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Assessment of Existing Waste Management Capacity

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1. Executive Summary

1.1 This report provides an updated assessment of how the existing waste management capacity in East London meets the management requirements for:

- the quantities of household, commercial and industrial waste (HIC) apportioned to the four Boroughs by the London Plan 2021 (LP apportionments); and
- Construction, Demolition and Excavation (C, D & E) waste and hazardous waste forecast to arise in East London to 2041.

1.2 The methodology applied replicates that used to generate capacity data that underpinned the West London Waste Plan adopted in July 2015 following examination, where the methodology was subject to scrutiny and its outputs found sound by an independent Inspector.

Findings

1.3 A comprehensive review of capacity data has revealed the following:

Management Capacity for Apportioned Waste

1.4 There is sufficient capacity to manage the LP apportioned forecast arisings to 2041.

1.5 A sensitivity analysis has been undertaken to account for the possible loss of Mechanical Biological Treatment (MBT) capacity after 2027 and even when the total loss of capacity at the MBT plants is factored in there is sufficient capacity.
The surplus capacity at 2041 ranges between c1.11Mtpa and co.63Mtpa (after loss of MBT).

Management Capacity for C, D & E Waste

1.6 There is sufficient capacity to manage the forecast C, D & E waste arisings to 2041.
The surplus capacity at 2041 is c1.7Mtpa.

Landfill Management Capacity for Residual non-inert waste

1.7 Under the scenario where the Planning Consent at Rainham Landfill does not constrain its life and taking 2% of total forecast HIC waste and the same amount of non-inert C, D & E waste, as was reportedly landfilled in 2022, it is predicted there would be sufficient non-inert waste landfill capacity throughout the entire Plan period (2041).

Management Capacity for Inert Waste

1.8 There is a predicted shortfall in management capacity for inert excavation waste of c172,000 tonnes emerging in 2025 rising to c923,500 tonnes at 2041.
The cumulative inert waste capacity requirement is c13.5Mt by 2041.

Management Capacity for Hazardous Waste

1.9 There is insufficient capacity to manage the forecast hazardous waste arisings to 2041. However, there is no policy expectation that individual Plan areas be net self sufficient for the management of hazardous waste forecast to be produced.

Where surpluses of capacity have been identified, existing waste sites contributing towards managing waste subject to LP apportionment and C,D & E waste may be released for non waste use without the Plan area's ability to meet the forecast management requirements being compromised.

2. Purpose

2.1 This report provides an updated assessment of how the existing waste management capacity in East London meets the management requirements for:

- the quantities of household, commercial and industrial waste (HIC) apportioned to the four Boroughs by the London Plan 2021 (LP apportionments);
- arisings of C, D & E waste and hazardous waste forecast to arise in East London to 2041.

2.2 East London is taken to comprise the following London Boroughs:

- Barking & Dagenham;
- Havering;
- Newham; and
- Redbridge

2.3 (hereinafter referred to as "the East London Boroughs").

Principal Data Sources

2.4 The principal data sources used to generate this capacity assessment are:

- Waste Data Interrogator (WDI)
- Environment Agency (EA) Permit Registers
- Borough Planning Registers

Each source is considered in more detail below.

Waste Data Interrogator

2.5 Operators of all sites subject to environmental permits relating to the management of waste in England are required to submit returns to the Environment Agency setting out the quantities, types and origin of waste received and, where applicable, destination and fate of waste removed. These returns are collated by the EA and reported in a national dataset known as the WDI. The WDI is released approximately nine months after the end of the calendar year to which the data relates. The 2022 WDI (version 2 released January 2023), for the calendar year 2022, was the most current version available at the time of producing this assessment.

Environment Agency Permit Registers

All extant environmental permits granted by the EA are listed on a searchable online database accessed here *https://environment.data.gov.uk/public-register/view/index*. The resulting list can be downloaded by local authority. Therefore, the listing for each borough was downloaded and combined into a single dataset. A request was also made for actual copies of the permits . These were used to determine maximum permitted capacities where they were bespoke.

Borough Planning Registers

2.6 Each planning authority keeps a register of all planning applications and permissions granted. *Each of the four London Borough's planning registers were s*earched for relevant planning permissions and background documents on a site-by-site basis to inform this assessment.

3. Policy Context

The London Plan

3.1 The London Plan 2021 forecasts arisings of Local Authority Collected Waste (LACW) (referred to as household waste) plus Commercial and Industrial (C&I) waste for London by Borough to 2041. These forecasts are used as a basis to allocate quantities of this waste for management to each Borough so that the overall goal of managing the equivalent of 100 per cent of London's waste within London (i.e. net self-sufficiency) by 2026 (Policy SI 8) is achieved[1]. The allocation has been derived through a process that includes assessment of existing capacity in each Borough along with a number of other factors that are considered to determine the ability of a particular Borough to provide additional management capacity[2]. The quantities arrived at are referred to as the London Plan apportionments (LP apportionments for short).

3.2 The types of capacity considered to count towards the management of apportioned waste (hereinafter referred to as "qualifying capacity") is listed in Paragraph 9.8.4 of the London Plan as follows:

- energy recovery in London;
- production of solid recovered fuel (SRF) and refuse derived fuel (RDF) in London;
- sorting or bulking for re-use or recycling including anaerobic digestion. The reuse or recycling may take place within or outside London providing the sorting and bulking capacity is located within London; and
- reuse or recycling including anaerobic digestion within London.

3.3 The London Plan 2021 also sets out management targets for waste generated in London in *Policy SI 7 Reducing waste and supporting the circular economy* as follows:

- ensure that there is zero biodegradable or recyclable waste to landfill by 2026
- meet or exceed the municipal waste recycling target of 65 per cent by 2030[3]
- meet or exceed the targets for each of the following waste and material streams:
    - construction and demolition – 95 per cent reuse/recycling/recovery
    - excavation – 95 per cent beneficial use[4].

3.4 In addition in connection with hazardous waste management capacity Paragraph 9.8.18 of the London Plan identifies "*..a need to continue to identify hazardous waste capacity for London.*"

3.5 The above requirements set the policy framework within which this capacity assessment exercise has been undertaken.

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[1] The London Plan specifically excludes excavation waste from the aim of overall net self-sufficiency on the following basis: " *The particular characteristics of this waste stream mean that it will be challenging for London to provide either the sites or the level of compensatory provision needed to apply net self-sufficiency to this waste stream.*" (Para 9.8.1)

[2] The methodology applied is set out in *London Plan Waste Forecasts and Apportionments Task 4 – Updating the apportionment method Methodology Report* (SLR/LUC August 2017).

