

East London Joint Waste Plan

Regulation 18 Consultation Draft Plan

July 2024

**Barking &
Dagenham**



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Abbreviations

AMR	Annual Monitoring Report
BAP	Biodiversity Action Plans
CCC	Climate Change Committee
CCS	Carbon Capture and Storage
CE	Circular Economy
C, D & E	Construction, Demolition and Excavation
C&I	Commercial and Industrial
ELJWP	East London Joint Waste Plan
HIC	Household, Industrial and Commercial waste
HRA	Habitats Regulation Assessment
LACW	Local Authority Collected Waste
LLDC	London Legacy Development Corporation
LNR	Local Nature Reserve
MBT	Mechanical Biological Treatment
NPPF	National Planning Policy Framework
OS	Ordnance Survey
PAN	Planning Advisory Note
RBMP	River Basin Management Plan
RDF	Refuse Derived Fuel
RWS	Resources and Waste Strategy
SIL	Strategic Industrial Location
SRF	Secondary Recovered Fuel
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SPA	Special Protection Area
tpa	Tonnes per annum
WDI	Waste Data Interrogator
WPA	Waste Planning Authority

Executive Summary

The efficient and effective management of waste is an important aspect of a well-functioning modern society. Whilst essential, waste management has the potential to cause impacts on the environment and communities, including those related to climate change, if it is not undertaken in the right place and in the right way. Without proper consideration, built development may result in the production of excessive quantities of waste.

The future management of waste therefore needs to be carefully planned for and it is a statutory requirement for each area to have a 'waste local plan' that sets out how and where waste will be managed. In East London, the current waste local plan, known as the 'East London Waste Plan', was adopted in 2012 and planned for the management of waste over the period until 2021 within the following East London boroughs: Barking and Dagenham; Havering; Newham; and, Redbridge. Once adopted, this Plan, the East London Joint Waste Plan (ELJWP), will update the East London Waste Plan.

The ELJWP will deal with all waste but will focus on Local Authority Collected Waste (LACW), Commercial and Industrial (C&I) waste, Construction, Demolition and Excavation (C, D&E) waste and Hazardous waste. The ELJWP takes account of the East London Waste Authority's strategy for managing Local Authority Collected Waste to 2057.

This document is a consultation draft and includes a draft Vision and eight draft Strategic Objectives. Six draft planning policies are included for use in determining the suitability of development proposals submitted to the Boroughs for planning permission. Implementation of the policies will ensure waste management facilities are well located and do not result in significant adverse impacts on local communities and the natural environment. They will also ensure that the right types of waste management capacity are developed to facilitate the achievement of targets such as those related to increasing recycling and diverting waste away from landfill.

The most recent waste management capacity assessment demonstrates that, other than for landfill, there is a surplus of capacity 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 Plan proposes the safeguarding of most existing sites and will allow additional waste development 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.

Policy JWP1 is intended to ensure that all types of development, and not just those relating to the management of waste, come forward in a manner that minimises the production of waste and ensures that any waste that is produced can be managed sustainably.

The overarching approach of the ELJWP can be summarised as follows:

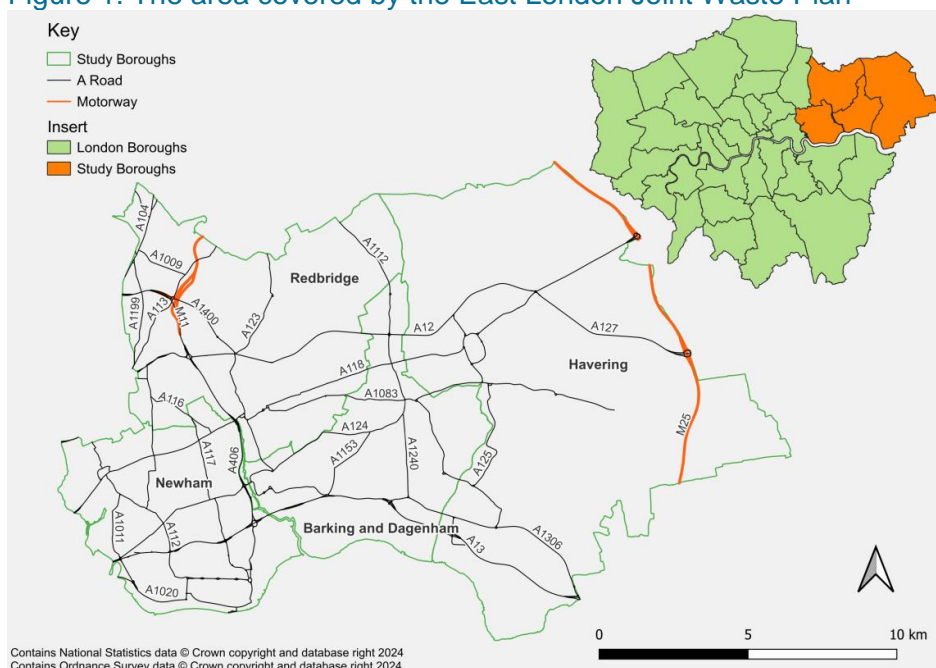
1. Ensuring that waste produced from development and during its occupation is minimised and then reused or recycled;
2. existing waste management capacity is safeguarded;
3. allowing the development of new waste management capacity at existing sites if it will result in waste being managed more sustainably;
4. not allowing the development of new waste management sites except in exceptional circumstances including the site being in a sustainable location; and,
5. Any new capacity should be designed in a way that protects and enhances communities and the natural environment.

1 Introduction and background

What is the East London Joint Waste Plan?

- 1.1 The efficient and effective management of waste is an important aspect of a well-functioning modern society. While essential, waste management has the potential to cause impacts on the environment and communities if it is not undertaken in the right place and in the right way. Without careful consideration, built development may result in the production of excessive quantities of waste.
- 1.2 It is a statutory requirement for each area to have a 'waste local plan' that sets out how and where waste will be managed. Policies in waste local plans are used to determine planning applications affecting the management of waste.
- 1.3 In East London, the current waste local plan, known as the 'East London Waste Plan', was adopted in 2012 and planned for the management of waste over the period until 2021 within the following East London boroughs ('the Boroughs'):
 - London Borough of Barking and Dagenham
 - London Borough of Havering
 - London Borough of Newham
 - London Borough of Redbridge
- 1.4 This Plan, the East London Joint Waste Plan (ELJWP), will update the adopted 2012 East London Waste Plan. A map of the area to be covered by the plan ('the Plan area') is provided in Figure 1.

