



The Planning
Inspectorate

Report to the East London Waste Authority Boroughs

by Terrence Kemmann-Lane JP DipTP FRTPI MCMI

an Inspector appointed by the Secretary of State for Communities and Local Government

Date: 14th November 2011

PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 20

REPORT ON THE EXAMINATION INTO JOINT WASTE DEVELOPMENT PLAN DOCUMENT

Document submitted for examination on 30 November 2010

Examination hearings held between 5 and 7 April 2011

File Ref: PINS/G5750/429/7

Non-Technical Summary

i. This report concludes that, with the recommendations that I make, the East London Waste Authority Boroughs' Joint Waste Development Plan Document provides an appropriate basis for waste planning in the Boroughs to 2021. The Councils have sufficient evidence to support the strategy and the approach taken to site identification and can show that it has a reasonable chance of being delivered.

ii. There are a number of matters of soundness which it has been necessary to address, and which are the subject of recommendations by me. As submitted the Development Plan Document (DPD) did not meet all the requirements set out in legislation: there was no Proposals Map and no Schedule of Superseded Policies. In addition, the period covered by the policies and proposals of the DPD did not meet the requirements of national guidance. I drew these matters to the attention of the Joint Boroughs and they responded with proposed changes which meet the requirements and which are therefore subject to recommendations. As a result there are ordnance survey based maps showing allocated sites, together with a location map covering the area of the four boroughs; a Schedule of Superseded Policies has been prepared; and the plan period has been extended to cover the required "at least 10 years". My recommendations in respect of these matters are set out in Appendix A.

iii. The changes which are the subject of my recommendations, together with the minor changes which I mention below, have all been the subject of advertisement and public consultation. The Boroughs have also assessed whether the changes affect the outcome of the Sustainability Appraisal (SA): this work satisfies me that the SA remains an adequate basis underpinning the plan. The GLA has re-confirmed, in a revised statement dated 21 September, that the plan is in general conformity with the London Plan July 2011.

iv. There were a number of shortcomings in the text of the document, including typographical errors, a lack of clarity in some areas where the text might be misleading, where it was insufficient to convey the full meaning, contained minor factual errors or could usefully be augmented by additional text. For the most part the Boroughs recognised these shortcomings at an early stage, either by their own post publication editing procedures or from responses made to advertisement of the document or proposed changes to it or from suggestions made by participants during the hearings. In addition, during the examination I have raised matters which, while not going to the question of soundness, have caused the Boroughs to determine that proposed minor changes would be beneficial. As a result, Appendix B to this report contains a schedule of all the Minor Changes proposed by the Joint Boroughs. For clarity I endorse these changes, but since they do not alter the thrust of the Boroughs' overall strategy, they require no formal recommendation from me.

Introduction

1. This report contains my assessment of the East London Waste Authority Boroughs Joint Waste Development Plan Document (DPD) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004. It considers whether the DPD is compliant in legal terms and whether it is sound. Planning Policy Statement (PPS) 12 (paragraphs 4.51-4.52) makes clear that to be sound, a DPD should be justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the Joint Boroughs have submitted what they consider to be a sound plan. The basis for my examination is the submitted draft Joint Waste Development Plan Document (November 2010) which resulted from changes to the document published for consultation in August 2009.
3. As a result of my reading of the DPD, my consideration of the written responses to the consultations, and the discussions at the hearings, I have identified three matters which go to the soundness of the DPD relating to the lack of a Proposals Map and a Schedule of Superseded Policies and the length of the plan period. These are dealt with in my assessment of soundness below.
4. There are a number of shortcomings in the text of the document, including typographical errors, a lack of clarity in some areas where the text might be misleading, where it was insufficient to convey the full meaning, contained minor factual errors or could usefully be augmented by additional text. For the most part the Boroughs recognised these shortcomings at an early stage, either by their own post publication editing procedures or from responses made to advertisement of the document or proposed changes to it or from suggestions made by participants during the hearings. In addition, during the examination I have raised matters which, while not going to soundness, have caused the Boroughs to determine that minor changes would be beneficial.
5. Some of the changes put forward by the Boroughs are factual updates, corrections of minor errors or other minor amendments in the interests of clarity. As these changes do not relate to soundness they are generally not referred to in this report although I endorse the Boroughs' view that they improve the plan. None of these changes materially alter the substance of the plan and its policies, or undermine the sustainability appraisal and participatory processes undertaken. These are shown the Appendix B. I am content for the Councils to make any additional minor changes to page, figure or paragraph numbering and to correct any spelling errors prior to adoption.

Assessment of Soundness

Preamble

6. There is a compliance issue in relation to Regulation 13(4) which requires that, where a document includes a site allocations policy, it must include a submission proposals map showing changes which would result to the adopted proposals map if the DPD is adopted. The submitted DPD is not accompanied by a submission proposals map. I have raised this with the Boroughs. They have outlined a considered approach to producing consolidate proposals maps, which seeks to balance the provision of sufficient information with the very

real consideration of minimising the cost to the public purse. There are clearly complexities raised by virtue of four Councils working together and I recognise the need to be pragmatic. The Councils have mitigated my concern by the provision of Ordnance Survey map extracts showing the allocated sites, together with a location map covering the areas of the four Boroughs. **I recommend that the DPD be changed by the inclusion of these maps, as set out in Inspector Change (IC) number 1 in Appendix A below.**

7. The submitted DPD has no List of superseded policies as required by Regulation 13(5). This has been overcome by the addition of the required list prepared by the Boroughs. **I recommend that this schedule be included in the DPD, as set out in IC number 2 in Appendix A below.**
8. The period covered by the DPD is to 2020 - less than the "at least 10 years" required by paragraph 16 of PPS10 and less than the "at least 15 years" required by paragraph 4.13 of PPS12. A time horizon to at least 2021 is necessary to meet the PPS10 policy and it is desirable for the DPD to look forward to the situation beyond 2021. This is a consequence of the DPD being delayed, but given the flexibility of identified sites against lower apportionment figures in the July 2011 London Plan, the Boroughs have proposed a change so that the period covered is 2011-21. **I recommend that the period of the plan, as dealt with in paragraph 1.2 of the DPD, be changed as set out in IC number 3 in Appendix A below.**
9. It will also be necessary for the Boroughs to review the DPD, in coming years, in the light of their annual monitoring, to take into account the period beyond 2021.

Main Issues raised in representations

10. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings I have identified five main issues which potentially, in addition to the matters dealt with in paragraphs 6 to 8 above, affect the soundness of the plan and which need to be dealt with in this report.

Issue 1 – i) Whether there has been adequate consultation with the local waste industry; ii) whether any lack of consultation has resulted in ineffective policies for construction, excavation and demolition waste

Consultation

11. Representations suggest that there has been inadequate consultation with the private sector waste management industry in the East London area, with the result that the evidence base is lacking in relation to construction, excavation and demolition (CE&D) waste, leading to an unsound plan.
12. Set against this is the fact that the Boroughs have attempted to maintain an extensive database of consultees, which includes a substantial number of waste industry companies, as well as many professional consultancies which are likely to include those acting for members of the industry. It is also of relevance to this issue that there have been notices published in local newspapers, copies of documents at various locations throughout the area and, of course, on the Boroughs' websites. The DPD has also been included in

the Local Development Schemes for the four boroughs. It is also fair to say that there is a responsibility on interest groups, including members of the waste industry, to make it their business to monitor the intentions of local planning authorities to prepare plans and the progress being made.

13. I conclude that there has been an acceptable level of consultation, fulfilling the requirement of the Statements of Community Involvement and following the advice in PPS12 and that there has been no real prejudice to any element of the waste industry. Furthermore, I am not persuaded that there are serious shortcomings in the evidence base, if anything it maybe that the existing waste management facilities are dealing with greater amounts of waste than the DPD indicates, but the figures change from year to year. This is an issue which should be answered by rigorous monitoring. The Boroughs are alive to this and have proposed a minor change which inserts a new indicator.

Polices for CE&D waste

14. The issue here is whether there is a need for safeguarding of existing sites. This is because it is not possible for all CE&D waste to be dealt with on construction sites, so that there is a significant amount that requires treatment on waste management sites. I accept that there will be construction sites, both medium size and small, where it will not be feasible, or viable, to set up dedicated recovery and recycling facilities. However, I was given evidence that the Boroughs have adequate capacity, including at the Barking Riverside Recycling Park, to deal with these arisings. I see no need to identify areas of search for new facilities, but I do see the need for safeguarding of existing waste management sites. My attention was drawn to policies of the London Plan (version recently superseded), specifically policy 4A.28 which specifies that "Boroughs should ensure that existing construction, excavation and demolition waste management sites are safeguarded...". It was suggested that the development plan needs to be read as a whole, and that there is no need for repetition of policy at the different levels of plan. Whilst I support this contention, it seems to me that policy 4A.28 does require some response from the Boroughs in terms of their own policy. Such an addition would be a minor change to the East London Waste DPD, because of the existing policy context, and the Boroughs have agreed to make such a change.

Issue 2 – Whether the DPD conforms generally to the London Plan

15. Following discussion at the hearings, and further meetings between officers of the four Boroughs and the Greater London Authority (GLA), in the light of the Boroughs' advertised Changes, the GLA has confirmed that the document is in general conformity with the London Plan.
16. The apportionment figures were taken from table 4A.6 of the London Plan extant at the time of the DPDs submission and at the point at which the examination hearings took place. However, in light of the publication of the replacement London Plan on 22 July these changes have been updated to remove reference to the 2008 London Plan, and fully incorporate content from the 2011 London Plan, which was previously included as emerging policy. I consider that these are minor changes because figures have been revised downwards by the GLA and the thrust of the document does not change. Nevertheless, these changes have been advertised.

17. As to the use of 75% of licensed capacity for sites, the evidence is clear that actual throughput at sites varies quite considerably from year to year. There has been agreement between the Borough and the GLA on this, and I agree that it is a pragmatic approach to be used in plan making. The necessary monitoring will reveal the effect of changes over time and the need for any action to be taken by the Boroughs.

Issue 3 – Whether Policy W5 xii is sound in relation to maximising sustainable travel modes.