[3] London Plan Footnote 163: Based on the EU definition of municipal waste being household waste and other waste similar in composition to household waste. This includes business waste collected by local authorities and by the private sector.

[4] London Plan Footnote 164 All inert excavation waste should be used for beneficial purposes.

4. Methodology

4.1 The following methodology was employed to identify the contribution that existing waste management sites in East London may make for the current and future management of waste subject to the London Plan apportionment, C, D & E waste and hazardous waste.

Stage 1: Preliminaries

4.2 The EA WDI has been used initially to identify waste sites in East London subject to an environmental permit that have been operational in 8 year period 2016-2022. This identified a total of 126 sites.

Step 1: Data Cleansing

4.3 Detailed checks of the EA WDI dataset were undertaken as inputs to 28 sites[5] were found not to have been reported in the WDI for themost recent 3 year period. Of these, 10 sites have not been considered further as their inputs were considered to be insignificant (less than 500tpa) and 18 inactive sites were also excluded on a precautionary basis that they may no longer exist [6]. One vehicle breaking site that received less than 4 tonnes in 2022 was also not considered further.

4.4 As advised by Newham Council, two sites were subject to temporary planning permissions that have actually expired[7] and two sites have been granted planning permission to change the use from waste[8]. Therefore capacity at these sites has been excluded.

4.5 This left 93 sites for further investigation. The remaining 93 sites fall within the facility type and site category shown in Table 1.

[5] These sites are not proposed to be safeguarded through the ELJWP as they made a nil contribution towards capacity.

[6] Only 5 of the 18 inactive sites were still subject to an environmental permit.

[7] One of these sites at Mohawk Wharf is still subject to environmental permits and would therefore still be classed as an existing waste site according to the London Plan definition. Four other sites are subject to temporary planning permissions due to expire in the next five years.

[8] One of these sites at Unit 4, Charles Street is still subject to environmental permits and would therefore still be classed as an existing waste site using the London Plan definition.

Table 1: Permitted Waste Sites in East London by Facility Type & Category

	Site Category						
Facility Type	**Landfill**	**Metal Recycling Site**	**To Land**	**Storage**	**Transfer**	**Treatment**	**Total**
Anaerobic Digestion						2	**2**
Biological Treatment						3	**3**
CA Site					4		**4**
Car Breaker		3					**3**
Clinical Waste Transfer					3		**3**
Clinical Waste Transfer / Treatment						1	**1**
Deposit of waste to land (recovery)			3				**3**
Haz Waste Transfer					4		**4**
Haz Waste Transfer / Treatment						1	**1**
Inert LF	2						**2**
Inert Waste Transfer					3		**3**
Material Recycling Facility						4	**4**
Metal Recycling		9					**9**
Non Haz Waste Transfer / Treatment						8	**8**
Non-Hazardous LF	2						**2**
Non-Haz Waste Transfer					17		**17**
Physical Treatment						16	**16**
Storage - Metal Reprocessing				1			**1**
Temporary storage installation				2			**2**
Vehicle depollution facility		5					**5**
Grand Total	**4**	**17**	**3**	**3**	**31**	**35**	**93**

Step 2: Initial screen for non qualifying capacity

4.6 Sites identified as landfill and deposit to land were removed as they have a finite life. Storage sites were also excluded as only waste transfer will take place. Neither type of capacity count towards qualifying capacity for the management of waste subject to apportionment. In total 10 sites were excluded at this stage. The assessment of capacity of these sites is included in Section 6 of this report.

4.7 This left 83 operational permitted sites for further investigation.

Consideration of Waste TransferStations

4.8 The London Plan identifies sites undertaking waste transfer as a different form of site to that where waste is actually managed. This is because historically waste was only bulked up for disposal elsewhere at such sites. However examination of data for inputs and outputs of such sites shows that in recent years some processing (or management) does actually take place at many sites classed as waste transfer sites (WTS) under the Environment Agency permit classification scheme. As this activity is included as qualifying capacity, capacity at these sites has been considered further below.

Step 3: Identify sites managing predominantly C, D & E waste and hazardous waste

4.9 Data for the latest year for which inputs were reported in the WDI were interrogated and split by the predetermined basic waste category set in the WDI as follows:

- household industrial & commercial waste (HIC);
- inert (predominately, but not exclusively) C, D & E waste; and
- hazardous waste.

4.10 Sites dedicated to the acceptance of C, D & E waste and hazardous waste were separated as there are separate management requirements[9] and in the case of C, D & E waste, capacity does not count towards the apportionments.

4.11 The percentage input of each waste type listed above was determined on a site-by-site basis. Where the input exceeded a threshold of 85% for either non-hazardous C, D & E waste or hazardous waste, these sites were screened out on the basis that they are dedicated to the management of non-apportioned waste. The following was found:

- 31 sites had inputs of 85% or more of non-hazardous C, D & E waste; and
- 9 sites had inputs of 85% or more of hazardous waste.

These sites are listed in Appendix 1 and 2 respectively and their capacity is assessed in Sections 3 and 4 of this report.

4.12 This left 43 operational permitted sites managing waste subject to the London Plan apportionment for further investigation of their capacity. Where a site received inputs of HIC waste plus other wastes, but the other waste only represented 15% of the input or less, these inputs were taken to be incidental to the principal operation involving the management of HIC waste and all available capacity was assumed to be available for the management of HIC. This is considered in Step 7.

[9] While HIC hazardous waste is counted in the apportionment it is dealt with separately in this report and a separate report *ELJWP East London Hazardous Waste Forecasts to 2041.* BPP Consulting July 2024.

Stage 2: Establishing Maximum Site Capacity

Step 4: Site by Site Assessment

4.13 The following data and information has been reviewed for each of the remaining 45 sites on a site by site basis:

1. Input data presented in the WDI over the most recent 5-year period for which data was available, 2018-2022. The 5-year peak input was then identified (as per London Plan advice). To allow for the possibility that the peak input value is not an absolute limit, a 15% 'freeboard' was added to the peak input values obtained[10]. This adjustment is intended to reflect the maximum realistic throughput of a facility.
2. Planning consents issued by each borough council have been reviewed where available[11] to identify any capacity limitations relating to annual throughput.
3. Permits issued by the Environment Agency were reviewed where available/provided. Where a site benefits from a bespoke permit with limits set according to the specific activities, the permitted limit has been applied. However, where it benefits from a Standard Rules permit, which have predefined banded input limits that do not necessarily correspond to the actual capacity of the individual sites, the permit limit has not been used.

