



East London Joint Waste Plan

Regulation 19 Submission Plan

Consultation Statement

Date: 12.02.25

**Barking &
Dagenham**

 **Havering**
LONDON BOROUGH

 **Newham London**

London Borough of
Redbridge 

Contents

Contents.....	2
1 Introduction.....	3
Purpose.....	3
2 Plan Production Timeline	4
Key Local Plan Stages Undertaken	4
3 Summary of Regulation 18 Consultation Process.....	7
Bodies and persons invited to make representations under Regulation 18	7
How bodies and persons were invited to make representations	8
Other consultation activity	9
4 Outcome of Consultation - Summary of Main Issues Raised.....	10
Appendix 1: Analysis of Comments received to Regulation 18 consultation on the Draft East London Joint Waste Plan from July to September 2024.....	13

Abbreviations:

- CCS - Carbon Capture and Storage
- CCUS - Carbon Capture, Utilisation and Storage
- CDE - Construction, Demolition, and Excavation waste
- EA – Environment Agency
- EfW – Energy from Waste
- GLA – Greater London Authority
- LP – London Plan
- SIL – Strategic Industrial Location
- SRN – Strategic Road Network
- TfL – Transport for London
- WPA – Waste Planning Authority

1 Introduction

Purpose

- 1.1 This Consultation Statement sets out how the East London Boroughs of Barking & Dagenham, Havering, Newham and Redbridge have involved residents and stakeholders in preparing the East London Joint Waste Plan 2025 to 2041 (ELJWP) in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (the ‘plan making Regulations’).
- 1.2 This Consultation Statement has been prepared to accompany the publication of the ‘Submission Draft’ ELJWP in accordance with Regulation 19 of the plan making Regulations. The Statement is intended to demonstrate that consultation during the preparation of the ELJWP has been undertaken in accordance with the relevant Regulations and the ‘East London Joint Waste Plan Consultation Protocol’. This Consultation statement is therefore intended to inform representations made at the Regulation 19 stage related to whether the Plan has been prepared in accordance with the Regulations concerning consultation.
- 1.3 The East London Joint Waste Plan Consultation Protocol document sets out how the Boroughs will consult and involve the public, statutory consultees and other organisations when preparing the ELJWP. The latest version of the Consultation Protocol can be viewed on the consultation website. This statement therefore considers the actual consultation activities undertaken and how they compare with those set out in the consultation protocol.
- 1.4 This Consultation Statement comprises four sections as follows:
 - Section 1 (this section) provides an introduction;
 - Section 2 sets out the timeline which has been followed in preparing the East London Joint Waste Plan which is in accordance with the Boroughs’ Local Development Schemes;
 - Section 3 summarises the consultation process.
 - Section 4 summarises main issues raised during the consultation carried out under Regulation 18 and how the comments received have been considered by the Boroughs. Section 4 is supported by Appendix 1 which provides more detail concerning the comments received and Boroughs’ responses.

2 Plan Production Timeline

- 2.1 The creation of a new Waste Local Plan requires thorough and robust consultation. Engagement with the local community, businesses and organisations helps develop a plan that is tailored to the needs of the area in terms of strategy and the policies required.
- 2.2 The timetable below outlines the main stages of preparing the ELJWP, including publication of the Submission Draft ELJWP for representations in accordance with Regulation 19 of the plan making Regulations.

Key Plan Production Stages

Stage 1: Identify issues and collect evidence

- 2.3 In 2023, the four East London Boroughs agreed to jointly update the adopted East London Waste Plan. Preparation of the first draft replacement ELJWP (Regulation 18 draft) involved the following steps:
 - Reviewed policies in the adopted East London Waste Plan and the adopted and emerging Borough Local Plans;
 - Reviewed national and regional policy, in particular:
 - National Planning Policy Framework
 - National Planning Policy for Waste
 - The London Plan 2021
 - Undertook a Waste Needs Assessment to establish the extent to which existing waste management capacity would be able to meet requirements for waste management over the Plan period, including the London Plan apportionments
- 2.4 From the above, the Boroughs identified the issues that needed to be addressed by the ELJWP and approaches to addressing them.
- 2.5 A draft Vision and Strategic Objectives were prepared setting out how the Boroughs would like to see land used for waste management in East London to 2041. Planning policies were drafted which are to be used when determining planning proposals. Text was also drafted for inclusion in the Plan to set out the vision and objectives, justify the policies and explain how they are to be implemented in practice.

Stage 2: Draft Local Plan consultation – July-September 2024

- 2.6 The Boroughs consulted on a full draft version of the ELJWP for a seven-week period between Monday 29 July and Monday 16 September. An evidence base was published alongside the draft ELJWP. The documents published are listed below:

- Draft East London Joint Waste Plan (July 2024)
- Draft East London Joint Waste Plan (July 2024) - Appendix 2
- Integrated Impact Assessment for the ELJWP
- Habitats Regulations Assessment for the ELJWP
- Circular Economy Topic Paper
- Climate Change Topic Paper
- Waste Management Topic Paper
- Assessment of Existing Waste Management Capacity Report
- Hazardous Waste Baseline and Arisings Report
- Construction, Demolition, & Excavation Waste Baseline and Arisings Report
- Strategic Waste Flows Report
- Release of Safeguarded Waste Sites Report
- ELJWP Consultation Protocol

Stage 3: Plan amendments and evidence base update – October 2024-January 2025

2.7 The Boroughs considered the comments received during the draft ELJWP consultation. The evidence base documents were updated, including the Integrated Impact Assessment, Capacity Assessment and assessment of sites for release from safeguarding. The ELJWP was updated to take account of the comments and ensure that it is sound i.e. Positively prepared; justified; effective; and, consistent with national policy.

Stage 4: Publish the Plan (Submission Plan Reg 19) – Mid 2025

2.8 In accordance with Regulation 19 of the plan making Regulations, a submission ready version of the ELJWP is being made available for stakeholders and the public to make representations on its soundness and legality for a statutory minimum period of 6 weeks. In accordance with the Local Plan Regulations, this consultation is formal and statutory, seeking comments specifically on the Plan's soundness for Examination in Public.

Stage 5: Submission to the Secretary of State: Late 2025/early 2026

2.9 The Boroughs will assess the representations received during the Regulation 19 formal consultation to confirm that they consider the ELJWP to be sound and therefore, that it can be submitted for examination by an independent inspector appointed by the Secretary of State.

Stage 6: Examination: Early-mid 2026

2.10 The Plan will be examined by an independent Planning Inspector.

Stage 7: Adopt - Late 2026

2.11 Subject to the Plan being found sound and legally compliant by the Inspector, the Plan will be adopted in late 2026.

3 Summary of Regulation 18 Consultation Process

3.1 During the preparation of the ELJWP a draft Plan was published for consultation for a period of seven weeks between 29 July and 16 September 2024. The Plan and the evidence base documents were made available for viewing online and hard copy documents were made available in each borough. Bodies and persons were invited to make representations under Regulation 18.

3.2 A total of approximately 2,665 organisations and individuals were specifically notified of the consultation and invited to make comments during the consultation. These included the following:

- All 32 London Borough Councils and the City of London Council.
- All joint waste authorities in London
- 24 Waste Planning Authorities outside of London
- The waste management industry (77 waste site operators/owners)
- Representatives from statutory and non-statutory consultees and other Duty to Cooperate prescribed bodies as follows:
 - Coal Authority
 - Department for Education
 - Environment Agency
 - Historic England
 - Marine Management Organisation
 - Natural England
 - NHS
 - Highways England / Highways Agency
 - Network Rail
 - Office of Rail and Road
 - Transport for London
 - Port of London Authority
 - Canal and River Trust
 - UK Power Networks
 - Thames Water
 - Anglian Water
 - Essex and Suffolk Water
 - National Grid
 - Cadent Gas
 - Homes England
 - Greater London Authority
 - London Local Nature Partnership
 - Sport England

How bodies and persons were invited to make representations

- 3.3 All contacts on the Boroughs' planning consultee databases, including statutory consultees, interested stakeholders and waste organisations were notified of the consultation directly via email on 29 July 2024. All emails included details of the consultation, how to make comments, and an invitation to attend events (drop-ins and online event).
- 3.4 Each Borough published a press notice about the consultation in their local newspapers and also published information on their social media channels.
- 3.5 The Regulation 18 public consultation on the ELJWP was facilitated using a bespoke website hosted by the London Borough of Havering (<https://consultation.havering.gov.uk/planning/east-london-joint-waste-plan/>). All consultation documents were available to view on the website from 29 July 2024.
- 3.6 Hard copies of the draft ELJWP were made available for inspection at the boroughs' main offices (Barking Town Hall, Havering Town Hall, Newham Dockside and Redbridge Town Hall), at Dagenham Library and local libraries in Newham.
- 3.7 All contacts were invited to an on-line consultation event which took place on 14 August 2024. The event was recorded and made available for viewing on the consultation website.
- 3.8 Further information about the ELJWP and the consultation was set in 'Frequently Asked Questions' which were published on the consultation website.
- 3.9 A feedback form was provided specifically for use in submitting comments and queries either by email or post.
- 3.10 Two drop-in sessions were held in each borough throughout the consultation period as detailed below. These sessions allowed anyone with an interest to request further information about the ELJWP in-person from representatives of the Borough Planning Policy teams.

