

East London Joint Waste Plan (Regulation 19)

Integrated Impact Assessment Report

Non-Technical Summary

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

Final report

Prepared by LUC

May 2025

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East London Joint Waste Plan (Regulation 19)

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Introduction

London Borough of Barking and Dagenham, London Borough of Havering, London Borough of Newham and the London Borough of Redbridge Waste Planning Authorities (collectively East London) commissioned LUC to undertake Integrated Impact Assessment (IIA) of the East London Joint Waste Plan (ELJWP). IIA is an assessment process designed to identify the likely significant effects of a plan and ways of minimising its negative effects and maximising its positive effects. So that it can best influence the plan, IIA runs alongside the plan-making process, considering and informing alternatives and opportunities for mitigation. The IIA also documents the ‘story’ of the plan – why the plan is the way it is and not something else.

The new ELJWP will cover the period to 2041 and will provide the local planning policy framework for waste planning matters across London Borough of Barking and Dagenham, London Borough of Havering, London Borough of Newham, and London Borough of Redbridge, alongside the London Plan and the relevant local plans. The current version of the ELJWP was adopted in 2012. There have been four iterations of the London Plan since 2011: the London Plan (2016), the Revised Early Minor Alterations to the London Plan (2013) to align within the NPPF, the Further Alterations to the London Plan (2015), and the current adopted London Plan (2021).

The ELJWP is not prepared in isolation and must align with national planning policy and the London Plan. It is supported by other documents such as the Statement of Community Involvement, Local Development Scheme and an updated Waste Needs Assessment.

This report is the Non-Technical Summary of the full IIA Report prepared in February 2025.

Method

The IIA integrated a number of types of assessment:

- Sustainability Appraisal incorporating Strategic Environmental Assessment – which consider environmental, social and economic effects of the plan.
- Health Impact Assessment – focussing on public health effects.
- Equality Impact Assessment – considering equalities issues and avoidance of discrimination against groups such as older people and the disabled.
- Community Safety Impact Assessment – aiming to improve community safety.

The IIA began with a ‘Scoping’ process. This brought together information about current and emerging conditions and significant problems in the Borough that the ELJWP could try to address. It also establishes what higher level plans such as the London Plan and national planning policy say the ELJWP must or should aim to do.

The information about existing problems and external policy requirements was used to develop a set of environmental and sustainability objectives (known as the IIA framework) against which the likely effects of the ELJWP, including reasonable alternatives, could be assessed.

The topics covered by the IIA objectives, which were also informed by legal requirements, were as follows:

- Climate Change
- Treatment of waste
- Economy
- Health and wellbeing
- Sustainable transport

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- Historic environment
- Biodiversity and geodiversity
- Open spaces and townscapes
- Water
- Flooding
- Noise, light and air pollution

The IIA identifies what effects different aspects of the Local Plan are expected to have on these topics. The effects can be positive or negative, significant or minor. Mixed effects are also identified in some cases, where directly opposing effects are expected.

The IIA was subject to a number of technical difficulties and limitations, such as the inherent difficulty of predicting the effects of development provided for by the ELJWP when the particular design and layout of developments will only be known when specific proposals come forward, and the need to use assessment methods that are proportionate to the level of detail of a joint waste local plan.

Identifying and appraising alternatives

An important part of the IIA process is to assess reasonable alternatives to what the plan is proposing. In particular, the IIA sets out:

- How reasonable alternatives were identified.
- The assessment results of these alternatives.
- Why the preferred alternatives have been chosen and others rejected.

The IIA of alternatives or options aims to inform the aspects of the ELJWP that address the biggest planning issues facing the plan area and where clear alternative approaches to addressing these issues exist. This Non-Technical

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Summary therefore focuses on the reasonable alternatives considered by the East London Waste Planning Authorities in preparing the ELJWP.

There are no proposed site allocations and so the IIA has not considered reasonable alternatives relating to site options. The IIA has considered reasonable alternatives to the vision, objectives and policies (including safeguarding of sites for waste treatments and wastewater treatment).

Appraising the Local Plan Proposals

The Local Plan policies were appraised independently of one another and the findings are summarised below.

Vision and Strategic Objectives

These two components of the ELJWP Regulation 18 document were subjected to IIA. No reasonable alternatives to the vision and objectives were identified.

Policies

There are a number of reasonable alternatives to the policies within the ELJWP Regulation 19 document. These are outlined below, and the findings discussed alongside the appraisal findings for the proposed policies within the Regulation 19 IIA document.