4.14 A sequential approach was adopted to establish what the maximum design capacity of each site might be, as follows[12]:

1. Where actual inputs (5 year WDI peak) plus 15% were within a +/-50% difference to consent/ permit limits, the consent/ permit limit was taken in preference;
2. Where actual inputs (5 year WDI peak) plus 15% are significantly different (+/-50%) from capacity limits specified in the bespoke permit or planning consent the actual input (5 year WDI peak) plus 15% value was used.
3. Where a maximum value was not provided by the consent or bespoke permit, the actual input (5 year WDI peak) plus 15% was used.

[10] As per adopted West London Waste Plan evidence base . The 15% freeboard was not added to sites with management capacity with an upper limit defined by the technology itself such as AD, MBT or EfW.

[11] Some sites such as established scrapyards, may be subject to Certificates of Lawfulness, Established Use Certificates (post 1964) or Existing User Rights (pre-1964 & post 1947). These may not specify capacity and even where they do case law indicates they ought only to be regarded as benchmarks and are not equivalent to rigid planning conditions.

[12] The percentage difference is the difference between two values divided by the average of two values multiplied by 100. This calculation helps to understand how significantly close two values are.

Step 5: Accounting for sites under ELWA control

4.15 The four East London boroughs have established a single waste disposal authority in the form of the East London Waste Authority (ELWA). Nine permitted sites are currently operated under the ELWA contract by Renewi UK Ltd. Table 2 below lists these sites and their assessed capacities. The two sites hosting the MBT facilities also host WTS. However, the WDI reports inputs to both operations under a single permit in both cases. So as to distinguish between the capacity types, the inputs have been split on the following basis: all inputs of mixed municipal waste were taken as being managed through the MBT facilities (as residual waste), while inputs of other wastes were taken to have been managed at the WTS (being unsuitable for MBT). The inputs over 5 years of these wastes have been assessed to find the peak input plus the 15% "freeboard" except for the MBT facilities whose peak input has been taken to be the absolute technical capacity limit as set in the permit. The assessed recovery rate achieved at each site are all 100%. That is to say no waste leaving any of the sites is reported as going for disposal.

Table 2: Sites under ELWA Contract and their Assessed Capacity

Facility Type	Site Name	Peak 5 yr input	Permitted Capacity (Bespoke Env Permit)	% Difference between Peak Input +15% and consented/ permitted capacity	Preferred Capacity[13]
HWRC	Chigwell Road	18,161	28,600	-45%	28,600
	Gerpins Lane	29,693	115,500	-118%	29,693
	Jenkins Lane	56,784	80,000	-34%	80,000
	Frizlands Lane	31,532	n/a		31,532
Transfer (Recycling)	Ilford	15,936	20,000	-23%	20,000
MBT	Frog Island Waste Management Facility	181,011	192,000	+19%	192,000
	Jenkins Lane Waste Management Facility	210,338	217,000	+77%	217,000
Transfer for Recovery	Frog Island Waste Management Facility	46,544	n/a	-	46,544
	Jenkins Lane Waste Management Facility	5,192	n/a	-	5,192
Total					**650,561**

4.16 Table 2 shows a total of c650,500 tonnes of capacity is available for the management of apportioned waste at the sites under the control of ELWA.

[13] Peak or permitted limit taken in absence of ELWA alternative value.

Step 6: Additional Sites

4.17 As the most recent WDI relates to 2022, and additional sites may have been granted permits since then, the site listing drawn from the WDI was compared with the listing for all sites subject to a permit granted by the EA at January 2024. This identified sites that have an environmental permit but for which no inputs were reported in the WDI from 2015-2022 listed in Table 3 below.

Table 3: Permitted Sites in East London with no input entry in the WDI

Site Name	Operator	Permit Type	Permit Limit[14]	Consented Capacity	Capacity Type
10e Noaks Industrial Estate	Dmap Spares Ltd	S1517 No 17: Vehicle Depollution Facility	*2,499*	-	Hazardous
Unit C6, Marsh Way	Ronnie & Ronnie Services Ltd	S1517 No 17: Vehicle Depollution Facility	*2,499*	-	
5, Eastbury Road	Terra Firma Pipeline Ltd	S0811 No 11: Inert & excavation Waste TS + treatment	*74,999*	-	CDE
Unit 5 Eastbury Road	Terra Firma Pipeline Ltd	A14: Transfer Station taking Non-Biodegradable Wastes	-	-	CDE

4.18 Furthermore, the East London Boroughs provided a listing of planning permissions granted since 2019. Cross reference of this listing to the site listing drawn from the WDI identified 2 additional sites. These are shown in Table 4 below.

Table 4: Additional sites with Planning Permission but no entry in the WDI

Site Name	Description	Permit Limit (tpa)	Consented Capacity (tpa)	Notes
London Sustainable Industries Park North, Dagenham	Construction of a building and associated plant and infrastructure to generate energy from residual waste	180,000	200,000[15]	Residual Waste from HIC sources
London Teleport Site Pier Road, Newham	Change of use to metal recycling facility	n/a[16]	c70,000[17]	Metal recycling from HIC sources
Rainham MRF	Extension of time to 2026 and phased redevelopment		c200,000 tonnes per annum (additional 40ktpa)	Municipal waste, pending GLA Phase 2 review
Rainham Silt Lagoons	The treatment of imported waste to produce recycled aggregate; and the export of waste soils for beneficial use	750,000	500,000 plus 20,000 (beneficial use)	C, D & E waste Time limited to 2050
Plot 22 Albright Industrial Estate	Use as a waste management facility with a throughput of over 75,000 tonne per annum	100,000	75,000	Mixed skip waste predominately CDE in origin

[14] Permit limits taken from SR permits to be treated with caution.

[15] Capacity increased from 180,000 tpa to 200,00tpa by permission 18/01501/FUL.

[16] Registered T9 permitting exemption.

[17] Promoted as a relocation of LCM Ltd operation at No 6 Factory Road (now occupied by EMR).

4.19 Table 4 also shows three sites providing additional qualifying capacity for managing apportioned waste as follows:

- London Sustainable Industries Park: providing an additional 200,000 tpa of residual waste recovery capacity. While the plant itself is yet to be built out, substantial piling and drainage has been undertaken on the site and development has therefore been taken by Barking and Dagenham (B&D) Council to have commenced[18].
- London Teleport Site Pier Road providing up to an additional 70,000 tpa of metal recycling capacity.
- Rainham MRF providing an additional 40,000 tpa of recycling capacity. However, it should be noted that given the capacity assessment has already counted it as providing 209,000 tpa of recycling capacity, this capacity has not been added.