Location	Date	Time
Redbridge Central Library (Studio 2), Clements Road, Ilford, IG1 1EA	5 August 2024	4pm - 6pm
Rainham Library, 6 Celtic Farm Road, Rainham RM13 9GP	6 August 2024	2:30pm – 4:30pm
East Ham Library (Café area), 328 Barking Rd, London E6 2RT	15 August 2024	5pm - 7pm

Location	Date	Time
Barking Town Hall (Committee Room 2) 1 Clockhouse Ave, Barking IG11 7LU	21 August 2024	3pm – 5pm
Romford Library, St Edwards Way, Romford RM1 3AR	28 August 2024	9:30 – 11:30am
Dagenham Learning Centre, 1 Church Elm Ln, Dagenham RM10 9QS	4 September 2024	11am - 1pm
Keith Axon Community Centre, 160 Grove Road, Chadwell Heath, Redbridge RM6 4XB	10 September 2024	4pm - 6pm
Stratford Library, 3 The Grove, Stratford, London, E15 1EL	12 September 2024	10am-12noon

Other consultation activity

3.11 Representatives of the boroughs attend the London Waste Planning Forum and were able to inform its members of the upcoming consultation and to remind them when the consultation was taking place. Relevant meetings of the LWPF took place on 8 November 2023 and 1 August 2024.

3.12 Meetings were held, and further correspondence took place, with certain stakeholders on parts of the Plan which were of particular interest to them as listed below:

- GLA
- East London Waste Authority
- Thames Water
- London Borough of Tower Hamlets
- Network Rail
- Legal and General
- Thurrock Council

3.13 In addition to the above, informal conversations about the ELJWP were held with representatives of the Boroughs preparing the West London Waste Plan. Where it was identified that a potentially strategically important quantity of waste which arose in the ELJWP area was being managed outside of the area, the relevant waste planning authority was contacted to obtain views on the importance of the movement, its quantity and whether that movement would be able to continue over the period of the ELJWP. Full details of which are laid out in the Duty to Cooperate statement.

4 Outcome of Consultation - Summary of Main Issues Raised

4.1 52 responses were received in total with the following breakdown of respondents:

- London Borough Councils = 2
- Joint waste authorities in London = 2
- Waste Planning Authorities outside of London = 3
- The waste management industry = 11
- Statutory consultation bodies = 12
- Utilities companies = 4
- Individuals = 18

4.2 A table has been prepared which summarises all the issues raised the consultation, and how these issues have been addressed, as appropriate, in the Regulation 19 Submission Draft East London Joint Waste Plan. This table is included in Appendix 1 of this document.

4.3 A summary of the main issues raised and how these have been addressed is included below:

Introduction and Background

- Broad support for the Plan's alignment with circular economy principles.
 - Response: Noted.
- Need for updates to context regarding the water environment and management of wastewater.
 - Response: Relevant text updated and added.
- Need for updates to context regarding the East London Waste Authority and the East London Joint Waste Strategy.
 - Response: Relevant text updated and added.

Policy and Strategic Framework

- Strong support for minimising waste from development and achieving net zero in waste management by 2041.
- Need to reference protection of historic environment
 - Response: Relevant updates made to Strategic Objective 3 and Policy JWP4.
- Need for specific policy and text addressing development associated with treatment of wastewater e.g. upgrades at Beckton and Riverside Sewage Treatment Works.
 - Response: Text of Plan amended with specific reference to wastewater (including changes to policies JWP3 and JWP4) and new

Project: East London Joint Waste Plan 2025-41

Document: Consultation Statement

Version: Final

Date: 12.02.25

Policy JWP2A included to address wastewater and sewage sludge management development. Specific consultation distances for development proposed proximate to waste water treatment works have been added,

- Concerns raised regarding location and environmental impacts of incineration facilities managing East London's waste.
 - Response: Such facilities require Environmental Permits issued by the EA intended to control pollution; policy is also included in the Plan to address environmental impacts associated. Policy JWP2 strengthened regarding the protection of residential amenity. Text in Section 2 updated to provide details of locations of potential facilities.
- Request that the Plan acknowledges 'secure by design' principles.
 - Response: Supporting text and Policy JWP 4 updated to reference 'secure by design'
- Concern that waste sites are often not suitable for educational visits
 - Response: Requirement for educational facilities at waste facilities has been deleted from Policy JWP1.

Transportation

- Support for alternative transportation modes, particularly utilising the River Thames, to reduce road congestion and emissions.
 - Response: Support noted. Objective SO7 amended to emphasise need for energy efficiency in transport methods.
- Concerns about traffic impacts.
 - Response: Policies ensure any proposals account for traffic mitigation measures. Policy JWP4 has been strengthened to ensure applications consider the safety of road users. Text clarifying the need for, and content of, Travel Plans and Transport Assessments to be submitted with applications has been added.

Safeguarding

- Concern that Plan is not in general conformity with London Plan policy on the safeguarding of waste management sites and that there is a need to retain strategic sites, including Eurohub and Renwick Road Rail Hub, for future waste management.
 - Response: Proposed release of sites will not have a strategic impact on the ability of waste arising in East London (or elsewhere in London) to be managed in future. Release of some sites is necessary to facilitate other forms of development for which there is a critical shortage e.g. housing or the intensification of industrial land. Other Boroughs were invited to request surplus capacity as part of their plan making. Clarification added

to Policy JWP2 (and supporting text) regarding which category of sites will be safeguarded in relation to status in planning law.

- Some support for site releases to facilitate housing development but the need to mitigate potential conflicts with adjacent industrial uses was highlighted.
 - Response: Proposed release of sites will not have a strategic impact on the ability of waste arising in East London (or elsewhere in London) to be managed in future. Release of some sites is necessary to facilitate other forms of development for which there is a critical shortage e.g. housing or the intensification of industrial land. Clarification added to Policy JWP2 (and supporting text) regarding which category of sites will be safeguarded in relation to its status in planning law.
 - Response: Agent of Change principles in the NPPF and specific policy JWP3 are intended to ensure redevelopment does not impact on ability of existing sites to manage waste.

Future Waste Management Capacity Requirements

- Inconsistencies in data on waste between the Plan and supporting Waste Needs Assessments were noted.
 - Response: Waste data in Plan updated and cross-checked to ensure accuracy and alignment with evidence base reports.
- Concerns about grouping all Construction, Demolition, and Excavation (CDE) Waste CDE waste types into a single category.
 - Response: Supporting evidence base provides disaggregated data for CDE waste components.
- Concerns about the Plan's reliance on export of inert waste to other areas for landfill were raised
 - Response: Text added to clarify that the availability of land in East London for the deposit of inert excavation waste is more constrained and so such waste is frequently transported to areas outside of London for management. This is recognised in paragraph 9.8.1 of the London Plan 2021 which observes that target net self-sufficiency by 2026 does not relate to this waste stream.

Appendix 1: Analysis of Comments received to Regulation 18 consultation on the Draft East London Joint Waste Plan from July to September 2024

<u>Part of Plan</u>	<u>Summary of comment</u>	<u>Borough Response including action arising</u>
1. Introduction and Background		
Para 1.16	Support for recognition that the planning system should not duplicate other regulatory regimes, an often overlooked but crucial concept. <i>[Heidelberg Materials UK]</i>	Noted. No action arising.
General	Support the proposed requirement that all local authorities must collect food waste weekly. <i>[resident]</i>	Noted. No action arising.
2. The Context		
General	Initiatives used in other countries to improve recycling rates should be adopted. Good examples include Germany and Switzerland. There is a need for more recycling sites and bins made available to households. <i>[resident]</i>	Plan is consistent with current Government policy and takes account new impacts of new initiatives intended to improve recycling such as consistent collection, DRS and EPR. JWP1 intended to ensure development comes forward that allows for greater recycling by ensuring appropriate storage for recycle is included. No action arising.
	Concerns about littering causing accidents like slips and trips. In Rwanda there are fines for littering which are very effective - keeps city hygienic. <i>[resident]</i>	Provision of waste facilities as proposed by the Plan will help reduce litter. Policy JWP4 intended to ensure that litter is not produced from waste management facilities. No action arising.
	Fly tipping an issue in East London. <i>[Metropolitan Police Service and resident]</i>	The Plan safeguards existing waste management sites and provides for the development of new ones to ensure there is sufficient capacity to allow waste to be managed lawfully. No action arising.

