition wastes."*

4.6 Hence the starting point for any assessment is that there will be no growth in arisings over the Plan period. This would simply project forward the values shown in Table 6 for the Plan period (to 2041).

4.7 In addition, as a sensitivity the Greater London Authority (GLA) employment projections in the construction sector were used to generate an upper range forecast. This produced the forecast shown in Table 7 below.

Table 7: Forecast Non-hazardous C, D & E waste arisings for East London based on average C, D & E waste arisings 2019-2023 applying growth rate based on GLA sector employment projections[10]

		2023 (values from Table 6)	2026	2031	2036	2041
C&D	Inert	177,513	185,414	197,613	203,715	210,005
	Non-inert	166,772	174,196	185,657	191,389	197,299
Excavation	Inert	704,874	736,249	784,690	808,919	833,896
	Non-inert	10,274	10,731	11,437	11,790	12,154
Total C, D & E waste		**1,059,433**	**1,106,590**	**1,179,397**	**1,215,814**	**1,253,355**
Growth Rate p.a.			**4.45%**	**6.58%**	**3.09%**	**3.09%**

4.8 Table 7 shows that C, D & E waste arisings could increase by c194,000 tonnes by 2041 if waste arisings were to grow at the same rate as forecast construction sector employment. However, it is considered that this is unlikely to be the case due to various factors driving down per unit waste reduction in construction. This includes:

- The need to separate plasterboard offcuts from other waste types going to landfill;
- the increased segregation of materials at source to reduce disposal costs;
- the move to modular offsite fabrication reducing waste generation on each construction site - particularly when operating in space constrained sites such as those in urban areas like London; and,
- a sector initiative to drive towards Zero Avoidable Waste in Construction[11] to meet the Government's Resources and Waste Strategy (2018) stated ambition 'to eliminate avoidable waste of all kinds by 2050' in England, plus the residual waste reduction target adopted into law by *The Environmental Targets (Residual Waste) (England) Regulations 2023* which includes waste from the construction sector.[12]

4.9 Therefore. the sensitivity forecast is considered to be worst-case, and not a reliable basis to plan future provision on.

[10] The GLA Employment projections run from 2026 to 2036. The growth rate in 2036 has been extrapolated to 2041.

11 *The Routemap for Zero Avoidable Waste in Construction* https://www.constructionleadershipcouncil.co.uk/wp-content/uploads/2021/07/ZAW-Interactive-Routemap FINAL.pdf

[12] https://www.legislation.gov.uk/en/uksi/2023/92/made

5. Accounting for waste reported in WDI for London as a whole

5.1 Data quality of the WDI relies on operators of permitted sites to report inputs down to origin Waste Planning Authority (WPA) level. A number of sites do not report inputs to that level, preferring to report at regional level only i.e. to London only. This means that there is a potential for an underestimation of the tonnage of waste arising in East London that is not attributed down to or below regional level.

5.2 The WDI 2023 reports nearly 14.7 million tonnes of waste from London that is not attributed down to WPA level below London. This is an increase of c1,939,000 tonnes from the 2022 value of c7,206,500 tonnes which included over 4 million tonnes misattributed to ELWA, which the Environment Agency confirmed should be counted as waste arising in London not attributed down to WPA level[13]. It appears that this misattribution has been rectified in the WDI 2023 with no entry for ELWA and all London attributed waste has been coded as such. The total tonnages are set out by type in Table 8 below:

Table 8: Totals of waste not attributed below London received at permitted site in England
Source: WDI 2022 + 2023

	Hazardous	Hhold/Ind/Com	C, D & E[14]	Grand Total
Tonnes 2022	195,615	5,397,807	7,206,270	12,799,692
Tonnes 2023	149,720	5,313,197	9,274,013	14,736,930
Mean value	**172,668**	**5,355,502**	**8,240,142**	**13,768,311**

5.3 Given the substantial tonnage of waste to be attributed, an assessment has been undertaken to establish if an amount might reasonably be considered to arise from East London itself. Given HIC waste is subject to London Plan apportionments, and hazardous waste is also reported through the Environment Agency Hazardous Waste Interrogator, the focus of this exercise is on accounting for the C, D & E waste not attributed below London taking the mean value of c8,240,000 tonnes across 2022 and 2023.

5.4 One approach taken to reattribute these wastes is to consider the tonnages accepted at sites within each WPA, on the presumption that C, D & E waste will not travel far. However, given the compact nature of London (the inner city in particular) and WPAs that have few if any suitable waste management sites available, it is not considered appropriate to apply this approach in this case.

5.5 Given that the GLA data on employment in the construction sector has been used as a proxy for construction activity within the East London Boroughs for the purposes of forecasting arisings in the past, this dataset has been referenced to establish a proxy for allocating the arisings between Boroughs across London. Table 9 sets out the employment values for 2021, the most recent estimate, with the Boroughs grouped according to the waste planning areas that exist.

[13] Email from Dr Matthew Caple 15th April 2024.

[14] Excluding EWC Chapter 01, 08, 15, and 16 and EWC code 19 12 05 included in the WDI definition of inert/C+D but not true C, D & E waste. Tonnages of these wastes have been reassigned to Hhold/Ind/Com.

Table 9: Construction Sector Employment Values

Source GLA Labour Data Statistics

Borough	Employment n	Percentage	Waste Plan Area
City of London	7,000	3.7%	Central London
Westminster	14,000	7.5%	
Tower Hamlets	5,000	2.7%	
	Sub Total	**13.9%**	
Barking and Dagenham	4,000	2.1%	ELWP
Havering	8,000	4.3%	
Newham	8,000	4.3%	
Redbridge	6,000	3.2%	
	Sub Total	**13.9%**	
Barnet	8,000	4.3%	NLWP
Camden	9,000	4.8%	
Enfield	8,000	4.3%	
Hackney	4,000	2.1%	
Haringey	3,500	1.9%	
Islington	5,000	2.7%	
Waltham Forest	4,500	2.4%	
	Sub Total	**22.4%**	
Bexley	6,000	3.2%	SE London
Bromley	7,000	3.7%	
Greenwich	4,500	2.4%	
Southwark	4,000	2.1%	
	Sub Total	**11.5%**	
Croydon	7,000	3.7%	SLWP
Kingston upon Thames	3,000	1.6%	
Merton	4,500	2.4%	
Sutton	6,000	3.2%	
	Sub Total	**10.9%**	
Brent	7,000	3.7%	WLWP
Ealing	7,000	3.7%	
Harrow	6,000	3.2%	
Hillingdon	7,000	3.7%	
Hounslow	4,500	2.4%	
Richmond upon Thames	2,500	1.3%	
	Sub Total	**18.2%**	
Hammersmith and Fulham	2,500	1.3%	Western Riverside
Kensington and Chelsea	2,250	1.2%	
Lambeth	5,000	2.7%	
Lewisham	3,000	1.6%	
Wandsworth	4,500	2.4%	
	Sub Total	**9.2%**	
Grand Total	**187,250**	**100.0%**	

5.6 Applying the above percentages to the mean unattributed C, D & E waste total gives the tonnages of C, D & E waste displayed in Table 10 below.

Table 10: Non inert C, D & E waste not attributed below London region, allocated across London sub-regions using Construction Sector Employment data as proxy

Source: Table 8 & Table 9

London Sub-region	Tonnes
Central London	1,144,158
East London	1,144,158
North London	1,848,256
South East London	946,131
South London	902,125
West London	1,496,207
Western Riverside	759,105
Total	**8,240,142**

5.7 Hence to ensure that the tonnage of waste not attributed below London is planned for i.e. not orphaned, it is proposed to add a further 1.1 million tonnes to the total considered for management from East London as a sensitivity.

Composition of Reattributed C, D & E waste from East London

5.8 In order to estimate the composition of unattributed C, D & E waste reattributed to East London, and hence its suitability for particular management methods, the tonnages reported under C, D & E waste attributed to London in 2023 as a whole have been allocated according to type between the C&D and excavation waste categories (using source WDI data), the values obtained were then converted into percentages as shown in Table 11 below.

Table 11: Allocation of Non-Hazardous C, D & E Waste from Waste attributed to London only

Source: WDI 2023

Category	Type	Percentage (rounded)
C&D	Inert	15%
	Non-inert	25%
Excavation	Inert	61%
	Non-inert	<1%

5.9 The percentages shown in Table 11 were then applied to the tonnage of reattributed non-hazardous C, D & E waste from East London (1,144,158 tonnes) to generate the waste type profile shown in Table 12 below.

Table 12: Estimated Composition of Reattributed Non-hazardous C, D & E waste from East London

Category	Type	Tonnes
C&D	Inert	167,982
	Non-inert	282,734
Excavation	Inert	693,079
	Non-inert	363
	Total	**1,144,158**

5.10 The reattributed waste by waste type from East London shown in Table 12 has been added to the mean non-hazardous C, D & E waste baseline from East London shown in Table 6 to produce a sensitivity baseline shown in Table 13 below.

Table 13: Non-hazardous C, D & E Waste Baseline arisings in East London including reattributed waste from London as whole

Source: Table 6 plus Table 12

Category	Type	Tonnes	
C&D	Inert	345,495	795,002
	Non-inert	449,507	
Excavation	Inert	1,397,953	1,408,589
	Non-inert	10,637	
Total C, D & E waste		**2,203,591**	

5.11 Table 13 shows that by adding the mean reattributed C, D & E waste to East London (Table 12) to the mean non-hazardous C, D & E waste arisings over the period 2019 to 2023 (Table 6) produces an arising value of c2.2M tonnes as a sensitivity baseline to forecast from.