Figure 1: The area covered by the East London Joint Waste Plan



- 1.5 The Plan area is bordered within London by the London Borough of Waltham Forest, London Borough of Hackney and the London Borough of Tower Hamlets to the west, and the London Borough of Greenwich and the London Borough Bexley to the south of the river Thames. To the north and east, outside of the Greater London area, are the Districts of Epping Forest and Brentwood (within the county of Essex) and the unitary area of Thurrock.
- 1.6 The ELJWP area is consistent with the geography for the East London Waste Authority¹. The ELJWP also includes the area covered by the London Legacy Development Corporation (LLDC) within the London Borough of Newham. The current planning powers of the LLDC will return to the Borough of Newham on 1 December 2024.
- 1.7 These planning applications concern proposals for new facilities, changes to existing facilities and proposals which might otherwise affect how waste is managed, for example proposals to redevelop existing waste management facilities for other non waste uses or to change how a facility operates. The Plan is also concerned with how proposals for new development consider how waste will be managed during demolition and construction and operational phases of the development.
- 1.8 The East London Joint Waste Plan will form part of the Development Plan for the East London Boroughs. Each Borough has a separate 'Local Plan' that is concerned with other forms of development such as housing and employment. It is important to note that all the policies of the Development Plan will be taken into account when decisions of development proposals are made. Furthermore, Supplementary Planning Documents may also exist which provide further guidance on the acceptability of certain aspects of development (e.g. design).

The need to replace the current waste plan

- 1.9 As the Boroughs have regard to the waste local plan when making decisions on development proposals, it is essential that the plan provides an up to date and robust policy framework to support the sustainable management of waste. Since the current plan was adopted in 2012, a number of changes have occurred which include the following:
 - Changes in the policy landscape, in particular a new London Plan was adopted in 2021, there have been several updates to national planning policy and the Boroughs have adopted new Local Plans.
 - Evolution of waste management technologies and approaches.
 - Current and emerging local conditions including pressure to release existing safeguarded waste sites to alternative development, in particular that relating to alleviating the pressures in London for more housing.

¹ East London Waste Authority (2022) Joint Strategy [online]. Available at: <https://eastlondonwaste.gov.uk/east-london-waste-authority/jointstrategy>

- Changes in patterns of waste production.
- Emergence of the ‘Circular Economy’ as a concept

1.10 The East London Waste Plan is to be updated by a new plan, known as the ‘East London Joint Waste Local Plan’ (ELJWP) (‘the Plan’), that will take account of the changes listed above and will cover the period to 2041.

1.11 Preparation of the new ELJWP will ensure that new waste management capacity is provided on the basis of the most up to date evidence and forecasts of waste arisings. The new ELJWP will help make sure that there continues to be sufficient capacity to manage waste in East London in the most sustainable way.

The process of preparing the East London Joint Waste Plan

1.12 There are several stages in preparing a Local Plan which are prescribed in legislation² and policy³. The way in which these stages are being applied to the preparation of the ELJWP is outlined in Table 1. Many of the stages offer opportunities for residents, businesses and other key stakeholders to comment and be involved in determining the content of the Plan.

Table 1- Anticipated Timetable for Development of the East London Joint Waste Plan

Key Stage	When
Draft ELJWP – 6-week public consultation (‘Reg 18’)	July-August
‘Final’ ELJWP published for representations (‘Reg 19’)	Early 2025
ELJWP submitted for independent examination	Spring 2025
Examination hearings (if needed)	Autumn 2025
Main modifications (if needed) published for representations	Late 2025/Early 2026
Inspector’s Report	Spring 2026
Adoption	Summer 2026

Key elements of the East London Joint Waste Plan

1.13 The key elements of the East London Joint Waste Plan are:

- Vision
- Strategic Objectives
- Policies

² Planning and Compulsory Purchase Act 2004 and the Town and Country (Local Planning) (England) Regulations 2012

³ National Planning Policy Framework, December 2023

- Policies Map

1.14 Together these elements confirm how and where the Boroughs expect the waste management of waste to take place in East London.

1.15 The draft Vision and draft Strategic Objectives set out how it is proposed that waste will be managed to ensure it benefits, protects and enhances communities and the environment of East London. The Policies and Policies Map are intended to ensure the Vision is realised and the Strategic Objectives are achieved.

1.16 The NPPF and National Planning Policy for Waste (NPPW) expect local planning authorities to focus on determining if a proposed development is a suitable use of land, and the consequences of the use, rather than managing any related processes or emissions, which are regulated under separate pollution control regimes. Local Planning Authorities (LPAs) should assume that these regimes will be applied effectively by pollution control authorities e.g. the Environment Agency. Similarly, once a planning decision has been reached for a specific development, the planning concerns should not be re-evaluated through the permitting regimes managed by pollution control authorities.

1.17 It is important that developers contact the pollution control authorities at the earliest design stages to ensure that proposals put forward take account of pollution control requirements.

This stage of preparing the ELJWP

1.18 Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires the Waste Planning Authority (WPA) to notify and invite representations from key stakeholders and communities on the content of the plan.

1.19 This draft ELJWP is the first formal opportunity for stakeholders to contribute to the new ELJWP. The Topic Papers published alongside this draft Plan explores the issues related to waste management in East London.

1.20 The first consultation, on this first draft of the Plan, will run for a period of six weeks during July and August 2024. A 'Consultation Protocol' has been prepared that sets out how the Boroughs will engage with communities and stakeholders during the preparation of the Plan. Following the consultation the Boroughs will publish a statement summarising the comments received and how they will be addressed in the content of the ELJWP.

