

**East London Joint Waste Plan (ELJWP),  
Regulation 19 Submission Draft, (February 2025):  
Strategic Flood Risk Assessment (SFRA) Position Statement.**

**1. Policy and guidance on Flood Risk Assessments**

1.1. Local Planning Authorities are required to carry out a Strategic Flood Risk Assessment (SFRA) to ensure that flood risk and any flood mitigation measures are a consideration when making planning decisions about the design and location of development in their area. The SFRA assesses the risk of flooding from all sources, the cumulative impact that development or changes in land use would have on the risk of flooding, and the effect of climate change on flood risk. The SFRA also identifies opportunities to reduce the causes and impacts of flooding as well as any land likely to be needed for flood risk management features and structures.

1.2. The National Planning Policy Framework (NPPF) 2024 states that Development Plans must include policies that set out a strategy for the pattern, scale and design quality of places which must be informed by a Strategic Flood Risk Assessment (SFRA) and make sufficient provision for flood risk and coastal change management, among other land uses. The assessment should *‘...consider cumulative impacts affecting local areas susceptible to flooding and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage board...’*

1.3. The NPPF at paragraph 172 states that:

*‘All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:*

- a) applying the sequential test and then, if necessary, the exception test as set out below;*
- b) safeguarding land from development that is required, or likely to be required, for current or future flood management;*
- c) using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management); and*
- d) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.’*

1.4. Annex 3 ‘Flood Risk Vulnerability Classification’ in the NPPF, states the following for waste facilities

- **Installations requiring hazardous substances consent** (that require coastal or waterside locations or need to be located in other high flood risk areas, classified as ‘Essential Infrastructure’). **Highly vulnerable.**

- **Landfill and sites used for waste management facilities for hazardous waste.** **More vulnerable.**
- **Waste treatment** (except landfill and hazardous waste facilities). **Less vulnerable.**

- 1.5. Most existing waste facilities in the ELJWP are waste treatment facilities that fall within the less vulnerable category of Annex 3 in terms of flood risk vulnerability.
- 1.6. All waste operators must obtain an environmental permit from the Environment Agency (EA) who provide guidance on how environmental permit holders must consider the risks of a changing climate to and from their business, in order to receive a permit.
- 1.7. Waste operators are required to complete a climate change adaptation risk assessment as part of their application for an environmental permit and must show mitigation measures against a number of impacts within the adaptation risk assessment. Depending on the type of waste being treated these impacts from flooding can include:
- potential for increased site surface water and flooding
  - increased site surface water and flash flooding - storage lagoons may require more capacity or careful management. The capacity of surface water discharge points may become overwhelmed
  - potential for increased site surface water and localised site flooding
  - potential for increased incidents involving water-reactive wastes
  - potential for drainage systems and interceptors to be overwhelmed
  - potential for contaminated floodwater or surface water run-off from site causing pollution
  - localised issues with surface water discharge leading to backing up and worsening site flooding
  - sea level rise, where a site is located near the coast
  - increased potential for fugitive odour emissions due to damaged building structures
  - unstable process conditions for compost sites causing temperature fluctuations and increased odours
  - land bank availability for spreading sludge, compost and digestate may experience extreme difficulty due to prolonged wet weather
  - leachate storage risk of over-topping
  - access or egress from site could be affected, impacting

- 1.8. Waste sites in East London holding waste permits would have been required to have considered the above impacts, among other environmental impacts, within their climate change adaptation risk assessments when applying for an environmental permit from the EA.

## **2. The East London Joint Waste Plan (ELJWP), Regulation. 19 Submission Draft**

- 2.1. The East London Joint Waste Plan (ELJWP) is an update to the 'Joint Waste Development Plan for the East London Waste Authority Boroughs' adopted in 2012. Regulation. 18 consultation for the ELJWP was undertaken between July and September 2024, and the East London Joint Waste Plan (ELJWP) Regulation. 19 Submission Draft has been prepared for the Regulation 19 consultation stage.