5.12 Applying the sector employment growth rates, the forecast shown in Table 14 is arrived at.

Table 14: Forecast Non-hazardous C, D & E waste arisings for East London based on average Non-hazardous C, D & E waste arisings 2019-2023 plus reattributed Non-hazardous C, D & E waste from London applying growth rate based on GLA sector employment projections

Source: Table 13 plus GLA sector employment projections[15] Table 7

		2023 (values from Table 13)	2026	2031	2036	2041[16]
C&D	Inert	345,495	366,138	390,227	402,276	414,697
	Non-inert	449,507	476,364	507,706	523,383	539,543
Excavation	Inert	1,397,953	1,481,478	1,578,950	1,627,703	1,677,963
	Non-inert	10,637	11,272	12,014	12,385	12,767
Total C, D & E waste		**2,203,591**	**2,335,252**	**2,488,896**	**2,565,747**	**2,644,970**
Growth Rate p.a.			**4.45%**	**6.58%**	**3.09%**	**3.09%**

5.13 Table 14 shows that non-hazardous C, D & E waste arisings could increase from 2.2M tonnes in 2023 to just over 2.6 million tonnes at 2041 if the upper range worst case growth scenario is used as a sensitivity. However, as explained above the growth rate is considered to be unreliable and therefore a static forecast using the adjusted baseline arising value of 2.2 Mtpa has been adopted, as per nPPG advice.

[15] *Evidence Base for the East London Joint Waste Plan for the East London Boroughs of Barking & Dagenham, Havering, Newham, and Redbridge.* Anthesis Final Report (2022).

[16] Extrapolating growth rate in 2036 through to 2041.

Profiling the Reattributed C, D & E waste from East London

5.14 In order to estimate the management profile of C, D & E waste reattributed to East London, the tonnages reported under C, D & E waste not attributed below London in 2023 as a whole have been interrogated to arrive at the management profile shown in Table 15.

Table 15: Non-hazardous Inert/ C+D Waste from Waste from London as a whole by Waste Management Profile 2023 (% of total arisings)

Category	Waste Type	Recycling	Recovery	Landfill	Transfer	Mobile Plant
C&D	Inert	12%	<1%	<1%	2%	0%
	Non-inert	12%	<1	<1%	13%	0%
Excavation	Inert	15%	29%[17]	0%	16%	<1%
	Non-inert	<1%	0%	<1%	0%	0%

5.15 Applying the proportions shown in Table 15 to the mean tonnage of non-hazardous C, D & E waste from London reattributed to East London (1,144,158tonnes) gives the management profile by tonnage shown in Table 16 below.

Table 16: Waste Management Profile of reattributed Non-hazardous C, D & E waste from London as a whole (tonnes)

Source: Table 15 + Table 12

Category	Waste Type	Recycling	Recovery	Landfill	Transfer	Mobile Plant
C&D	Inert	138,942	2,166	1,949	25,459	0
	Non-inert	132,909	22	1,436	148,368	0
Excavation	Inert	176,033	328,726	0	186,834	953
	Non-inert	90	0	273	0	0

5.16 To establish a final management profile of total non-hazardous C, D & E waste arising in East London in 2023 (directly attributed to East London in WDI 2023 and reattributed London C, D & E waste), the values in Table 16 have been combined with the tonnages attributed directly to East London in 2023 (shown in Table 3) to produce the tonnages shown in Table 17.

[17] Includes tonnage to landfill as per footnote 8.

Table 17: Waste Management Profile of East London Waste including reattributed Waste from London as a whole (tonnes)

Source: Table 3 + Table 16

Category	Waste Type	Recycling	Recovery	Landfill	Transfer	Mobile Plant	Total[18]
C&D	Inert	305,471	2,166	2,295	29,274	0	339,207
	Non-inert	204,719	18,260	1,501	172,620	0	397,100
	Subtotal	**510,190**	**20,426**	**3,797**	**201,894**	**0**	736,307
Excavation	Inert	381,010	566,030	0	320,384	15,275	1,282,699
	Non-inert	90	0	273	0	0	363
	Subtotal	**381,100**	**566,030**	**273**	**320,384**	**15,275**	1,283,062
						Total	**2,019,369**

5.17 This produces the management profile by proportion shown in Table 18 below.

Table 18: Non-hazardous C, D & E Waste attributed to East London plus reattributed Non-hazardous C, D & E Waste from London Combined Waste Management Profile 2023 (% of waste category subtotals)

Category	Waste Type	Recycling	Recovery	Landfill	Transfer	Mobile Plant
C&D	Inert	41%	1%	<1%	4%	0%
	Non-inert	28%	2%	<1%[19]	23%	0%
	Subtotal	**69%**	**3%**	**1%**	**27%**	**0%**
Excavation	Inert	30%	44%	0%	25%	1%
	Non-inert	<1%	0%	<1%	0%	0%
	Subtotal	**30%**	**44%**	**<1%**	**25%**	**1%**

5.18 To summarise the management profile for non-hazardous C& D waste is as set out below:

- 69% was managed at recycling facilities;
- 3% was recovered (either through incineration or recovery to land);
- 1% was disposed at permitted landfills;
- 27% was managed at intermediate sites and transferred on for recovery or disposal; and
- 0% was managed via mobile plant (normally for recycling or reuse).

5.19 The management profile for non-hazardous excavation waste is as set out below:

- 30% was managed at recycling facilities;
- 44% was recovered (either through incineration or recovery to land and use in restoration/ backfilling on permitted landfills);
- <1% was managed at permitted landfills;
- 25% was managed at intermediate sites and transferred on for recovery or disposal); and
- 1% was managed via mobile plant (normally for recycling or reuse).

[18] Totals do not correspond to the values shown in Table 13 as that is derived using a mean value across 3-years.

[19] Does not include residues from processing of mixed skip waste classed under EWC code 19 12 12 that may be landfilled as inactive waste under the Landfill Tax regime but would not be classed as inert under environmental permitting.

5.20 This compares with the following targets set in the London Plan for C, D & E waste generated in London in *Policy SI 7 Reducing waste and supporting the circular economy*:

- meet or exceed the targets for each of the following waste and material streams:
  - construction and demolition – 95 per cent reuse/recycling/recovery
  - excavation – 95 per cent beneficial use overall and 100% of inert excavation beneficially used.[20]

5.21 When the different categories of management method are assigned by activity, performance against the London Plan targets as shown in Table 19 is indicated.

Table 19: Non-hazardous C, D & E Waste attributed to East London plus reattributed Non-hazardous C, D & E Waste from London as whole Combined Waste Management Profile 2022

Category	Activity	Recycling	Recovery	Landfill	Transfer	Mobile Plant	Total
C&D	Recovery inc recycling	69%	3%	-	27%	0%	**>99%**
	Other	-	-	<1%[21]		-	**<27%**
Inert Excavation	Recovery inc recycling	30%	44%[22]	0%	25%	1%	**>99%**
	Other	-	-	-		-	**<30%**
All Excavation	Recovery inc recycling	30%	44%	0%	25%	1%	**>99%**
	Other	-	-	<1%		0%	**<25%**

5.22 To summarise the management profile for non-hazardous C& D waste managed at permitted facilities reporting through the WDI is as set out below:

- At least 72% was managed through recycling or recovery;
- With less than 1% disposed at permitted landfills; and
- 27% transferred on for recovery or disposal.

It should be noted that waste going for reuse may not be managed through permitted sites, plus a substantial amount of the fraction of C&D waste that constitutes hardcore may be managed on the site of production and converted into recycled aggregate either used on site or sold offsite[23]. Hence the recycled value should be taken to be a minimum 'at least' value.

5.23 The management profile for non-hazardous excavation waste is as set out below:

- At least 74% was managed through recycling or recovery (inc mobile plant);
- With <1% disposed at permitted landfills; and
- 25% transferred on for recovery or disposal. Given that disposal would only be to landfill, and backfilling of mineral workings and other uses would be classed as recovery, it is considered highly unlikely that the inert fraction of this stream would actually end up being disposed of.

[20] London Plan Footnote 164.

[21] Does not include residues from processing of mixed skip waste classed under EWC code 19 12 12 that may be landfilled as inactive waste under the Landfill Tax regime, but would not be classed as inert under environmental permitting.

[22] Taken to be used for restoration or operational purposes which is classed as recovery.

[23] Data provided by the National Federation of Demolition Contractors.

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East London Joint Waste Plan

Identification of Strategically Significant Cross Boundary Waste Movements

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2.2	Regulation 19 Consultation Draft	Ella Mills (Data Analyst)	18.02.2025	Alan Potter (Partner)	19.02.2025

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1. Introduction

The purpose of this report is to undertake an assessment of the movements of waste (a.k.a. waste flows) between East London and other waste planning authority areas to determine which movements may be regarded as strategic (or strategic in future). Establishing strategic movements is a necessary step in determining whether the emerging East London Joint Waste Plan can rely on such movements over the plan period or whether it needs to specifically include provision for additional capacity to address potential shortfalls. Where strategic movements are identified the relevant Waste Planning Authorities (WPAs) will be contacted to establish whether ongoing movements into their area can be relied upon.

Engagement with WPAs involves consideration of the following:

1. Whether historical flows of waste identified in this report are likely to continue;
2. Barriers to the continuation of waste exports due to, for example, exhaustion of finite capacity facilities and cessation due to time limited availability;
3. Whether new flows of waste beyond the Plan area are likely to take place. This takes the above factors into account as well as any changes in capacity that the management of waste arising in East London currently relies on (situated either within or beyond East London).