Reasonable alternatives to Policy JWP 1

One reasonable alternative to Policy JWP 1 was identified (Alternative 1). This involves applying the London Plan threshold for the size of development

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required to provide Circular Economy Statements, i.e. referable development rather than all major development. This would result in fewer applications for development preparing circular economy statements. Although this alternative could result in major development applicants providing less detail with regards to the circular economy, the other criteria within policy JWP 1 still encourage all development to follow the principles of the circular economy. Therefore, this alternative would likely reduce the sustainability of the ELJWP in relation to IIA1 and IIA2, but not significantly enough to alter the IIA scores.

The preferred policy was selected over the reasonable alternative because applying a lower threshold than the London Plan for the size of development required to provide Circular Economy Statements will result in more applications for development considering and planning for the circular economy across East London.

Reasonable alternatives to Policy JWP 2

Need alternatives (JWP 2)

In terms of 'need', one reasonable alternative to Policy JWP 2 was identified (Need Alternative 1). This involves making provision for further additional waste management capacity above the London Plan apportionment. It is likely that this option would result in waste travelling further, if the sites were to deal with waste from outside of the plan area. This option could also have negative effects on all IIA objectives, where East London's environment and communities would be under additional pressure to allocate and/or identify less suitable sites for waste development to come forward.

Safeguarding alternatives (JWP 2)

JWP2 safeguards sites with permanent planning permission and sites that hold an environmental permit, lawful sites (including sites that benefit from a

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certificate of lawful use), due to the time a site has been operational. Where planning permission is temporary, safeguarding will fall away at the time limit of the permission. Sites will also lose the benefit of safeguarding where a permit is given up where the site does not benefit from planning permission or lawful status. Sites that have a throughput of less than 500 tonnes and do not operate for a specialist use are not safeguarded.

Safeguarded wastes sites within the Appendix to the new ELJWP have only been included where they have not since been allocated for alternative uses in adopted local plans (and plans that have reached a late stage of examination), or by change of use through planning applications, since the adoption of the previous ELJWP, or they have an annual throughput of less than 500 tonnes.

In terms of safeguarding, a number of reasonable alternatives were identified:

Safeguarding all sites that have planning permission for waste use or an environmental permit (the London Plan position). This includes sites that hold an environmental permit but have no planning permission.

Safeguarding all sites above a higher permitted throughput (for example 5000 tonnes) in the future.

Safeguarding only sites that have valid planning permission.

A supplementary option for any of the options above is to safeguard any sites that have a lawful waste use, without express planning permission and benefit from a Certificate of Lawful Existing Use or Development (CLUED).

Safeguarding Alternative Option 1 is likely to have more negative effects than the proposed approach in JWP 2, particularly on IIA4, 7, 8, 9 and 11, as it safeguards waste sites that benefit from a waste permit but do not have planning permission.

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Safeguarding Alternative Option 2 would reduce the number of sites that are safeguarded and may, over time, reduce the effects of smaller waste sites. These may have a disproportionate negative effect compared to larger sites that are more strategic in nature, as they are more likely to be dispersed through the plan area alongside other potentially more sensitive land uses. These effects are considered uncertain and at a such a low level that there is no meaningful distinction between this option and the policy within the ELJWP.

Safeguarding Alternative Option 3 would only safeguard sites with valid planning permission. This would remove negative effects (in relation to the environment and amenity) relating to sites that only benefit from an environmental permit. The level of uncertainty around the level of improvement or the nature of the improvements, which would only occur if a site was redeveloped for another use, means that there is again no difference in the significance of effects (i.e. the effects score) between this policy option and the policy within the ELJWP.

The policy within the ELJWP also includes safeguarding for sites that benefit from CLUED. With each of the alternative options, this has the potential to increase negative effects in relation to the environment and amenity, as the sites will not have been subject to the same restrictions as sites that applied for permission through the normal planning application process. Again, the level of this effect is difficult to quantify and is uncertain, therefore the appraisal scores for this option are the same as for the proposed policy.

Site allocations

There is no identified need for additional waste sites or allocations. Any sites that come forward through the plan period would be subject to criteria set out in national policy, such as land at a lower risk of flooding, or where there are negative effects on the natural environment will be avoided, minimised or mitigated. Any proposed development would need to meet these criteria, and as such, they have not been considered as reasonable alternatives within this IIA.