- 2.2. The most recent waste management capacity assessment demonstrates that, other than for landfill, East London has a surplus of capacity than is necessary for the management of current and forecast future waste arisings. Therefore, there is no need for development of additional capacity to meet the London Plan apportionments within the Plan area. The ELJWP proposes the safeguarding of existing sites, except where there are policy, legal or regulatory reasons to remove them (see summary of the ELJWP approach to safeguarding in appendix B below), and will allow additional waste development **only in exceptional circumstances. On this basis no land is proposed to be allocated specifically for the development of additional waste management capacity.** This is a significant change to the adopted East London Waste Plan that currently identifies land for new waste management facilities.
- 2.3. Taking into account that the focus of the ELJWP will be on existing sites **and no further development of waste facilities is proposed on new site locations**, a Strategic Flood Risk Assessment (SFRA) for the sites within the Plan has not been prepared. As no new locations for new waste facilities have been identified there are no potential development sites to assess for flood risk - as stated in Planning Practice Guidance paragraph: 013 Reference ID: 7-013-20220825, '*...Minerals and waste planning authorities need to take account of flood risk **when allocating land for development...***'
- 2.4. Policies within the East London Joint Waste Plan (ELJWP) Regulation. 19 Submission Draft include criteria developed to mitigate against a number of negative environmental outcomes, including flood risk, and have been assessed within the Integrated Impact Assessment (IIA) as part of the Sustainability Appraisal for the Plan. IIA Objective 10: '*To manage and reduce flood risk from all sources within East London*' is given a positive effect overall as most policies in the ELJWP have a negligible, a minor positive, or a significant positive effect on this objective.
- 2.5. These effects recognise the appropriate efforts of the ELJWP to reduce flood risk through flood resilience in design as well as promoting reductions in the extent of impermeable surfaces on waste sites across East London. On balance, given the scale and density of London, and the relatively small footprint of East London's existing waste management facilities, the ELJWP is considered to have a minor positive effect on this objective within the IIA.
- 2.6. The ELJWP boroughs also have policies within their local plans that aim to minimise the risk to people and property from flooding. They include<sup>1</sup>:
- Barking & Dagenham, Policy DMSI 6: Flood risk and defences
  - Havering, Policy 32: Flood Management
  - Newham, Policy SC3: Flood Risk and Drainage, and emerging policy CE7 Managing Flood Risk
  - Redbridge, Policy LP21: Water and Flooding
- 2.7. In response to the Regulation 18 consultation for the ELJWP the Environment Agency stated with regard to the Sustainability Appraisal/IIA, '*We are pleased to see that the document has identified that*

---

<sup>1</sup>Links to East London Borough's Local Plan Flood Risk Policies:

Barking & Dagenham - [B&D LocalPlan A4 SEP24 digital.pdf](#)

Havering - [Local Plan 2016-2031 Adopted 2021](#)

Newham- [newham-local-plan-2018-pdf-](#) and [local-plan-2024-web-part-1-](#)

Redbridge - [Redbridge Local Plan 2015-2030](#)

*the ELJWP provides an opportunity to help adapt to the unavoidable effects of climate change by locating development in locations with no or low flood risk and is in line with the requirements of the PPG and NPPF.*

- 2.8. *'...We are pleased that our previous comments provided for the Scoping Report for the East London Waste Plan Integrated Impact Assessment on 16 April 2024 have been considered. We agree and support the commitment to ensure that specific sites and policies will mitigate against flood risk in line with National Planning requirements, the London Plan, and the Thames Estuary 2100 Plan'.*
- 2.9. Available Flood Risk Information for Applicants
- 2.10. The ELJWP does not propose the development of new waste facilities and does not identify new site locations for that purpose. However, proposals for the development of new waste sites would be required to meet design criteria set out in Policy JWP4: 'Design of Waste Management and Wastewater Treatment Facilities', which states that new development should be designed to include *'...climate adaptation measures such as sustainable drainage systems, flood resistance and resilience, water storage and recycling, open space design, green roofs and drought-resistant landscaping...'*
- 2.11. To support applicants with their proposals Strategic Flood Risk Assessments have been prepared by the Local Planning Authorities for each borough as part of their Local Plan evidence base. Flood risk information relevant to existing waste facility sites is available in these assessments. The Strategic Flood Risk Assessments (SFRA) for the adopted East London Local Plans are listed in the appendix A below.
- 2.12. The Environment Agency (EA) routinely updates their flood risk modelling and mapping, and Local Planning Authorities update their flood risk maps and spatial data accordingly. The EA is due to publish updated flood risk maps on 25<sup>th</sup> March 2025 as part of their National Flood Risk Assessment (NaFRA2), which now accounts for climate change. It will also separately provide surface water flood risk information. It is expected that there may be some changes to flood zones and that the new EA flood maps will become the best available flood risk data for East London.
- 2.13. The policies within the ELJWP have been drafted to ensure that the re-modelling of the flood zones are suitably addressed to protect new development proposals. Applicants are required to make use of the latest available flood risk information and engage with the EA at the earliest opportunity to consider flood risk implications for any proposals
- 2.14. The timing of the release of the EA data should not interrupt the agreed timeline for the Regulation 19 consultation process but will allow East London boroughs to consider the changes, their implications and take the appropriate course of action required.