Advice is provided to support the East London Boroughs as WPAs for East London in their engagement activities by recommending which WPAs should be contacted about which waste movements.

This report forms part of the evidence base for the emerging East London Joint Waste Plan.

2. Waste as a Strategic Issue

The management of waste has little regard for administrative boundaries, with waste arising in one WPA area often being managed in another. Furthermore, waste management facilities may have catchments that extend beyond the boundary of the Plan area within which it is situated. Such flows are recognised in relation to the disposal of waste and recovery of mixed municipal waste in particular in the National Planning Policy for Waste that expects waste planning authorities to:

> "*…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*;" .

Hence the management of waste can be a cross boundary strategic matter, the planning for which may require co-operation between WPAs.

2.1 The Duty to Cooperate

Section 33A of the *Planning and Compulsory Purchase Act 2004* requires Councils in England that produce development plan documents to cooperate with local planning authorities, county councils and bodies or other persons as prescribed. The Duty to Cooperate imposes, in particular, a duty to: *engage constructively, actively and on an ongoing basis*" .This is to have "*regard to*" activities concerned with supporting or preparing planning policies "*so far as relating to a strategic matter*" . in "*maximising the effectiveness*" of Local Plans.

The Duty applies to the preparation of development plan documents, in so far as they relate to a "*strategic matter*". A strategic matter is defined as "*sustainable development or use of land that has or would have a significant impact on at least two planning areas including... in connection with infrastructure that is strategic*..." (S33A(4)). Waste management qualifies as a strategic matter for the purposes of the Duty.

The updated National Planning Policy Framework (December 2023) expects that Local Plans include strategic' policies that:

> "*...set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:…..infrastructure*"

and this includes "*for…..waste management*" .

It goes on to state that:

> "*In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these.*"

The recently published *Levelling up and Regeneration Act 2023* includes provisions for the revocation of the Duty to Cooperate. However, at the time of writing, the regulations and guidance that would enact these provisions have still to be published and until such time, the Duty remains a requirement in Plan making that is intended to seek alignment between Plan making bodies and other Plan making and statutory bodies. It is anticipated that whatever replacement mechanism is put in place, an assessment of strategic flows of waste will still need to be undertaken for plan making purposes.

2.2 Net Self Sufficiency

Net self sufficiency is an approach applied in waste planning to establish how much capacity should be planned for in each waste Plan area. This follows the polluter pays principle whereby the area that produces the pollution (in this case waste) should be responsible for managing it. The self sufficiency requirement is subject to the 'net' caveat as waste does not recognise administrative boundaries and so there is no expectation that every tonne of waste produced in a particular Plan area ought to be managed within that Plan area, rather that, overall, there should be a balance of provision. The objective of net self sufficiency is therefore to ensure that there is sufficient capacity to manage the tonnage of waste equivalent to that predicted to arise within a Plan area.

In the case of East London, The London Plan 2021 sets out the expectation for London as a whole to achieve net self sufficiency by 2026 (Policy SI 8 A 1) and to continue to be so for the Plan period. The apportionments that apply to household, commercial and industrial (HCI) waste produced in London is intended to ensure this objective is achieved at Borough level. Hence while achievement and maintenance of net self sufficiency is not a stated objective of the emerging ELJWP it can be inferred for HIC waste as a minimum.

The degree to which a Plan area is net self sufficient is established by comparing the available capacity within the Plan area with the projected capacity requirements, to ascertain if there is any gap. The management of any waste by disposal or recovery of mixed municipal waste is subject to the proximity principle[1] which means that it should be managed at one of the nearest appropriate facilities. Such a facility may be located outside a Plan area.

[1] See National Planning Policy for Waste

2.3 Identifying Waste Flows that might be strategic

A key matter to address when assessing the robustness of the emerging Plan strategy is to establish whether key historical patterns of management of waste outside of the Plan area can be relied upon for the duration of the Plan period. To ensure compliance with the Duty to Cooperate, the focus for engagement in this case is therefore to address outgoing waste flows, which may be regarded as 'strategic' in nature.

'Strategic' flows of waste have been identified applying the following approach:

Step 1. Does the flow to the WPA area exceed the initial significance screening thresholds?

The guideline values provided in the National Waste TAB Chairs 'Duty to Cooperate on Waste – Practice Guide for Waste Planning Authorities in England' were used as follows:

- *Non-hazardous waste: 5,000 tonnes per annum*
- *Inert waste: 10,000 tonnes per annum*
- *Hazardous waste: 100 tonnes per annum*

Step 2. Does the specific flow represent a significant proportion of total arisings of the particular waste type produced in the Plan area?

It is considered that where flows that exceed the screening thresholds represented an amount greater than 20% or a fifth of the total quantity of that particular waste type produced in the Plan area it may be considered to be strategic and hence this value was used as a further screening threshold.

Step 3: Does the specific flow go to a single site or multiple sites?

Where flows to a particular Plan area went to a single or small number of sites the dependency is greater than if it was distributed across a large number of sites. This suggests that flows to such sites would be of strategic importance to a Plan strategy. Conversely where inputs to individual sites fell below the screening threshold they have been excluded from further analysis.

The following section assesses the flows of waste from East London to other Plan areas that might be considered strategic in nature.

It should be noted that only flows between WPAs located in England have been considered, as the principal data source used, the Environment Agency Waste Data Interrogator, only reports on inputs to site located in England subject to Environment Agency environmental permits. Hence possible flows to sites located in Scotland and Wales and further afield are not accounted for in this exercise. Having said that, the geographical location of East London and spread of flows to facilities in England indicated by this report suggests it is highly unlikely that additional strategic flows between East London and Wales and/or Scotland exist.

3. Assessing Waste Flows from East London

3.1 Net Self Sufficiency Balance

Table 1 below shows the tonnages of waste attributed to East London in the WDI 2022 managed at permitted facilities within East London and beyond, as well as the tonnage of waste from outside of East London managed within East London in 2022.

Table 1: Tonnages of East London waste managed in permitted facilities within East London and outside East London, and tonnage of imported waste to East London facilities

Source: WDI 2022

East London arisings		Managed in East London		
	East London waste managed outside East London	East London waste managed in East London	Waste imported to East London	Total Managed
	859,030	931,768	4,671,537	5,603,305
Total East London waste managed	1,790,798			

Table 1 shows that c0.9M tonnes of East London's waste were managed in East London in 2022. This compares with c0.8M tonnes of East London waste managed outside East London. This export is offset by the significant import of waste for management from outside East London of c4.7M tonnes. So, taking this snapshot as a simple balance, it can be said that in 2022 East London achieved and far exceeded net self sufficiency in management capacity, imports of waste being substantially greater than waste exports (4.7Mt imported vs 0.8Mt exported). Figure 1[2] displays the balance between imports and exports by waste management method and waste type.

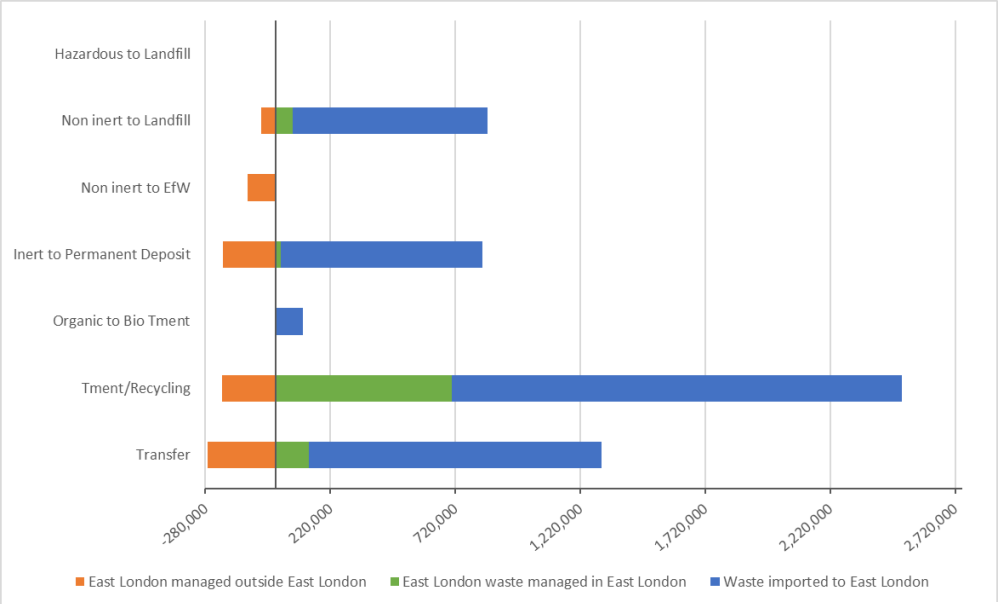

Figure 1: Waste import and export balance in East London 2022 by management method and waste type where known (tonnes)

[2] Note that Figure 1 only includes waste managed at permitted sites in England and does not include any waste exported to Wales, Scotland or further afield as this is not reported in the WDI.

It should be noted that Figure 1 presents:

1. A snapshot in time for a single year; and
2. is not necessarily a true representation of net -self-sufficiency as actual inputs to facilities in 2022 may not be reflective of potential capacity of sites operating in East London (in most cases inputs will be lower than actual site capacity).

3.2 Identifying Potentially Strategic Waste Flows

Step 1: Applying the National Waste Movement Screening Guidelines

The waste movement guidelines referred to above have been applied as thresholds by waste category to screen out movements that would not be considered strategic to the Plan area. Table 2 shows movements of waste from East London in 2022 (latest data available) to other WPAs (in rank order) where one or more of the thresholds have been met or exceeded by waste category.