18. All four boroughs have planning policies in other documents which promote sustainable modes of transport, including transport by water. Development plans must be read as a whole, taking all of the constituent parts into account. As far as this DPD is concerned, policy W5(xii) includes a reference to sustainable transport modes. However, on reflection the Boroughs have agreed that this element (xiii) of the policy is not well worded in relation to the wording of the London Plan or the other numbered points in policy W5, and have suggested a minor change. At the same time, they have taken the opportunity to add a reference in the reasoned justification to policy W5 dealing with designated routes and vehicle operating times. I support both minor changes, which I consider satisfactorily answer the issue, whilst not affecting the thrust of policy.

Issue 4 – Whether there is a robust and credible evidence base for site selection.

- i. Are the details and capacities of the Schedule 1 sites accurate or adequate?
- ii. Are the Schedule 2 sites deliverable?
- iii. Should Policy W2 support facilities in industrial areas set out in Table 4A.8 of the London Plan? Does it adequately deal with waste water/sewerage waste?
- iv. Is there a need to deal explicitly with landfill capacity?

Schedule 1

19. It was clear at the hearing that sites had been omitted from Schedule 1 of the submitted DPD. This was acknowledged by the Boroughs and subsequently additions have been made to the schedule by way of minor changes. I am satisfied that the recognition of existing sites does not amount to a change which requires a recommendation by me, although these additions have been subject to publicity and consultation.
20. Schedule 1 uses licensed capacities in listing the capacities of the sites. The explanation for this, which I accept, is that this is the compensatory provision that must be made if a facility is lost to non waste use, as required by policy W2 which is consistent with policy 4A.24 of the (recently superseded) London Plan. There were errors of capacity, but again this has been rectified by minor changes which do not change the overall situation.

Schedule 2

21. Schedule 2 identifies areas which are considered to be deliverable within the

Plan's timeframe, now showing phasing, ownership, availability and implementation. I consider that this is in accordance with paragraphs 17 and 18 of PPS10. The site over which the biggest doubt has been suggested is the Beckton Riverside site owned by National Grid Property Holdings, shown as 7ha in the schedule but, by minor change, indicated to be that figure gross but 3.5ha net. It is situated within Beckton Strategic Industrial Location, making it suitable for industrial use, and consistent with the London Borough of Newham's submission Core Strategy.

22. It is not the most straightforward of sites for development since there are a number of constraints including the East London River Crossing, Dockland Light Railway extension, East London Transit, the need for remediation, etc. Having had these constraints discussed in some detail I am not convinced that the inclusion of this site in Schedule 2 makes the DPD is unsound. It appears to me that it is likely that a suitable area for the intended purpose can be identified, given the will to do so, whilst the alternative put forward would not have the advantage of the potential sustainable transport opportunity of jetty and landing stage for waste materials which the adjacent River Thames provides. Furthermore, there has been no suggestion that the alternative has been the subject of sustainability appraisal.
23. I consider that Schedule 2 provides a reasonable and desirable degree of certainty by designating sites. Any addition to the document which would leave open ready acceptance of other sites, instead of providing necessary flexibility, would open the door to a proliferation of facilities. There is a degree of flexibility in the policy, which allows for other sites within designated industrial locations to be considered if it is demonstrated that the preferred areas provide no opportunity.

Policy W2

24. In light of my reasoning in paragraph 23 above, I consider that there is no basis for Policy W2 to give general support for waste facilities in industrial areas.
25. The question of whether Policy W2 adequately deals with waste water/sewerage waste has been answered by an advertised change which sets out within the policy, text which was initially part of the reasoned justification. Since this is a statement of policy, I consider that the Policy is the proper place for it.

Landfill

26. Policy W4 sets out a criteria based approach to landfilling. The overarching policy is to reduce waste going to landfill to the absolute minimum, and over time there should be a substantial reduction, although it seems that there will always be a residual amount. I am satisfied that Policy W4, together with the continued working with other authorities as mentioned in paragraph 28 below, is a sound basis for dealing with the likely level and nature of waste going to landfill in the future.

Issue 5 – Whether there should be phasing of sites, and whether the DPD provides for adequate monitoring and implementation?

- 27. As a result of raising this issue, Schedule 2 of the submission document has been amended so that it now includes an indication of anticipated timescale of implementation and the landowners involved. This provides a better basis for monitoring. This also has the benefit of enabling the addition of monitoring indicators in the schedule in the Monitoring and Implementation section of the DPD. In addition the Boroughs have inserted an indicator for monitoring the actual waste throughput of the Schedule 1 sites.
- 28. Related to this issue, since it facilitates monitoring and determining any remedial action which may be required, the Boroughs have added a reference in paragraph 6.6 of the document which refers to them continuing to work closely with the East London Waste Authority, together with joint working with other London Boroughs, local authorities outside Greater London, and the Environment Agency by way of continued membership and participation at the London Regional Technical Advisory Body.

Legal Requirements

- 29. My examination of the compliance of the **Joint Waste Development Plan Document** with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Joint Waste Development Plan Document is identified within the approved LDS of each of the four Borough Councils, although there is some discrepancy in the dates indicated for submission and adoption. The Joint Waste Development Plan Document's content and timing are compliant with the LDS.
Statements of Community Involvement (SCI) and relevant regulations	All four Boroughs have SCIs and consultation has been compliant with the requirements therein, including the consultation on the advertised proposed changes.
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Appropriate Assessment (AA)	Natural England has confirmed that the Habitats Regulations AA satisfied the required methodology and the assessment is sound.
National Policy	The Joint Waste Development Plan Document complies with national policy except where indicated and a change is recommended.
Sustainable Community Strategies (SCS)	Satisfactory regard has been paid to the SCS.
2004 Act and Regulations (as amended)	The Joint Waste Development Plan Document complies with the Act and the Regulations except where indicated and changes are recommended.
Regional Strategy (RS)	The Joint Waste Development Plan Document is in general conformity with the July 2011 London Plan.

Overall Conclusion and Recommendation

30. **I conclude that with the advertised changes proposed by the Boroughs, set out in the Appendix A, which are the subject of my recommendations, the East London Waste Authority Boroughs Joint Waste DPD satisfies the requirements of s20(5) of the 2004 Act and meets the criteria for soundness in PPS12. For the avoidance of doubt, I also endorse the Boroughs' proposed minor changes set out in Appendix B. Therefore I recommend that the plan be changed accordingly.**