Supporting documents

1.21 This draft ELJWP is supported by evidence base documents including:

- Updated Waste Capacity Assessment and Arisings Estimates
- Safeguarded Sites for Release – Assessment Report

- 2022 Evidence Base for the East London Joint Waste Plan (Anthesis)
- Integrated Impact Assessment comprising:
 - Sustainability Appraisal
 - Habitats Regulation Assessment
- Climate Change Topic Paper
- Circular Economy Topic Paper
- Waste Management in East London Topic Paper

1.22 The draft ELJWP and all evidence base documents can be found on the following website: [ELJWP project website](#).

How to comment on the Draft ELJWP

1.23 You can respond to the questions associated with this consultation via the [ELJWP project website](#) during the consultation period during July and August 2024.

1.24 A separate questionnaire has been prepared to help all communities in East London respond to this consultation. The questionnaire is available online and at the Borough's main offices as listed below:

- London Borough of Barking & Dagenham: Barking Town Hall, 1 Town Square, Barking, IG11 7LU
- London Borough of Havering: Town Hall, Main Road, Romford RM1 3BB
- London Borough of Newham: Newham Dockside, 1000 Dockside Road, London E16 2QU
- London Borough of Redbridge: Lynton House 255 - 259 High Road, Ilford IG1 1NY

2 The Context

Geographical Context

Population

- 2.1 The population of the ELJWP Area has grown from 772,900 in the 2011 Census to 1,142,300 in the 2021 Census. The London Plan predicts that the population of London will increase by 70,000 every year, reaching 10.8 million in 2041, and East London will make a large contribution to this growth⁴.

Table 2 – Population in East London

Borough	2021 census population total	2030 expected total population	Population increase since 2011 census	Projected population increase By 2030
Barking and Dagenham	218,900	238,044	17.7%	9%
Havering	262,100	299,000	10.4%	14%
Newham	351,000	465,035	14.0%	32%
Redbridge	310,300	362,000	11.2%	17%

Housing

- 2.2 The London Plan 2021 sets out the ten-year housing targets for each London borough as net housing completions for 2019/20 - 2028/29. The table below sets out the targets for East London boroughs.

Table 3 – Housing in East London

Borough	Total housing stock in 2017	Ten-year target for net housing completions (2028/29)	Projected total	Percentage increase from 2017 housing stock total
Barking and Dagenham	71,079	19,440	90,519	27%
Havering	99,184	12,850	112,034	13%
Newham	100,062	47,600 ⁵	132,862	33%
Redbridge	101,348	14,090	115,438	14%
<i>Authority Average</i>	-	<i>16,340</i>	-	-

⁴ https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

⁵ This reflects an element of the current London Legacy Development Corporation target that Newham will be responsible for planning for.

Economy⁶

- 2.3 The spatial make-up of London's economy shows that different sectors are important to different boroughs. In Newham, the largest employment sector is banking, finance and insurance, employing 29.8% of the workforce. In Havering, Barking and Dagenham and Redbridge, the largest percentage of residents aged 16 and over (27.8%, 23% and 26.7% respectively) are employed in the public administration, education and health sector. In Barking and Dagenham, the production industries account for 21.2% of total output.

Table 4 – Employment in East London

Borough	Employment rate for 16–64 year olds	Unemployment rate for 16-64 year olds
Barking and Dagenham	73.1%	5.5%
Havering	82.6%	3.5%
Newham	75.5%	4.7%
Redbridge	72.5%	5.1%
Authority average	75.9%	4.7%

- 2.4 Across London in the year ending June 2023, 75.1% of people aged 16 to 64 years were employed. This means that Barking and Dagenham and Redbridge are below the London average. Across London in the year ending June 2023, 4.6% of people aged 16 to 64 years were unemployed. This means that Newham, Barking and Dagenham and Redbridge have a higher unemployment rate than the London average. Newham has the fifth highest unemployment rate out of all London boroughs.
- 2.5 Strategic Industrial Locations (SIL) are protected through Policy E5 of the London Plan which ensures that SILs are given strategic protection because they are critical to the effective functioning of London's economy. A map of SIL in East London is included in Figure 2 below.

⁶ Source: Greater London Authority (2016) Economic Evidence Base for London [online] Available at: https://www.london.gov.uk/sites/default/files/economic_evidence_base_2016.compressed.pdf



Figure 2 Strategic Industrial Locations in East London

2.6 SIL can accommodate activities which - by virtue of their scale, noise, odours, dust, emissions, hours of operation and/or vehicular movements - can raise tensions with other land uses, particularly residential development. The London Plan notes the importance of these locations in East London, and the role the Thames Gateway will play in a '*strategically co-ordinated plan-led consolidation of SILs in order to manage down overall vacancy rates, particularly in the boroughs of Newham and Barking & Dagenham*'. The East London Boroughs have, and will, explore the release of SIL for other land uses (such as housing) through the preparation of their Local Plans.

Transport infrastructure

2.7 Several of the ELJWP road links are inadequate, with several roads (e.g. A12 and A13) and junctions noted as being at or near to capacity, and many experiencing congestion at peak times. Adverse traffic conditions on these routes often have knock-on effects on local roads, leading to localised gridlock on occasion and impacting negatively on economic productivity. In addition, with planned developments and increased housing and job provision, more pressure may be placed on the road networks.

2.8 The London Infrastructure Plan 2050: Transport Supporting Paper notes that across London, trip rates are expected to remain constant on a per person basis, but that expected growth in population will require significant additional capacity across London's transport networks by 2050

Wharves and railheads

2.9 The London Plan reflects the NPPF in seeking to maximise recycling and reuse of construction, demolition, and excavation (C, D& E) wastes and the Boroughs should support the development of aggregate recycling facilities in their local plans. Moreover, in recognition of the heavy dependence of London on imports of crushed rock and marine (dredged) aggregates, the London Plan requires the Boroughs' local plans to safeguard wharves and railheads for aggregate distribution. The location of safeguarded wharves in East London is shown in Figure 3 below.