Reasons for choosing the proposed policy JWP 2 in light of alternatives

The preferred policy was selected over the reasonable alternatives because East London has established through its emerging evidence base that the plan area has more capacity than required for its needs and the additional needs of its neighbours. The preferred policy allows for redevelopment of sites that are no longer required to manage the identified need for waste, or the wider need for London. The preferred policy requires compensatory capacity if sites are lost. The alternative policy options could increase the likelihood of meeting the target of net-self-sufficiency within the London Plan; however, the extent to which London is already net-self-sufficient is uncertain and will be explored through future updates to the London Plan.

Reasonable alternatives to Policy JWP 2b

No alternatives were considered in relation to Policy JWP2b. The policy requires the safeguarding of existing facilities, the consenting of new facilities to meet additional need, supports appropriate intensification on existing sites, and requires that new development protects and enhances local communities. The additional need will be considered in reference to new development set out in local plans, and the Asset Management Plans of the relevant water companies. There are no other reasonable options to consider need. Other options would not be consistent with national policy or the London Plan, which acknowledges the need for additional treatment in East London beyond 2041. It should be noted that expansion of wastewater treatment works is already underway within the plan area.

Reasonable alternatives to JWP Policy 3

One reasonable alternative was identified for ELJWP Policy 3 (Alternative 1). The policy within the Regulation 18 draft did not include a specified distance

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where the policy would apply whereas the policy within the Regulation 19 ELJWP provides guidance on buffer zones within the supporting text. Although the effects from waste development are likely to differ due to the nature of the waste activity and the proposed new use within proximity to the existing waste site, a precautionary distance buffer would remove uncertainty around the implementation of the policy. It may be appropriate to include more than one buffer dependant on the scale of development and the type of waste. This could more effectively minimise the potential for adverse effects of ELJWP Policy 3 on the IIA objectives, and improve the sustainability of the ELJWP.

The preferred policy was selected over the reasonable alternatives because specified distances have been selected within the supporting text to aid in avoiding and mitigating impacts. It is worth noting that impacts depend on pathways and the specific sensitivities of receptors and not proximity, and the criteria would be difficult to define and manage over time, given the wide variation in waste uses and the environment across the plan area.

Reasonable alternatives to Policy JWP 4

The only reasonable alternative identified for this policy was to rely on the more general development management policies within the London Plan and the adopted local plans within East London instead. This would be likely to result in additional negative effects on IIA objectives 6, 7, 8 and 11 where there are gaps in policy within the development plan of particular relevance to waste management, and reduce certainty and consistency for waste development within East London.

The preferred policy was selected over the reasonable alternatives because the policy wording within the ELJWP provides a specialist policy framework for waste development. Alternative policy options could result in additional negative effects, where existing policies within the wider development plan do not address the potential impacts of waste development.

Reasonable alternatives to Policy JWP 5

The only reasonable alternative identified for policy JWP 5 was to rely on policies within the London Plan and the adopted local plans within East London (Alternative 1). This would be likely to result in additional negative effects on IIA objectives 2, 4, 5 and 11, and reduce certainty for development on energy from waste facilities within East London where appropriate.

The preferred policy was selected over the reasonable alternatives because, as with the preferred option of JWP 4, JWP 5 provides specialist policy criteria to address the specific effects of energy from waste facilities.

Reasonable alternatives to Policy JWP 6

The only reasonable alternative identified in relation to Policy JWP 6 was to explicitly require a target of zero biodegradable waste to landfill by either 2026 or 2030 (Alternative 1). The alternative option was considered to be more ambitious than the draft policy wording, which does not contain any target for the reduction of biodegradable waste to landfill. The effect on the IIA objective 2 would be positive as it would be more likely that more waste would be diverted from landfill up the waste hierarchy. This option of zero waste by 2030 is consistent with national policy, but a less stringent requirement than the target of zero biodegradable waste to landfill by 2026 within the Mayor of London's Environment Strategy. Either the 2026 or 2030 target could be implemented within the ELJWP, and either option could increase the sustainable treatment of waste within East London.

The preferred policy was selected over the reasonable alternatives because it offers flexibility in the timescales for reducing biodegradable waste to landfill. This is considered to be less sustainable than the alternative option and the IIA recommends that a target could be included within JWP 6 to improve the sustainability of the plan.

Cumulative Effects of the ELJWP

Cumulative effects of the Plan are considered both in terms of the plan as a whole, and in relation to other plans or development in the plan area, and potentially outside of the plan area, depending on the potential impacts.