<u>Part of Plan</u>	<u>Summary of comment</u>	<u>Borough Response including action arising</u>
Paragraph 2.10	Mention of Epping Forest SAC as a key designated site is welcomed <i>[Natural England]</i>	Noted. No action arising.
Paras 2.21-2.23	Updates to context needed regarding the water environment and management of wastewater. <i>[Environment Agency (EA)]</i>	Text in chapter 2 updated accordingly.
Para 2.33	Para 2.33, states that 480,000t waste produced and 190,000t were burnt, 130,000t recycled and only 117t sent to landfill so 160,000t needs explaining. <i>[resident]</i>	Values have been checked and updated as necessary.
Para 2.33	Please specify where incineration of waste arising in East London waste takes place - it would be better to manage within East London. <i>[resident]</i>	Information included in paragraph 2.33. The total capacity of waste management facilities in East London exceeds that which arises in East London. Waste is transported across boundaries for Management by EfW, especially in London due to economies of scale.
Paragraph 2.35	Agree that most CDE waste can be recycled or recovered, provided suitable facilities are available. <i>[Heidelberg Materials UK]</i>	Noted. No action arising.
Para 2.45-2.47	Thames Water is the statutory sewerage undertaker for the Boroughs of Newham, Redbridge and majority of Barking & Dagenham. The key sewage treatment works (STW) is Beckton STW, but there are strategic sewage pumping stations in these Boroughs. Support reference to wastewater and sewage sludge in paras 2.45-2.47, ELJWLP recognises the need for ongoing development at Beckton STW during the plan period i.e. up to 2041. <i>[Thames Water]</i>	New policy JWP2A added which includes supporting text with details of expected upgrades.
	Havering Borough includes our Riverside STW which will also require upgrading during AMP8 so support should be included for this. <i>[Thames Water]</i>	New policy JWP2A added which includes supporting text with details of expected upgrades.
	There is a need for a specific wastewater treatment/sewage sludge policy as fundamentally, waste water treatment has different geographical and technical requirements from other forms of waste management. <i>[Thames Water]</i>	New policy JWP2A added which includes supporting text with details of expected upgrades.
Para 2.73 and 2.74	Support for CCS and CCUS technologies in EfW facilities though this is still in early stages. Priority should continue to be reducing overall carbon emissions through	No action arising.

<u>Part of Plan</u>	<u>Summary of comment</u>	<u>Borough Response including action arising</u>
	heat capture for re-use as a low carbon heat source (secondary heat recovery) wherever possible. <i>[Barking Riverside Ltd]</i>	Noted. ELJWP5 sets out need for CCUS and heat capture associated with EfW.
Para 2.7	Support for recognition of road congestion issues in the ELJWP in particular those affecting the A12 and A13. <i>[City of London Corporation]</i>	Noted. No action arising.
Para 2.88	Statement that excavation waste is excluded from LP net self-sufficiency target as it is difficult to recycle is incorrect as it being more difficult for London to provide sites for management or beneficial use. <i>[Thurrock Council]</i>	Excavation waste is used for beneficial recovery rather than recycling as it is not suited to recycling. Beneficial use sites normally have significant footprints and therefore accommodating such projects within the confines of the urban area of London is challenging. No action arising.
2.99	LP requirement to share any surplus capacity with boroughs facing a shortfall before considering release of site from safeguarding protection is supported. In deciding which sites to offer to other boroughs consideration should be given to those best located to meet their needs to minimise vehicle miles. Riverside and perhaps rail side sites could be well suited in locational terms. <i>[TfL]</i>	The sharing of apportionment does not (and cannot) involve identification of specific sites with surplus capacity for specific waste types as the Plan cannot dictate which existing sites are used to serve which areas. No action arising.
Paragraphs 2.112 to 2.118	Text is not quite accurate as to the nature of East London Waste Authority (ELWA) or the East London Joint Resources and Waste Strategy (2027-57). <i>[ELWA]</i>	Text updated in accordance with ELWA advice.
Pages 4 and 5	Other than reference to heritage and archaeology in the geographical context section of the Plan, there is no reference to the historic environment which could be included at bullet point 5 in relation to projects designed to increase or upgrade waste management capacity. <i>[Historic England]</i>	Text added to overarching approach in executive summary.
3. Vision		
	Support for circular economy principles, aiming for landfill to be a last resort by 2041, and high-quality restoration of landfill sites. <i>[Various]</i>	Noted. No action arising.
	Support for the Vision – consistent with water industry approach. <i>[Water industry]</i>	Noted. No action arising.
	Support for Vision that waste will be managed efficiently by maximising existing capacity of facilities, releasing underutilised or poorly located sites, minimising	Noted. No action arising.

<u>Part of Plan</u>	<u>Summary of comment</u>	<u>Borough Response including action arising</u>
	transportation and using infrastructure established for alternative means of waste movement, in particular via the River Thames. <i>[Port of London Authority]</i>	
	Waste industry cannot control products on market; <i>[Integrated Skills Ltd]</i>	Noted. No action arising.
	Vision needs to cover 'prevention' level of waste hierarchy; <i>[resident]</i>	Already addressed by the Vision which states 'By 2041, the principles of the circular economy will be fully integrated into all forms of development within East London, resulting in reduced waste production'. No action arising.
	Positive Vision but not reflected in Plan or background documents. Specifically no information on transport of waste to authorities in the East of England. <i>[East of England Waste Technical Advisory Body]</i>	Figure 8 displays the balance between imports and exports by waste management method and waste type to and from East London in 2022. The report 'Identification of Strategically Significant Cross Boundary Waste Movements', BPP Consulting, April 2024 includes more details. No action arising.
	Vision and objectives should recognise the importance of the Local Nature Recovery Strategy being developed by the Greater London Authority (GLA) in helping to establish wider ecological connectivity. <i>[Natural England]</i>	The Vision and strategic objectives address the need to improve the natural environment (including biodiversity) in broad terms. Detail regarding the Local Nature Recovery Strategy being developed by the GLA has been inserted chapter 2 and in the supporting text to JWP4
Strategic Objectives		
SO1	Support for minimising waste from development. <i>[resident]</i>	Noted. No action arising.
	Net zero in waste management by 2041 will be difficult when waste industry cannot control products on market; <i>[Integrated Skills Ltd]</i>	The Government is introducing other initiatives to control products in the market that do not involve the waste industry. No action arising.

<u>Part of Plan</u>	<u>Summary of comment</u>	<u>Borough Response including action arising</u>
SO2	No specific comments	No action arising.
SO3	Strategic Objective 3 should also refer to the historic as well as natural environment. <i>[Historic England]</i>	Noted. Text of SO3 has been updated accordingly.
	Strategic Objectives 3 and 7 need to consider location of waste management capacity for those without access to a private car. For example, Havering has the Gerpins Lane RRC which is not accessible to anyone without a car. <i>[resident]</i>	Other communal facilities, not just, Reuse and Recycling Centres, and services are available for the management of waste from households. No action arising.
SO4	Support for strategic objective 4 seeking to ensure the high-quality restoration and aftercare of landfill sites maximize benefits to the community and the environment. <i>[Henry Boot Developments (HBD) and Barings]</i>	No action arising.
SO5	Does net zero include the production and use of the products, or just what happens after they become waste <i>[ELWA]</i>	The objective is concerned with achieving net zero in the management of waste i.e. how materials (which are waste) are managed. Although the use of recycled materials in the production of goods (or reduction in the use of materials e.g. light-weighting of packaging) reduces carbon impacts this is beyond the Plan's control except where those goods/materials are used in construction or refurbishment of development that requires planning permission. No action arising.
	Does plan consider fossil-based emissions, and biogenic emissions - if so how will they be distinguished from one another? <i>[ELWA]</i>	The issue of distinguishing between fossil based and biogenic based carbon emissions only arises with regard to development of new energy from waste capacity. In such a case it will be necessary to make such a distinction as energy derived from biogenic sources is offset by the carbon absorbed when the biogenic material is produced whereas the production of fossil based material (mainly plastic) does not involve absorption of carbon.

<u>Part of Plan</u>	<u>Summary of comment</u>	<u>Borough Response including action arising</u>
	Are emissions being counted even after waste has been exported, whether to other regions or abroad? <i>[ELWA]</i>	No because controlling the way in which exported waste is managed is beyond the remit of the Plan
	Details of benchmarks and models used may be required for other stakeholders to engage effectively on the delivery of this SO <i>[ELWA]</i>	Explanatory text is included in relevant policies any benchmarks and models used will have to be consistent with accepted practice at the time an application is made.
SO6	Support for safeguarding existing capacity <i>[Various including waste industry and local authorities]</i>	Noted. No action arising.
SO7	Support for alternative modes of transport including the River Thames <i>[Various including Port of London Authority]</i>	Noted. No action arising.
	Support SO7's aim to minimise transportation of waste and improve road safety by locating facilities as close as possible to their sources and establishing alternative transport means, including utilising the River Thames and railheads. <i>[Various including National Highways, Port of London Authority]</i>	Noted. No action arising.
	SO7 should be strengthened. River transportation is also largely fossil fuel powered. Emphasis should be given to the energy efficiency of transport i.e. water-based transport is considerably more efficient than land-based, regardless of energy source. <i>[EA]</i>	Noted. Text of SO7 has been updated accordingly.
	Move toward non road transport is welcomed however would only be realistic for the sites nearest the Thames. This proposal could help to achieve air quality and climate change targets due to less HGVs.	Noted. No action arising.
	Support SO7 which is in line with London Plan Policy T1. To deliver on this objective the strategy should take account of opportunities for the movement of waste by sustainable means, such as by river and rail if appropriate, and also ensuring location of facilities close to major generators of waste and places where there is demand for waste by products as well as reducing the amount of waste. <i>[TfL]</i>	Policy JWP2 encourages the development of facilities which are close to arisings and can make use of river and rail transportation. The Plan seeks to minimise waste production via Policy JWP1. No action arising.
SO8	What would amount to exceptional circumstances for landfill? <i>[Integrated Skills Ltd.]</i>	This is set out in Policy JWP6