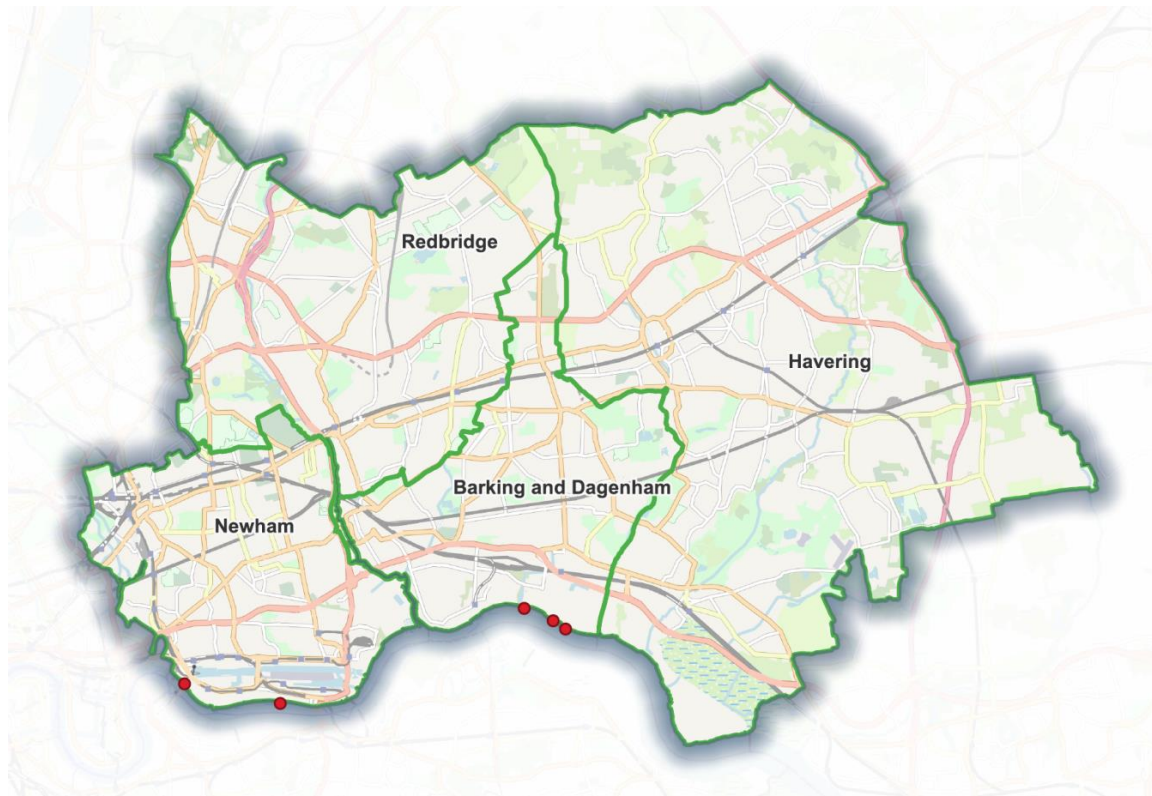


Figure 3 Location of Safeguarded Wharves in East London

Nature conservation and biodiversity

2.10 The Plan area contains many areas of high ecological value ranging from European designated sites such as the Epping Forest SAC in Redbridge, to nationally designated Sites of Special Scientific Interest, Sites of Metropolitan Nature Conservation Importance and Sites of Importance for Nature Conservation among local green spaces and networks that provide ecological connectivity and greater biodiversity, and there is proximity to sites of national importance. There is a need for continued preservation and long-term management of these areas within the Plan area, as well as consideration of potential effects on sites outside the Plan area boundary.

2.11 Local Wildlife Sites in each borough can be negatively impacted by actions such as inappropriate management, traffic pollution and recreational activities. If this continues, it could affect their wildlife value and contribution they make to biodiversity, landscapes and the natural environment.

Landscape

2.12 The National Character Map defines the Plan area as lying within National Character Areas (NCA) 111 - Northern Thames Basin and Area 112 – Inner London. The Northern Thames Basin area is more diverse mix of urban and rural landscapes. The rural and dispersed landscape adjacent to Essex becomes increasingly urban towards the centre of London. There is a mix of historic settlement patterns, with remnants of historical orchards and other communal green and farmed spaces. Urban areas have low levels of tranquillity with pockets of perceived tranquillity, as with the Inner London area. Moving eastwards in the ELJWP area, tranquillity increases as green space and Green Belt areas increase.

2.13 Within the Inner London area, there is a strong sense of place along the Thames and particularly in the wharfs and creeks of East London as well as the parks and gardens, green spaces, rivers and other natural habitats. There are strong settlement patterns, and industrial features, with good public access to heritage assets. The whole NCA scores negatively for tranquillity, but there are good pockets of perceived tranquillity in public parks and other small spaces.

Open spaces and Green Belt

2.14 Barking and Dagenham has ambitions to be the 'Green Capital of the Capital'. One third of the Borough is green open space (463 hectares) and the Borough is in close proximity to Epping Forest.

2.15 More than 50% of Havering is classed as Metropolitan Green Belt, and the Borough has some of the most green space in London. Romford town centre has a lack of green space although it is within walking distance of number of local parks. This mirrors other areas of the Borough where, if there is a lack of one type of open space it is often met by another type of open space. There is generally a good coverage of parks, gardens, natural and semi natural spaces and amenity greenspaces across the Borough.

- 2.16 Newham has an extensive network of natural and open areas, encompassing not only nature reserves, parks, and rivers but also playgrounds, playing fields, allotments, gardens, hedges, green walls, green/brown roofs, cycle and footpaths, street trees, docks, lakes, and ponds. Specifically, Newham has 25 parks and green spaces and total open space provision across all typologies of 922.78 Ha. This figure includes the Borough's 308.31 hectares of water spaces as well as its green infrastructure. However, the Borough has 16% tree cover which is the second lowest in London. There are deficiencies in local and district park access, the former in urban Newham, and the latter particularly in the east and west of the Borough.
- 2.17 Redbridge is one of London's greenest boroughs and comprises extensive Green Belt land (37% of total area) to the north-east. About 48% of the Borough comprises open spaces, including notable locations like Hainault Forest Country Park, Roding Valley Park, Fairlop Waters Country Park, Valentines Park, and around 120 hectares of countryside. These open spaces, including country parks and formal parks, contribute to the Borough's character, biodiversity, and climate change mitigation efforts.