## APPENDIX A

### East London Borough's Strategic Flood Risk Assessments prepared for adopted Local Plans

#### **London Borough of Barking & Dagenham Strategic Flood Risk Assessment:**

<b>Document ID</b>	<b>Document Name and Link to View / Download Document</b>	<b>Date</b>
F1	<a href="#">Local Flood Risk Management Strategy</a>	2017
F2	<a href="#">Strategic Flood Risk Assessment (SFRA) Level 1</a>	2017
F3	<a href="#">Strategic Flood Risk Assessment (SFRA) Level 2</a>	2017
F4	<a href="#">SFRA: Summary of the Local Flood Risk Management Strategy</a>	2017
F5	<a href="#">SFRA: Annex A Action Plan</a>	2017
F6	<a href="#">SFRA: Annex B Map of Rivers</a>	2017
F7	<a href="#">SFRA: Annex C Example of Investigation Priority</a>	2017
F8	<a href="#">SFRA Level 2: Appendix A</a>	2017
F9	<a href="#">SFRA Level 2: Appendix B</a>	2017
F10	<a href="#">SFRA Level 2: Appendix C</a>	2017
F11	<a href="#">SFRA Level 2: Appendix D</a>	2017
F12	<a href="#">SFRA Level 2: Appendix E</a>	2017
F13	<a href="#">SFRA Level 2 Appendix F</a>	2017
F14	<a href="#">SFRA Level 2 Appendix G</a>	2017
F15	<a href="#">SFRA Level 2 Appendix H</a>	2017
F16	<a href="#">SFRA Level 2: Appendix I</a>	2017
F17	<a href="#">SFRA Level 2: Appendix J</a>	2017
F18	<a href="#">SFRA Level 2: Appendix K</a>	2017
F19	<a href="#">SFRA Level 2: Appendix L</a>	2017
F20	<a href="#">SFRA Level 2: Appendix M</a>	2017
F21	<a href="#">SFRA Level 2; Appendix N</a>	2017
F22	<a href="#">SFRA Level 2: Appendix O</a>	2017
F23	<a href="#">SFRA Level 2: Appendix PA</a>	2017
F24	<a href="#">SFRA Level 2: Appendix PB</a>	2017

#### **London Borough of Newham Strategic Flood Risk Assessment:**

[London Borough of Newham Strategic Flood Risk Assessment \(SFRA\) Part 1 \(PDF\)](#)

[London Borough of Newham Strategic Flood Risk Assessment \(SFRA\) Part 2 \(PDF\)](#)

[London Borough of Newham Strategic Flood Risk Assessment \(SFRA\) Part 3 \(PDF\)](#)

[London Borough of Newham Level 1 Strategic Flood Risk Assessment \(SFRA\)](#)

[London Borough of Newham Level 2 Strategic Flood Risk Assessment \(SFRA\)](#)

All parts available at

<https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh/4>**London**

**Borough of Havering Strategic Flood Risk Assessment:**

[Strategic Flood Risk Assessment – Level 1](#)

[Strategic Flood Risk Assessment – Level 1 Annex A Growth Areas Review](#)

[Strategic Flood Risk Assessment – Level 1 Figures 101-105](#)