<u>Part of Plan</u>	<u>Summary of comment</u>	<u>Borough Response including action arising</u>
		No action arising.
	Restriction of landfilling to exceptional circumstances welcomed, but unclear if this applies to landfill within the Plan area or outside it. <i>[East of England Waste Technical Advisory Body]</i>	The policies of the Plan can only be applied to the area covered by the Plan.
4. Future Requirements for Waste Management Capacity		
	Data in the plan needs cross checking with the Waste Needs Assessment documentation in particular relating to construction demolition and excavation waste. <i>[Integrated Skills Ltd.]</i>	Data has been checked and updated to ensure data in Plan is consistent with that in the data reports
	Table needed detailing waste exports. Authorities outside East London are currently not planning for waste from the area and so exported waste may have to travel further resulting in high financial and environmental costs. <i>[East of England Waste Technical Advisory Body]</i>	Such a table could be included but this would only be a snapshot. The scale of imports and exports is shown in Figure 8. DtC dialogue underway to establish likely management routes relating to waste exports.
	Add text highlighting that ongoing engagement and robust monitoring with regional waste technical groups and adjoining authorities to further understand the implications of flows of inert excavation waste will be needed. <i>[East of England Waste Technical Advisory Body]</i>	Text added to supporting text to JWP6 and related monitoring indicators.
Para 4.5	Combining all forms of construction demolition and excavation waste management together may present misleading picture regarding capacity requirements especially if Demolition and Excavation waste are combined. <i>[Integrated Skills Ltd.]</i>	C, D & E waste capacity is considered in greater detail in the separate evidence base report. The London Plan does not distinguish between the components of C, D & E waste other than excavation waste.
Para 4.9	Dialogue sought with respect to sharing surplus capacity to allow Western Riverside Waste Authority boroughs to meet their London Plan apportionments for HIC waste. <i>[Western Riverside Waste Authority]</i>	Affected boroughs (Lambeth and Wandsworth) have since confirmed that they do not wish to rely on surplus capacity in the ELJWP.
	Does the capacity assessment consider the impact from changes to the Permitting Regulations which will close sites operating T8 and T9 exemptions? <i>[Integrated Skills Ltd]</i>	Details of changes to the permitting regulations are still awaited and so it is not possible to state with any certainty what the impact will be. In any event sites which currently benefit from an

<u>Part of Plan</u>	<u>Summary of comment</u>	<u>Borough Response including action arising</u>
		<p>exemption may continue to operate with an Environmental Permit.</p> <p>Note that if the capacity assessment were to include sites currently operating under the T8 and T9 exemptions, assessed available capacity would increase.</p>
	<p>Encourage further engagement with GLA to ensure there is a more formalised mechanism for accounting for the tonnage of materials shared between the boroughs for apportionment purposes going forward. This is so the overall strategic picture can be planned with more certainty with a pragmatic methodology which suits the needs of London as a whole. <i>[EA]</i></p>	<p>Ongoing engagement with GLA is already taking place. Statement of Common Ground (SoCG) with GLA to be prepared.</p>
5. Sites for Waste Management		
Table 9 Existing Waste Sites Proposed for Release from Safeguarding	<p>London policy requirements relating to release of waste sites have not been met - the loss of any waste site would need evidence of the requisite alternative capacity being provided elsewhere in London – this is a general conformity issue. <i>[GLA]</i></p>	<p>Only a small number of sites are proposed for release and there is substantial surplus capacity remaining. Sites proposed for release are those which are not compatible with wider Borough development aspirations, in particular relating to the provision of housing and regeneration which is also an important use of land. The London Plan allows for sites to be released under such circumstances providing the apportionments are still met and net self sufficiency is not compromised. SoCG with GLA to be prepared.</p>
	<p>If the principle of releasing waste sites is established, their capacity should be offered to boroughs with a shortfall in waste capacity. The GLA is aware that some London boroughs cannot meet their borough apportionment targets and have a shortfall in waste capacity. <i>[GLA]</i></p>	<p>All Boroughs have been contacted and invited to consider whether surplus capacity in East London should be used to help meet waste requirements in their areas.</p>
	<p>All sites with Planning Permission or Environmental Permit should be safeguarded. <i>[GLA]</i></p>	<p>See above.</p>

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	Annex of Shed A, Box Lane has full planning permission and an Environmental Permit. Shed A itself has full permission (granted May 2022) and a permit. Both sites located in SIL. Draft B&D Local Plan specifically identifies Box Lane for larger logistics and distribution and heavier industrial activities with rail connections. Removal of Box Lane sites (Eurohub, Shed A and the Annex) is in conflict with the LP and the draft local plan. <i>[Integrated Skills Ltd.]</i>	Sites to be released at landowner request as occupancy of waste uses to cease in 2025 and Environmental Permits to be surrendered on vacation.
	Loss of three sites proposed for release are located in the Castle Green Masterplan area: (1) Eurohub Box Lane (D B Cargo) (2) Eurohub Box Lane (Titan Waste) (3) Renwick Road Rail Hub (Biffa Waste Services) This is within SIL – any loss of industrial capacity or changes to SIL designation will need consideration of how any change in status could impact on a borough’s industrial capacity and ability to meet its industrial needs as required by LP. <i>[GLA]</i>	Renwick Road Rail Hub (Biffa Waste Services) to be safeguarded. Other sites to be released at landowner request to enable the regeneration of the site as a freight terminal, as occupancy of waste uses to cease in 2025 and Environmental Permits to be surrendered on vacation.
	The existing Box Lane (Eurohub) site offers potential for transporting waste by rail including to Europe. Existing plans for redevelopment are entirely dependent on commercial viability; it is crucial that the site be allowed to offer a wide range of capabilities in order to optimise its chance of commercial success and so there is a need for some flexibility in redesignating the site. It will need to be able to handle waste to and from trains and the Plan should not prejudice that capability. <i>[Legal & General Investment Management]</i>	The site does not have full planning permission and is currently safeguarded only by virtue of Environmental Permits being in place. Sites to be released at landowner request to enable the regeneration of the site as a freight terminal, as occupancy of waste uses to cease in 2025 and Environmental Permits to be surrendered on vacation.
	Support for not safeguarding the Old Bus Depot waste management site <i>[City of London Corporation]</i>	Noted. No action arising.
	Support for not safeguarding the Dagenham Dock Sustainable Industries Park which is allocated in the adopted 2012 ELWP, in particular a site at Plot 64, Hindmans Way, Dagenham Dock, Barking. <i>[City of London Corporation]</i>	Noted. Parts of the Dagenham Dock Sustainable Industries Park that accommodate facilities classed as Existing Waste Sites under the London Plan will be safeguarded, but the remaining land currently allocated for waste development will be released.
	The Mayer Parry Wharf site at Bidder Street, London, E16 4ST is safeguarded by the adopted ELWP 2012 but is proposed for redevelopment without compromising	This site has already been effectively released from safeguarding when EMR relocated to Unit 6

Project: East London Joint Waste Plan 2025-41
Document: Consultation Statement
Version: Final
Date: 12.02.25

<u>Part of Plan</u>	<u>Summary of comment</u>	<u>Borough Response including action arising</u>
	waste capacity within the ELJWP area and should be expressly identified as a site to be released from safeguarding. <i>[IXDS Ltd]</i>	Standard Industrial Estate in Newham and so was not counted as an existing waste site in the capacity assessment nor identified in Appendix 1 and 2. There is therefore no need for this site to be mentioned specifically. The site at Standard Industrial Estate is listed in the ELJWP as a safeguarded site.
	Object to release of 5 sites in Barking which will result in 'redirection' of waste to two sites in Newham resulting in increased impacts from traffic. <i>[resident]</i>	Unclear which two sites in Newham this comment relates to but existing waste sites have been granted planning permission on the basis that they will not cause unacceptable adverse impacts the highway including congestion. Note that 3 of the site in B&D do not benefit from planning permission for waste, and the remaining two are inactive (hence any waste managed at these sites will already be being managed elsewhere). No action arising.
Paragraph 5.1.2	It could be clarified that the provisions of Paragraph 5.1 indent 2 only apply to Local Plans adopted prior to the adoption of this emerging WLP. <i>[Barking Riverside Limited]</i>	Add 'adopted and emerging' before 'Local Plans' to clarify the position.
	Concern that proposals will lead to more traffic in Newham as the airport creates pollution and there are residential buildings and schools around the area. <i>[resident]</i>	The Plan includes policy which is intended to ensure new waste management development will not cause unacceptable impacts on congestion.
	Reducing sites when there is ever increasing population is short sighted. <i>[resident]</i>	In most case the release of sites is intended to facilitate the development of housing to accommodate the growing population. An assessment of capacity has been undertaken that shows there will be sufficient capacity to meet future needs with release of the sites identified.