Terrence J Kemmann-Lane

Inspector

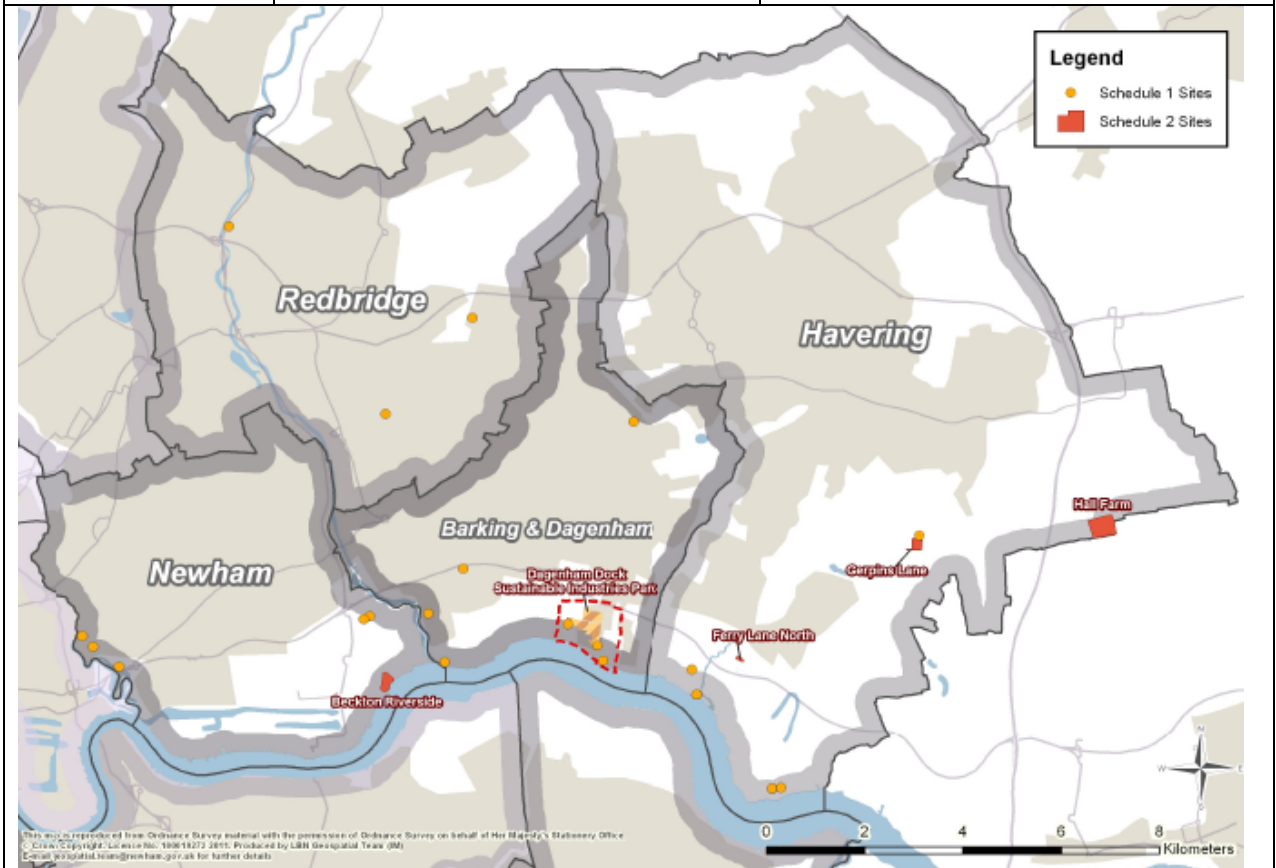
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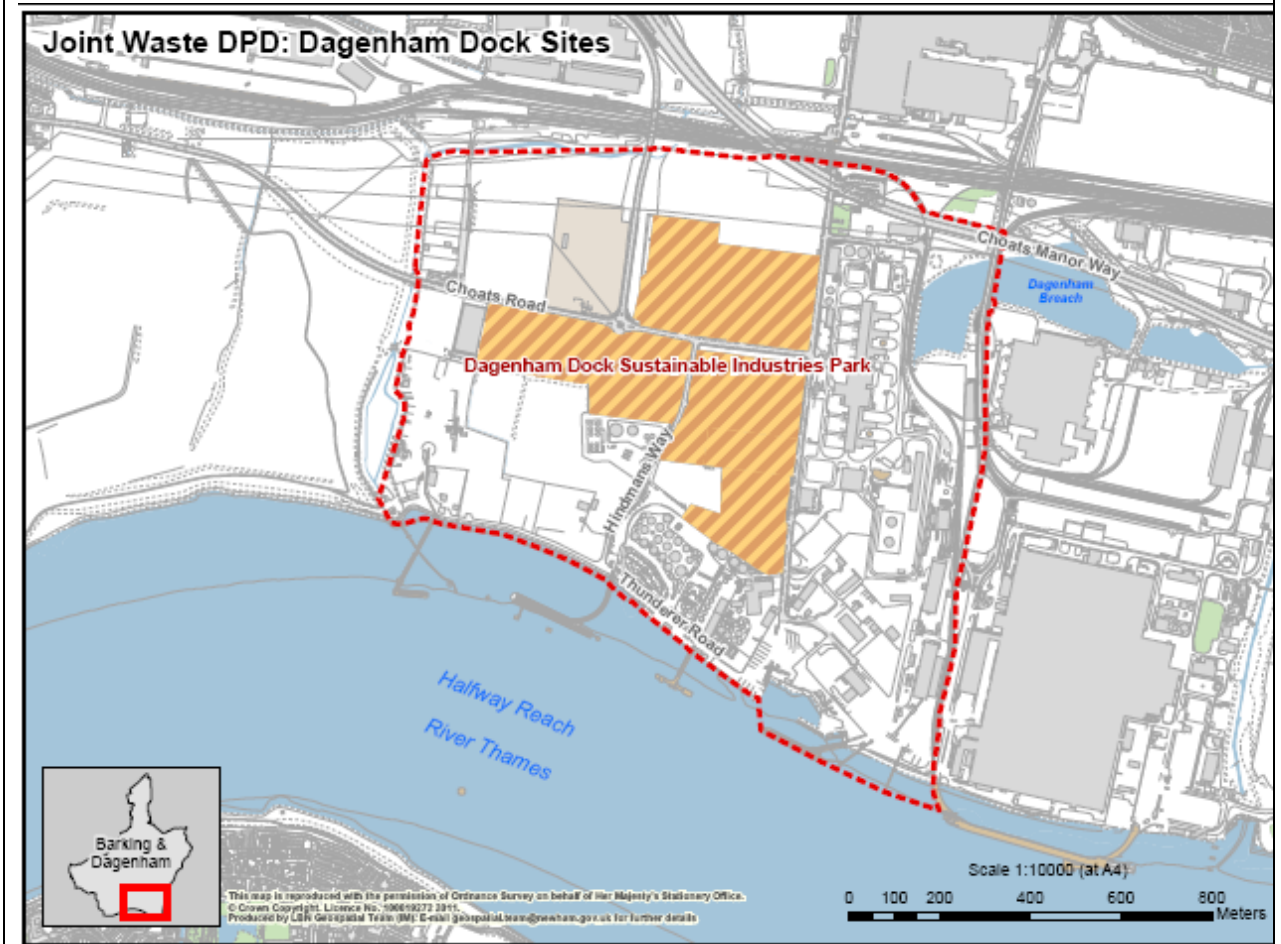
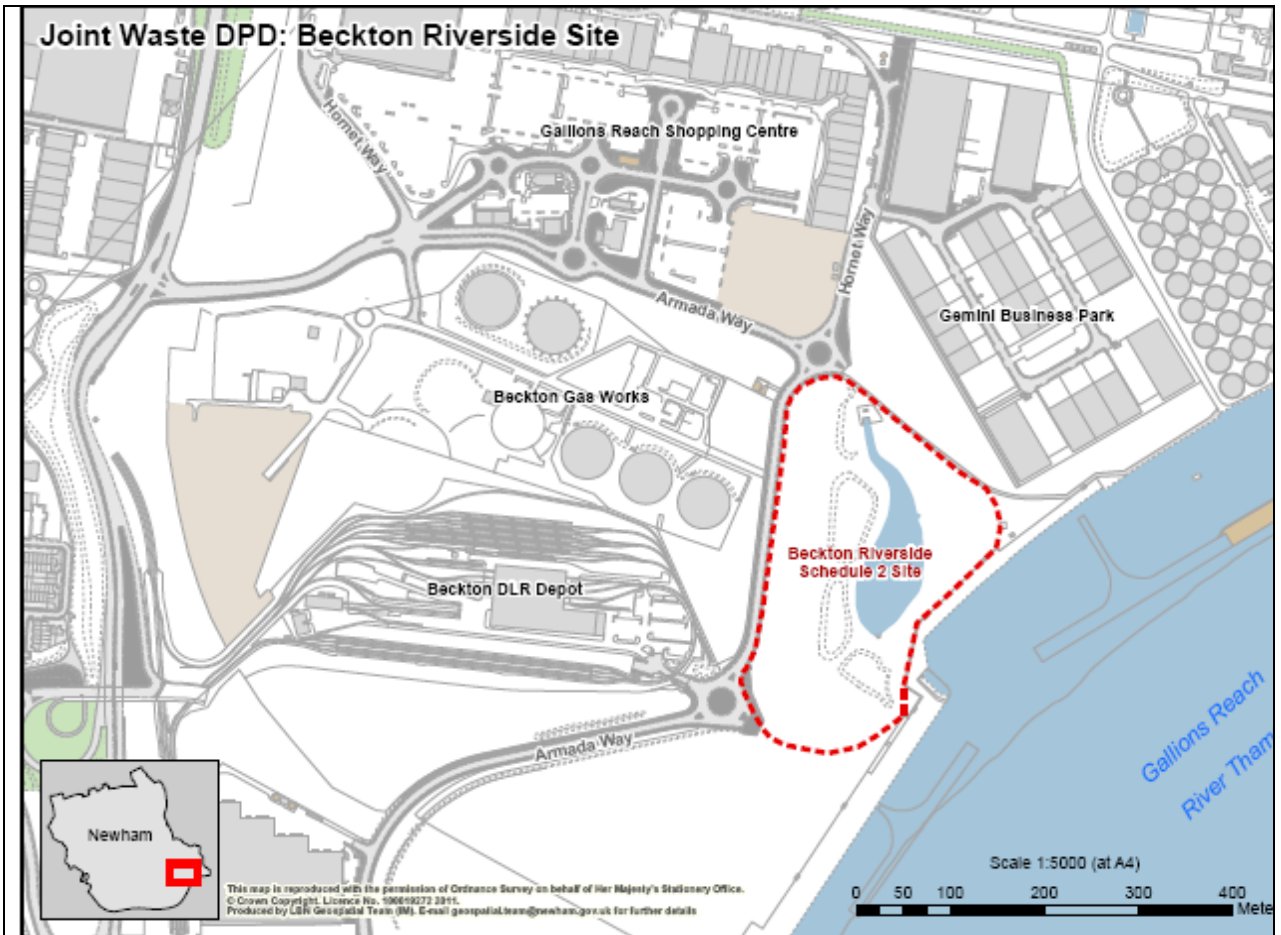
Appendix A Changes that the Inspector considers are needed to make the plan sound.

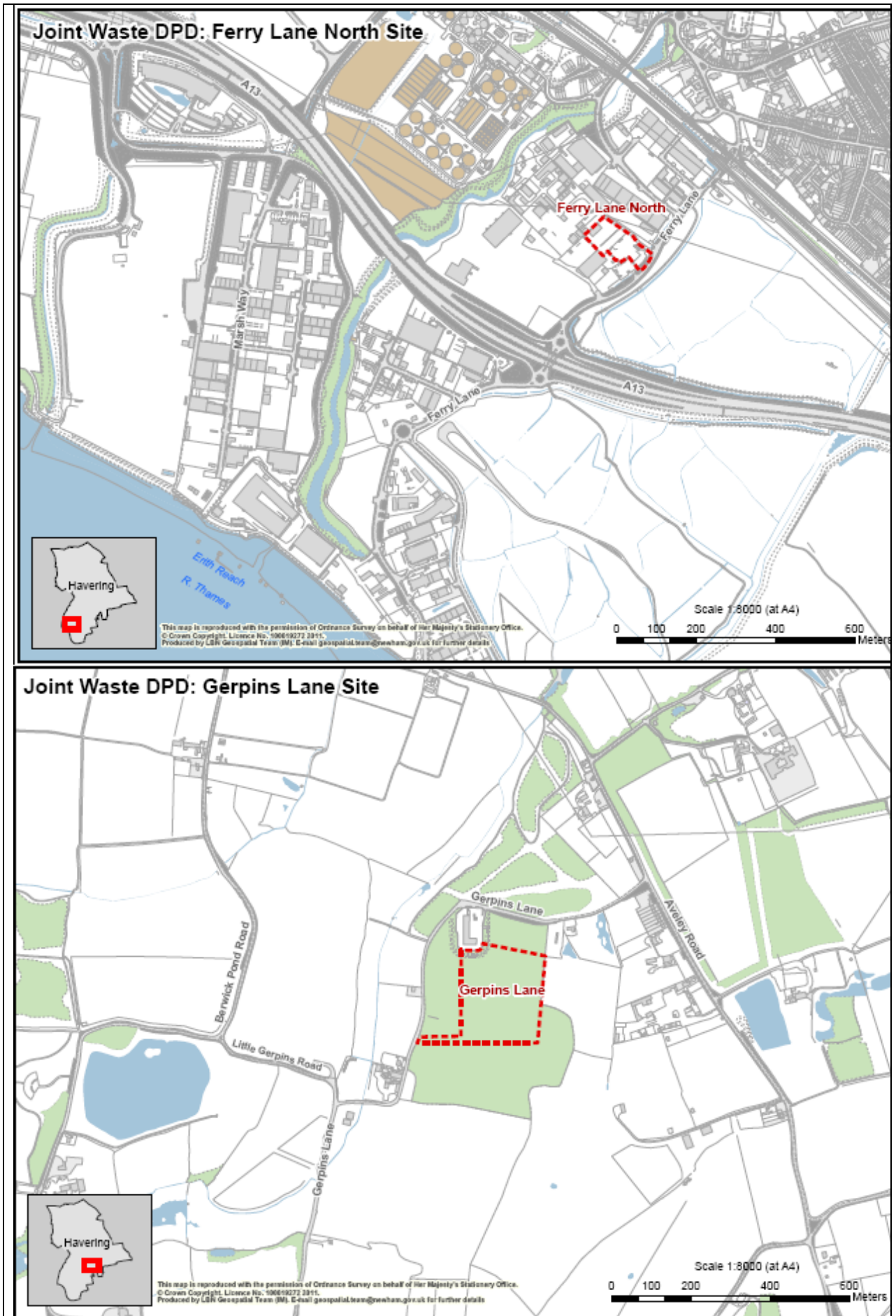
Appendix B Council's Minor Changes.