The above sites will be safeguarded through the ELJWP as existing waste sites.

4.20 The additional consented capacity at Rainham Silt Lagoons and Plot 22 has been counted towards the capacity for the management of C, D & E waste, considered later in this report. These too will be safeguarded through the ELJWP as existing waste sites.

Stage 3: Screening out Non-Qualifying Capacity

Step 7: Accounting for CDEW & Hazardous Waste Management Capacity

4.21 Some sites report receiving multiple waste streams. As the LP apportionment is specific to HIC waste, capacity at sites that received a mixture of HIC waste plus C, D & E waste and/or hazardous waste were seperated. The percentage inputs of each waste stream (using the most recent year WDI data entry per site) reported was applied to the preferred maximum capacity value on a site-by-site basis. Where the percentage input for either C, D & E waste or hazardous waste or both in combination fell below 15%, all capacity has been taken to count towards apportioned waste. This is on the basis that management of 15% or less is incidental to the principal waste use.

Step 8: Assessing Landfill Diversion Rates Achieved

4.22 As the definition of capacity for waste considered to have been managed in London, and hence defined as qualifying capacity for the purposes of meeting the apportionments set by the London Plan includes capacity for transfer that results in the waste going for onward recycling or reuse, capacity used solely for transfer for onward disposal is excluded by omission. Therefore capacity at such sites has been discounted applying the following approach:

1. For certain types of sites, such as metal recycling sites (MRS), it has been assummed that all the capacity contributes towards the diversion targets (This includes 7 sites).
2. For specialist treatment plant (the two AD facilities) the same was taken to be the case. Capacity at waste water treatment works (WwTW) was excluded.

[18] The original planning application planning permission 13/01134/FUL has been amended a number of times, most recently in 2023 when application 23/01239/NONMAT was granted allowing for the deployment of alternative technologies to gasification for energy from waste.

3. For the remaining sites, the actual diversion rates achieved as indicated by the WDI output data was used on a site by site basis. Where fates were indicated as 'landfill', 'transfer' or 'unknown' the values were taken to be counted towards disposal. Where they were reported as going on for 'recovery', 'treatment' or 'incineration' they were counted towards diversion capacity. This was undertaken using the last 5 years of output data reported in the WDI to take the maximum recovery rate the site had achieved. Appendix 3 shows the result of these calculations.

4.23 This exercise generated a value for capacity for the management of waste subject to the LP apportionment of c1,690,000 million tonnes per annum. When the c650,500 tonnes per annum of capacity provided by the sites operating under contract with ELWA, and the capacity of at least 270,000 tonnes per annum offered by the additional sites shown in Table 4 is also counted, a total of **c2,610,500 tonnes per annum of capacity is identified**. When capacity at the sites to be released through the Plan is also taken into account, 49,360 tpa, the total capacity stands at **c2,561,000** tpa. This value was then compared with the quantities of apportioned waste whose management the Boroughs are expected to provide for, as set in the London Plan 2021 as shown in Table 5 below.

Table 5: Combined apportionment for East London boroughs compared to Estimated Apportionment Capacity in East London (after release of sites)

	2021	2041
Apportionment Forecast	1,409,000	1,497,000
Capacity	2,561,000	2,561,000
Difference	**+1,152,000**	**+1,064,000**

4.24 Table 5 shows there is sufficient capacity to manage the apportionment forecast arisings to 2041 with just over 1.0M tonnes 'surplus' capacity in 2041.

Sensitivity for loss of MBT Capacity

4.25 Currently c391,000 tonnes[19] of residual LACW (classed as 'mixed municipal waste') is managed via MBT plants located at Frog Island and Jenkins Lane respectively. These have been assessed to provide just under 0.4 million tpa of qualifying capacity by virtue of the conversion of residual LACW into RDF, following extraction of some recyclable materials.

4.26 It is understood that ELWA will be retendering its residual waste management contract from December 2027. It is entirely possible that the post 2027 residual management solution will not involve the continued use of MBT. This presents the possibility that the MBT capacity will no longer be available and therefore ought not be counted from 2028 onwards. While some options being considered by ELWA will involve retention of some capacity at at least one site (Jenkins Lane), the implications of the total loss of this capacity plus the transfer for recycling/recovery capacity at Frog Island (46,544 tonnes) for the Plan area continuing to meet the LP apportionment has been considered in Table 6 on a precautionary basis.

[19] Peak input of mixed municipal waste managed at Frog Island and Jenkins Lane as set out in Table 2.

Table 6: Combined apportionment for East London boroughs compared to Estimated Apportionment Capacity in East London (MBT Sensitivity)

	2021	2041
Apportionment Forecast	1,409,000	1,497,000
Capacity minus MBT post 2027	2,561,000	2,123,596
Difference	**+1,152,000**	**+626,596**

4.27 Table 6 shows there is sufficient capacity to manage the collective LP apportionments to 2041 for the four Boroughs even when the total loss of capacity at the MBT plants and associated transfer for recovery facility at Frog Island is factored in. This is considered to be a worst case scenario.

4.28 This means that capacity at existing waste sites to be safeguarded through the emerging ELWJP contributing towards managing apportioned waste amounting to up to 626,500 tpa is available to cover the release of other existing waste sites for non-waste use (see for example Appendix 2) without the Plan area's ability to meet the LP apportionments being compromised, even with the loss of the MBT capacity at some point in the forthcoming Plan period. In the event sites offering 49,360 tpa of apportioned waste management capacity are to be released and this value has already been deducted from the total cited.

5. Assessing C, D & E Waste Management Capacity

5.1 As mentioned in Step 3, sites managing 85% or more C, D & E waste were concluded as being dedicated to the management of C, D & E waste. These sites and their assessed capacities are shown in Appendix 1. These sites contribute c3,283,213 tonnes (reducing to c2,838,520 tonnes in 2024 due to a number of temporary permissions expiring) of C, D & E waste management capacity, once capacity at the sites to be released through the Plan is deducted. When combined with the c372,000 tonnes of recovery capacity for C, D & E waste shown in Appendix 3 plus the additional consented capacity identified in Table 4 of c595,000 tpa, a total capacity post 2024 of c3,790,000 tpa is given.

5.2 A separate report[20] updated the baseline arising value for non-hazardous C, D & E waste in 2022 at c2,123,000 tonnes. A static forecast has been adopted and compared with the capacity as shown in Table 7 below.