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		No action arising
	<p>Renwick Road Rail should be safeguarded. <i>[Biffa]</i></p> <p>Strongly oppose the release of railhead sites Barking Eurohub and Renwick Road Railhub from safeguarding due to the potential impact on waste management and the likely impact on sustainable transport initiatives. <i>[EA]</i></p>	<p>The Renwick Road Rail site is now included as a site to be safeguarded.</p> <p>Other Barking Eurohub sites are proposed for released to facilitate redevelopment of the area as a freight terminal in accordance with the Local Plan and in response to landowner request as occupancy of waste uses to cease in 2025 and Environmental Permits to be surrendered on vacation.</p>
	<p>Release of land should take into account whether the site is subject to any specialist transfer or treatment of hazardous waste on site. <i>[EA]</i></p>	<p>This has been undertaken. None of the sites proposed for release provide specialist transfer or treatment of hazardous waste. This information will be included in the evidence base. No action arising.</p>
	<p>As waste is moved up the hierarchy it needs more area per tonne to manage it. It is important that the current waste estate is maintained and loss of sites is minimised, especially those of strategic significance in terms of size or logistical considerations. <i>[EA]</i></p>	<p>Only a small number of sites are proposed for release and there is substantial surplus capacity remaining. Only one of the site proposed for released might be classed as making a strategic contribution to management of East London's waste (Eurohub) and this does not benefit from permanent planning permission for waste. No action arising.</p>
	<p>If sites are to be released for housing, there is a need to consider the relationship with other adjacent remaining industrial and related uses to ensure that it is a feasible and suitable location for residential development taking account of the agent of change principle. We suggest that surplus sites are considered for other similar uses (e.g. bus garages, logistics) when in SIL or LSIS before release. <i>[TfL]</i></p>	<p>Policies of the Borough Local Plans would ensure that proposals for redevelopment of waste sites for residential uses take account of the Agent of Change principle contained in the NPPF and are appropriate for the particular location. No action arising.</p>

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	Support approach that no land is proposed to be allocated specifically for the development of additional waste management facilities. <i>[Henry Boot Developments (HBD) and Barings]</i>	Noted. No action arising.
	No allocations being proposed means there is less chance of a site allocation having an impact on protected sites <i>[Natural England]</i>	Noted. No action arising.
6. Policies		
Policy JWP1: Circular Economy		
	Support for minimising waste from development <i>[Various]</i>	Noted. No action arising.
	Support for application of the circular economy to all forms of development. <i>[Various]</i>	Noted. No action arising.
	Support for JWP1 – consistent with water industry ambition. <i>[Water Industry]</i>	Noted. No action arising.
	Plans for infrastructure support such as sites for construction waste e.g. Circular Economy Construction Hubs) to facilitate a circular economy should be set out. <i>[Heidelberg Materials Ltd.]</i>	Noted. No action arising.
	Support for requirement for circular economy statements for major development proposals. <i>[Various]</i>	Noted. No action arising.
	Pleased to see flats included when considering recycling plans but not convinced will this be enforced especially with current purpose built flats. Currently experiencing unsatisfactory arrangements with insufficient collection facilities. How will the plan require new and existing flat developments to include recycling facilities and then enforce this? <i>[resident]</i>	Noted. JWP1 is intended to ensure new development only comes if appropriate recycling facilities are proposed to be included. The policies of the Plan can only be applied to determining proposals for new development which require planning permission and therefore cannot influence practice in existing development.

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	Concerned that waste arrangements for the 6,000 or so flats which will be built along Rom Valley Way help to maximise recycling - often there is a tail-off in recycling levels in densely-developed flatted areas - and that effective arrangements are in place to ensure that bin areas in flats are kept clean and reduce smell from them. <i>[Romford Civic Society]</i>	Policy JWP1 is intended to ensure that appropriate and effective recycling provision is made in all forms of residential development which, if maintained, would not result in nuisance. No action arising.
	Support for more Repair centres with good access by public transport. <i>[resident]</i>	Noted. No action arising.
	Clause D requiring visitor facilities is generally not practical in most cases due to need to protect health and safety of visitors and sites often being inaccessible <i>[ELWA]</i>	The policy concerns 'major' waste facilities however it is recognised that it may not be practicable to incorporate waste facilities in every such development. In terms of providing such facilities, general meeting rooms included within facilities will often suffice. Amended wording policy is proposed (some changes to the supporting text are also necessary)
	Current waste sites should be safeguarded as much as possible and loss minimised, especially those of strategic significance in terms of size or logistical considerations. <i>[EA]</i>	Only a few sites are proposed for release and only one of the sites proposed for release might be classed as making a strategic contribution to management of East London's waste (Eurohub) and this does not benefit from permanent planning permission for waste.
Para 6.13	Support for introduction consistent collection of materials and weekly food waste collections. <i>[resident]</i>	Noted. No action arising.
Para 6.15	Specific figures relating to the Envac system at Barking Riverside should be removed as these are no longer accurate. <i>[Barking Riverside Limited]</i>	Information on Envac system at Barking Riverside has been updated.
Para 6.20 (table)	Table is unclear should be revised to show a total household recycling rate that combines dry mixed recyclables and food waste. Heading other wastes is ambiguous does this relate to non household developments. <i>[Barking Riverside Limited]</i>	The table has been updated to ensure its meaning is clear.
Paras 6.22 to 6.27	Issues relating to bin stores being used for rough sleeping and drug dealing have been ascribed to bin stores being left open during collection times for excessive	Supporting text updated to mention 'Secured by Design (SBD)' initiative.

Project: East London Joint Waste Plan 2025-41

Document: Consultation Statement

Version: Final

Date: 12.02.25

<u>Part of Plan</u>	<u>Summary of comment</u>	<u>Borough Response including action arising</u>
	periods or not being shut properly. Should require consideration of security (e.g. gating, doorsets/windows, access control/CT measures, lighting and CCTV etc.) for Major and Non-Major development proposals where bin stores are incorporated. <i>[Metropolitan Police Service]</i>	
Policy JWP2: Safeguarding and Provision of Waste Capacity		
	Support for safeguarding existing waste management capacity <i>[Various including local authorities]</i>	Noted. No action arising.
	Support for the development of new waste management facilities in sustainable locations <i>[Various]</i>	Noted. No action arising.
	Policy JWP2 is overly complex and restrictive as part of the policy does not allow for any growth in CDE waste to be met. <i>[Heidelberg Materials UK]</i>	No action arising. Policy does allow for new capacity in certain, albeit limited circumstances.
	Waste sites should be located away from people and residential areas <i>[resident and Henry Boot Developments (HBD) and Barings]</i>	Policy JWP2 requires that facilities are developed in locations that will not cause unacceptable adverse impact on communities. No action arising.
	Safeguarding waste management capacity is essential. London is not net self-sufficient in waste capacity and the LP apportionments will not be met. East London will likely have to make a greater contribution to the management of waste in London overall. <i>[East of England Waste Technical Advisory Body]</i>	No evidence provided to justify statement that <i>'London is not net self-sufficient in waste capacity and the LP apportionments will not be met.'</i> The LP apportionments are set at a level which takes account of the fact that East London is expected to make a greater contribution to the management of waste produced in London and the capacity assessment shows that this will be met through to 2041. Local Plans in areas surrounding London should take account of the possibility of inert excavation

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		waste being transported to its area as the London Plan 2021 recognises that the export of such waste to areas beyond London for management is likely to happen. The approach to safeguarding in Policy JWP2 has been updated but a small number of sites are still proposed for release (see separate report).
	The wording of Policy SI8 in the LP concerning release of waste sites based on compensatory capacity being available elsewhere and achievement of net self sufficiency should be included in the Plan. <i>[Lester Harrison & Partners, Chartered Surveyors]</i>	There is no need to repeat the text of the LP in the ELJWP - the text of the ELJWP already references and reflects the text of the LP. No action arising.
	What would the policy position be if land was allocated in a district local plan but did not come forward? <i>[Essex County Council]</i>	Assumed that this comment concerns the Borough Local Plans. Any allocation in the Borough non waste Local Plans would need to be consistent with the ELJWP or justify any divergence. In most instances, the latest policy to be adopted takes precedent. No action arising.
	Text of clause e should be made amended so it is clearer when waste development would be 'particularly needed' on greenfield land. <i>[Essex County Council]</i>	This has been covered in the supporting text.
	All sites should be safeguarded and release of safeguarding should not take place unless WPAs have been consulted in accordance with DtC. This is especially important for site close to boundary of the Plan area where release may result in waste arising in the Plan area being exported to other areas even though there is sufficient capacity across the area as a whole. <i>[Essex County Council, Cambridgeshire County Council]</i>	Very few sites are proposed for release and those that are those identified as not being compatible with wider Borough development aspirations, in particular relating to the provision of housing which is also an important use of land. The London Plan allows for sites to be released under certain circumstances. DtC discussions are taking place with other Boroughs and neighbouring WPAs. The approach to safeguarding in Policy JWP2 has been updated

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		but a small number of sites are still proposed for release (see separate report).
	Change to operations associated with decarbonisation of waste management, as well as movement up the waste hierarchy, may mean operations have a reduced throughput and this form of repurposing should be allowed as well. <i>[ELWA]</i>	Not clear what process, which did not involve moving waste up the hierarchy, is envisaged that would lead to better carbon outcomes.
	Suggest clarifying that “new waste management capacity” includes re-purposing of existing waste management capacity in paragraph 6.36. <i>[ELWA]</i>	Text updated accordingly
	When accounting for capacity MBT facilities be considered as being at the ‘recovery’ level of the waste hierarchy. <i>[ELWA]</i>	Noted. In establishing whether there is sufficient capacity to meet the management of the London Plan apportioned HIC waste, other than avoidance of management by landfill, all forms of management contribute to the management of apportioned waste.
	Maximum flexibility for the development at safeguarded waste sites should be allowed in light of potential changes to the uses of existing waste sites during the plan period <i>[ELWA]</i>	Improvements to existing sites are encouraged in principle by the Plan. The release of sites from safeguarding needs to be tightly controlled to ensure sufficient waste management capacity is maintained. The criteria for release also need to be in general conformity with the London Plan. No change proposed.
	Policy should provide the opportunity to review the policies and approach of the ELJWP if underlying assumption that there is surplus capacity changes. Changes to technology may also affect capacity requirements <i>[ELWA]</i>	It is highly unlikely that the ‘assumption’ that there is surplus capacity will change but the Plan includes a requirement for monitoring of waste capacity which will take place on annual basis. If monitoring reveals issues with the provision of capacity then the Plan may be reviewed and updated accordingly. In any event the relevance of the Plan must be reviewed at least every five years.
	Safeguarding may help stimulate growth of ‘green jobs’. Land is a scarce resource, and investment in new technologies to drive waste up the hierarchy will face significant competition for sites from other sectors. Safeguarding existing waste	Support for safeguarding noted. No action arising.