Heritage and archaeology

- 2.18 The importance of protecting, conserving and enhancing both designated heritage assets and those more informally recognised, together with their setting, is generally recognised in the Borough Local Plans. The former includes those buildings, monuments, structures, parks, etc., that are subject to national listing/scheduling; the latter includes Locally Listed buildings and buildings that are yet not on the local register but the development management processes uncover their heritage value.
- 2.19 At local level, new developments, infrastructure and environmental pressures, such as extreme weather and flooding, present the greatest risk to cultural heritage assets.
- 2.20 Historic England has a Heritage at Risk Register which includes historic buildings, listed buildings, sites and Conservation Areas at risk of being lost through neglect, deterioration or decay. The register aims to highlight those places and buildings in greatest need of repair. As of 2023, there are eighty-one heritage assets registered as at risk within wider London. There are six heritage assets registered at risk within Barking and Dagenham, twelve within Havering, thirteen within Newham and ten within Redbridge.

Water environment

- 2.21 For each of the major catchments in the UK a river basin management plan (RBMP) has been prepared, which provides information about the current status of the different aspects of the water environment and sets targets for their improvement by 2027. The Boroughs contain waterbodies and catchments that lie within the areas covered by the Thames RBMP and the South East RBMP.

- 2.22 Several water bodies across the four Boroughs do not meet the required 'good' status, and a number of water bodies and watercourses are protected sites and sensitive to changes in water quality. In Newham, the Thames, Lea and Roding rivers have not improved in water quality over the past few years, whilst the River Beam (from Ravensbourne to the Thames) is classified as 'Bad' and the Lower Roding, Mayesbrook River and the Goresbrook in Barking and Dagenham all fail against Chemical quality targets.
- 2.23 Under predicted climate change scenarios, more frequent drought conditions are expected in London and the South East of England, along with increased demands on water resources. Future developments will create additional demand for water abstraction from surface and groundwater sources in London. At a high level, it is broadly assumed that the quality of water bodies will improve in line with national objectives. However, water quality is influenced by a wide range of internal and external factors, including climate change, geology and soils, human consumption and population change, and pollution from human activities such as industry, agriculture, contaminated runoff from roads and other built surfaces, combined sewer overflows, and nutrient enrichment from treated wastewater. Future development, particularly in areas close to water bodies, may therefore hamper efforts to improve water quality.

Climate change

- 2.24 Climate change presents a global risk, with a range of different social, economic and environmental impacts that are likely to be felt within the Plan area across numerous receptors. A key challenge in protecting the environment will be to tackle the causes and consequences of climate change: warmer, drier summers and wetter winters with more severe weather events all year, higher sea levels and increased river flooding.
- 2.25 There has been a general trend towards warmer average temperatures in recent years with the most recent decade (2012–2021) being on average 0.2°C warmer than the 1991–2020 average and 1.0°C warmer than 1961–1990. All the top ten warmest years for the UK in the series from 1884 have occurred this century.
- 2.26 Given the trends in carbon emissions and energy consumption at both national and local level, carbon emissions in London, and each of the four London Boroughs within the ELJWP area, are likely to continue declining.

Flood risk

- 2.27 Heavy rainfall and flooding events have been demonstrated to have increased potential to occur in the UK as the climate has generally become wetter. For example, for the most recent decade (2012–2021) UK summers have been on average 6% wetter than 1991–2020 and 15% wetter than 1961–1990.

2.28 The effects of climate change in the ELJWP area are likely to result in extreme weather events becoming more common and more intense. Flood risk is of particular significance in this regard, alongside heatwaves and drought. Fluvial and surface water flooding poses the most significant risk to the plan area, particularly in areas in close proximity to the River Thames.

Existing waste management

2.29 The legal definition of waste, set out in section 75(2) of the Environmental Protection Act 1990, is “any substance or object which the holder discards, or intends or is required to, discard”. The key concept relates to the producer or holder's intention regardless of whether the waste may have a value to the recipient.

2.30 The main types of waste produced are:

- Local Authority Collected Waste (mainly household waste) (LACW);
- Commercial and Industrial Waste (waste from businesses and industry) (C&I waste);
- Construction, Demolition and Excavation Waste (C, D & E waste);
- Hazardous Waste from various sources; and,
- Wastewater and Sewage Sludge

2.31 Planning Practice Guidance also expects Waste Planning Authorities to plan for the management of Agricultural Waste and Low Level Radioactive Waste.

2.32 There is a range of waste management facilities that handle waste both from within and beyond East London. Data for 2022 indicates that there are around 100 permitted sites in East London currently managing waste. Figure 4 below shows the distribution of waste management facilities in East London.