Table 2: Destination WPAs of Non-inert. Inert and Hazardous Waste, exports from East London in rank order by total applying National DtC Guidelines as Thresholds 2022

Source: WDI 2022

Highlighted entries are those where initial screening threshold values have been exceeded

Receiving WPA	Non-inert	Inert	Hazardous
Sheffield	<5,000	193,677[3]	0
Essex	17,609	93,257	279
Buckinghamshire	<5,000	103,592	0
Thurrock	40,166	50,856	<100
Wakefield	49,633	0	0
Oxfordshire	11,227	30,486	0
LB Enfield	7,288	32,003	0
Kent	36,092	<10,000	1,546
Medway	29,556	<10,000	1,925
Greenwich	<5,000	29,301	0
Lincolnshire	25,092	0	0
Waltham Forest	<5,000	10,051	<100
North Lincolnshire	9,851	0	0
Milton Keynes	7,313	<10,000	0
Liverpool	6,159	<10,000	254
Rotherham	6,240	<10,000	0
Derbyshire	5,831	<10,000	<100
Leeds	<5,000	0	3,214
Staffordshire	<5,000	<10,000	1,743
Sandwell	<5,000	<10,000	1,260
Surrey	0	0	1,234
Manchester	<5,000	0	500
West Sussex	<5,000	<10,000	440
Tameside	0	0	337
Walsall	<5,000	<10,000	323
Hertfordshire	<5,000	<10,000	278
Kingston Upon Hull City	<5,000	0	248
Suffolk	<5,000	0	247
LB Bexley	0	0	210
Salford	<5,000	0	127
Stoke-on-Trent City	<5,000	<10,000	124
Bedford	<5,000	0	111

Table 2 shows that in 2022 a total of 32 WPA areas accepted quantities of waste from East London in excess of the strategic screening thresholds, with 7 accepting waste in quantities that exceeded at least two of the screening thresholds. However, if the guideline screening threshold for hazardous waste movements was increased to 500t the number would fall to 22 WPAs in total.

[3] Transported via rail depot.

In addition, analysis of data for 2020 and 2021 indicates a further 3 WPAs received waste in excess of the initial screening thresholds. The WPAs are listed in Appendix 1 and the sites in Appendix 2.

Step 2: Establishing if the Movements are of Strategic Significance.

The movements from East London that exceed the guideline screening thresholds listed in Table 2 may only be considered to be strategic following further analysis as to the significance each movement may have for the overall management of the particular waste stream arising within the Plan area (in this case East London).

This is assessed primarily in terms of:

1. The proportion of overall tonnage arising that the movement accounts for; and
2. the availability of alternative capacity within the Plan area catchment (this is represented by the distance from East London equivalent to the furthest site waste of that type travels to (this varies depending on the waste type being considered)).

For the purpose of this exercise, a value of over 20% i.e. a fifth of the total arising of each waste type has been taken as a threshold of significance. The outputs of this exercise are displayed in Tables 3, 4 and 5 below. The total tonnages shown should not be taken as actual arisings as there will be a degree of double counting in the values with the same waste being managed at a number of facilities before reaching its final fate.

Table 3: Principal Flows of HIC waste arising in East London
Source: WDI 2022
Highlighted entries are those that exceed 20% significance threshold

Waste Type	Total tonnes arising in East London	Destination WPA	Total Tonnes Received by WPA	Proportion of total waste arising from East London managed at WPA
Mixed municipal waste	407,788	Medway	16,405	4%
Process residues	124,285	Kent	26,021	21%
		Essex	17,313	14%
		Oxfordshire	9,631	8%
		Milton Keynes	7,313	6%
		LB Enfield	5,547	4%
RDF	59,690	Wakefield	49,630	83%
		Kent	7,380	12%
Wood	39,449	Thurrock	31,062	79%
		Rotherham	6,240	16%
Plastic and rubber	37,665	Lincolnshire	20,124	53%
		Derbyshire	5,753	15%
Glass	12,761	North Lincolnshire	9,851	77%
Fluff light fraction	9,589	Medway	8,675	90%

Table 3 shows the following:

- Non-inert waste travels significant distances for management from East London (as far as Wakefield (c186 miles and 3.5 hour drivetime) in some cases; and,
- the three dominant flows were process residues from East London waste management facilities at c66,000 tonnes, RDF at c57,000 tonnes and wood at c37,500 tonnes; and
- Of the non-inert waste exported, 6 movements in 2022 exceeded the 20% significance threshold.

Table 4: Principal Flows of Inert waste arising in East London

Source: WDI 2022

Highlighted entries are those that exceed 20%

Waste Type	Total tonnes arising in East London	Destination WPA	Total Tonnes Received by WPA	Proportion of total waste arising from East London managed at WPA
Soil and stones	534,904	Sheffield	193,677	36%
		Buckinghamshire	103,592	19%
		Essex	84,243	16%
		Oxfordshire	30,486	6%
		Thurrock	19,446	4%
Mixed construction and demolition wastes	98,468	LB Enfield	30,641	31%
		LB Greenwich	13,080	13%

Table 4 shows the following:

- Transport of inert waste out of East London to other parts of London and the Home Counties (inc Oxfordshire) is widespread with a significant flow to Sheffield via rail as a consequence of a railhead; and
- the two dominant flows were soils & stones at c431,500 tonnes, and mixed CDE at c43,500 tonnes; and,
- of the inert waste exported only 3 movements in 2022 exceeded the 20% significance threshold.

Table 5: Principal Flows of Hazardous waste arising in East London

Source: WDI 2022

Highlighted yellow entries are those that exceed 20%; amber entries exceed 20% but fall below 500t significance threshold

Waste Type	Total tonnes arising in East London	Destination WPA	Total Tonnes Received by WPA	Proportion of total waste arising from East London managed at WPA
Solid wastes from gas treatment[4]	3,383	Leeds	3,171	94%
		Suffolk	212	6%
Lead acid batteries	2,968	Staffordshire	1,650	56%
		Manchester	494	17%
		Walsall	295	10%
Soil and stones containing dangerous substances	2,270	Surrey	1,225	54%
		Sandwell	1,045	46%
Hazardous components	2,028	West Sussex	440	22%
ELV depollution residues	1,634	Medway	1,368	84%
		LB Bexley	210	13%
WEEE	1,538	Kent	1,246	81%
		Liverpool	217	14%
Infectious waste	625	Medway	482	77%
Other fuels	365	Kingston Upon Hull City	248	68%
		Tameside	112	31%
Construction materials containing asbestos	311	Sandwell	181	58%
Petrol	212	Tameside	212	100%
ELVs	183	Kent	112	61%
Oily water from oil/water separators	171	Hertfordshire	162	95%

Table 5 shows the following:

- the three dominant flows were solid wastes from gas treatment at c3,500 tonnes; lead acid batteries from vehicles at c2,500 tonnes and hazardous soils and stones (contaminated land) at c2,500 tonnes.
- Of the hazardous waste exported, 14 movements in 2022 exceeded the 20% significance threshold; and
- if 500 tonnes is used as the threshold, the number of movements that exceed the 20% significance threshold falling below 500 tonnes reduces to 6.

Given a large number of sites (8) received more than 100 tonnes but less than 500 tonnes of hazardous waste from East London, it is considered that these are not as significant as the

[4] There is no known source of this waste type in East London so this may be a data anomaly.

flows that exceed a 500-tonne threshold and account for 20% or more of the total quantity produced. Therefore, the next step excludes sites that received less than 500 tonnes.

Step 3: Identifying Specific Receiving Sites of Strategic Significance.

Detailed examination of the waste stream specific totals indicates that movements of waste from East London that ***might*** be classed as strategically significant i.e. met or exceeded the screening thresholds, were managed at the sites shown in the following tables. It is considered that where strategic flows went to a small number of sites the strategic dependency is greater than if it was distributed across a large number of sites. This suggests that flows to such sites would be of greater strategic importance to a Plan strategy. Conversely where inputs to individual sites fell below the screening threshold they have been excluded from further analysis.

A detailed analysis by principal waste streams has been conducted using 2022 data.

East London Non-Inert Waste Destinations

Table 6 shows the destination sites for East London non-inert waste which received more than 5,000 tonnes in 2022 where the tonnage received exceeded the 20% significance threshold.

Table 6: Destination sites for East London Non-Inert Waste exports > 5,000t and >20% by WPA in rank order by tonnes

Source: WDI 2022

WPA	Site Category	Site Name	Site Operator	Waste Type	Tonnage
Kent	Landfill	Shelford Landfill Site	Valencia Waste Management Ltd	Process residues	23,403
Wakefield	Incineration	Ferrybridge 2	Enfinium Ferrybridge 2 Ltd	RDF	42,828
		Ferrybridge 1	Enfinium Ferrybridge 1 Ltd		6,803
Thurrock		Tilbury Green Power, Port of Tilbury	Tilbury Green Power Ltd	Wood	26,045
	Treatment	Fort Road Biomass Processing Plant	Esken Renewables Ltd		5,017
Lincolnshire	Transfer	Hemswell Business Park	Clean Tech (UK) Ltd	Plastic and rubber	20,733
North Lincolnshire	Treatment	Groveport, Grove Wharf, Gunnes	M R F Glass Recycling Ltd	Glass	9,851
Medway		Berth 6, Chatham Dockyard	Street Fuel Ltd	Fluff light fraction	8,675

Table 6 shows the significant flows of non-inert waste from East London were managed at 8 facilities located in 6 WPAs.