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	management site capacity may help to encourage diversification and innovation within the resources and waste sector in East London. <i>[ELWA]</i>	
	Where sites are co-located release of safeguarding provision may result in encroachment of the remaining sites by non waste development. The WPA itself should agree to release rather than the Local Plan automatically removing any safeguarding provisions. <i>[Barking Riverside Limited]</i>	Any development of released site would need to consider location of existing facilities and Policy JWP3 would apply to ensure there would be no impacts.
	Clause 6v is too restrictive: Compost and digestate cannot be used repeatedly on adjoining land. Flexibility must be included to allow export. <i>[Integrated Skills Ltd.]</i>	Text updated to allow flexibility.
	Use of the word "generally" should be removed as the LP safeguards all waste management sites with planning permission or a permit. <i>[Integrated Skills Ltd.]</i>	The ELJWP proposed release of some sites hence use of the term 'generally'.
	Hazardous waste disposal points should not be sited near proposed new builds and radioactive materials should be disposed of carefully at sites with appropriate Counter Terrorism measures in place. <i>[EA]</i>	Policy JWP2 in the Plan ensures appropriate siting of facilities and ensures these matters are taken into account.
	Specific concern with any proposals which have the potential to impact the M25, M11, A13 and A12 which experience congestion at peak times. <i>[National Highways]</i>	Policy JWP2 intended to ensure that no development would take place if it were likely to cause impacts on the SRN.
	Concern with any increase in slow moving HGVs accessing the SRN and the resulting potential impact to the safe and efficient SRN. <i>[National Highways]</i>	Policy JWP2 intended to ensure that no development would take place if it were likely to cause impacts on the SRN.
	Support JWP2's aim to minimise the transportation of waste and improve road safety by locating facilities as close as possible to their sources and establishing alternative transport means, including utilising the River Thames and railheads. <i>[National Highways]</i>	Noted. No action arising.
	Several safeguarded sites are proximate to the SRN. If any new development does come forward in these locations, it should be ensured that Transport Assessments are submitted with alongside planning applications. If safeguarded sites are released for other forms of development, an assessment of SRN impacts should be provided. National Highways should be consulted at pre-application stage if possible. <i>[National Highways]</i>	Transport Assessment would be prepared in accordance with Local Plan policy which would include an assessment of impacts on the SRN.
	Any proposals which include operations that have air quality impacts would need to be situated as far from designated sites like Epping Forest SAC as possible and would need to be assessed for their possible impacts on the site. <i>[Natural England]</i>	The Plan recognises the need to protect designated sites like Epping Forest SAC and

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		includes policy to ensure this is taken into account.
<i>Policy JWP 3 Prevention of Encroachment</i>		
	The Agent of Change principle should also apply to new waste sites or those where intensification or changes to waste operations are proposed, to ensure no adverse impacts on the occupants of existing / consented development in proximity to such waste sites. Policy JWP3 should be amended to make clear that new or expanded operations should have regard to impacts on existing and future occupiers of lawful development. <i>[Barking Riverside Ltd]</i>	This is already specifically addressed by Clause D. 4 iv which only allows waste development where it avoids ‘ <i>creating an undue amenity impact on existing permitted non-waste uses, or land allocated, or land with permission for non-waste uses that could conflict with the proposed waste management use;</i> ’ No action arising.
	Development proposals for waste sites in or near SILs should not hinder their industrial function. <i>[City of London Corporation]</i>	See above No action arising.
	JWP3 is an important policy and is welcomed. <i>[Various including waste industry and developers]</i>	Noted. No action arising.
	Policy JWP3 and its supporting text should be combined with the safeguarding elements of Policy JWP2, and those parts of JWP2 associated with new capacity should be turned into a new Policy JWP3, which would then focus solely on new capacity. <i>[Essex County Council]</i>	Considered that separation of matters between JWP2 and JWP3 as proposed is not necessary.
	For waste local plans within the Anglian Water region there is generally a 400m waste consultation zone around water recycling centres to ensure that any necessary noise or odour assessments are provided to facilitate appropriate mitigation measures. Size of encroachment buffers for Water Recycling Centres are risk assessed according to the size of the works and the population it serves. For Upminster water recycling centres a 250m encroachment buffer should be specified in the Policy. <i>[Anglian Water]</i>	Supporting text updated to specify 250m consultation zone for all wastewater treatment works except Beckton which has an agreed 800m zone.
	Policy should be clear whether it will also apply to extensions/new treatment facilities at the Upminster water recycling centre. <i>[Anglian Water]</i>	Supporting text updated to include wastewater treatment facilities.

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Para 6.50	'Odour' should be included in the list of potential impacts that might arise from proposed developments with sensitive receptors within 250m radius of the Upminster Water Recycling Centre. <i>[Anglian Water]</i>	Supporting text (para 6.50 in the Reg 18 Draft) updated to take this into account
	Reference to transport impacts should be included. <i>[TfL]</i>	Supporting text updated.
	Support for JWP3 specifically ensuring that existing safeguarded waste management facilities are safeguarded from nearby development. <i>[Various including waste industry]</i>	Noted. No action arising.
Policy JWP4: Design of Waste Management Facilities		
	General support for Policy ELJWP 4 <i>[Various]</i>	Noted. No action arising.
	Biodiversity measures should be integrated into new buildings, e.g. biodiverse roofs, swift bricks or boxes, green walls. <i>[Swifts Local Network: Swifts & Planning Group]</i>	Achievement of BNG might require such measures to be installed. Supporting text added.
	No measures mentioned about security. Some of the sites can count as part of the critical infrastructure and so could be targeted. New and existing sites should review areas such as gating, doorsets/windows, access control/CT measures, lighting, CCTV, staffing levels and intruder alarms to ensure that facilities are fit for purpose. <i>[Metropolitan Police Service]</i>	Supporting text updated to include mention of 'Secured by Design (SBD)' initiative.
	In line with the NPPF (including Section 8) and PPG (Health and wellbeing section) consideration should be given to how new development will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help. <i>[Sport England]</i>	Such matters are dealt with in the Borough Local Plans which would also need to be taken into account when proposals are considered.
	Supporting text should note detail needed to show how use of non-road transportation has been considered, for example through a Transport Assessment that specifically looks at the rail/river transportation opportunities. <i>[Port of London Authority]</i>	Text added setting out need for Transport Assessments. This is considered more relevant to Policy JWP2 which requires that proposals will: i. <i>Minimise transportation of waste by being well located in relation to the sources of waste to be managed; and,</i> ii. <i>have good access to railheads and wharves and utilise non road modes of transportation or</i>

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		<p><i>demonstrate why this would not be practicable; and, Subject to criteria i., have good access to the road network and will not cause unacceptable adverse impacts on road safety or unacceptable adverse effects on the road network;</i></p>
	<p>Achievement of BREEAM excellent or equivalent is too onerous for waste operators, and generally not applicable to waste facilities. The application of CEEQUAL standards for development/redevelopment of waste sites. [EA]</p>	<p>The clause states: ‘achievement of a BREEAM ‘Excellent’ rating or its equivalent unless it is demonstrated that this isn’t practical;’ In light of the caveat included it is considered that this recognises that in certain circumstances waste facilities may not be able to achieve an excellent rating. No action raising</p>
	<p>Would expect risk to groundwater to be included as part of this policy. [EA]</p>	<p>Text updated to mention the ‘water environment’. Definition of ‘water environment’ added to the glossary.</p>
	<p>Reference to historic environment should be added to clause A e.g. ‘<i>Any adverse impacts on the historic environment, including measures to avoid and/or mitigate effects.</i>’ [Historic England]</p>	<p>Policy updated.</p>
	<p>The ELJWP should reference the use of Direct Vision Lorries for waste vehicles or the use freight operators who can demonstrate their commitment to TfL’s Freight Operator Recognition Scheme (FORS) or similar. The Plan should reference TfL’s Vision Zero Action Plan. [TfL]</p>	<p>Supporting text referencing the Direct Vision standard has been added.</p>
	<p>Not all storage and management of waste is required to take place in a building. Composting takes place in the open. For the avoidance of doubt, the plan should define a building or ensure that flexibility is permitted on a case by case basis; [Integrated Skills Ltd]</p>	<p>The supporting text of Policy JWMP4 states: ‘Enclosure of operations within a building, where operationally feasible, will be required as the best means of reducing noise, dust and odour. In exceptional cases, if it is shown that this is not a practicable option, other mitigation such as acoustic screening and operational management measures will be required’</p>