Table 7: Forecast non-hazardous C, D & E waste arisings for East London compared to Estimated non-hazardous C, D & E waste Management Capacity in East London (after release of sites)

	2026	2031	2036	2041
Forecast Arisings	2,123,218	2,123,218	2,123,218	2,123,218
Capacity (para above)	3,789,831	3,789,831	3,789,831	3,789,831
Difference	**+1,666,613**	**+1,666,613**	**+1,666,613**	**+1,666,613**

5.3 Table 7 shows there is sufficient capacity to manage the forecast C, D & E waste arisings to 2041 **after the release of sites that offered 368,669 tpa of capacity.**

5.4 The surplus capacity at existing waste sites of c1.7M tpa for managing C, D& E waste for recovery would be available to release further existing waste sites within the Plan area (see for example Appendix 2), and/or to meet unmet needs of other boroughs outside East London. .

[20] ELJWP East London C,D & E Waste Forecasts to 2041. BPP Consulting July 2024

6. Permanent Deposit to Land Depletion Profiles

Non inert Waste Landfill Capacity

6.1 While there is no obligation in planning policy for East London to achieve net self-sufficiency for non-inert waste management alone, the management of mixed municipal waste by disposal or recovery is subject to the proximity principle and hence consideration has been given to the sufficiency of the remaining consented non-inert landfill capacity within East London. This approach recognises that the proximity principle encourages each WPA to plan for the disposal and recovery of mixed municipal waste on a more localised basis[21].

6.2 Currently the planning consent for Rainham Landfill is set to expire in 2024. Table 8 considers an alternative scenario whereby the planning consent is not subject to a time constraint so that the site continues to provide capacity for East London's waste requiring landfill to the point when all of its void space has been exhausted. It is notable that there is a live application to remove the end date from the permission.

6.3 It should be noted that landfill does not count as qualifying capacity under the London Plan and the Mayor wants London to be a "zero waste city" which means no biodegradable or recyclable waste from any source should go to landfill after 2026. However, on a precautionary basis, because there may be some intractable wastes for which landfill will remain the only viable management solution, an assumption of 2% of HIC waste forecast to arise in East London by the London Plan, going to landfill has been applied.

[21] Waste Management Plan for England (DEFRA, January 2021)

Table 8: Possible Depletion Profile of Non-inert Landfill void (Rainham) in East London under scenario where life of Rainham extended (tonnes)

Year	Annual Non-inert Waste Management Requirement			15% inert input for restoration/ operational purposes	Capacity for non-inert waste	Surplus or Shortfall
	Non-inert C+D waste plus non-inert excavation waste (Table 17 ELJWP CDEW Forecasts)	2% of London Plan HIC Forecast	Total non-inert inputs			
2024	18,601	17,812	36,413	5,462	705,498[22]	0
2025	18,601	17,887	36,488	5,473	669,086	0
2026	18,601	17,963	36,564	5,485	632,597	0
2027	18,601	18,039	36,640	5,496	596,033	0
2028	18,601	18,115	36,716	5,507	559,393	0
2029	18,601	18,191	36,792	5,519	522,677	0
2030	18,601	18,266	36,867	5,530	485,886	0
2031	18,601	18,342	36,943	5,541	449,019	0
2032	18,601	18,418	37,019	5,553	412,075	0
2033	18,601	18,494	37,095	5,564	375,057	0
2034	18,601	18,569	37,170	5,576	337,962	0
2035	18,601	18,645	37,246	5,587	300,791	0
2036	18,601	18,721	37,322	5,598	263,545	0
2037	18,601	18,797	37,398	5,610	226,223	0
2038	18,601	18,873	37,474	5,621	188,825	0
2039	18,601	18,948	37,549	5,632	151,276	0
2040	18,601	19,024	37,625	5,644	113,651	0
2041	18,601	19,100	37,701	5,655	75,950	0

6.4 Table 8 shows that under this scenario there is sufficient capacity in non-inert waste landfill to the end of the plan period (2041) and beyond.

6.5 If Rainham closes later this year, in accordance with its current planning permission, it will cease to operate without being completed, and all non-hazardous residues requiring landfill produced within East London would need to be managed at alternative sites outside the Plan area.

6.6 There are also separate Silt Lagoons at Rainham (operated by Land & Water Remediation Ltd) and the EA remaining landfill void dataset for 2022 identifies these as having 2,513,579 m3 non-hazardous landfill capacity. The extent to which this site may actually offer non-hazardous landfill capacity is considered below.

Rainham Silt Lagoons – Non-Hazardous Landfill Capacity

6.7 A review of the inputs to the Rainham Silt Lagoons 2018-2022 reveals that the site only received a specific waste type classed as non-hazardous (premixed wastes with EWC 19 02 03) plus substantial quantities of waste classed as inert/ C + D (soils and stones EWC 17 05 04 and

[22] Starting capacity value for 2024 obtained by taking EA remaining landfill void at end of 2022 minus inputs in 2022 minus 15% for inert inputs for restoration purposes to take account of the void that would have been used in 2023.

dredging spoil EWC 17 05 06). In estimating the proportion of non-hazardous landfill capacity in East London available for inert waste[23], the capacity at the Silt Lagoons can be included on the following basis:

- Establishing the average ratio between inputs of 19 02 03 (non-hazardous waste) and the waste classed as excavation waste (soils, stones and dredging waste) (inert waste) over 5 years. This produced a 50:50 ratio,
- Splitting the remaining void value, of 2,513,579m3, in half (in accordance with the 50:50 ratio), with half taken as capacity for inert excavation waste which equates to 1,885,184 tonnes[24]. An average of the inputs to the Silt Lagoons of inert waste over the last 3 years, as reported in the WDI, was then deducted to account for the void that will have been filled in 2023. This gave a starting capacity of 1,649,743 tonnes. Table 9 below presents the predicted depletion profile of the deposit to land sites in East London accepting inert excavation waste.

Inert Waste Management

6.8 The London Plan sets a target for all inert excavation waste to being put to beneficial use i.e. not disposed of without a specific purpose. Table 9 assumes that the use of inert excavation waste in recovery to land and landfill restoration would be classed as beneficial use.

[23] Given the specific nature of non-hazardous waste inputs and nature of the site, the non-hazardous waste landfill capacity offered by the silt lagoons has been taken to not be available for merchant non-hazardous waste.

