

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 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 Connellley 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.