Equalities Impact Assessment, Health Impact Assessment and Strategic Environmental Assessment

The EqIA and HIA criteria are embedded within the IIA objectives used to appraise the ELJWP.

With regards to equality, the vision, strategic objectives and policies for the ELJWP are likely to have a negligible effect on protected characteristics given their strategic nature, their focus on waste management issues, and as the plan does not allocate land for development. However, the ELJWP does indirectly give consideration to the potential effects of waste development on specific groups, where there may be increased vulnerability to the effects of waste management facilities and processes, including air pollution, climate change, employment opportunities and social deprivation.

Total effects of the ELJWP

The total effects of the vision, strategic objectives and policies in the Regulation 19 East London Joint Waste Plan document in relation to each of the IIA objectives are discussed below and summarised in Table 1.

Table 1: Total effects of the ELJWP (Regulation 19) document

| IIA objectives | Total effect |
|---------------------------------------|--------------|
| IIA1: Climate Change | ++ |
| IIA2: Treatment of waste | ++ |
| IIA3: Economy | ++/- |
| IIA4: Health and Wellbeing | +/-? |
| IIA5: Sustainable Transport | ++ |
| IIA6: Historic Environment | +? |
| IIA7: Biodiversity and geodiversity | +/-? |
| IIA8: Open spaces and townscapes | +/-? |
| IIA9: Water | +/-? |
| IIA10: Flooding | + |
| IIA11: Noise, light and air pollution | ++/-? |
| IIA12: Mineral resources and Soils | + |

Cumulative effects of the ELJWP with other plans

Development proposed in the ELJWP will not be delivered in isolation from development proposals in other plans and projects covering East London and the surrounding area. This section outlines the development proposed by nationally significant infrastructure projects, plans covering London as a whole, and the Local Plans of the neighbouring authorities which may combine with the ELJWP to produce additional cumulative effects.

Nationally significant infrastructure projects

At the time of writing eight NSIP projects within London were identified on the National Infrastructure Planning website:

- Expansion of Heathrow (third runway)
- Heathrow West
- North London (Electricity Line) Reinforcement
- North London Heat and Power Project
- Riverside Energy Park
- Silvertown Tunnel
- Teddington Direct River Abstraction
- Thames Tideway Tunnel

Potential for cumulative effects with Nationally Significant Infrastructure Projects

There is uncertainty around the potential cumulative effects of NSIP projects across London in relation to the ELJWP, given the lack of proximity and the relatively small-scale nature of the development being managed within the ELJWP. There are potential cumulative effects in relation to NSIPs such as flood risk and water quality in the Thames; air quality, including from increased road traffic on the major arterial roads, or roads within impact zones for Epping Forest; noise and vibration; biodiversity; and landscape and visual amenity.

The London Plan and other London strategies

The London Plan 2021 provides the regional planning framework for London. The relevant plans and strategies in relation to the ELJWP are set out in Chapter 3 and an expanded list is contained in Appendix A.

Potential for cumulative effects with the London Plan

The ELJWP could result in in-combination effects with the London Plan where the specific location and type of development proposed in the ELJWP, although at a relatively small scale, could combine to result in more significant effects. Given that many of the development growth areas within London are large scale, and there are no proposals for additional waste allocations within the ELJWP, it is likely that any in-combination effects will be minimal.

The London Transport Plan is designed to deliver the transport solutions required to support development delivered through Borough Local Plans in London, while also addressing existing transport challenges and issues, including improving the public transport network, to improve use of public transport and to reduce air pollution. The small level of development likely to arise from the ELJWP is likely to result in a negligible effect when combined with the large-scale projects within the London Transport Plan.

East London Local Plans and neighbouring Local Plans

Each of the boroughs within the ELJWP area has an adopted local plan. The main development proposed by their respective Local Plans is summarised in Appendix C (Baseline).

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- Barking and Dagenham aim to deliver more than 40,000 dwellings between 2024 and 2037.
- Havering aim to deliver a minimum of 18,930 dwellings between 2016 to 2031.
- Newham aim to deliver 43,000 dwelling across the plan area between 2017 and 2033. The Regulation 19 Local Plan sets out a stepped trajectory to deliver between 51,425 and 53,784 additional new homes between 2023/24 and 2037/38.
- Redbridge aims to deliver a minimum of 16,845 new dwellings between 2015 and 2030.