[24] 1,256,790m3 void converts to 1,885,184 tonnes by applying x1.5 inert waste placed density factor

Table 9: Predicted Depletion Profile of Capacity for Deposit of Inert Waste on Land in East London (tonnes)

Highlighted red cells indicate expected closure of site

Year	Annual Inert Waste Management Need (inert C+D plus inert excavation Table 17 ELJWP CDE Forecasts)	Recovery to Land[25]	Inert Landfill		non-hazardous landfill capacity for restoration	non-hazardous landfill	Total Inert Deposit Capacity	Annual Shortfall	Cumulative Shortfall
		Central Park Dagenham	East Hall Farm Inert Landfill[26]	Wennington Quarry Inert Landfill[27]	Rainham Landfill at 15%[28] of inert inputs[29] (Table 8)	Silt Lagoons, Rainham and Wennington Marshes[30]			
2024	929,347	120,184	394,463[31]	326,541[32]	275,596	1,649,743	2,766,527	0	0
2025	929,347	0	274,463	26,541	270,134	1,438,169	2,009,307	-172,127	-172,127
2026	929,347	0		0	264,661	1,226,595	1,491,257	-685,759	-857,886
2027	929,347	0			259,176	1,015,022	1,274,198	-712,289	-1,570,175
2028	929,347	0			253,680	803,448	1,057,128	-712,277	-2,282,452
2029	929,347	0			248,173	591,874	840,047	-712,266	-2,994,718
2030	929,347	0			242,654	380,300	242,654	-712,254	-3,706,972
2031	929,347	0			237,124	168,726	237,124	-712,243	-4,419,215
2032	929,347	0			231,583	0	231,583	-755,079	-5,174,294
2033	929,347	0			226,030		226,030	-923,794	-6,098,089
2034	929,347	0			220,466		220,466	-923,783	-7,021,871
2035	929,347	0			214,890		214,890	-923,771	-7,945,643
2036	929,347	0			209,303		209,303	-923,760	-8,869,403
2037	929,347	0			203,705		203,705	-923,749	-9,793,152
2038	929,347	0			198,095		198,095	-923,737	-10,716,889
2039	929,347	0			192,474		192,474	-923,726	-11,640,615
2040	929,347	0			186,842		186,842	-923,715	-12,564,329
2041	929,347	0			181,198		181,198	-923,703	-13,488,033

[25] Recovery to Land remaining capacity calculated using the total permitted capacity minus annual WDI inputs.
[26] Site input limited to 120,000 tonnes of infill pa to 2026 as per planning application P0271.14.
[27] Inputs started in 2018 according to EA WDI dataset. Site limited to 300,000 tonnes of infill pa and limited to 9 years (2027) as per Environmental Permit Application.
[28] 15% of non-hazardous landfill void taken as what is expected to be occupied by inert fill for site restoration purposes.
[29] Void (m3) multiplied by 1.5 factor to convert to inert waste (tonnes) minus inert inputs in 2022 to account for the void filled in 2023.
[30] Assumed depletion based on 5-year average inputs of inert waste.
[31] Starting capacity takes EA remaining landfill void at end of 2022 minus inputs in 2022 to take account of the void used in 2023.
[32] As footnote 32

6.9 The London Plan sets a target for all inert excavation waste to being put to beneficial use i.e. not disposed of without a specific purpose. Table 9 assumes that the use of inert excavation waste in recovery to land and landfill restoration would be classed as beneficial use.

6.10 Table 9 shows that an annual shortfall in management capacity for excavation waste of c172,000 tonnes is predicted to emerge at 2025 rising to c923,500 tonnes at 2033, through to 2041. This gives a cumulative capacity requirement of c13.5 million tonnes over the Plan period.

6.11 Table 9 assumes that the planning consent for Rainham Landfill will be altered such that it provides capacity for East London's waste to completion rather than be dictated by the planning permission set to expire in 2024. If Rainham closes later this year in accordance with its current planning permission it will cease to operate without being completed, and the tonnage of inert excavation waste produced within East London shown as managed at the site in Table 9 would need to be managed outside the Plan area by beneficial use from 2025 onwards.

6.12 It should be noted that currently not all non-hazardous residues requiring landfill and inert excavation waste produced within East London is actually managed within East London and it may be that other sites may be able to receive additional waste from East London, however this needs further investigation through Duty to Cooperate (DtC) engagement with WPAs hosting sites with capacity.

7. Assessing Hazardous Waste Management Capacity

7.1 Sites managing 85% or more hazardous waste were taken to be dedicated to the management of hazardous waste. These sites and their assessed capacities are shown in Appendix 2. Note that virtually all inputs to the 9 sites were hazardous waste of HIC origin. These sites contributed c18,500 tonnes of hazardous waste management capacity. Combined with the c20,500 tonnes of recovery capacity for the management of hazardous waste available at sites also managing non-hazardous waste of various types shown in Appendix 3 (virtually all sites managed hazardous HIC waste) gives a total c39,000 tonnes of management capacity for hazardous HIC waste. It should be noted that the London Plan actually includes hazardous waste from HIC sources within the apportionments, so the 39,0000tpa identified as dealing with hazardous waste from HIC sources could also be counted towards the apportionments if needed.

7.2 A separate report[33] updated the forecasts for hazardous waste expected to arise in East London through t 2041, taking a baseline value in 2022 of c57,500 tonnes. The forecast arisings values are compared with the assessed capacity as shown in Table 10 below.

Table 10: Forecast hazardous waste arisings for East London compared to Estimated hazardous waste Management Capacity in East London

	2026	2031	2036	2041
Total	**56,346**	**54,704**	**54,704**	**54,704**
Capacity	39,000	39,000	39,000	39,000
Difference	**-17,346**	**-15,704**	**-15,704**	**-15,704**

7.3 Table 10 shows there is a predicted deficit in capacity within the Plan area to manage the forecast hazardous waste arisings throughout the Plan period. However given the diverse nature of hazardous wastes, there is no policy expectation that individual Plan areas be net self sufficient for the management of hazardous waste forecast to be produced. Rather that existing capacity be safeguarded and additional capacity be sought in co-operation with other Plan areas. This is set out in the London Plan as follows:

i) *"The main requirement is for sites for regional facilities to be identified. Boroughs will need to work with neighbouring authorities to consider the necessary facilities when planning for their hazardous waste." (paragraph 9.8.18)*

7.4 Therefore the indicated presence of a shortfall should not be a barrier to release of other sites, or impose a requirement to provide for additional capacity through allocation in the ELJWP.

[33] BPP Consulting ELJWP Hazardous Forecast Update.