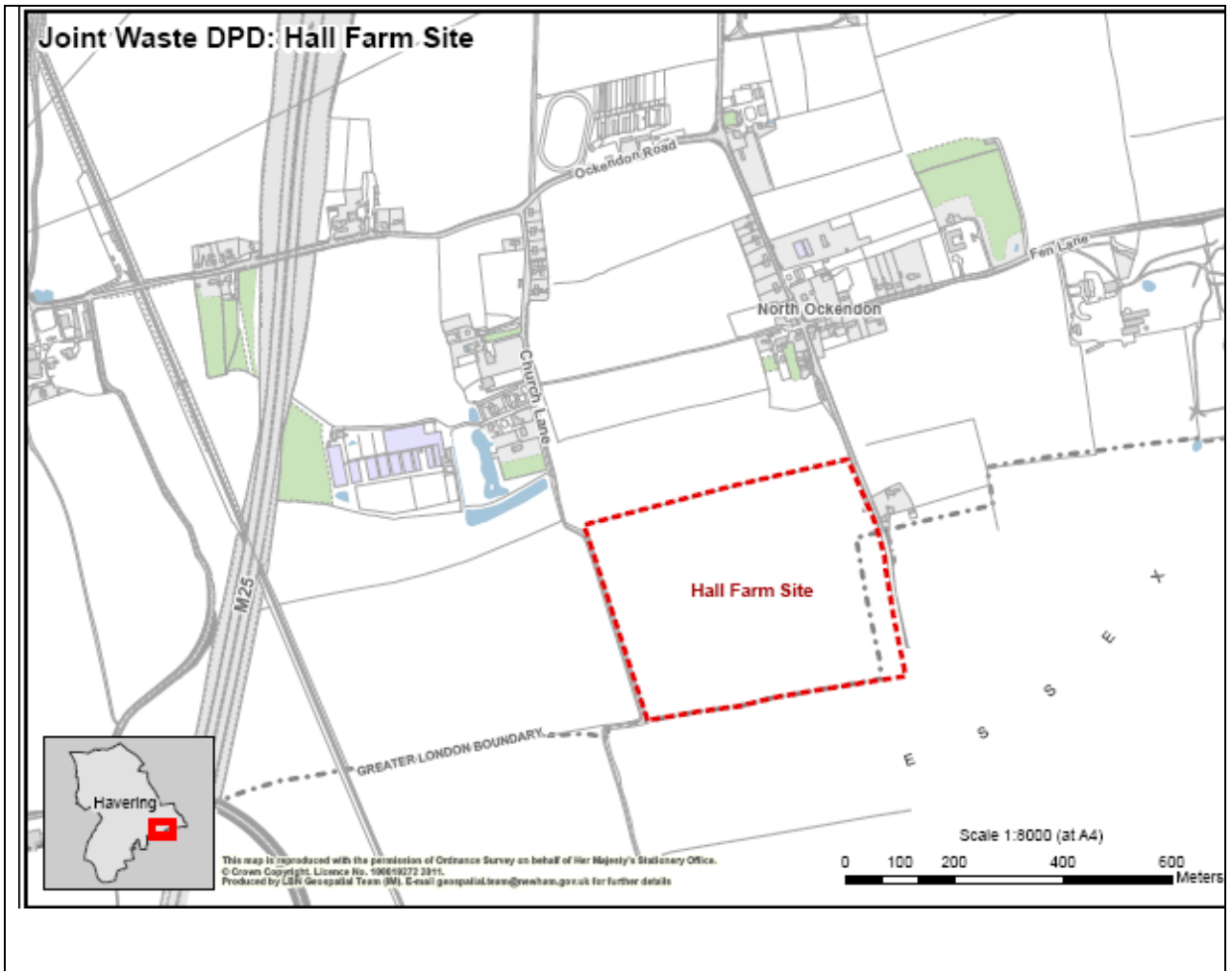
Appendix A – Changes that the Inspector considers are needed to make the plan sound

Inspector Change No.	Policy/Paragraph/Page	Change
IC1	Appendix 1: Joint Waste Site Map and Site boundary plans	Delete and substitute detailed site plans and Location Map:









<p>IC2</p>	<p>No current content</p>	<p>Add as Appendix 2 a Schedule of Superseded Policies</p> <p>Policies Superseded by the Adoption of the Joint Waste Development Plan Document</p> <ul style="list-style-type: none"> • <i>Barking and Dagenham</i> <p>LBBB UDP policies to be superseded by the Joint Waste DPD are G29, G30 and G31. Attached is a document setting out information relating to all the LBBB UDP policies.</p> <ul style="list-style-type: none"> • <i>Havering</i> <p>Havering has an adopted Core Strategy (2008) and all of its UDP policies are now fully superseded. The Joint Waste DPD will sit alongside Core Policy CP11 (Sustainable Waste Management).</p> <ul style="list-style-type: none"> • <i>Newham</i> <p>Newham has a submission Core Strategy and a list of proposed superseded UDP policies, as follows:</p> <ul style="list-style-type: none"> ○ UDP policy EQ58: Waste and Disposal, Reclamation of Land, replaced by INF3 ○ UDP policy SH23 Recycling, replaced by INF3 <p>Other UDP policies are saved until the Core Strategy and / or JWDPD are adopted:</p> <ul style="list-style-type: none"> i. EQ54: Integrated waste management facilities (until adoption of JWDPD) ii. EQ55: Safeguarding of Jenkins Lane (until adoption of JWDPD) iii. EQ56: Waste management facilities (until
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		<p>adoption of JWDPD)</p> <p>iv. EQ57: Hazardous waste (until adoption of JWDPD though this is covered in INF3)</p> <p>v. EQ60 Recycling of aggregates (until adoption of JWDPD)</p> <p>Redbridge</p> <p>Redbridge UDP was fully superseded in 2008, so there are no policies left for the Joint Waste DPD to supersede – it will sit alongside Strategic Policy 11 (Waste) in the adopted Core Strategy. The Joint Waste DPD simply provides additional detail which would not be suitable in a Core Strategy but nevertheless requires DPD status, as advocated by para 5.3 of PPS12.</p>
IC3	Paragraph 1.2	Line 1, delete 2020 and insert 2021

Appendix B – Schedule of Minor Changes that the Joint Boroughs have proposed as factual updates, corrections of minor errors or other minor amendments in the interests of clarity.

Please note: For completeness and clarity this Schedule includes the Inspector Changes which are set out in Appendix A.

Joint Waste Development Plan for the East London Waste Authority Boroughs

Schedule of post-Hearing minor changes to the Submitted Joint Waste Development Plan Document

Consultation period 6th September 2011
until 26th September 2011

Appendices:

Annex 1 - Note regarding Sustainability Appraisal, Habitats Regulations Assessment, PPS25 Sequential Test and Equalities Impact Assessment

Annex 2 - Revised Schedule 1 (separate document)

Annex 3 - Revised Proposals Maps and insets (separate document)

Annex 4 – Revised Technical Report (separate document)

April 2011

(Updated August 2011 to reflect London Plan publication)

Local Development Framework
London Borough of Barking and Dagenham
London Borough of Havering
London Borough of Newham
London Borough of Redbridge

This document includes the Further Proposed Changes made prior to the start of the hearings, the Hearing Proposed Changes made as a result of discussion during the hearings and the London Plan changes made as a result of the adoption of the London Plan 2011.

The changes below are expressed in the form of ~~strikethrough~~ for deletions and underlining for additions of text. Where there has been an amendment to the Advertised Proposed Changes through the Further Proposed Change or to the Further Proposed Changes through the Hearing Proposed Changes this is shown as ~~double strikethrough~~ for deletions and double underlining for additions of text. Where there has been a change to an Advertised Proposed Change and a Further Proposed Change through the Hearing Proposed Change or to these changes through the London Plan changes this is shown through ~~double strikethrough in red font~~ for deletions and double underlining in red font for additions.

Proposed Minor Changes to the Submitted East London Joint Waste Plan

No. of Proposed Change	Proposed Change	Reason for Change						
<p><u>Further Proposed Change 1</u></p>	<p>Amend Table 1 as follows:</p> <table border="1" data-bbox="869 592 1637 1319"> <thead> <tr> <th data-bbox="869 592 1189 628">Borough</th> <th data-bbox="1189 592 1637 628">Documents</th> </tr> </thead> <tbody> <tr> <td data-bbox="869 628 1189 1177">Barking and Dagenham</td> <td data-bbox="1189 628 1637 1177"> <ul style="list-style-type: none"> • Core Strategy (Pre-submission Report <u>Adopted July 2010</u>) • Borough Wide Development Policies DPD (Pre-submission Report <u>Adopted March 2011</u>) • Site Specific Allocations (Preferred Options <u>Adopted December 2010</u>) • Barking Town Centre Area Action Plan (Preferred Options <u>Adopted February 2011</u>) </td> </tr> <tr> <td data-bbox="869 1177 1189 1319">Havering</td> <td data-bbox="1189 1177 1637 1319"> <ul style="list-style-type: none"> • Core Strategy (Adopted, July 2008) • Site Specific Allocations (Adopted, July 2008) </td> </tr> </tbody> </table>	Borough	Documents	Barking and Dagenham	<ul style="list-style-type: none"> • Core Strategy (Pre-submission Report <u>Adopted July 2010</u>) • Borough Wide Development Policies DPD (Pre-submission Report <u>Adopted March 2011</u>) • Site Specific Allocations (Preferred Options <u>Adopted December 2010</u>) • Barking Town Centre Area Action Plan (Preferred Options <u>Adopted February 2011</u>) 	Havering	<ul style="list-style-type: none"> • Core Strategy (Adopted, July 2008) • Site Specific Allocations (Adopted, July 2008) 	<p>Updating document.</p>
Borough	Documents							
Barking and Dagenham	<ul style="list-style-type: none"> • Core Strategy (Pre-submission Report <u>Adopted July 2010</u>) • Borough Wide Development Policies DPD (Pre-submission Report <u>Adopted March 2011</u>) • Site Specific Allocations (Preferred Options <u>Adopted December 2010</u>) • Barking Town Centre Area Action Plan (Preferred Options <u>Adopted February 2011</u>) 							
Havering	<ul style="list-style-type: none"> • Core Strategy (Adopted, July 2008) • Site Specific Allocations (Adopted, July 2008) 							