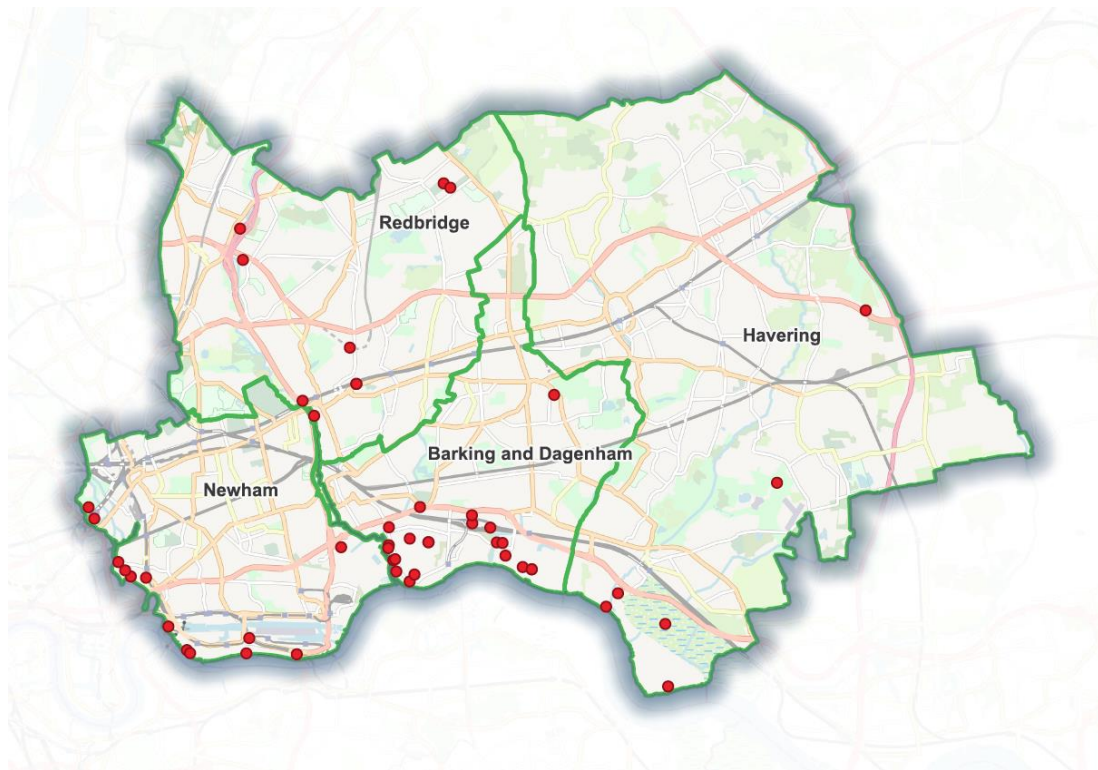


Figure 4: Map of Existing Waste Sites in East London

Local Authority Collected Waste

2.33 Local Authority Collected Waste (LACW) waste consists of waste which comes into the possession of, or under the control of, the local authority and includes waste collected from households (household waste). LACW collected by the Boroughs can include household waste (residual, dry mixed recycling and food waste), street sweepings, green waste from maintenance of open spaces, and a small quantity of clinical waste⁷. Depending upon the local arrangements, LACW can include commercial waste collected by trade waste operations.

Household Industrial & Commercial waste

In 2022 0.48 million tonnes of LACW was generated in East London, with 0.19 million tonnes managed through incineration with Energy from Waste (EfW), 0.13 million tonnes recycled or composted, and only 117 tonnes managed through disposal to landfill.

Construction, Demolition and Excavation Waste

⁷ Household clinical waste is not deemed hazardous unless a particular risk has been identified (based on medical diagnosis).

- 2.34 C, D & E waste comprises waste arising from the construction and demolition industries, including excavation during construction activities, and is made up of mainly inert materials such as soils, stone, concrete, brick and tile. However, there are also non-inert elements in this waste stream such as wood, metals, plastics, cardboard, and residual household-like wastes. Hazardous waste are also present particularly when development takes place on brownfield sites that have been affected by historical contamination. Due to their weight, the inert elements make up the majority of the total tonnage.
- 2.35 Different types of C, D & E waste require different forms of management. For example, hard inert⁸ materials (such as concrete, brick and road planings arising from demolition and road maintenance) can be recycled for use as an aggregate, while soft materials such as soils and sub-soils can be deposited on land for beneficial purposes such as the restoration of minerals workings and in other engineering projects. The non-inert component includes timber, plasterboard and plastics may be recycled if separated. Ultimately there is very little C, D & E waste that cannot be recycled or recovered in some other way.
- 2.36 Soft inert excavation material may be deposited on land for beneficial purposes which may be consented as non waste development and, either subject to an Environmental Permit as a recovery to land operation or managed under the CL:AIRE definition of waste protocol. If the latter case applies, the material managed through this route is not classed as waste.
- 2.37 The London Plan does not apportion quantities of C, D & E waste for management, but boroughs are still required to plan for this waste stream.
- 2.38 The production of C, D & E waste is influenced by large-scale infrastructure projects, as well as commercial and residential developments, which means that peaks and troughs in its production are often observed with arisings not following a regular pattern. Given it is a bulky and heavy waste type it does not tend to travel significant distances from source for management.

Table 5: Non-hazardous C, D & E Waste arisings from East London 2019-2022 (tonnes)

Category	Type	Tonnes	
C&D waste	Inert	653,333	805,033
	Non-inert	151,700	
Excavation waste	Inert	1,302,370	1,318,185
	Non-inert	15,816	

⁸ Inert waste is defined as “waste that does not undergo any significant physical, chemical or biological transformations”.

Total C, D & E waste:		2,123,218	

2.39 The management routes for Non-hazardous C, D & E waste (including inert waste) arising in East London in 2022 is set out in Table 6 below.

Table 6: Non-hazardous C, D & E Waste in East London Waste Management Profile 2022

Category	Waste Type	Recycling	Recovery	Landfill	Transfer	Mobile Plant
C&D Waste	Inert	36%	<1%	<1%	5%	2%
	Non-inert	29%	1%	<1% ⁹	27%	0%
	Subtotal C&D	65%	1%	<1%	32%	2%
Excavation Waste	Inert	27%	43% ¹⁰	0%	28%	1%
	Non-inert	<1%	0%	1%	0%	<1%
	Subtotal Excavation	27%	43%	1%	28%	1%

2.40 The management profile for Non-hazardous C&D waste is as set out below:

- 67% was managed at recycling facilities;
- 1% was recovered (either through incineration or recovery to land);
- <1% was managed at permitted landfills;
- 32% was managed at intermediate sites and transferred on for recovery or disposal; and
- 2% was managed via mobile plant (normally for recycling or reuse).

2.41 The management profile for Non-hazardous excavation waste is as follows:

- 27% was managed at recycling facilities;
- 43% was recovered (through recovery to land including use in restoration or operational needs on permitted landfills);
- 1% was managed at permitted landfills (dredging spoil);
- 28% was managed at intermediate sites and transferred on for recovery or disposal; and
- 1% was managed via mobile plant (normally for recycling or reuse).