Appendix 1: Site by Site Breakdown of Management Capacity Contribution to C, D & E Waste (85% threshold)

Site subject to temporary planning permissions (all but 1 expiring in 2024) marked in amber. n/a= not available, Sites to be released excluded

Borough	Site Name	Operator	CDEW % input	Peak Input (2018-2022) +15%	Permit Limit[34]	Consented Capacity	% Difference between Peak Input +15% & consented/ permitted capacity	Preferred Value
Barking & Dagenham	11 Atcost Road	Plasterzone Ltd/Keep Green Ltd	100%	13,230	n/a	n/a		13,230
	12-14 River Road	E L G Haniel Metals Ltd	89%	23,831	n/a	n/a		23,831
	2 Chequers Lane	M M S Supplies Ltd	100%	40,802	n/a	n/a		40,802
	2 Choats Road	S U C Exc Uk Ltd	100%	81,352	n/a	n/a		81,352
	Alfreds Way, Barking	Creek Metals Ltd	99%	27,091	n/a	n/a		27,091
	Barking Riverside Recycling Centre (Choats Road)	Sewells Reservoir Construction Ltd	100%	354,950	500,000	n/a	-34%	500,000
	Creek Road Waste Management Facility	Workrate Ltd	91%	26,986	65,000	n/a	-83%	26,986
	Dagenham Dock Aggregate Recycling Facility	Hanson Quarry Products Europe Ltd	100%	35,043	250,000	n/a	-151%	35,043
	Docklands Wharf Transfer Station	Multi Services Kent Ltd	96%	70,862	441,700	n/a	-145%	70,862
	Media Park	SH & WS Company Ltd	100%	6,570	n/a	n/a		6,570
	Neptune Recycling	Neptune Contract Services Ltd	85%	33,301	n/a	n/a		33,301
	Perry Road Recycling Facility	Recycled Material Supplies Ltd	100%	286,196	250,000	n/a	+14%	250,000
	Thunderer Road	Neptune Contract Services Ltd	93%	124,573	n/a	n/a		124,573
	Unit 11 Atcost Road	Jac Skip Hire	100%	11,559	n/a	n/a		11,559
Havering	35 Nelmes Way	Albright Transfer Station Ltd	100%	86,031	75,000	n/a	+14%	75,000
	Frog Island	S Walsh & Son Ltd	100%	228,679	209,000	n/a	+9%	209,000
	Grove Farm	R J Skip Hire Ltd	94%	11,569	n/a	n/a		11,569
	Land At, York Road, Rainham	Kilnbridge Construction Services Ltd	99%	44,593	n/a	n/a		44,593
	Rainham Recycling Facility	Brett Aggregates Ltd	100%	137,678	n/a	n/a		137,678
Newham	12 Bradfield Road	Metro (London G B) Ltd	100%	23,817	n/a	n/a		23,817
	Canning Town Depot	G B N Services Ltd (formerly Orion)	99%	53,078	150,000	n/a	-95%	53,078
	Knights Road, E16 2AT	JRL Environmental Ltd	100%	73,436	n/a	n/a		73,436
	Knights Road, Silvertown	Recycled Material Supplies Ltd	100%	270,593	350,000	n/a	-26%	350,000
	Marshgate Sidings	D B Schenker/D B Cargo	100%	496,880	700,000	n/a	-34	700,000
	Marshgate Sidings	S Walsh & Son Ltd	100%	208,493	350,000	n/a	-51%	208,493
	Oasis Park, Stephenson Street, Canning Town	I O D Skip Hire Ltd (Powerday)	98%	61,809	350,000	100,000[35]	-140%	61,809
	Plaistow Wharf	Keltbray Environmental Ltd	100%	80,413	n/a	200,000	-85%	80,413
Redbridge	Unit U, Pegasus Works	N R M Metal Recycling Ltd	100%	9,127	n/a	n/a		**9,127**
							Total	**3,283,213**
							Reducing post 2024	**2,838,520**

[34] Using bespoke permit limit. Italicised entries are taken from Standard Rules permits which are considered to be less reliable so are provided for information only.

[35] 23/00760/FUL granted to increase the processing capacity of the facility from 60,000 tonnes to 100,000 tonnes of waste per annum on average.

Appendix 2: Site by Site Breakdown of Management Capacity Contribution to Hazardous Waste (virtually all hazardous HIC waste management capacity) (85% threshold)

Borough	Site Name	Operator	% Haz input	Peak Input (2018-2022) +15%	Permit Limit	Consented Capacity	Preferred Value
Barking & Dagenham	13a River Road	Abbott Car Care	100%	69	n/a	n/a	69
Havering	Unit 7b Salamons Way, Rainham	Hunt, G P t/a ANV Vehicle Services		32	n/a	n/a	32
	Car Breakers Yard, 2 Oaks, Broxhill Road, Havering	Randall, John t/a Randalls Car Dismantlers		690	n/a	n/a	690
	Unit 3, Guardian Business Centre, Harold Hill	Sonono Ltd		94	n/a	n/a	94
	Unit 7, Albright Industrial Estate, Ferry Lane	C T Wakefield & A Wakefield t/a Pier Metals		1,001	n/a	n/a	1,001
	Ferry Lane South WTF	Adler & Allan Limited	98%	16,014	n/a	n/a	16,014
Newham	66-68 New Barn Street, Plaistow[36]	Universal Autoparts Ltd	100%	350	n/a	n/a	350
Redbridge	1a Wanstead Park Road	Kwik Body Works Ltd		60	n/a	n/a	60
	7 Juniper Road	Dial - A - Spare Ltd		170	n/	n/a	170

[36] Site to be granted permission Newham for non-waste redevelopment.

Appendix 3: Site by Site Breakdown of Management Capacity Contribution to Apportionment (in alphabetical order by address). Sites to be released excluded.