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		Therefore in certain circumstances, such as open windrow composting, it may be possible for proposals with operations which are not fully enclosed to be allowed. It should be noted Supporting text updated to note that the need for enclosure of operations is also prescribed via the Environmental Permitting process.
	Operations at EMR Silvertown, 6 Standard Industrial Estate cause noise nuisance from 7am Monday to Saturday - any development here opposed due to noise and disruption. How is noisy activity allowed from such an early hour; Object to development close to residential area; Noise levels and hours of operation have to be taken into consideration when building such facilities in built up areas. <i>[resident]</i>	Policy JWP4 is intended to ensure proposals for new development take account of the need to avoid noise nuisance by locating in suitable areas and providing appropriate mitigation. The Local Authority and/or the Environment Agency can take action regarding noise nuisance resulting from existing waste facilities. No action arising.
	Requirement for considering Biodiversity Net Gain is welcomed. <i>[Natural England]</i>	Noted. No action arising.
	Support requirement for the efficient use of water - this helps reduce the volume of wastewater treated at water recycling centres which saves energy. <i>[Anglian Water]</i>	Noted. No action arising.
	Support requirement for climate adaptation measures to ensure developments are resilient and resistant to flood risk and the use of sustainable drainage systems to manage surface water flood risk. <i>[Anglian Water]</i>	Noted. No action arising.
Policy JWP5: Energy from Waste		
	The policy should make clear that requirements set out in the policy would apply only to new EfW facilities, and not to existing permissions or operations	All policies of the Plan can only apply when an application for planning permission is made and therefore could not be applied to development that has already been granted planning permission. No action arising.
	Opposed to policy which might allow for burning waste. Support for policy but not convinced it will be effective in stopping waste that is not residual from being burned	EfW is an accepted form of waste management which can be deployed in certain limited

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	as economic will mean operators will seek waste to manage. EfW undermines recycling and genuine low carbon electricity and heating. Disagree that increasing energy efficiency will mean less CO2 is produced as the energy could be produced by solar and wind instead. <i>[resident]</i>	circumstances as described by policy JWP5 which includes the need for maximum heat recovery and capture of non-biogenic gaseous carbon emissions. The London Plan also requires a minimum performance level of 400g of CO2 equivalent per kilowatt hour of electricity produced
	Need to recognise role of incineration in management of hazardous waste which may not always able to achieve commercially viable scales for energy or heat recovery. <i>[EA]</i>	Supporting text and text to policy added to recognise this issue.
	The policy does not reflect commercial or current policy and legislative realities – there are insufficient powers to require full segregation of reusable or recyclable items from mixed residual wastes, and post-collection sorting yields low-quality recycle for which there is little market. suggest that the word “viably” should be inserted before the word “reused”. <i>[ELWA]</i>	Text updated as suggested.
	Support for EfW as not all waste can be recycled and burning it for and energy is preferable to landfill. <i>[resident]</i>	Noted. No action arising.
	Regarding point 5 although heat and energy is stipulated, it is not a requirement to state in an application how this is achieved, so an extra point should be added for para 6.7 to address this. <i>[EA]</i>	Supporting text added to address this concern.
	Noted that no incinerators are proposed however this could be clarified to mention whether there are any within the plan area or not. When assessing the plan and its HRA it appeared to suggest that waste is aggregated within plan area for shipment out to incinerators (or Combined Heat and Power (CHP) facilities) but that no such facilities exist within the area. <i>[resident]</i>	There are currently no incinerators in the Plan area – this has been confirmed in additional supporting text.
	The waste hierarchy being the main drive of this plan (and dealing with waste as early on as possible) makes sense and should be the aspiration. This avoids incineration / landfill which should only be as a very last resort. <i>[resident]</i>	Noted. No action arising.
Policy JWP6: Deposit of Waste on Land		
	General support for JWP6. <i>[Various including resident]</i>	Noted. No action arising.

<u>Part of Plan</u>	<u>Summary of comment</u>	<u>Borough Response including action arising</u>
	Use of landfill sites outside the Plan area for waste arising in East London should be acknowledged and liaison is needed between East London and the authorities where the waste is received. <i>[East London Waste Technical Advisory Body]</i>	Noted. Liaison is taking place. Text of section 4 has been updated to reflect this.
	The deposit of waste on land for recovery purposes should match the requirements of the Environment Agency to avoid duplication of control. <i>[Integrated Skills Ltd.]</i>	The approach taken for planning and permitting reasons may not be the same as one is concerned with land use and the other is concerned with pollution control. No action arising.
Para 6.77	Should add flood defences as an engineering use for some inert waste. <i>[EA]</i>	Text added (see para 6.97)
	The word “reworking” in the policy is vague. Does this relate to redevelopment of former landfill sites for other uses or possible ‘landfill mining’ activities to re-access discarded materials that have become valuable. <i>[ELWA]</i>	This is explained in the supporting text – it means extraction to free up land for development and/or recovery of recyclable or recoverable materials.
	Risk associated with extraction of landfilled waste would have to be weighed against the risks of leaving such wastes where they are. <i>[ELWA]</i>	This is already effectively noted by the supporting text.
	Text should be added to confirm need for ongoing liaison with neighbouring areas and monitoring regarding landfill of inert excavation waste. <i>[Thurrock Council]</i>	Text included.
General		
	Broad support for the ELJWP <i>[Various]</i>	Noted. No action arising.
	A specific policy that sets out how proposals for the management of wastewater will be considered should be included in the Plan (E.g. NLWP) <i>[Thames Water]</i>	Policy (JWP2A) and supporting text setting out how proposals for the management of wastewater will be considered has been included in the Plan. Text elsewhere has been updated to clarify how the Plan relating to wastewater.
	Clarity is needed concerning how the Plan relates to the management of wastewater <i>[Anglian Water]</i>	See above.
	Plan is too long, complicated and verbose. <i>[resident]</i>	The Plan is a detailed technical document by necessity as it must set out all the issues facing the management of waste and related policy must be carefully drafted to ensure it can be

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		implemented which may add to the apparent verbosity of the document. Efforts have been made to use plain English and a glossary and executive summary are provided to help with understanding of the Plan. A further check of the use of plain English has been undertaken and changes made where it is considered that the text could be simplified.
	Request for explanation of terms: 'safeguarding'; 'circular economy'; 'encroachment'; 'energy from waste'; 'deposit of waste on land' <i>[resident]</i>	These terms are explained in the Plan specifically 'safeguarding', 'circular economy', and 'energy from waste' are already included in the Glossary. 'encroachment'; 'Energy from waste'; 'deposit of waste on land' added to the glossary
	Tighter vehicle restrictions at household sites will mean that this will increase fly tipping. <i>[resident]</i>	Noted however this is not a land use issue. The comment has been referred to ELWA for its attention as the body responsible for the provision of household waste sites.
	Western Riverside Waste authority report note capacity gap for LACW and C&I waste in its area and an option could be for engagement with other boroughs and surplus capacity - engagement with East London boroughs would be beneficial for addressing the capacity gap for the London Borough of Wandsworth and the London Borough of Lambeth <i>[Western Riverside Waste Authority]</i>	Dialogue with London Borough of Wandsworth and the London Borough of Lambeth did not result in specific requests concerning capacity.
	Concern about waste collection and disposal in central Romford including Rom Valley Way to Roneo Corner, in particular overflowing trade waste bins in central Romford including meat waste in overflowing bins in Victoria Road. <i>[Romford Civic Society]</i>	Noted. Such issues should be reported to the Environmental Health team for action.
	Any public site locations are more easily accessible to the general public and thus less likely to result in fly tipping. It would be useful to assess currently identified fly tipping points to see if there is capacity for more locally placed sites or that any proposed sites may help to reduce this risk. <i>[Metropolitan Police Service]</i>	Sites are safeguarded and provided by the Plan to allow for the proper management of waste. Flytipping should be reported to the EA and the Borough.
	Planning policies in a plan should be based on a proportionate assessment of the need for sporting provision in its area. <i>[Sporting England]</i>	This matter is addressed in the Borough's Local Plans which would also need to be taken into

Project: East London Joint Waste Plan 2025-41

Document: Consultation Statement

Version: Final

Date: 12.02.25

<u>Part of Plan</u>	<u>Summary of comment</u>	<u>Borough Response including action arising</u>
		account when considering proposals for waste management.
	No new sites being allocated so there should be no impact on National Grid assets. <i>[National Grid]</i>	Noted. No action arising.
7. Policies Map		
	Would be useful to show existing sites numbered on a map to allow cross reference to location plans of sites. <i>[Natural England]</i>	Due to the number of sites such a map would be illegible.
8. Appendices		
<i>Appendix 1 – List of Safeguarded Sites</i>		
	Not safeguarding certain waste sites may impact on the achievement of net self sufficiency in London. <i>[East of England Waste Technical Advisory Body]</i>	Data shows sites can be released without impact net self-sufficiency. No action arising.
	The list of safeguarding sites does not include some of the sites included in the BPP assessment of existing waste management capacity. <i>[EA]</i>	The list of safeguarded sites has been updated and now reflects the assessment of capacity.
	The London Teleport site should not be included for safeguarding because there is sufficient capacity for metal recycling in Newham and safeguarding to 2041 will result in significant adverse impact on local communities and the environment e.g. housing developments on the east side of Store Road and on Pier Road. <i>[Lester Harrison & Partners, Chartered Surveyors]</i>	The London Teleport Site benefits from permanent planning permission for waste and must operate within terms of the Environmental Permit enforced by the EA intended to ensure that unacceptable impacts do not arise from operation of the site
	The Heidelberg materials Dagenham wharf off Chequers Lane in Barking and Dagenham (TQ 49227 81902) has a permit for the processing of construction and demolition wastes and should be added to Appendix 1 (and 2) as a safeguarded site. <i>[Heidelberg Materials UK]</i>	Added to list of safeguarded sites