⁹ Does not include residues from processing of mixed skip waste classed under EWC code 19 12 12 that may be landfilled as inactive waste under the Landfill Tax regime but would not be classed as inert under environmental permitting.

¹⁰ Including 36% sent to landfill taken to be used for restoration or operational purposes.

2.42 This compares with the following targets in the London Plan for C, D & E waste management in *Policy SI 7 Reducing waste and supporting the circular economy*:

- 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 overall and 100% of inert excavation beneficial used.¹¹

Hazardous Waste

2.43 Hazardous wastes are categorised as those that are harmful to human health, or the environment, either immediately or over an extended period of time. In East London, hazardous waste arises mainly from: construction and demolition activity, vehicle maintenance and/or dismantling activity and healthcare.

2.44 It is estimated that around 58,000 tonnes of hazardous waste was produced in East London in 2022. Hazardous waste covers a wide range of waste types which each may require management at a range of specialist facilities for treatment and disposal, and given they generally arise in relatively small amounts, such facilities are developed to manage quantities greater than that arising in a single Plan area. Therefore this waste may often travel further than non-hazardous wastes for management.

Wastewater and Sewage Sludge

2.45 Wastewater generally comprises surface water runoff and effluent discharged to the foul sewer system from homes and industrial and commercial premises from where it is channelled to wastewater treatment works for treatment¹². Output of this treatment is sewage sludge that may, if it meets certain parameters, be applied to land as a fertiliser in accordance with the Sludge (Use in Agriculture) Regulations 1989 and associated best practice guidance. Sludge applied in this manner falls outside the normal regulatory regime for waste. Alternatively, the sludge can be treated either through anaerobic digestion or incineration. The cleaner effluent may be discharged to a watercourse in accordance with a discharge consent granted by the Environment Agency.

¹¹ London Plan Footnote 164.

¹² These works can provide a valuable function in managing wastes, other than wastewater, that arise in liquid and sludge form such as septic tank emptyings.

- 2.46 In East London wastewater and sewage sludge are managed by Thames Water. Wastewater treatment capacity is delivered through 'Asset Management Plans'. Thames Water use information in the public domain to forecast when upgrades to wastewater treatment facilities will be required.
- 2.47 Beckton Sewage Treatment Works is the key facility serving East London, being Thames Water's and the UK's largest sewage treatment works. It is located in the London Borough of Newham. To address changing need, a major upgrade is underway so it can receive wastewater from the new Thames Tideway Tunnel and provide for growth, resilience and consent compliance to a design horizon of 2036.

Agricultural Waste

- 2.48 Given the relatively small amount of agricultural land in East London arisings of agricultural waste are small, with quantities being so low as to not require specific provision of management capacity.

Low level radioactive waste

- 2.49 Radioactive waste is any material that is either radioactive itself or is contaminated by radioactivity and for which no further use is envisaged. Radioactive waste is not included in the definition of hazardous waste and therefore needs to be accounted for separately. Most radioactive waste is produced from nuclear power stations and the manufacture of fuel for these power stations. This is referred to as "nuclear waste." Radioactive waste also arises from nuclear research and development sites and Ministry of Defence sites. No such sites exist within East London.
- 2.50 Radioactive waste also arises from nuclear research and development sites. Some also arises from Ministry of Defence sites and medical, industrial and educational establishments, such as hospitals and universities. This is sometimes referred to as "non-nuclear waste". Being of a low level of radioactivity this may be referred to as low level radioactive waste, or even very low level radioactive waste.
- 2.51 Low level radioactive waste (LLW) does not normally require shielding during handling or transport. LLW consists largely of paper, plastics and scrap metal items that have been used in hospitals, research establishments and the nuclear industry.
- 2.52 According to the EA public register, there are two organisations holding four permits to keep and use radioactive materials in East London, mainly in Havering. LLW is not managed within East London and it is likely that very little LLW is produced in East London and that which is produced will likely continue to be managed via existing specialist arrangements.

The Policy Context

2.53 The main policy context within which the ELJWP is prepared is illustrated in Figure 5 below.

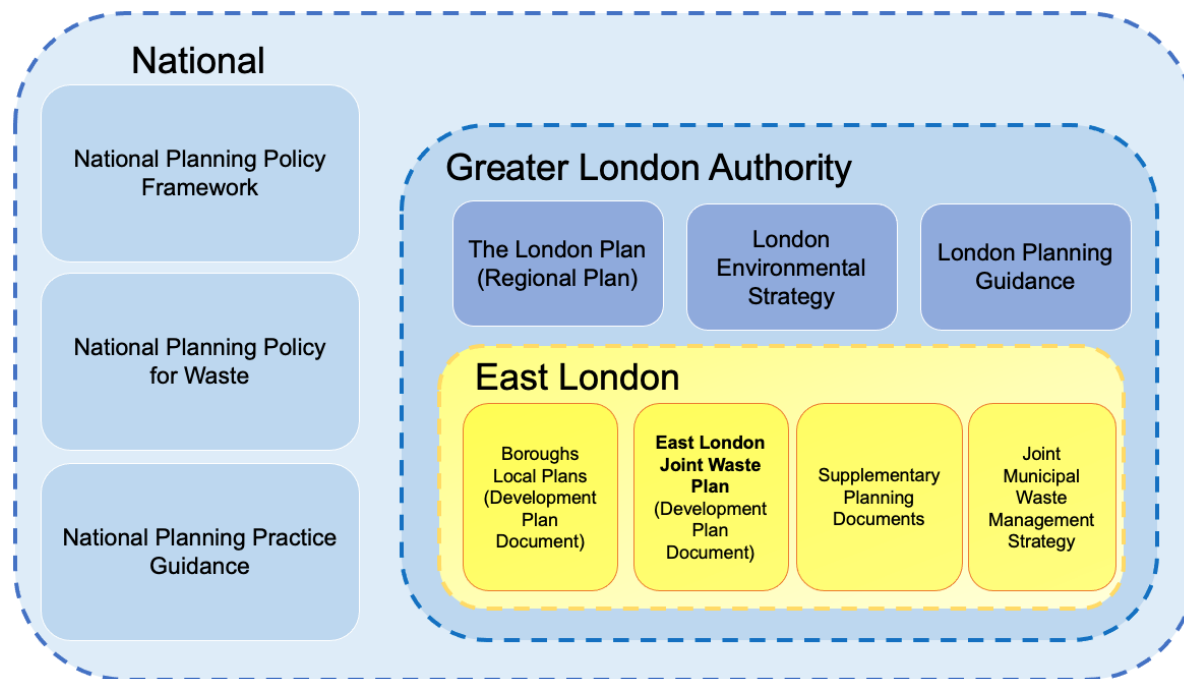


Figure 5 – The ELJWP Within the Wider Policy Context

2.54 To be found sound the ELJWP will need to be in general conformity with the London Plan and consistent with national policy.