East London Inert Waste Destinations

Table 4 shows the destination sites for inert waste from East London that received more than 10,000 tonnes in 2022 where the tonnage received exceeded the 20% significance threshold.

Table 7: Destination sites for East London Inert Waste exports >10,000t and >20% by WPA in rank order by tonnes

Source: WDI 2022

WPA	Site Category	Site Name	Site Operator	Waste Type	Tonnage
Sheffield	Transfer	Tinsley Sidings	DB Cargo (UK) Ltd	Soils and stones	193,677
LB Enfield		Pegamoid Site	J O' Doherty Haulage Ltd	Mixed construction and demolition wastes	23,195

Table 7 shows the significant flows of inert waste from East London were managed at 2 facilities located in 2 WPAs.

East London Hazardous Waste Destinations

Table 8 shows the destination sites for East London hazardous waste receiving more than 100 tonnes where the tonnage received exceeded the 20% significance threshold. Note that the WDI has been used to produce Table 8 given the HWI does not report site specific details, and due to the WDI tendency to under report arisings by specific WPA the data shown in Table 8 does not align with that displayed in Table 5 in all cases

Table 8: Destination sites for East London Hazardous Waste exports c100t or more in 2022 and >20% by WPA in rank order by tonnes

Source: WDI 2022

WPA	Site Category	Site Name	Site Operator	Waste Type	Tonnage
Leeds	Treatment	Aggregates Manufacturing Facility	O.C.O Technology Ltd	Solid wastes from gas treatment	3,171
Staffordshire		Unit 22, Watling St Business Park	Super R Ltd	Lead acid batteries	964
Surrey	Landfill	Patteson Court Landfill Site Redhill	Biffa Waste Services Ltd	Soil and stones containing dangerous substances	1,234
Sandwell	Treatment	ERQ - STC	Waste Recycling Group (Central) Ltd		1,221
Medway		Kingsnorth Oil TP	Slicker Recycling Ltd	ELV depollution residues	1,420
Kent		Gas Road, Sittingbourne	Sweeep Kuusakoski Ltd	WEEE	1,246

Table 8 shows the hazardous waste exported was primarily managed at 6 sites located in 6 WPAs.

4. Summary

A total of 16 sites were initially identified as receiving potentially strategically significant quantities of waste from East London in 2022. These were spread across a total of 12 WPA areas.

Further analysis suggests the Plan area has strategically significant reliance on facilities located in the 12 WPA areas identified in Table 9 below.

Table 9: WPA areas to which strategically significant tonnages of East London waste flowed in 2022 by principal waste type (in alphabetical order)

WPA	Non-inert	Inert	Hazardous
Kent	23,403	-	1,246
LB Enfield	-	23,195	-
Leeds	-	-	3,171
Lincolnshire	20,733	-	-
Medway	8,675	-	1,420
North Lincolnshire	9,851	-	
Sandwell	-	-	1,221
Sheffield	-	193,677[5]	
Staffordshire	-	-	964
Surrey	-	-	1,234
Thurrock	31,062	-	-
Wakefield	49,630[6]	-	-

These strategically significant flows have been mapped in Figure 2 & 3 below.

[5] Soil & stones received at Tinsley Sidings operated by DB Cargo. Believed to be transferred on to Thurcroft Landfill in Rotherham (reported as waste received from Sheffield).

[6] Refuse derived fuel managed at Enfinium EfW plant.

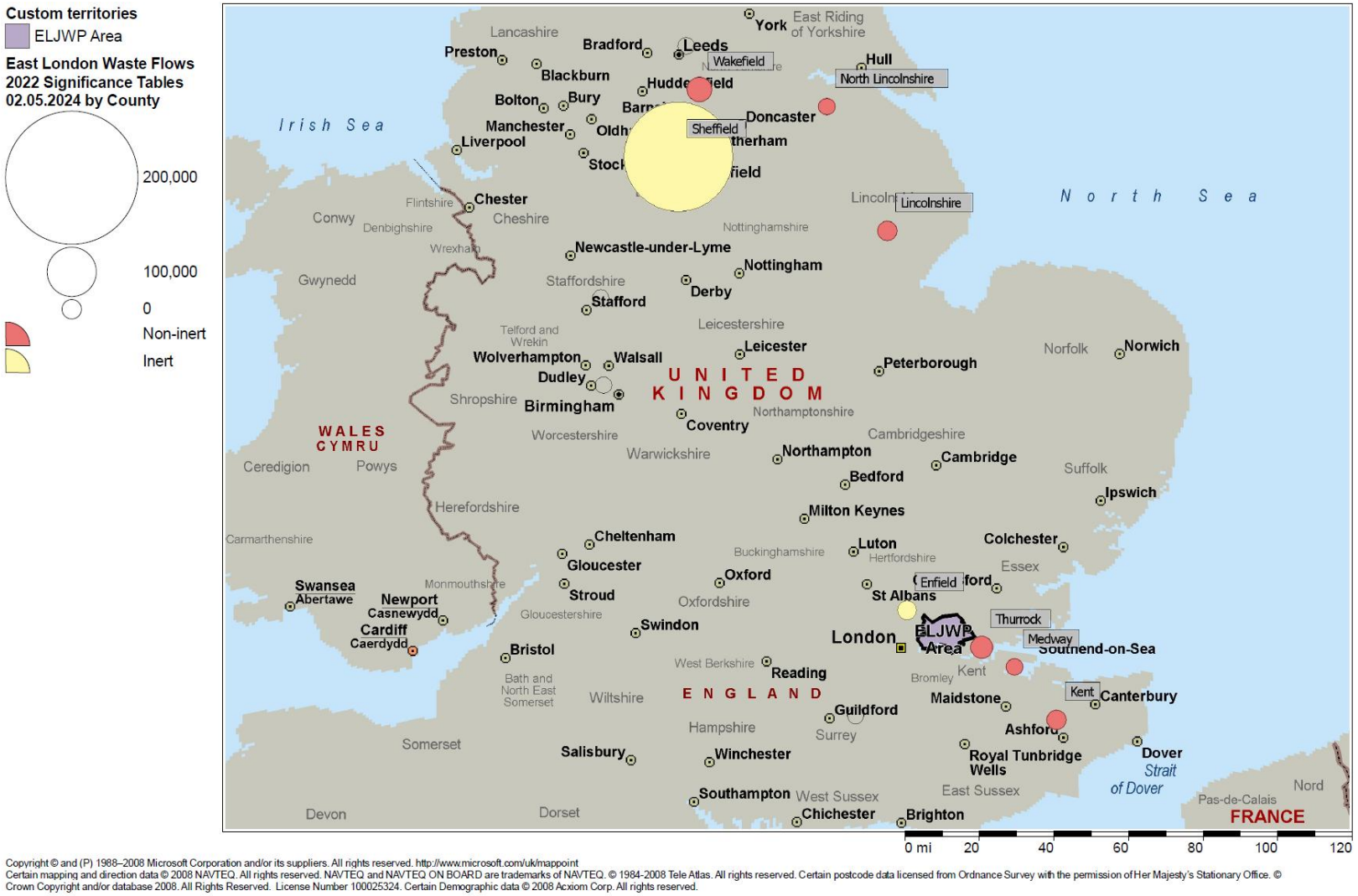

Figure 2: Significant Waste Flows from East London in 2022 by receiving WPA and principal waste type - England (tonnes)

5. Recommendation

It is recommended that 12 WPAs hosting facilities identified as having received waste movements from East London in quantities that may be regarded as strategic be contacted to confirm the following:

1. Whether the facilities identified as receiving waste are still operational given the dataset is for 2022.
2. Any planning reasons that might mean the acceptance of wastes from East London cannot continue, such as consent conditions and end dates; or if the site has been earmarked in local plans for redevelopment. In addition, where no planning reason is given confirmation that the site is safeguarded for the management of that type of waste should be sought.
3. Whether the host WPA has any specific policies in its local plan concerning providing for the management of waste that arises outside their respective Plan area.
4. Whether any Statements of Common Ground have been entered into, or whether there has been correspondence, with other source WPAs concerning continued availability of capacity at the facility in question, that might compromise continued access for East London's waste.

Furthermore, it is recommended that all WPAs receiving waste from East London in quantities which exceed the initial screening thresholds be given the opportunity to comment when the emerging ELJWP is published for consultation. This will provide an opportunity for WPAs to set out their position on waste movements from East London.

The outcomes of the above engagement should be documented, and agreement sought with WPAs hosting facilities expected to take strategically significant quantities of waste for which ongoing access is to be relied upon during the Plan period as appropriate. While in most cases it is envisaged that agreement will be achieved via an exchange of correspondence, host WPAs will be invited to consider whether a Statement of Common Ground is necessary.