No. of Proposed Change	Proposed Change			Reason for Change
			<ul style="list-style-type: none"> • Development Control Policies (Adopted, <u>October</u> 2008) • Romford Area Action Plan (Adopted, <u>October</u> 2008) 	
		Newham	<ul style="list-style-type: none"> • <u>Core Strategy Proposed Submission Document</u> (Submitted, <u>March</u> 2011) • <u>Core Strategy (Issues & Options)</u> • <u>Development Control Manual (Issues and Options)</u> 	
		Redbridge	<ul style="list-style-type: none"> • Core Strategy (Adopted, <u>March</u> 2008) • Borough Wide Primary Policies DPD (Adopted, <u>May</u> 2008) • Development Sites with Housing Capacity (Adopted, <u>May</u> 2008) • Development Opportunity Sites (Adopted, <u>May</u> 2008) • Ilford Town Centre Area 	

No. of Proposed Change	Proposed Change			Reason for Change
			Action Plan (Adopted, May 2008) <ul style="list-style-type: none"> • Gants Hill Area Action Plan (<u>Submitted Adopted, March 2009</u>) • Crossrail Corridor Area Action Plan (Submitted) • Minerals DPD (Issues and Options) 	
<u>Further Proposed Change 2</u>	Introduction—under heading “Timetable for the Preparation of the Joint Waste DPD” Delete paragraphs 1.6 – 1.16 and renumber subsequent paragraphs.			Updating document.
<u>Further Proposed Change 3</u>	Amend paragraph 1.17 as follows: 1.17 Details of other documents referred to throughout this document are detailed below: <ul style="list-style-type: none"> • Planning Policy Statement 10: Planning for Sustainable Waste Management (ODPM, July 2005). Available at http://www.communities.gov.uk/index.asp?id=1143834 • The London Plan (GLA July 2011) (GLA, February 2004) including Alterations to the Plan’s housing provision targets and waste and minerals policies (December 2006) and Draft further alterations to the London Plan (September 2006) and Draft minor alteration on borough level waste apportionment (December 2006) Available at http://www.london.gov.uk/mayor/strategies/sds/index.jsp • Building the Evidence Base and Identifying the Issues & Options Consultation Document (May 2007) 			Updating document and improving clarity.

No. of Proposed Change	Proposed Change	Reason for Change
	<p>Technical Report (October 2006) Sustainability Appraisal Interim Report: An appraisal of the Issues and Options (May 2007) Report on Consultation (November 2007)</p> <ul style="list-style-type: none"> • Preferred Options Preferred Options Report (April 2008) Sustainability Appraisal of Preferred Options (April 2008) Site Assessment to inform Preferred Options (June 2007) Sustainability Appraisal of reasonable alternative sites (July 2007) Preferred Options Technical Report (April 2008) • Proposed Submission Documents Proposed Submission Joint Waste DPD Joint Waste DPD Map Sustainability Appraisal of the Joint Waste DPD Technical Report 	
<p><u>Hearing Proposed Change 2</u></p>	<p>Amend Further Proposed Change 4 and split existing paragraph 2.11 so that a new paragraph is inserted after the first sentence and insert additional text under existing paragraph 2.11 to refer to Sustainable Community Strategies:</p> <p><u>2.11 The preparation of each borough Core Strategy reflects their Sustainable Community Strategy.</u></p> <p><u>London Borough of Barking & Dagenham</u> <u>Barking and Dagenham's Sustainable Community Strategy, The Community Plan (2009 Agreed Version) has six aims one of which is to work together for a clean, green and environmentally sustainable borough. As part of this the Partnership will be focusing on reducing the amount of waste that goes to landfill and reducing how much carbon dioxide is realised released into the environment. The rate of recycling (NI192) in 2008/09 was 25% increasing to 32% in 2009/10.</u></p>	<p>Adding explanatory cross-referencing.</p>

No. of Proposed Change	Proposed Change	Reason for Change
	<p><u>London Borough of Havering</u> <u>Havering's Sustainable Community Strategy (2008 -2013) states that the LSP Local Strategic Partnership (LSP) wishes to ensure a clean, safe and green borough. High recycling rates will reduce the burden we place on landfill and the Council will invest in new ways of improving recycling rates. The rate of recycling (NI192) in 2007/08 was 23.98%, increasing to 27.37% in 2008/09 and 34.35% in 2009/10.</u></p> <p>-</p> <p><u>London Borough of Newham</u> <u>Newham Sustainable Community Strategy (2010-2030) states that the LSP wishes to help residents and businesses to minimise waste arisings and to recycle in the easiest and most cost effective way. The Council is examining ways to reduce the amount of waste produced, improve how it is disposed of and improve access to recycling. The rate of recycling (NI192) increased from 16% in 2008/9 to 19% between April and November 2009; the baseline (2007/8) rate was 15%.</u></p> <p>-</p> <p><u>London Borough of Redbridge</u> <u>The Redbridge Sustainable Community Strategy (SCS) (2008-2018) sets an ambition to promote a positive attitude to the environment and have a cleaner, greener Redbridge. As part of this ambition the strategy makes a commitment to reduce waste production and increase recycling. The SCS provides the overarching framework for all Local Development Documents, and the Joint Waste DPD will assist win with the delivery of its priorities. The 2009/10 AMR showed that the recycling and composting rate in Redbridge was 31.5%, which was an increase from 26.2% in 2008/09, but below the 40% national target.</u></p>	
<u>Hearing Proposed Change 3</u>	<p>Amend Further Proposed Change 5, delete detailed policy text to Borough Core Strategy policies and incorporate text underneath the newly created paragraph 2.12</p> <p><u>2.12 This Joint Waste DPD must be in conformity with borough Core Strategy policies. Borough Core Strategy policies of specific relevance to the Joint Waste DPD are outlined below:</u></p>	To avoid repetition of policies in other documents and to make sure documents are future proof as Newham's policy may be amended

No. of Proposed Change	Proposed Change		Reason for Change
		<p>Barking & Dagenham (Pre-Submission Report, Nov 2008 Adopted July 2010)</p> <p>POLICY CR3: SUSTAINABLE WASTE MANAGEMENT</p> <p>To protect human health and the environment the Borough will seek to manage waste in a sustainable way and to help achieve national recycling and composting targets.</p> <p>This will be done by prioritising waste reduction, re-use, recycling and composting, new and emerging recovery technologies and conventional incineration over landfill, which will only be considered acceptable as a last resort.</p> <p>To meet the needs of our growing population, and to meet the Waste Apportionment requirements set out in the Further Alterations to the London Plan (Consolidated with Alterations since 2004), appropriate existing waste management capacity will be safeguarded and preferred sites for new facilities identified. The specifics of what capacity will be safeguarded and what sites are preferred for new waste management facilities will be set out in the Joint Waste DPD which the Council is developing with the neighbouring boroughs of Havering, Newham and Redbridge. In the interim the favoured broad locations for new or expanded waste management facilities in Barking and Dagenham are the Strategic Industrial Locations and Locally Significant Industrial Sites (subject to environmental and amenity considerations).</p>	<p>during the examination process.</p>

No. of Proposed Change	Proposed Change		Reason for Change
		<p>Until the Joint Waste DPD has been adopted, applications for waste developments will be determined in accordance with PPS10 and the London Plan, and the capacity of existing waste management facilities will be safeguarded.</p>	
	<p>Havering (Adopted, July 2008)</p>	<p>CP11- Sustainable Waste Management</p> <p>The Council is committed to minimising the production of waste, increases in recycling and composting and achieving substantial reductions in the use of landfill.</p> <p>New waste management facilities, therefore, will only be acceptable in Havering where they:</p> <ul style="list-style-type: none"> ▲ represent the most sustainable location for the management of the waste ▲ ensure that the community or business which generated the waste is taking responsibility for its management ▲ help the waste planning authority or London waste authority where the waste arose to achieve the maximum degree of self sufficiency in managing their waste ▲ help deliver national targets for recycling and composting of waste. <p>The broad locations for new waste management facilities will be in Strategic Industrial Locations, secondary employment areas and existing licensed waste management sites.</p> <p>Until the Joint Waste Plan is adopted the Council will safeguard all existing waste management sites, unless appropriate compensatory provision is made.</p> <p>The Joint Waste Plan will identify the amount of waste that</p>	

No. of Proposed Change	Proposed Change		Reason for Change
		<p>will need managing across the four East London Boroughs up to 2020 and this will be based on robust evidence which will be informed by the regional waste apportionment. It will identify the range and type of facilities necessary to manage this waste and suitable locations for them.</p> <p>The Joint Waste Plan will identify sufficient land to manage waste by having regard to the apportionment at Borough level as in the London Plan.</p>	
		<p><u>Newham, Submission (31 March 2011)</u></p> <p>Policy INF3</p> <p>Development proposals for waste management facilities must support movement up the waste hierarchy as follows: Reduce, Reuse, Recycle, Energy recovery, [then] Disposal</p> <p>The emerging Joint Waste Development Plan Document for the East London Waste Authority Boroughs sets out the amount of waste to be managed by the Boroughs of Barking and Dagenham, Havering, Newham and Redbridge; the range and type of facilities needed to manage the waste, and suitable locations for these facilities.</p> <p>Licensed operational sites are listed in Schedule 1 of the Joint Waste Development Plan Document, as follows:</p> <ul style="list-style-type: none"> Jonkins Lane Waste Management and Materials Recovery Facility Bywaters, Materials Recovery Facility, Twelve Trees Crescent, Bow The Remet Company Limited, Cody Road, Canning 	