Site Category	Borough	Site Name	Operator	Peak Input (2018-2022) +15%	Permit Limit[37]	Consented Capacity	% Difference between Peak Input +15% and consented/ permitted capacity	Preferred Value	Capacity for Apportioned Waste	Capacity for Hazardous Waste	Capacity for C, D & E Waste	Recovery Rate	Recovery Capacity for Apportioned Waste	Management Capacity for Hazardous Waste	Management Capacity for C, D & E Waste
MRS	Barking & Dagenham	72-76 River Road	S Norton & Co Ltd	176,455	[38]	n/a	-	176,455	146,457	0	29,997	100%	146,457	0	29,997
		Perry Road	HKS Dagenham Ltd	69,480	n/a	n/a	-	69,480	69,480	0	0		69,480	0	0
	Newham	Cody Road, Canning Town,	The Remet Company Ltd	86,535	75,000	n/a	+14%	75,000	12,060	6,056	56,883		12,060	6,056	56,883
		EMR Silvertown, Unit 6, Standard Industrial Estate	EMR formerly operated by London City Metals Ltd	71,666[39]	*74,999*	n/a	-	71,666	71,666	0	0		71,666	0	0
	Havering	Off Crow Lane	Crow Metals Ltd	30,463	30,000	n/a	2%	30,000	25,436	4,320	245		25,436	4,320	245
AD[40]	Barking & Dagenham	Hitch Street AD Plant	ReFood UK Ltd	218,309	160,000	n/a	-	218,309	218,309	0	0		218,309	0	0
		Organic Waste Treatment Facility, Dagenham Dock	East London Biogas Ltd	51,791	75,000	n/a	-37%	75,000	75,000	0	0		75,000	0	0
Treat'nt		Dagenham Dock MRF Choats Road	Euro Closed Loop Recycling Ltd/Veolia	14,540	75,000	n/a	-135%	14,540	14,540	0	0	76%	11,099	0	0
		Halyard Street Dagenham	Cemex U K Materials Ltd	16,802	100,000	n/a	-142%	16,802	4,158	0	12,644	100%	4,158	0	12,644
		Kingsbridge Road	G & S Tyre Services Ltd	1,922	*74,999*	n/a	-	1,922	1,922	0	0	100%	1,922	0	0
		Old Bus Depot, Perry Road	Manns Waste Management Ltd	78,775	*74,999*	n/a	-	78,775	22,128	0	56,647	100%	22,128	0	56,647

[37] Using bespoke permit limit. Italicised entries are from Standard Rules permits so are provided for information only.

[38] Site operates under 2 permits - one SR 75,000 and one bespoke.

[39] It has been assumed that inputs to this site will remain at the same level as when the site was operated by LCM Ltd.

[40] No 15% freeboard has been included for these sites as their capacity is set by their design and retention time.

Site Category	Borough	Site Name	Operator	Peak Input (2018-2022) +15%	Permit Limit[41]	Consented Capacity	% Difference between Peak Input +15% and consented/ permitted capacity	Preferred Value	Capacity for Apportioned Waste	Capacity for Hazardous Waste	Capacity for C, D & E Waste	Recovery Rate	Recovery Capacity for Apportioned Waste	Management Capacity for Hazardous Waste	Management Capacity for C, D & E Waste
Treat'nt	Newham	Silvertown Recycling Centre	Harrow Green Ltd	62	4,000	n/a	-194%	62	62	0	0	100%	62	0	0
	Havering	Centenary Works	F J Church & Sons Ltd	25,947	n/a	n/a	-	25,947	25,947	0	0	100%	25,947	0	0
		Frog Lane, Off Marsh Way, Rainham,	Andrews Waste Management	171,786	*75,000*	n/a	-	171,786	111,659	0	60,128	20%	22,127	0	11,915
		Rainham Clinical Waste Treatment Centre[42]	Sharpsmart Ltd	12,456	30,000	n/a	-83%	12,456	2,118	10,339	0	99%	2,087	10,118	0
		Rainham MRF Coldharbour Lane	Veolia	209,269	n/a	n/a	-	209,269	209,269	0	0	100%	209,269	0	0
		Unit 5 Denver Site	Excel Waste Management Ltd	113,177	100,000	n/a	12%	100,000	25,165	0	74,835	48%	12,025	0	35,760
Transfer	Barking & Dagenham	54-60 River Road Barking	Cory Barking Operations Ltd	229,446	480,000	550,000	-71%[43]	229,446	184,128	0	45,311	100%	184,128	0	45,311
		75 - 77 Chequers Lane	R White Waste Management Ltd	103,153	170,256	n/a	-49%	170,256	47,616	0	122,640	70%	35,561	0	86,441
		Barking Transfer Station	Shukco/Suez	230,844	182,500	n/a	23%	182,500	182,500	0	0	100%	182,500	0	0
		Barking Waste Transfer And Recycling Facility	Biffa Waste Services Ltd	113,954	n/a	n/a	-	113,954	113,954	0	0	95%	108,712	0	0

[41] Using bespoke permit limit. Italicised entries are from Standard Rules permits so are provided for information only.

[42] The site is capable of accepting 100% hazardous waste.

[43] Using the permit limit.

Site Category	Borough	Site Name	Operator	Peak Input (2018-2022) +15%	Permit Limit[44]	Consented Capacity	% diff between Peak Input +15% and consented/ permitted capacity	Preferred Value	Capacity for Apportioned Waste	Capacity for Hazardous Waste	Capacity for C, D & E Waste	Recovery Rate	Recovery Capacity for Apportioned Waste	Management Capacity for Hazardous Waste	Management Capacity for C, D & E Waste
Transfer	Barking & Dagenham	Barking Clinical Waste Facility	OCS/Cannon/Citron Hygiene UK Ltd	509	n/a	n/a	-	509	509	0	0	33%	166	0	0
		Perry Road, Off Chequers Lane	Edwards Waste Paper Ltd	77,386	75,000	75,000	3%	75,000	75,000	0	0	0%	0	0	0
	Newham	Recycling & Recovery Centre, Unit J Prologis Park	Bywaters (Leyton) Ltd	168,317	n/a	n/a	-	168,317	168,317	0	0	100%	168,317	0	0
	Havering	New Road, Wennington	B & P Scrap Co Ltd	21,696	50,000	n/a	-79%	21,696	21,696	0	0	100%	21,696	0	0
		Salamons Way, Rainham	Craven, Peter	3,015	n/a	n/a	-	3,015	3,015	0	0	100%	3,015	0	0
		Unit 13 Swift Business Park, Creek Waye	Citron Hygiene UK Ltd	379	n/a	n/a	-	379	312	67	0	17%	52	11	0
		Unit 7, Albright Industrial Estate	G & S Waste Management Ltd	12,464	*74,999*	n/a	-	12,464	2,392	0	10,072	100%	2,392	0	10,072
	Redbridge	Dock Road[45]	G & B Compressor Hire Ltd	60,168	n/a	52,000	15%	52,000	17,744	0	34,256	0%	0	0	0
		45-47, Roebuck Road, Hainault Business Park	G & B Compressor Hire Ltd	10,127	n/a	n/a	-	10,127	4,295	0	5,832	100%	4,295	0	5,832
		Ley Street Depot, Ilford	Redbridge Council	686	n/a	n/a	-	686	686	0	0	100%	686	0	0
		Woodford Service Centre	Rentokil Initial UK Ltd	4,269	5,000	n/a	-16%	5,000	1,090	3,910	0	0%	0	0	0
												Total	**1,640,752**	**20,505**	**351,747**

[44] Using bespoke permit limit. Italicised entries are from Standard Rules permits so are provided for information only.

[45] Subject to temporary permission expiring in 2024.