Appendix 1: Destination WPAs of Hazardous, Non-inert and Inert Waste exports from East London applying initial screening thresholds 2020-2022

Highlighted cells: Green – WPAs receiving waste from East London above screening thresholds
Yellow- additional WPAs receiving waste from East London above screening thresholds in 2020 and/or 2021
Source: WDI 2020, 2021 & 2022

Facility WPA	Non-Inert			Inert			Hazardous		
	2020	2021	2022	2020	2021	2022	2020	2021	2022
Sheffield	<5,000	<5,000	<5,000	0	0	193,677	0	<100	0
Essex	47,176	48,796	17,609	152,435	124,503	93,257	206	287	279
Buckinghamshire	<5,000	<5,000	<5,000	198,681	11,532	103,592	<100	<100	0
Thurrock	99,982	183,694	40,166	148,807	203,339	50,856	<100	<100	<100
Wakefield	20,154	41,711	49,633	0	0	0	0	0	0
Oxfordshire	<5,000	13,924	11,227	<10,000	98,799	30,486	0	0	0
Enfield	12,284	<5,000	7,288	20,708	28,845	32,003	0	0	0
Kent	61,312	63,994	36,092	<10,000	<10,000	<10,000	1,478	1,467	1,546
Medway	13,375	30,250	29,556	0	<10,000	<10,000	1,187	1,445	1,925
Greenwich	<5,000	12,599	<5,000	43,971	50,006	29,301	<100	0	0
Lincolnshire	13,571	23,505	25,092	0	0	0	0	0	0
Waltham Forest	<5,000	<5,000	<5,000	11,585	10,422	10,051	<100	<100	<100
North Lincolnshire	<5,000	8,718	9,851	0	0	0	<100	0	0
Milton Keynes	<5,000	34,412	7,313	0	0	<10,000	0	0	0
Liverpool	<5,000	7,129	6,159	0	0	<10,000	131	290	254
Rotherham	11,927	16,998	6,240	<10,000	<10,000	<10,000	0	0	0
Derbyshire	<5,000	<5,000	5,831	<10,000	0	<10,000	100	<100	<100
Leeds	<5,000	<5,000	<5,000	0	0	0	<100	780	3,214
Staffordshire	<5,000	<5,000	<5,000	38,407	<10,000	<10,000	119	<100	1,743
Sandwell	<5,000	<5,000	<5,000	0	0	<10,000	948	1,259	1,260

Surrey	<5,000	<5,000	0	<10,000	<10,000	0	<100	<100	1,234
Manchester	<5,000	<5,000	<5,000	0	0	0	<100	565	500
West Sussex	<5,000	<5,000	<5,000	<10,000	0	<10,000	0	0	440
Tameside	<5,000	0	0	0	0	0	285	456	337
Walsall	<5,000	<5,000	<5,000	<10,000	0	<10,000	1,504	1,893	323
Hertfordshire	6,983	<5,000	<5,000	<10,000	<10,000	<10,000	210	213	278
Kingston Upon Hull City	0	<5,000	<5,000	0	0	0	0	0	248
Suffolk	<5,000	<5,000	<5,000	0	0	0	1,848	224	247
Bexley	0	0	0	0	0	0	<100	187	210
Salford	<5,000	<5,000	<5,000	<10,000	0	0	133	101	127
Stoke-on-Trent City	<5,000	<5,000	<5,000	<10,000	<10,000	<10,000	253	138	124
Bedford	<5,000	<5,000	<5,000	0	0	0	139	<100	111
East Sussex	12,777	8,369	<5,000	19,287	14,000	0	0	0	0
Lewisham	102,820	17,503	<5,000	0	<10,000	<10,000	0	0	0
Northamptonshire	<5,000	<5,000	<5,000	<10,000	<10,000	<10,000	3,382	<100	0

Appendix 2: Facilities that received tonnages of waste from East London above initial screening thresholds pre-2022

Year	Facility WPA	Site Category	Site Name	Operator	Principal Waste Type	Total
Non-inert						
2021	East Sussex	MRS	East Quay, Newhaven Port	Ripley Property Holdings Ltd	Ferrous metal	8,330
Inert						
2021	East Sussex	Incineration	Robertsbridge Gypsum Works	Saint-Gobain Construction Products UK Ltd	Gypsum CDE waste	12,043
Hazardous						
2020	Northamptonshire	Transfer	East Northants RM Facility	Augean South Ltd	Hazardous Soils and Stones	3,456

East London Joint Waste Plan (ELJWP),
Regulation 19 Submission Draft, (February 2025):
Strategic Flood Risk Assessment (SFRA) Position Statement.

1. Policy and guidance on Flood Risk Assessments

1.1. Local Planning Authorities are required to carry out a Strategic Flood Risk Assessment (SFRA) to ensure that flood risk and any flood mitigation measures are a consideration when making planning decisions about the design and location of development in their area. The SFRA assesses the risk of flooding from all sources, the cumulative impact that development or changes in land use would have on the risk of flooding, and the effect of climate change on flood risk. The SFRA also identifies opportunities to reduce the causes and impacts of flooding as well as any land likely to be needed for flood risk management features and structures.

1.2. The National Planning Policy Framework (NPPF) 2024 states that Development Plans must include policies that set out a strategy for the pattern, scale and design quality of places which must be informed by a Strategic Flood Risk Assessment (SFRA) and make sufficient provision for flood risk and coastal change management, among other land uses. The assessment should *'…consider cumulative impacts affecting local areas susceptible to flooding and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage board...'*

1.3. The NPPF at paragraph 172 states that:

'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. They should do this, and manage any residual risk, by:

a) applying the sequential test and then, if necessary, the exception test as set out below;
b) safeguarding land from development that is required, or likely to be required, for current or future flood management;
c) using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management); and
d) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.'

1.4. Annex 3 'Flood Risk Vulnerability Classification' in the NPPF, states the following for waste facilities

• **Installations requiring hazardous substances consent** (that require coastal or waterside locations or need to be located in other high flood risk areas, classified as 'Essential Infrastructure).	**Highly vulnerable.**

- **Landfill and sites used for waste management facilities for hazardous waste.** **More vulnerable.**
- **Waste treatment** (except landfill and hazardous waste facilities). **Less vulnerable.**

1.5. Most existing waste facilities in the ELJWP are waste treatment facilities that fall within the less vulnerable category of Annex 3 in terms of flood risk vulnerability.

1.6. All waste operators must obtain an environmental permit from the Environment Agency (EA) who provide guidance on how environmental permit holders must consider the risks of a changing climate to and from their business, in order to receive a permit.

1.7. Waste operators are required to complete a climate change adaptation risk assessment as part of their application for an environmental permit and must show mitigation measures against a number of impacts within the adaptation risk assessment. Depending on the type of waste being treated these impacts from flooding can include:

- potential for increased site surface water and flooding
- increased site surface water and flash flooding - storage lagoons may require more capacity or careful management. The capacity of surface water discharge points may become overwhelmed
- potential for increased site surface water and localised site flooding
- potential for increased incidents involving water-reactive wastes
- potential for drainage systems and interceptors to be overwhelmed
- potential for contaminated floodwater or surface water run-off from site causing pollution
- localised issues with surface water discharge leading to backing up and worsening site flooding
- sea level rise, where a site is located near the coast
- increased potential for fugitive odour emissions due to damaged building structures
- unstable process conditions for compost sites causing temperature fluctuations and increased odours
- land bank availability for spreading sludge, compost and digestate may experience extreme difficulty due to prolonged wet weather
- leachate storage risk of over-topping
- access or egress from site could be affected, impacting

1.8. Waste sites in East London holding waste permits would have been required to have considered the above impacts, among other environmental impacts, within their climate change adaptation risk assessments when applying for an environmental permit from the EA.

2. The East London Joint Waste Plan (ELJWP), Regulation. 19 Submission Draft

2.1. The East London Joint Waste Plan (ELJWP) is an update to the 'Joint Waste Development Plan for the East London Waste Authority Boroughs' adopted in 2012. Regulation. 18 consultation for the ELJWP was undertaken between July and September 2024, and the East London Joint Waste Plan (ELJWP) Regulation. 19 Submission Draft has been prepared for the Regulation 19 consultation stage.

2.2. The most recent waste management capacity assessment demonstrates that, other than for landfill, East London has a surplus of capacity than is necessary for the management of current and forecast future waste arisings. Therefore, there is no need for development of additional capacity to meet the London Plan apportionments within the Plan area. The ELJWP proposes the safeguarding of existing sites, except where there are policy, legal or regulatory reasons to remove them (see summary of the ELJWP approach to safeguarding in appendix B below), and will allow additional waste development **only in exceptional circumstances**. **On this basis no land is proposed to be allocated specifically for the development of additional waste management capacity**. This is a significant change to the adopted East London Waste Plan that currently identifies land for new waste management facilities.

2.3. Taking into account that the focus of the ELJWP will be on existing sites **and no further development of waste facilities is proposed on new site locations**, a Strategic Flood Risk Assessment (SFRA) for the sites within the Plan has not been prepared. As no new locations for new waste facilities have been identified there are no potential development sites to assess for flood risk - as stated in Planning Practice Guidance paragraph: 013 Reference ID: 7-013-20220825, *'…Minerals and waste planning authorities need to take account of flood risk* ***when allocating land for development...****'*

2.4. Policies within the East London Joint Waste Plan (ELJWP) Regulation. 19 Submission Draft include criteria developed to mitigate against a number of negative environmental outcomes, including flood risk, and have been assessed within the Integrated Impact Assessment (IIA) as part of the Sustainability Appraisal for the Plan. IIA Objective 10: '*To manage and reduce flood risk from all sources within East London'* is given a positive effect overall as most policies in the ELJWP have a negligible, a minor positive, or a significant positive effect on this objective.

2.5. These effects recognise the appropriate efforts of the ELJWP to reduce flood risk through flood resilience in design as well as promoting reductions in the extent of impermeable surfaces on waste sites across East London. On balance, given the scale and density of London, and the relatively small footprint of East London's existing waste management facilities, the ELJWP is considered to have a minor positive effect on this objective within the IIA.