No. of Proposed Change	Proposed Change		Reason for Change
		<p>Town Mayor Parry Recycling Limited, Bidder Street, Canning Town</p> <p>In Schedule 2, A 7 ha site has been identified at Beckton Riverside for a medium sized waste management site to manage the level of additional waste apportioned to Newham in the London plan. Proposals for alternative/additional sites will need to demonstrate that the Beckton Riverside site is inappropriate for the type of waste or waste management process or has been developed and further waste management facilities</p> <p>Other Minor changes proposed to Policy INF3: A minor change is proposed following the second paragraph of the policy and its bullet points to the effect that: "<u>The Environment Agency licenses a further 18 operational sites in Newham, all of which are safeguarded by (Draft) London Plan Policy 5.17 and will be reviewed in a Site Allocations Development Plan Document. The sites do not contribute towards the London Plan waste apportionment as their function lies outside of the definition of the apportionment (see Glossary); however the London Plan requires that if for any reason an existing waste management site is lost to non waste use, an additional compensatory site provision will be required that meets the maximum throughput that the site could have achieved.</u>"</p>	
	Redbridge (Adopted, March 2008)	<p>Strategic Policy 11: Waste</p> <p>The Council is committed to helping the delivery of national targets for recycling and composting by minimising the production of waste, increasing recycling and composting,</p>	

No. of Proposed Change	Proposed Change		Reason for Change
		<p>and achieving substantial reductions in the use of landfill.</p> <hr/> <p>A Waste Development Plan Document will be prepared in partnership with the London Boroughs of Barking & Dagenham, Havering and Newham which will identify:</p> <ul style="list-style-type: none"> (a) the amount of waste to be managed across the four Boroughs up to 2020; (b) sufficient land within Redbridge to manage the relevant waste apportionment at Borough level; (c) the range and type of facilities necessary; and (d) locations for new waste management facilities including designated business areas and the expansion of existing licensed waste management facilities. 	
<u>Further Proposed Change 6</u>	Delete paragraph 2.13		Now redundant paragraph
<u>Hearing Proposed Change 4</u>	<p>Amend Further Proposed Change 7, incorporate the first sentence of para. 2.21 into para. 2.20 and delete the remainder of para. 2.21 and also para 2.22:</p> <p>“2.20 The Sustainability Appraisal of Preferred Options⁴ tested the DPD objectives, policies and identified sites against the Sustainability Framework. The Appraisal suggested mitigation measures which were have been incorporated into the development of this Proposed Submission Document. Note: A Habitats Regulations Assessment of the Joint Waste DPD has been undertaken to determine whether the DPD will effect European biodiversity designations. The HRA was developed in consultation with officers at Natural England. 2.24 A Final Sustainability Appraisal specifically relating to the Proposed Submission Joint Waste DPD has now been produced.”</p> <p>We welcome your comments on the Sustainability Appraisal and the reports are available online at www.barkingdagenham.gov.uk; www.havering.gov.uk; www.newham.gov.uk or www.redbridge.gov.uk or by contacting your Council (see details on page 4). Responses to this document should be received no later than 5pm</p>		Updating document.

No. of Proposed Change	Proposed Change	Reason for Change
	<p>on 28 September 2009. Comments should be made via the online response form available at http://newham-consult.limehouse.co.uk/portal/. Alternatively, please return the response form to the address on page 4 or email ldf@newham.gov.uk.</p> <p>2.22 Please be aware that comments made cannot be treated as confidential and will be made available for public inspection.</p>	
<p><u>Further Proposed Change 9</u></p>	<p>Amend existing paragraph 3.4 as follow:</p> <p>The four ELWA boroughs are at different stages in the preparation of their Local Development Framework Core Strategy. <u>The London Boroughs of Barking and Dagenham, Havering and Redbridge have an adopted Core Strategy, Barking & Dagenham have consulted on their Proposed Submission Document, and Newham is at Issues & Options. Newham's Core Strategy was submitted on 31 March 2011.</u> The Borough Core Strategies <u>each</u> contain a strategic waste policy which sets the framework for the Joint Waste DPD including:</p> <ul style="list-style-type: none"> • encouraging movement up the waste hierarchy • suitable locations for waste management facilities • help deliver targets for recycling and composting • regard to the London Plan apportionment • Joint Waste DPD to identify amount of waste to be managed, the range and type of facilities needed, sufficient land to manage waste apportionment and suitable locations for these facilities. 	<p>Updating document.</p>
<p><u>Hearing Proposed Change 6</u></p>	<p>Insert new fourth sentence into existing paragraph 4.6 as follows:</p> <p><u>As with all the other facilities (see paragraph 4.7 below), the Joint Waste DPD technical report then applies an actual throughput of 75% of this existing capacity at ELWA's four Reuse and Recycling Centres (i.e. 75% of 50% of the annual permitted tonnage). As almost all C, E & D waste is inert it is</u></p>	<p>For clarification.</p>

No. of Proposed Change	Proposed Change	Reason for Change
	appropriate to include Landfill taking Non-Biodegradable (i.e. inert) waste.	
<u>Hearing Proposed Change 10</u>	Proposed new table 5, note 2: Amend paragraph numbering from 4.8 to 4.7	Correction to paragraph number
<u>Further Proposed Change 11</u>	Number the table set out under existing paragraph 4.8 as Table 3 and renumber subsequent Tables.	Correcting typographical omission.
<u>Hearing Proposed Change 7</u>	Amend further Proposed Change 12 and amend the final sentence of existing paragraph 4.8 as follows: The established targets for implementation in the Joint Waste DPD are: <u>The Waste Strategy 2007</u> establishes the following targets for waste management:	For clarification.
<u>Hearing Proposed Change 11</u>	Amend Advertised Proposed Change 6 and move paragraph 4.20 to [new] paragraph 5.14 and re-number subsequent paragraphs Waste Water and Sewage Treatment Plants: <u>5.14 There is an established network of sewage facilities within East London, but upgrades may be required during the Plan period and this may involve new development. As the Landfill Directive introduces a ban on the disposal of liquid to other landfill facilities, this may result in additional pressure to find available space within operational sewage treatment plants to manage liquid wastes that were previously disposed of through landfill. Sewage treatment plants may also be appropriate locations for new facilities to manage domestic and other wastes.</u>	Moving existing text into Policy W2 justification for clarity.
<u>Hearing Proposed Change 12</u>	Amend Advertised Proposed Change 6 and Further Proposed Change 15 and move paragraph 4.21 to Policy W2 as the penultimate paragraph and re number subsequent paragraphs in chapter 4. 4.21 <u>Planning permission will only be granted for new waste water and sewage treatment plant, extensions to existing works, or facilities for the codisposal of sewage with other wastes, where development is either needed to treat waste arisings from within the East London Waste Authority area or in the case of arisings from elsewhere the need cannot be practicably and reasonably be met at another site – subject to the relevant borough's</u>	Correcting typographical error. Moving existing text into policy for clarity.

No. of Proposed Change	Proposed Change	Reason for Change
	<u>policy/guidance and Policy W5 of this Plan. Wherever practical and economical, renewable energy generation will be encouraged as part of such waste management facilities.</u>	
<u>Hearing Proposed Change 19</u>	Delete the third bullet point in Policy W4 as follows: (iii) Whalebone Lane North: Marks Warren Farm (Brett Lafarge Ltd)[SiteID1712] has been duly considered as a site for the disposal of inert C, E & D waste.	For clarification.
<u>Hearing Proposed Change 13</u>	Amend Further Proposed Change 16 and amend first paragraph in box under Paragraph 4.22 <u>4.20</u> as follows: A MRF is designed to process source separated or comingled dry recyclables into individual materials prior to despatch to reprocessors who prepare the materials for manufacturing into new recycled products. The MRF is made up of a series of conveyor belts and a mix of manual and automatic machines to separate the materials and remove any items that can't can not be recycled.	See Hearing Proposed Change 11. Correcting typographical error.
<u>Hearing Proposed Change 14</u>	Para 4.23 <u>4.21</u> In accordance with PPS10, the London Plan and borough Core Strategy policy, the Proposed Submission Joint Waste DPD identifies sites suitable for recycling and waste treatment facilities. The process for determining these sites has been documented throughout the development of this Submission Document and has been influenced by representations received.	Updating document.
<u>Hearing Proposed Change 15</u>	Amend Further Proposed Change 17 and add reference to the draft replacement London Plan. Para 5.2, add references: first two bullets: <u>Waste Strategy for England (2007, page 11)</u> ; Second two bullets: <u>London Plan 2011 Policy 5.16 (Waste Self-Sufficiency)</u>	For clarification.

No. of Proposed Change	Proposed Change	Reason for Change
<u>Further Proposed Change 18</u>	Policy W2. Delete “preferred” in the very last line of the policy wording.	For clarification.
<u>Hearing Proposed Change 17</u>	Amend the last sentence in paragraph 5.9 as follows: Table 4-6 summarises the capacity required and estimated land-take that may be required to provide this capacity.	Updating
<u>Further Proposed Change 19</u>	Para 5.9 Table to be renumbered. Table 5 6: Summary of average capacity required within the ELWA boroughs and land area required to meet the London Plan apportionment for MSW and C&I waste	Updating
<u>Further Proposed Change 20</u>	Delete Para 5.13 New waste management facilities should be of a high standard of design and contribute positively towards the overall development of the ELWA area.	Deleting text already covered by Policy W5 (x).
<u>Further Proposed Change 21</u>	Para 5.17. Delete “it is recommended that” and insert after working the word “can” 5.17 Due to the need for inert C,E&D waste landfill capacity, it is recommended that the voids left by mineral working <u>can</u> be used for landfill to achieve restoration of the site. Policy W4 sets the requirements that will govern the circumstances under which these sites should be developed <u>can be used for landfill materials</u>	For clarification.
<u>Further Proposed Change 22</u>	Para 5.18 Amend the second and third sentence in paragraph 5.18 and replace with a new sentence as follows: The finished levels of a restored landfill site may be higher than adjoining land, however this is commonly not the case for inert waste landfills. However, they will still be expected to incorporate high quality standards of restoration of the site that are appropriate to the surrounding landscape All restored landfills will be expected to incorporate high quality standards of restoration of the site that	For clarification