[Strategic Flood Risk Assessment – Level 1 Figures 106-107](#)

[Strategic Flood Risk Assessment – Level 1 Figures 108-114](#)

[Strategic Flood Risk Assessment – Level 1 Figures A01-A07](#)

[Strategic Flood Risk Assessment – Level 1 Figures A08-A13](#)

[Strategic Flood Risk Assessment – Level 1 Figures A14a-f](#)

**London Borough of Redbridge Strategic Flood Risk Assessment:**

<https://www.redbridge.gov.uk/media/10514/lbr-2611-strategic-flood-risk-assessment-level-1.pdf>

<https://www.redbridge.gov.uk/media/10515/lbr-2612-strategic-flood-risk-assessment-level-2.pdf>

<https://www.redbridge.gov.uk/media/10516/lbr-2613-strategic-flood-risk-assessment-level-2-addendum.pdf>



## APPENDIX B

### East London Joint Waste Plan (ELJWP) policy approach on safeguarding<sup>2</sup>

- 1.1. The purpose of safeguarding waste management sites is to maintain waste management capacity that contributes to meeting the objectives and targets for waste management set out in the Plan.
- 1.2. The London Plan states that safeguarded sites includes those that benefit from permanent planning, and sites holding an Environmental Permit permitting a waste management activity. Under the London Plan definition of an existing waste use, sites which do not have planning permission specifically for a waste use but are subject to an Environmental Permit would be safeguarded. Sites safeguarded by virtue of an Environmental Permit alone would lose their safeguarded status if/when the Permit ceases to exist.
- 1.3. Since 2012 the grant of an Environmental Permit by the Environment Agency can occur independently of the land-use planning system. This means, an Environmental Permit may be granted for an activity that is unlawful under the planning system. Therefore, the ELJWP does not safeguard such sites, although they remain safeguarded under the London Plan until the relevant permit ceases to exist, or until such time as the London Plan definition changes.
- 1.4. The London Plan definition does not include sites with a waste use that is lawful by virtue of time and is therefore immune from enforcement action. The lawful status of such sites can be confirmed by issue of a Certificate of Lawful Existing Use or Development (CLEUD) – the ELJWP safeguards such sites along with sites with planning permission for a waste use.
- 1.5. In the case of sites for which a CLEUD has not been granted, evidence of the activity taking place continuously for 10 years or more, for example an Environmental Permit covering the same area and activity issued over 10 years ago, has been taken to establish a waste use deemed to be lawful over time.
- 1.6. In addition, in order to avoid the safeguarding of sites that make a minor contribution to capacity in East London that may inhibit redevelopment schemes, sites that consistently manage less than 500 tonnes a year and were not providing specialist waste management capacity have been excluded from safeguarding.
- 1.7. Some sites may have a time limited planning permission for a waste management use and are only safeguarded by the ELJWP up to the date on which the permission expires. This is regardless of the status of any related Environmental Permit for the site.

---

<sup>2</sup> Refer to Policy JWP2: Safeguarding and Provision of Waste Capacity, and supporting text at page 63 of the East London Joint Waste Plan (ELJWP) Regulation 19 Submission Plan ([link to be added](#)).

- 1.8. In cases where land on which the waste use is lawful under the land use planning system and land covered by an Environmental Permit don't align, the area to which the lawful use under planning applies is taken as that to be safeguarded.
- 1.9. Finally, where a site is subject to planning enforcement action against the continued use, safeguarding will not take effect/is held in abeyance until the matter has been resolved regardless of permitted status.
- 1.10. A small number of existing waste sites have not been safeguarded on the basis that their re-development will achieve wider planning objectives and will not significantly impact the achievement of the London Plan strategic objective of net self-sufficiency and the Plan's objectives for the management of waste.
- 1.11. Sites that are not safeguarded by the ELJWP but are subject to Environmental Permits are still safeguarded through London Plan Policy SI9. The policy applies to sites proposed for redevelopment until such time that the Environmental Permit is surrendered/ceases to exist. Any relevant changes to the London Plan approach to safeguarding would then apply to sites not expressly safeguarded by the ELJWP.