2.6. The ELJWP boroughs also have policies within their local plans that aim to minimise the risk to people and property from flooding. They include[1]:

- Barking & Dagenham, Policy DMSI 6: Flood risk and defences
- Havering, Policy 32: Flood Management
- Newham, Policy SC3: Flood Risk and Drainage, and emerging policy CE7 Managing Flood Risk
- Redbridge, Policy LP21: Water and Flooding

2.7. In response to the Regulation 18 consultation for the ELJWP the Environment Agency stated with regard to the Sustainability Appraisal/IIA, '*We are pleased to see that the document has identified that*

[1]Links to East London Borough's Local Plan Flood Risk Policies:
Barking & Dagenham - B&D_LocalPlan_A4_SEP24_digital.pdf
Havering - Local Plan 2016-2031 Adopted 2021
Newham- newham-local-plan-2018-pdf- and local-plan-2024-web-part-1-
Redbridge - Redbridge Local Plan 2015-2030

the ELJWP provides an opportunity to help adapt to the unavoidable effects of climate change by locating development in locations with no or low flood risk and is in line with the requirements of the PPG and NPPF.

2.8. *'…We are pleased that our previous comments provided for the Scoping Report for the East London Waste Plan Integrated Impact Assessment on 16 April 2024 have been considered. We agree and support the commitment to ensure that specific sites and policies will mitigate against flood risk in line with National Planning requirements, the London Plan, and the Thames Estuary 2100 Plan'*.

2.9. Available Flood Risk Information for Applicants

2.10. The ELJWP does not propose the development of new waste facilities and does not identify new site locations for that purpose. However, proposals for the development of new waste sites would be required to meet design criteria set out in Policy JWP4: 'Design of Waste Management and Wastewater Treatment Facilities', which states that new development should be designed to include *'...climate adaptation measures such as sustainable drainage systems, flood resistance and resilience, water storage and recycling, open space design, green roofs and drought-resistant landscaping…'*

2.11. To support applicants with their proposals Strategic Flood Risk Assessments have been prepared by the Local Planning Authorities for each borough as part of their Local Plan evidence base. Flood risk information relevant to existing waste facility sites is available in these assessments . The Strategic Flood Risk Assessments (SFRA) for the adopted East London Local Plans are listed in the appendix A below.

2.12. The Environment Agency (EA) routinely updates their flood risk modelling and mapping, and Local Planning Authorities update their flood risk maps and spatial data accordingly. The EA is due to publish updated flood risk maps on 25th March 2025 as part of their National Flood Risk Assessment (NaFRA2), which now accounts for climate change. It will also separately provide surface water flood risk information. It is expected that there may be some changes to flood zones and that the new EA flood maps will become the best available flood risk data for East London.

2.13. The policies within the ELJWP have been drafted to ensure that the re-modelling of the flood zones are suitably addressed to protect new development proposals. Applicants are required to make use of the latest available flood risk information and engage with the EA at the earliest opportunity to consider flood risk implications for any proposals

2.14. The timing of the release of the EA data should not interrupt the agreed timeline for the Regulation 19 consultation process but will allow East London boroughs to consider the changes, their implications and take the appropriate course of action required.

APPENDIX A

East London Borough's Strategic Flood Risk Assessments prepared for adopted Local Plans

London Borough of Barking & Dagenham Strategic Flood Risk Assessment:

Document ID	Document Name and Link to View / Download Document	Date
F1	Local Flood Risk Management Strategy	2017
F2	Strategic Flood Risk Assessment (SFRA) Level 1	2017
F3	Strategic Flood Risk Assessment (SFRA) Level 2	2017
F4	SFRA: Summary of the Local Flood Risk Management Strategy	2017
F5	SFRA: Annex A Action Plan	2017
F6	SFRA: Annex B Map of Rivers	2017
F7	SFRA: Annex C Example of Investigation Priority	2017
F8	SFRA Level 2: Appendix A	2017
F9	SFRA Level 2: Appendix B	2017
F10	SFRA Level 2: Appendix C	2017
F11	SFRA Level 2: Appendix D	2017
F12	SFRA Level 2: Appendix E	2017
F13	SFRA Level 2 Appendix F	2017
F14	SFRA Level 2 Appendix G	2017
F15	SFRA Level 2 Appendix H	2017
F16	SFRA Level 2: Appendix I	2017
F17	SFRA Level 2: Appendix J	2017
F18	SFRA Level 2: Appendix K	2017
F19	SFRA Level 2: Appendix L	2017
F20	SFRA Level 2: Appendix M	2017
F21	SFRA Level 2; Appendix N	2017
F22	SFRA Level 2: Appendix O	2017
F23	SFRA Level 2: Appendix PA	2017
F24	SFRA Level 2: Appendix PB	2017

London Borough of Newham Strategic Flood Risk Assessment:

London Borough of Newham Strategic Flood Risk Assessment (SFRA) Part 1 (PDF)

London Borough of Newham Strategic Flood Risk Assessment (SFRA) Part 2 (PDF)

London Borough of Newham Strategic Flood Risk Assessment (SFRA) Part 3 (PDF)

London Borough of Newham Level 1 Strategic Flood Risk Assessment (SFRA)

London Borough of Newham Level 2 Strategic Flood Risk Assessment (SFRA)

All parts available at

https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh/4**London Borough of Havering Strategic Flood Risk Assessment:**

Strategic Flood Risk Assessment – Level 1

Strategic Flood Risk Assessment – Level 1 Annex A Growth Areas Review

Strategic Flood Risk Assessment – Level 1 Figures 101-105

Strategic Flood Risk Assessment – Level 1 Figures 106-107

Strategic Flood Risk Assessment – Level 1 Figures 108-114

Strategic Flood Risk Assessment – Level 1 Figures A01-A07

Strategic Flood Risk Assessment – Level 1 Figures A08-A13

Strategic Flood Risk Assessment – Level 1 Figures A14a-f

London Borough of Redbridge Strategic Flood Risk Assessment:

https://www.redbridge.gov.uk/media/10514/lbr-2611-strategic-flood-risk-assessment-level-1.pdf

https://www.redbridge.gov.uk/media/10515/lbr-2612-strategic-flood-risk-assessment-level-2.pdf

https://www.redbridge.gov.uk/media/10516/lbr-2613-strategic-flood-risk-assessment-level-2-addendum.pdf

APPENDIX B

East London Joint Waste Plan (ELJWP) policy approach on safeguarding[2]

1.1. The purpose of safeguarding waste management sites is to maintain waste management capacity that contributes to meeting the objectives and targets for waste management set out in the Plan.

1.2. The London Plan states that safeguarded sites includes those that benefit from permanent planning, and sites holding an Environmental Permit permitting a waste management activity. Under the London Plan definition of an existing waste use, sites which do not have planning permission specifically for a waste use but are subject to an Environmental Permit would be safeguarded. Sites safeguarded by virtue of an Environmental Permit alone would lose their safeguarded status if/when the Permit ceases to exist.

1.3. Since 2012 the grant of an Environmental Permit by the Environment Agency can occur independently of the land-use planning system. This means, an Environmental Permit may be granted for an activity that is unlawful under the planning system. Therefore, the ELJWP does not safeguard such sites, although they remain safeguarded under the London Plan until the relevant permit ceases to exist, or until such time as the London Plan definition changes.

1.4. The London Plan definition does not include sites with a waste use that is lawful by virtue of time and is therefore immune from enforcement action. The lawful status of such sites can be confirmed by issue of a Certificate of Lawful Existing Use or Development (CLEUD) – the ELJWP safeguards such sites along with sites with planning permission for a waste use.

1.5. In the case of sites for which a CLEUD has not been granted, evidence of the activity taking place continuously for 10 years or more, for example an Environmental Permit covering the same area and activity issued over 10 years ago, has been taken to establish a waste use deemed to be lawful over time.

1.6. In addition, in order to avoid the safeguarding of sites that make a minor contribution to capacity in East London that may inhibit redevelopment schemes, sites that consistently manage less than 500 tonnes a year and were not providing specialist waste management capacity have been excluded from safeguarding.

1.7. Some sites may have a time limited planning permission for a waste management use and are only safeguarded by the ELJWP up to the date on which the permission expires. This is regardless of the status of any related Environmental Permit for the site.

[2] Refer to Policy JWP2: Safeguarding and Provision of Waste Capacity, and supporting text at page 63 of the East Lonon Joint waste Plan (EWLJWP) Regulation 19 Submission Plan (link to be added).

1.8. In cases where land on which the waste use is lawful under the land use planning system and land covered by an Environmental Permit don't align, the area to which the lawful use under planning applies is taken as that to be safeguarded.

1.9. Finally, where a site is subject to planning enforcement action against the continued use, safeguarding will not take effect/is held in abeyance until the matter has been resolved regardless of permitted status.

1.10. A small number of existing waste sites have not been safeguarded on the basis that their re-development will achieve wider planning objectives and will not significantly impact the achievement of the London Plan strategic objective of net self-sufficiency and the Plan's objectives for the management of waste.

1.11. Sites that are not safeguarded by the ELJWP but are subject to Environmental Permits are still safeguarded through London Plan Policy SI9. The policy applies to sites proposed for redevelopment until such time that the Environmental Permit is surrendered/ceases to exist. Any relevant changes to the London Plan approach to safeguarding would then apply to sites not expressly safeguarded by the ELJWP.

LOCAL DEVELOPMENT SCHEME (LDS)

2025-2027

1. Introduction

What is the Local Development Scheme?

1.1 Local planning authorities are required to prepare and maintain a Local Development Scheme (LDS) under Section 15 of the Planning and Compulsory Purchase Act 2004, as amended by the Localism Act 2011 and the Housing and Planning Act 2016. A Local Development Scheme sets out all the planning policy documents to be produced by the authority over a 3-year period.

