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Assessment of Existing Waste Management Capacity

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Document Control

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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.

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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.