No. of Proposed Change	Proposed Change	Reason for Change
	<u>are appropriate to the surrounding landscape</u> '.	
<u>Hearing Proposed Change 21</u>	<p>Para 5.21:</p> <p>To maintain the principles of sustainable development and the right balance of waste facilities across London, proposals for <u>new</u> facilities managing waste which is not included in the London Plan apportionment for the ELWA area must undergo a sequential test. This will entail the applicant demonstrating as part of their application that there are no more suitable opportunities to manage the non-apportioned waste closer to its source. This is necessary to ensure that the distance waste is transported is minimised, to encourage communities to take more responsibility for managing their own waste, and to prevent an over-concentration of waste management facilities in east London.</p>	Boroughs proposed change following discussion at Examination.
<u>Further Proposed Change 23</u>	Policy W5 title: General Considerations <u>'General Considerations with regard to Waste Proposals.'</u>	For clarification.
<u>Further Proposed Change 24</u>	<p>Policy W5: : "(xii) transport impacts of all movements, including opportunities for use of sustainable transport modes, traffic generation, access and the suitability of the highway network in the vicinity, access to and from the primary network;"</p> <p><u>"(xii) adverse impacts of all movements including: traffic generation, an unsuitable highway network, inadequate accessibility to the site or the primary road network in the vicinity; and limited or no opportunities for the use of sustainable transport modes;"</u></p>	For clarification.
<u>Further Proposed Change 25</u>	Para 5.25: Consideration of traffic generation characteristics will incorporate an assessment of the level and type of traffic generated and the impact of that traffic. This assessment will identify opportunities for use of sustainable transport modes, the suitability of access and the highway network in the vicinity of the site, including access to and from the primary route network, <u>designated routes and vehicle operating times</u> and works necessary to accommodate the development.	For clarification.
<u>Hearing</u>	Amend Further Proposed Change 26 and amend reference to Technical Report in order to be	For clarification and

No. of Proposed Change	Proposed Change	Reason for Change
<u>Proposed Change 22</u>	<p>consistent with paragraphs 4.6 and 4.10 of the document. This is in the fourth sentence in paragraph 6.2 as follows:</p> <p>The technical report (Joint Waste DPD Development Plan Documents for the East London Waste Authority Boroughs Preferred Options – technical report) provides a spreadsheet where the variables input (including apportionment, recycling and composting targets and existing facility capacity) calculate the estimated facility capacity needed.</p>	consistency.
<u>Further Proposed Change 27</u>	<p>Para 6.3</p> <p>Planning for Waste Management Facilities: A Research Study, <u>ODPM (August 2004)</u></p> <p>Recycling and recovery facilities: Sites investigation in London, <u>Land Use Consultants and SLR Consulting Ltd for the GLA (July 2005)</u></p>	For clarification.
<u>Hearing Proposed Change 24</u>	Para 6.7 Amend Further Proposed Change 29, delete reference to <u>GeL</u> and replace with <u>CLG</u> .	Updating document.
<u>Hearing Proposed Change 25</u>	<p>Amend Advertised Proposed Change 12 and amend Schedule 1 (Schedule 1 is appended to these Proposed Minor Changes as Annex 1)</p> <p>Amend Schedule 1 to include the SITA recycling facility in River Road and amend name of Rainham <u>Waste Recycling & Reclamation Centre</u>. Amended Schedule 1 (which is also amended as a result of Hearing Proposed Change 5) is appended to this Schedule of Proposed Minor Changes as Annex 1.</p>	For clarification and to correct typographical error.
<u>Hearing Proposed Change 29</u>	This confirms that no changes are required to the Sustainability Appraisal following the Schedule of Advertised Proposed Changes and amendments to the Proposals Map. A statement confirming this is appended to this Schedule of Proposed Minor Changes as Annex 1.	No changes made; note included for clarity.
<u>Hearing Proposed</u>	Change colour of Table 3 from magenta font to black font.	For consistency.

No. of Proposed Change	Proposed Change	Reason for Change
<u>Change 31</u>		
<u>Hearing Proposed Change 32</u>	Table 4. Note 2 should refer to Table 4 not Table 3	For clarification and to correct typographical error.
<u>Hearing Proposed Change 33</u>	Paragraph 4.11. Last line should refer to Table 5.	For clarification and to correct typographical error.
<u>Hearing Proposed Change 34</u>	Text Box, Paragraph 4.20 Under the heading Advanced Thermal Treatment. Insert the text “(See policy W3)” at the end of the third sentence which begins with the text "Within the ELWA area"	For clarification.
<u>Hearing Proposed Change 35</u>	Text Box, Paragraph 4.20 Delete the final sentence under the heading C,E&D Recycling which starts with the text "Permissions granted..." . Place the text after the second paragraph in policy W5 to create a new third paragraph.	Moving existing text into policy for clarity.
<u>Hearing Proposed Change 36</u>	Paragraph 2.20. "this Proposed Submission Document" should be changed to "the Proposed Submission Document...."	For clarification.
<u>Hearing Proposed Change 37</u>	Paragraph 3.4 "Borough Core Strategy's" should be "Borough Core Strategies"	For clarification and to correct typographical error.
<u>London Plan Proposed Change 5</u>	Amend Further Proposed Change 3 by amending the second and deleting the third bullet point under paragraph 1.6 which begins with the text <i>"Details of other documents referred to throughout this document are detailed below:"</i> <ul style="list-style-type: none"> • Planning Policy Statement 10: Planning for Sustainable Waste Management (ODPM, July 2005). Available at http://www.communities.gov.uk/index.asp?id=1143834 • The London Plan (GLA July 2011) (Consolidated with Alterations since 2004) (GLA, February 2004) including Alterations to the Plan's housing provision targets and waste and minerals policies (December 2006) and Draft further alterations to the London Plan (September 2006) and Draft minor alteration on borough level waste apportionment 	Update to reflect London Plan.

No. of Proposed Change	Proposed Change	Reason for Change
	<p>(December 2006). Available at http://www.london.gov.uk/mayor/strategies/sds/index.jsp</p> <p>The London Plan Consultation Draft Replacement Plan (GLA October 2009) (including minor alterations to the Consultation Draft relating to Borough level waste arisings and apportionments in December 2009)</p>	
<p><u>London Plan Proposed Change 6</u></p>	<p>Amend paragraph 2.6</p> <p>2.6 The London Plan (2011) Consolidated with Alterations since 2004 provides planning policies for waste management which boroughs must be in general conformity with, including the tonnages of municipal and commercial and industrial waste to be managed by each London borough, revised targets for recycling of municipal waste and new targets for recycling of commercial and industrial waste and recycling or reuse of construction and demolition waste.</p>	<p>Update to reflect London Plan</p>
<p><u>London Plan Proposed Change 7</u></p>	<p>Amend paragraph 2.9</p> <p>Adjoining regional or local policy</p> <p>2.9 It is important for the Joint Waste DPD to take into account the relevant strategies and plans of adjoining areas. The key waste planning policies from adjoining areas are detailed below:</p> <p>East of England Plan (RSS) Policy WM3 [Imported Waste] “The East of England should plan for a progressive reduction in imported waste. After 2015, provision for the management of imported waste from London should be restricted to the landfill of residual waste that has been subject to the maximum practical level of recovery and treatment, for which landfill is the only practical option”. This is supported by Thurrock Core Strategy Issues and Options Consultation where the proposal to reduce the use of landfill including importation of London’s waste to landfill residues by 2015 and only if landfill capacity is still available. It was favoured by 71% of respondents. The Essex Waste Development Plan is currently in preparation.</p>	<p>Update to reflect London Plan and RSS</p>

No. of Proposed Change	Proposed Change	Reason for Change
<u>London Plan Proposed Change 8</u>	<p>Amend paragraphs 2.16 and 2.17</p> <p>2.16 London Plan Policy 5.17 4A.25 requires the Joint Waste DPD to identify sufficient land to provide capacity to manage the apportioned tonnages of municipal solid waste (MSW) and commercial and industrial (C&I) waste. Waste is deemed to be managed in London if it is used for energy recovery in London, or it is compost or recycle sorted or bulked in London material recycling facilities for reprocessing either in London or elsewhere.</p> <p>2.17 Although the London Plan borough level apportionment does not include construction, excavation and demolition waste (C, D&E) or hazardous waste streams, these are addressed in London Plan Policies 4A.28 and 4A.29 5.18 and as such are included in the Joint Waste DPD.</p>	To reflect policy numbering change in London Plan
<u>London Plan Proposed Change 9</u>	<p>Amend paragraph 4.1</p> <p>4.1 The determination of how much waste will need to be managed by the ELWA boroughs was debated through previous public consultation. The London Plan (consolidated with Alterations since 2004) identifies the borough level apportionment of municipal solid waste (MSW) and commercial and industrial waste (C&I) to be managed. The apportionment for each ELWA boroughs is pooled for the purpose of this Joint Waste DPD.</p>	
<u>London Plan Proposed Change 10</u>	<p>Amend paragraph 4.3</p> <p>4.3 Graph 1 below show the tonnages of these waste streams to be managed by the ELWA boroughs to 2020. Municipal solid waste and commercial and industrial waste tonnages are as per London Plan (Consolidated with Alterations since 2004) Table 4A.6.¹⁸ Construction, excavation and demolition waste and hazardous waste projections for the ELWA boroughs are as set out in the</p>	

¹ The projections for municipal solid waste and commercial and industrial waste have been reduced in the latest version of the London Plan which was published in July 2011.