1.2 This LDS sets out:

- The planning policy documents that Havering have already adopted;
- The planning policy documents that Havering intend to produce;
- The subject matter and geographical area of each of the proposed documents;
- The timetable for the preparation of the documents over the next three years; and
- The opportunities for the local community and stakeholders to be involved in preparing planning policies by setting out an indicative timetable for the preparation of each document.

1.3 The Government requires local planning authorities to produce an updated LDS by 6 March 2025. The updated LDS is expected to include specific dates for consultation on the Local Plan and its submission.

1.4 Progress on the implementation of the LDS will be reported annually in the Authorities Monitoring Report.

2. Planning Policy Context

National Planning Policy

2.1 National Planning Policy Framework (NPPF) sets the national policy context for preparation of local plans. Local plans must be consistent with national policy and should enable the delivery of sustainable development in accordance with the policies in the framework.

2.2 National Planning Policy for Waste was published in October 2014 and National Planning Policy for Traveller Sites was updated in December 2024.

Regional Planning Policy

2.3 The Greater London Authority Act 1999 requires the Mayor of London to produce a spatial development strategy – which has become known as ‘the London Plan’ - and keep it under review. London borough Local Development Documents

(such as local plans) must be 'in general conformity' with the London Plan. A new London Plan was published in 2021 and this forms part of Havering's Development Plan, against which planning applications must be determined.

2.4 The Mayor of London has also published London Plan Guidance (LPG) and Supplementary Planning Guidance (SPG) on a range of topics. These documents provide additional guidance on the implementation of London Plan policies.

3. Havering's adopted Planning Policy Documents

Havering Local Plan 2016-2031 and Policies Map

3.1 The Havering Local Plan 2016-2031 was adopted in November 2021. The Local Plan sets the vision and objectives for the spatial development of the borough.

3.2 The Local Plan replaced the Core Strategy and Development Management Policies Development Plan Document (DPD) and the policies within the Romford Area Action Plan.

Site Specific Allocations

3.3 The Local Plan 2016-2031 does not include Site Specific Allocations and for this reason the Site Specific Allocations DPD 2008 and site allocations in the Romford Area Action Plan (2008) have been retained until they are replaced.

Joint East London Waste Plan

3.4 The Joint East London Waste Plan was adopted in 2012 by the four East London Waste Authorities: Havering, Newham, Barking and Dagenham, and Redbridge. The Waste Plan expired in 2021 and the four Waste Authorities are working collaboratively to produce a new East London Joint Waste Plan (ELJWP). The emerging ELJWP will replace the out-of-date 2012 ELJWP. The Waste Plan sets out a planning strategy for sustainable waste management enabling the adequate provision of waste management facilities) in appropriate locations for municipal wastes, and commercial and industrial waste, construction, excavation and demolition, and hazardous wastes.

Supplementary Planning Documents

3.5 Supplementary Planning Documents provide additional guidance on the implementation of policies in the Development Plan.

3.6 On adoption of the Local Plan 2016-2031 in November 2021, a number of previous SPDs were retained to support the new Local Plan, (refer to table 1 for further detail).

The following SPDs remain in place:

- Residential Extensions and Alterations SPD 2011
- Hall Lane Policy Area SPD 2009
- Emerson Park Policy Area SPD 2009
- Heritage SPD 2011 (including the Local List of Heritage Assets)

*The Romford Master Plan is going to Cabinet in March for approval to adopt. We will provide a factual update if it is adopted.

Other Planning Documents

3.7 There are a number of other planning documents that the Council prepares:

- *Statement of Community Involvement 2021* The purpose of the SCI is to set out the preferred options and legal requirements for involving the community and other stakeholders in the preparation of planning policies and the determination of planning applications.

- *Authority Monitoring Report* The Localism Act 2011 requires local authorities to prepare and publish an Authority Monitoring Report containing information on the implementation of the Local Development Scheme and the extent to which the policies set out in the Local Plan are being achieved. The AMR is published annually.

4. *Future Commitments*

4.1 The Council's commitments are set out in Tables 1 and 2 below. Table 1 sets out the existing documents and any plans for them to be reviewed and updated. Table 2 sets out the new documents that the Council intends to produce.

Table 1 – Existing planning policy documents and programme for their review

Existing document and date of adoption	Description	Geographical Coverage	Timescale for review
Local Plan 2016-2031 Adopted 2021 and Policies Map 2021	Sets out the Council's vision, objectives and spatial strategy for the future development of the Borough The Policies Map provides a spatial representation of the policies in the Local Plan	Borough wide	• Regulation 18 consultation – Autumn 2025 • Regulation 19 consultation – Summer 2026 • Submission to the Secretary of State - Winter 2026 The timeframe for adoption of the Local Plan is dependent on the Examination Process and is outside the control of the Council.
Site Specific Allocations Development Plan Document 2008	Sets out the specific allocations for individual sites across the borough except for sites in Romford Town Centre which are set out in the Romford Area Action Plan and sites for Waste management which are identified in the Joint Waste Development Plan Document	Borough wide	To be revoked upon adoption of the Local Plan update, which will include updated site specific allocations
Site Specific Allocations in the Romford Area Action Plan 2008	Sets out the specific allocations for individual sites within Romford	Romford	To be revoked upon adoption of the Local Plan update, which will include updated site specific allocations for Romford
East London Joint Waste Plan (ELJWP)	Sets out a planning strategy for sustainable waste management enabling the adequate provision of	Havering, Barking and Dagenham,	Regulation 18 consultation on the new East London Joint Waste Plan (ELJWP) was undertaken in August 2024. Regulation 19

	waste management facilities in appropriate locations.	Redbridge, and Newham Local Authority Areas	consultation is expected to take place in mid 2025. Submission for examination is expected late 2025 / early 2026. The adoption of the Waste Plan is dependent on the Examination Process and is outside the control of the Council.
Heritage SPD 2011 including Local List of Heritage Assets	Seeks to ensure appropriate identification, protection, enhancement and management of Havering's heritage assets by providing additional guidance on the implementation of policies relating to heritage	Borough wide	The Local List of Heritage Assets was reviewed and underwent public consultation in summer 2023. The updated list was published in July 2024. There are no current plans to update the Heritage SPD 2011 ahead of the adoption of the new Local Plan.
Residential extensions and alterations SPD 2011	Provides design guidance to ensure householder development is sympathetic to the existing property and the street scene and does not detrimentally affect the living conditions of neighbouring properties	Borough wide	There are no current plans to update the Residential extensions and alterations SPD 2011 ahead of the adoption of the new Local Plan.
Hall Lane Policy Area 2009	Provides guidance on maintaining and enhancing the special character of the Hall Lane Policy Area	Hall Lane Policy Area	Hall Lane Policy Area was considered as part of the Character Study and recommendations made to obtain further evidence on the operation of the Policy Area. The Character Study is part of the evidence base for the new Local Plan
Emerson Park Policy Area 2009	Provides guidance on maintaining and enhancing the special character of the Emerson Park Policy Area.	Emerson Park Policy Area	Emerson Park Policy Area was considered as part of the Character Study and recommendations made to obtain further evidence on the operation of the Policy Area. The Character Study is part of the evidence base for the new Local Plan.

Statement of Community Involvement 2021	Sets out how the community and other stakeholders will be involved in the preparation of future planning policy documents and in decisions regarding planning applications	Borough-wide	The SCI remains up to date and will be reviewed in 2026.
Conservation Area Appraisals and Management Plans for each of the designated conservation areas	These documents identify the special interest of each conservation area and provide a clear basis for assessing how far planning proposals preserve or enhance their character or appearance.	Individual Conservation Areas across the borough	The Council is committed to a review of all Conservation Area Appraisals and Management Plans. Consultation will take place on updated Conservation Area Appraisals for Romford, Rainham and Gidea Park in 2025. Consultation on the remaining Conservation Area Appraisals will take place in 2026 / 2027.

Table 2 – Programme for the preparation of new planning policy documents

Policy Document	Description	Geographical coverage	Key Milestones
Romford Master Plan Supplementary Planning Document	The SPD is a strategic plan aimed at guiding future development within the area. The Masterplan aims to improve Romford's unique character and history, creating a vibrant, mixed-use town centre.	Romford	Adoption anticipated March 2025.
Planning obligations Supplementary Planning Document	This SPD will set out the council's approach to funding and delivering the infrastructure needed to support sustainable development and good growth across the borough through the use of planning obligations (S106). The document will explain the Council's approach to the Community Infrastructure Levy (CIL) and the interaction between CIL and S106. It will also detail the council's approach to securing non-financial obligations such as affordable housing or other restrictions over the use of the land. In addition, it will include the process and fees for monitoring S106 clauses.	Borough Wide	Consultation – 2025 Adoption – early 2026
Design guide	The NPPF 2021 states that all local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences. Design guides and codes provide a local framework	The NPPF states that guides and codes can be prepared at an area-wide, neighbourhood or site specific scale.	The Council is currently considering the best way of implementing the new requirement for design guidance and is following the pilot schemes currently underway elsewhere in the Country.

	for creating beautiful and distinctive places with a consistent and high quality standard of design. They should be produced as part of a Plan or as SPD		As part of the evidence base for this work and for the Local Plan in general, a Character Study was commissioned and was published in 2024. The Character Study provides high level design guidance and will be the basis for any future design guidance. Whilst the NPPF states the need for Design Code/Guide, it also states that the National Design Guide and the National Model Design Code 'should be used to guide decisions on applications in the absence of locally produced design guides or design code'

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