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	Cemex site on land at Docks Estate, Choats Road, Dagenham, RM9 6LB should be identified as a safeguarding waste site given the extant planning permission and Waste Permit. The northern part of the Site is an existing waste recycling operation, processing returned concrete or construction and demolition waste to produce either single or grade aggregates. <i>[Cemex]</i>	Added to list of safeguarded sites
	The EfW facility in the London Sustainable Industries Park has an implemented planning permission for development of an energy from waste facility and should therefore be added to the list of safeguarded sites. <i>[Barking Riverside Limited]</i>	London Sustainable Industries Park added to list of safeguarded sites
	Veolia's operations at Coldharbour Lane, Rainham are negatively impacting the Momentum Logistics Park site. <i>[Henry Boot Developments (HBD) and Barings]</i>	Enforcement of the site's Environmental Permit by the EA should mean that impacts do not arise from operation of the site.
	Upminster Water Recycling Centre not listed in Appendix – this is an oversight as an encroachment buffer or identified waste consultation zone would be applicable for this type of waste site. <i>[Anglian Water]</i>	WWTs including Upminster Water Recycling Centre added to the list of safeguarded sites.
	The following safeguarded sites are also designated as safeguarded wharves: Barking and Dagenham - 60 River Road (Safeguarded Rippleway Wharf) - 12-14 River Road (Safeguarded Alexander Wharf) - Pinns Wharf (Safeguarded Pinns Wharf) Newham - Knights Road (Safeguarded Royal Primrose Wharf) - Plaistow Wharf (Safeguarded Peruvian Wharf) The status of these sites as safeguarded wharves must be highlighted in the ELJWP for water borne freight handling uses and their use encourage for river-related transportation uses. <i>[Port of London Authority]</i>	Information added to Chapter 2.
	The list of safeguarded sites is incomplete <i>[EA]</i>	The list of safeguarded sites has been updated to include additional sites
Appendix 2 – Maps of Safeguarded Sites		

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	Appendix 2 should include: <ul style="list-style-type: none"> - Unit 11 Atcost Road - 5 and 10 Salamons Way - Perry Road RMS - York Road - Shed A and the Annex to Shed A; <i>[Integrated Skills Ltd.]</i>	5 and 10 Salamons Way, Perry Road (RMS) and Land at York Road added to list of safeguarded sites. Unit 11 Atcost Road not added to list of safeguarded sites as site does not have permission for waste use. Shed A and the Annex to Shed A to be released from safeguarding to facilitate redevelopment of site
2 Choats Road	The Primary Electrical Substation Site north of Choats Road off of Reef Road should be excluded from the location plan. Boundary of 2 Choats Road shown in Appendix 2 includes land which does not form part of the existing waste site and should be excluded ownership. <i>[Southern Electric Power Distribution and Barking Riverside Limited]</i>	Substation removed from within boundary of 2 Choats Road on location map in Appendix 3.
Barking Waste Transfer and Recycling Facility, Ripple Road	Barking Waste Transfer And Recycling Facility, Ripple Road, IG11 0TT is in proximity to a nearby freight site and redevelopment is proposed. Additional details requested to allow thorough assessment of potential impacts and confirm associated risks and mitigation measures. <i>[Network Rail]</i>	This is an existing site with planning permission which will be safeguarded as such – it is not proposed in the Plan as a new location for waste development.
Marshgate Sidings, Pudding Mill Lane	This site is currently part of the larger masterplan development for the two Bow sites. There is spoil running through part of the site, and it has an environmental permit issued by the EA. Clarification requested on what the plan represents for the future of this site. <i>[Network Rail]</i>	Site is safeguarded, as an existing waste management facility, for future waste management uses.
	The Recycled Material Supplies Limited Physical Treatment Facility at Perry Road, Dagenham is missing from Appendices 1 and 2 (Safeguarded sites) <i>[Recycled Material Supplies Limited]</i>	Site map added and site included in list of safeguarded sites.
Appendix 3 – Sites with Potential for Release from Safeguarding		
Old Bus Depot, Perry Road	Support for consideration of potential release of the Old Bus Depot, Perry Road (Manns Waste Management) site from safeguarding as part of the ongoing transformation of the area. <i>[City of London Corporation]</i>	Noted. No action arising.

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	Given policy requirements and evidence required for consideration of release of existing waste sites from safeguarding, sites included in Appendix 3 should be removed as their inclusion is not supported by such evidence. <i>[GLA]</i>	These sites are not proposed for release but included as those which may have potential for release in future. This helps ensure that the ELJWP is consistent with future Borough development aspirations. Note Appendix 3 in the Daft Plan has become Appendix 4 in the Reg 19 Submission Plan.
Appendix 4 – Replacement of Policies in the ELWP		
	No specific comments made on Appendix 4	No action arising.
A. Evidence Base		
Waste Needs and Capacity Assessments	Reliance on areas outside of London to manage inert waste. Management of inert waste from London has not been taken into account in the Cambridgeshire and Peterborough Minerals and Waste Local Plan. <i>[Cambridgeshire County Council]</i>	The London Plan recognises that the export of such waste to areas beyond London for management is likely to happen and this should be taken into account in the Cambridgeshire and Peterborough Minerals and Waste Local Plan.
	Evidence base reports including waste data are inaccurate and difficult to understand which undermines the Plan. Not possible to see how data and assumptions are derived. Liaison with neighbouring authorities cannot be meaningfully carried out until this is corrected. <i>[East of England Waste Technical Advisory Body]</i>	The data reports set out how findings have been derived. Reports have been checked and updated where the derivation of assumptions is unclear.
	The list of safeguarding sites does not include some of the sites included in the BPP assessment of existing waste management capacity.	The list of sites safeguarded by the Plan has been updated with the addition of a significant number of additional sites.
	CDE waste figures presented in the Plan need checking as don't appear to correspond with those in the Waste Needs and Capacity Assessments. There appear to be errors in the Construction, Demolition & Excavation Waste Arisings in East London to 2041 Report (2024). <i>[Integrated Skills Ltd, Heidelberg Materials UK]</i>	The report has been checked and updated as necessary.

Project: East London Joint Waste Plan 2025-41

Document: Consultation Statement

Version: Final

Date: 12.02.25

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	Table 9 in the report 'Assessment of Existing Waste Management Capacity (2024)' needs reworking with new supporting text to provide clarity on the figures and methodology used. <i>[Cambridgeshire County Council, Thurrock Council]</i>	The table has been checked and updated as necessary.
	Concern about cumulative impact of flows to Thurrock and how they impact upon the existing capacity of a range of waste facilities. Ongoing monitoring and assessment of flows should be undertaken to assess any more recent trends and ascertain that 2022 was not just an atypical year. <i>[Thurrock Council]</i>	SoCG with Thurrock being prepared. Data for 2022 checked against 2023 data (now released)
	Agree with findings that no additional land is needed for new waste management facilities, as there is sufficient capacity until 2041. <i>[Barings/Henry Boot Developments]</i>	Noted. No action arising.
'Assessment of Safeguarded Sites for Release' report	Section 21 is incorrect when it states the London Plan has already taken into account the ability of Boroughs to accommodate waste management capacity when the apportionments were calculated as this is a complex formula. <i>[EA]</i>	The basis of the apportionments and the "taking account" are not contradictory. All the ELJWP boroughs are expected to manage a greater tonnage than that which is predicted to arise (and has sufficient capacity to manage this) so the apportioned tonnages for East London do in fact cover that which is predicted to arise as stated. No action arising.
Circular Economy Topic Paper	No specific comments on the Circular Economy Topic Paper	No action arising.
Waste Management Topic Paper	Evidence base reports including waste data are inaccurate and difficult to understand which undermines the Plan. Not possible to see how data and assumptions are derived. Liaison with neighbouring authorities cannot be meaningfully carried out until this is corrected. <i>[Various local authorities and waste industry]</i>	The data reports set out how findings have been derived. Reports have been checked and updated where the derivation of assumptions is unclear. Separate targeted communication with neighbouring authorities has taken place with specific issues clearly explained as part of this dialogue.

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Climate Change Topic Paper	No specific comments Climate Change Topic Paper	No action arising.
B. Integrated Impact Assessment		
	Objective 10 outlined in the Integrated Impact Assessment to not increase flood risk from any sources is vague, and while climate change is mentioned, the TE2100 Plan and required design adaptations resulting from climate change are not specifically listed <i>[EA]</i>	Noted
C. HRA		
	Agree with the assessment conclusions, providing that all mitigation measures are appropriately secured in any planning permission given. <i>[Natural England]</i>	Noted.
	Impacts on the beechwood habitats of the Epping Forest SAC should be mentioned. The Atlantic acidophilous beech forests which are Annex 1 habitats under the designation of the site as a Special Area of Conservation should be screened in for further assessment in terms of air quality. <i>[Natural England]</i>	Noted.