The ELJWP area is adjoined by the neighbouring local authorities of Tower Hamlets, Hackney, and Waltham Forest within London. Epping Forest, Brentwood and Thurrock form the boundaries to the East of the plan area. Although parts of the areas within Essex are more rural, all of these local plan areas are expected to see high levels of housing growth, employment growth and to benefit from strategic transport infrastructure improvements.

The Boroughs within the ELJWP area and the authorities surrounding the ELJWP area range from the densely urban areas of central London to the rural areas in Essex.

All of the local plans identified above whether adopted or in the process of preparation, provide for both increases in housing supply as well as job creation. The increased level of development in East London and neighbouring authorities will, in combination with the ELJWP, lead to increased traffic, which in turn has the potential to increase air pollution and carbon emissions. To mitigate this, the Local Plans aim to support sustainable transport modes and energy efficiency in built development. Many of the in-combination effects at a sub-regional scale are likely to be concentrated within and around major development areas and along the strategic transport corridors. In addition, a number of the locations targeted for large-scale growth by neighbouring plans are close to the border of the plan area, increasing the potential for more

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localised in combination effects. There may be localised impacts in relation to health, noise, air quality, water resources and flooding, and transport.

Although there may be increased negative cumulative effects when the ELJWP is considered alongside other plans and projects, the policies within the ELJWP that seek to protect the environment and local amenity could result in increased positive effects, when taken alongside similar policies in the wider development plan.

However, given the lack of allocations within the ELJWP for new or improved waste facilities over the plan period, and the lack of need for additional waste management capacity, it is likely that the cumulative effect of the ELJWP with other local plans will be relatively minor.

Habitats Regulations Assessment

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

The first stage of HRA was to screen for likely significant effects. Following the HRA screening, likely significant effects could not be ruled out in relation to:

- Physical damage and loss of habitat: Epping Forest (directly or via functionally linked habitats) – ELJWP alone.
- Air pollution - dust: Epping Forest SAC (direct impacts only) – ELJWP alone.
- Air pollution – industrial emissions: Epping Forest SAC (direct impacts only), Lee Valley SPA and Ramsar site (direct impacts only), and Thames Estuary & Marshes SPA and Ramsar site (direct impacts only) – ELJWP alone or in-combination with other plans / projects.

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- Air pollution – vehicle emissions: Epping Forest SAC (direct impacts only) and Lee Valley SPA and Ramsar site (direct impacts only) – ELJWP alone or in-combination with other plans / projects.
- Pests and vermin: Epping Forest (directly or via functionally linked habitats) – ELJWP alone.
- Water quality and quantity – abstraction: Lee Valley SPA/Ramsar (direct impacts only) – ELJWP alone or in-combination with other plans / projects.

Non-physical disturbance and wastewater were screened out as there are no impact pathways.

These impacts would arise from three of the ELJWP's policies: JWP 2, JWP 5 and JWP 6. However, the Appropriate Assessment concluded that, with safeguards provided by policy JWP4 along with environmental permitting requirements for industrial emissions and water abstraction, adverse effects on the integrity of Habitats Sites will be avoided.

The HRA will be published alongside the ELJWP Regulation 18 consultation. Following the consultation, the plan will be updated as necessary and will include confirmation of the existing waste sites to be removed from safeguarding. The HRA will then be updated to reflect any changes to the ELJWP and in response to any relevant Regulation 18 consultations, for example if received from Natural England.

Next Steps

This Non-Technical Summary will be available on the ELJWP website and accompany the IIA Report, which will be consulted on together with the Publication Version ELJWP.

Once the period for representations on the Publication Version ELJWP and IIA Report is complete, the Boroughs will consider whether the Plan is 'sound'. If

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this is the case, the Plan will be submitted for examination alongside the IIA Report.

At examination, the Inspector will consider the representations received on both the ELJWP and IIA, before reporting back on soundness or identifying the need for modifications. If the Inspector identifies the need for modifications, these will be prepared and published for consultation alongside an IIA if necessary

Once found to be 'sound' by the Inspector, the Local Plan will be adopted by the Boroughs. At that time, the 'IIA Adoption Statement' must be published that sets out certain information including on monitoring indicators

Monitoring

Chapter 7 of the IIA Report suggests indicators for monitoring the potential sustainability effects of implementing the ELJWP. It is then for the Council to choose an appropriate monitoring framework in light of practical considerations around available resources.

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