No. of Proposed Change	Proposed Change	Reason for Change																				
	<p>Issues and Options Consultation Document. These projections have been will be subject to review during the preparation period covered by of the Waste Plan with the publication by the Mayor of London of a draft Replacement London Plan in July 2011</p>																					
<p><u>London Plan Proposed Change 11</u></p>	<p>Amend Graph 1 to reflect figures relate to London Plan 2008.</p> <p>Graph 1: Waste volumes projected to be managed by ELWA boroughs</p> <table border="1"> <caption>Data points from Graph 1: Waste volumes projected to be managed by ELWA boroughs</caption> <thead> <tr> <th>Year</th> <th>MSW (London Plan 2008 Table 4A.6)</th> <th>C&I (London Plan 2008 Table 4A.6)</th> <th>C,E&D forecast</th> <th>Hazardous waste forecast</th> </tr> </thead> <tbody> <tr> <td>2010/11</td> <td>402,914</td> <td>991,933</td> <td>1,545,170</td> <td>97,731</td> </tr> <tr> <td>2014/15</td> <td>656,467</td> <td>1,190,954</td> <td>1,281,221</td> <td>96,113</td> </tr> <tr> <td>2019/20</td> <td>760,541</td> <td>1,410,013</td> <td>1,267,281</td> <td>94,521</td> </tr> </tbody> </table>	Year	MSW (London Plan 2008 Table 4A.6)	C&I (London Plan 2008 Table 4A.6)	C,E&D forecast	Hazardous waste forecast	2010/11	402,914	991,933	1,545,170	97,731	2014/15	656,467	1,190,954	1,281,221	96,113	2019/20	760,541	1,410,013	1,267,281	94,521	
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No. of Proposed Change	Proposed Change	Reason for Change
<u>London Plan Proposed Change 12</u>	<p>Amend paragraph 4.4</p> <p>What facilities will we need?</p> <p>4.4 Taking into account the reduced apportionment in the London Plan (2011) the ELWA boroughs will need to provide sufficient waste management capacity for:</p> <ul style="list-style-type: none"> • 1.573 million tonnes of MSW and C&I waste at 2021 • 1.267 million tonnes of C,E&D waste at 2020; and • 0.095 millions tonnes of hazardous waste at 2020. <p>4.1</p>	Update to meet London Plan
<u>London Plan Proposed Change 13</u>	<p>Amend Advertised Proposed Change 1 and amend paragraph 4.11 (now paragraph 4.10) as follows:</p> <p>4.11 4.10 The 2011 London Plan proposed current figures are lower than in the previous current London Plan (consolidated with alterations since 2004, see Table 3) and have resulted should they be published in this form following the examination of the replacement London Plan there would clearly be in increased flexibility within the Waste DPD in terms of site deliverability. Such flexibility recognises that in some cases a site may not come forward or be required to meet the apportionment during the plan period. Site delivery and capacity requirements will be monitored extensively through LDF Annual Monitoring Reports. Where it is apparent that surplus capacity has been identified it may be necessary to put back the delivery of a waste management facility to a later five year period, or review its allocation in the DPD and seek an alternative use. As set out in Policy W2, sites will only be approved where they are needed to contribute to meeting the London Plan apportionment figures for the ELWA boroughs, and capacity sought only where there is an identified need.²</p>	
<u>London Plan</u>	Amend Advertised Proposed Change 5 and amend paragraph 4.16 to take into account the adopted London Plan 2011	

² Ibid.

No. of Proposed Change	Proposed Change	Reason for Change
<u>Proposed Change 14</u>	<p><u>The London Plan, Spatial Development Strategy for Greater London (Greater London Authority, 2008/11) noted that in 2003/7 around 300,000 tonnes of hazardous waste was produced in London, 50.35% from C&D waste (containing asbestos and contaminated soil), 29.1% from oil and oil/water mix waste, and 20.44% from chemical and other industrial processes. There are no figures for hazardous waste on an individual borough basis; however with 33 boroughs, the individual tonnages generated in each borough are likely to be low. ...</u></p>	
<u>London Plan Proposed Change 15</u>	<p><u>Amend paragraph 4.17 to reflect adopted policy in the London Plan 2011.</u></p> <p>4.17 The definition of hazardous waste includes substances that commonly make up household, commercial and industrial construction (including WEEE) and construction, excavation and demolition waste streams (including asbestos and contaminated soils). Whilst London Plan Policy 4A.29.19 states that Development Plan Documents should make provision for hazardous waste treatment plants to achieve, at a regional level, the necessary waste management requirements there is no definition of such facilities. Any application for a waste management facility that manages hazardous waste would be determined in accordance with the policies of this Joint Waste DPD.</p>	
<u>London Plan Proposed Change 16</u>	<p><u>Amend Hearing Proposed Change 15 (which amends Further Proposed Change 17) to reflect adopted policy in the London Plan 2011</u></p> <p>The agreed targets for the Joint Waste DPD intend to deliver sustainable waste development (Preferred Objective A) and are consistent with the Waste Strategy for England 2007 and the London Plan as consolidated with alterations since 2004 (2011). are:</p> <ul style="list-style-type: none"> • Recycling & Composting of MSW - 40% by 2010, 45% by 2015, 50% by 2020 <u>Waste Strategy for England (2007, page 11)</u> • Recovery of MSW - 53% by 2010, 67% by 25, 75% by 2020 <u>Waste Strategy for England (2007, page 11)</u> • Recycling and composting of C&I - 70% by 2020 <u>London Plan 2008/11 (consolidated with alterations since 2004) Policy 4A.21 5.16 (Waste strategic policy and targets Self-Sufficiency and the Draft London Plan)</u> 	

No. of Proposed Change	Proposed Change	Reason for Change
	<ul style="list-style-type: none"> • Recycling and reuse of C,E&D - 95% by 2020 	
<u>London Plan Proposed Change 17</u>	<p>Amend Policy W2 to reflect adopted policy in the London Plan 2011</p> <p>Policy W2: Waste Management Capacity, Apportionment & Site Allocation</p> <p>The London Plan identifies the amount of municipal and commercial waste to be managed by the ELWA boroughs as 1,394,847 1,228,000 tonnes at 2011; 1,395,000 tonnes at 2016 and 1,573,000 tonnes at 2021. The ELWA boroughs will meet this apportionment by:</p>	
<u>London Plan Proposed Change 18</u>	<p>Amend paragraph 5.8 and amend Hearing Proposed Change 16 to reflect adoption of the London Plan 2011</p> <p><u>5.8 The Councils recognised that before all the sites in Schedule 2 are operational it will need to treat carefully proposals which involve the loss of existing waste management facilities that are not safeguarded. This is necessary to ensure there remains sufficient capacity in place to meet the apportionment. The Councils will require appropriate compensatory provision to be made where this is not the case.³ Existing construction excavation and demolition waste management sites are safeguarded in line with Policy 4A.28 of the London Plan (consolidated with Alterations since 2004)</u></p> <p>5.</p>	

³ Advertised Proposed Change 15 in response to representation JWDPD 1220

No. of Proposed Change	Proposed Change		Reason for Change
<u>London Plan Proposed Change 19</u>	Amend item in the Acronyms and terms section		
	London Plan	Refers to the current iteration of the London Plan (consolidated with Alterations since 2004), published in July 2011 the strategic spatial planning document <u>Spatial Development Strategy for Greater London.</u>	

Annexes

Annex 1

Note regarding Sustainability Appraisal, Habitats Regulations Assessment, PPS25 Sequential Test and Equalities Impact Assessment

This document represents a schedule of post-hearing amendments to the Joint Waste DPD, as submitted. These amendments represent minor and statutory provision changes and clarifications to the draft DPD following the Schedule of Proposed Advertised Changes consultation and examination; no significant changes to the policies or site allocations in the draft DPD are proposed. It is considered that the minor changes set out in this schedule do not change the findings of impact assessments prepared in conjunction with the draft DPD and submitted to the Secretary of State: the Sustainability Appraisal (SA); Habitats Regulations Assessments (HRA); PPS25 Sequential Test; and Equalities Impact Assessment (EqIA). These impact assessments can be accessed on LB Newham's website at <http://www.newham.gov.uk/planning/planningpolicy>.

Annex 2
Schedule 1⁴

⁴ Changes to this Schedule have been made in accordance with Hearing Proposed Change 25 which amends Advertised Proposed Change 12

Ref	Facility name	Borough	Facility type	Annual Permitted Tonnage
RECYCLING				
80090	Gerpins Lane Reuse & Recycling Centre	Havering	A13 - Household Waste Amenity Site	115,500
80679	Jenkins Lane Waste Management Facility	Newham	A13 - Household Waste Amenity Site	110,000
80106	Chigwell Road Reuse & Recycling Centre	Redbridge	A13 - Household Waste Amenity Site	28,600
80105	Frizlands Lane Reuse & Recycling Centre	Barking & Dagenham	A13 - Household Waste Amenity Site	80,000
	Bywaters	Newham	A15 - Material Recycling Treatment Facility	500,000
80126	Ilford Recycling Centre	Redbridge	A15 - Material Recycling Treatment Facility	7,500
80518*	Rainham <u>Waste</u> Recycling & Reclamation Centre	Havering	A15 - Material Recycling Treatment Facility	50,000
80734	Express Recycling & Plastics Limited	Havering	A15 - Material Recycling Treatment Facility	30,000
	White Mountain Roadstone Ltd	Barking & Dagenham	A15 - Material Recycling Treatment Facility	12,000
80704*	Rainham Waste Recycling & Reclamation Centre	Havering	A15 - Material Recycling Treatment Facility	131,000
BT 9364**	Jenkins Lane MRF	Newham	A15 - Material Recycling Treatment Facility	50,000
BT 9372**	Frog Island MRF	Havering	A15 - Material Recycling Treatment Facility	70,000
80759	Closed Loop Recycling	Barking & Dagenham	A15 - Material Recycling Treatment Facility	25,000
	<u>SITA UK Ltd, Barking Materials Recycling Facility</u>	<u>Barking and Dagenham</u>	<u>A15 – Material Recycling Treatment Facility</u>	<u>75,000</u>
80120	Reuse Collections Limited	Barking & Dagenham	A14 – Transfer Station taking Non-Biodegradable Wastes	260,000
80091	Jewometals (UK) Ltd	Barking & Dagenham	A20 – Metal Recycling (mixed MRSs)	24,000
80115	The Remet Company Ltd	Newham	A20 – Metal Recycling (mixed MRSs)	41,600
80125	Mayer Parry Recycling Ltd (EMR)	Newham	A20 – Metal Recycling (mixed MRSs)	150,000
COMPOSTING				
80704*	Rainham Waste Recycling & Reclamation Centre	Havering	A22 - Composting Facility (in-vessel)	49,000
80704*	Rainham Waste Recycling & Reclamation Centre	Havering	A22 - Composting Facility (windrow/wood processing)	153,000
RECOVERY				
80704*	Rainham Waste Recycling & Reclamation Centre	Havering	A16 - Physical Treatment Facility (lamp processing)	24,000
80620	Hunts Wharf	Barking & Dagenham	A16 - Physical Treatment Facility	150,000
Potential	Clinical Waste Ltd (Goodmayes Hospital)	Redbridge	A18 – Incinerator (Clinical Waste)	7,000
	Novera Gasification (Frog Island)	Havering	A17 - Physico-Chemical Treatment Facility (gasification)	90,000
80662	Frog Island Bio-MRF	Havering	A23 - Biological Treatment Facility	180,000 93,600
BT 9364	Jenkins Lane Bio-MRF	Newham	A23 - Biological Treatment Facility	102,000 99,840