2.55 The ELJWP will also need to be aligned with the policies of the adopted Local Plans in East London. This is intended to ensure there are no policy tensions (i.e. contradictions) within the Development Plan. Having said that, the ELJWP may update the Development Plan and where any conflict between policies exists the latest policy to have been adopted generally takes precedent in decision making. One adopted the policies in the ELJWP will supersede the policies in the ELWP and Appendix 4 shows how the ELWP policies will be replaced by the ELJWP.

National Policy

2.56 The key objective of national policy for managing waste¹³ is to protect the environment and human health by:

- Preventing or reducing the generation of waste;

¹³ See [The Waste \(England and Wales\) Regulations 2011](#) and the Waste (Circular Economy) (Amendment) Regulations 2020

- where its production is unavoidable, reducing the adverse impacts of its generation and management; and
- reducing the overall impacts of the use of resources from which waste may arise and improving the efficiency of such use.

2.57 The National Planning Policy for Waste 2014 (NPPW)¹⁴, associated Planning Practice Guidance and the Resources and Waste Strategy for England 2018 (RWS)¹⁵ currently set the planning policy context for waste management in England. Whilst the NPPF does not contain policies specific to waste, its principles remain relevant. The Waste Management Plan for England¹⁶ was updated in 2021 and signposts policies concerning waste management in England in particular those included in the RWS.

2.58 Both NPPW and RWS require application of the Waste Hierarchy in priority order as one of the key principles of sustainable waste management. The 'Waste Hierarchy' identifies different ways of dealing with waste as set out in Figure 6 below. This shows that 'Prevention' is the most preferred option with 'Disposal' at the bottom being the option of last resort.

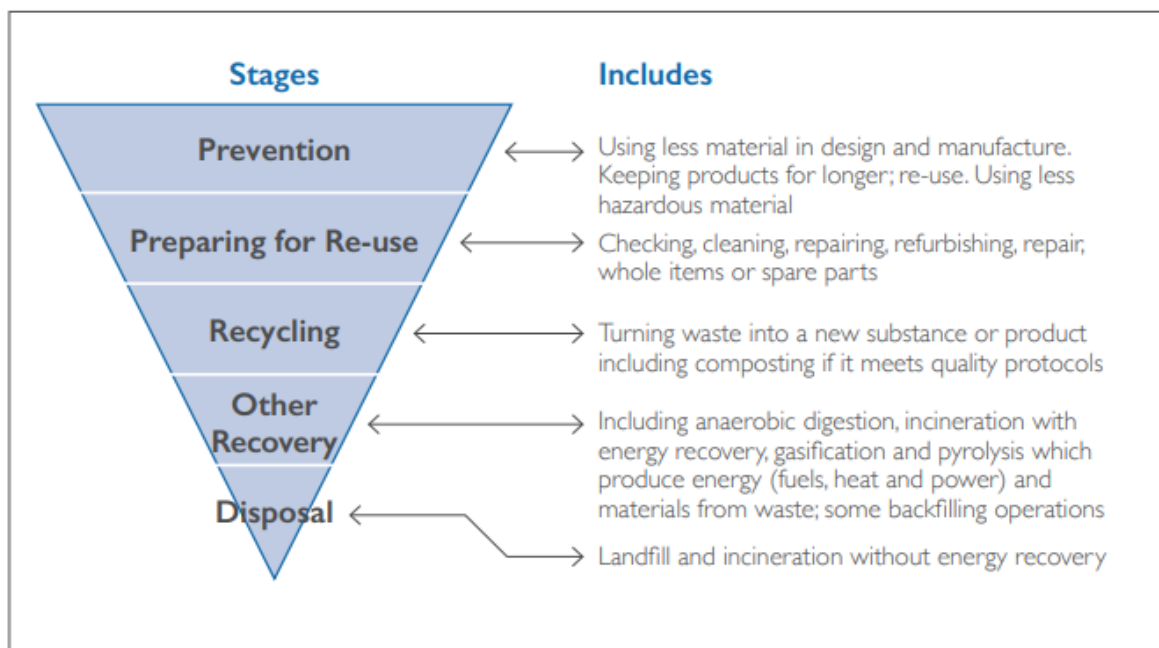


Figure 6 The Waste Hierarchy

14

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf

15 <https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england>

16 <https://www.gov.uk/government/publications/waste-management-plan-for-england-2021>

2.59 The RWS sets out current Government thinking on waste management in England, including how the country is to minimise waste and manage it more effectively through maximising opportunities to generate value from material that is both prevented from entering, and extracted from, the waste stream.

2.60 The RWS identifies five strategic ambitions:

- To work towards all plastic packaging placed on the market being recyclable, reusable or compostable by 2025;
- To work towards eliminating food waste to landfill by 2030;
- To eliminate avoidable plastic waste over the lifetime of the 25 Year Environment Plan;
- To double resource productivity by 2050; and
- To eliminate avoidable waste of all kinds by 2050.

2.61 The RWS is also concerned with ensuring that society's approach to waste aligns with the following circular economy principles:

- Design out waste and pollution;
- keep products and materials in use; and
- regenerate natural systems.

2.62 The role waste management plays in the material cycle that is central to creating a more circular economy is illustrated in Figure 7 below.

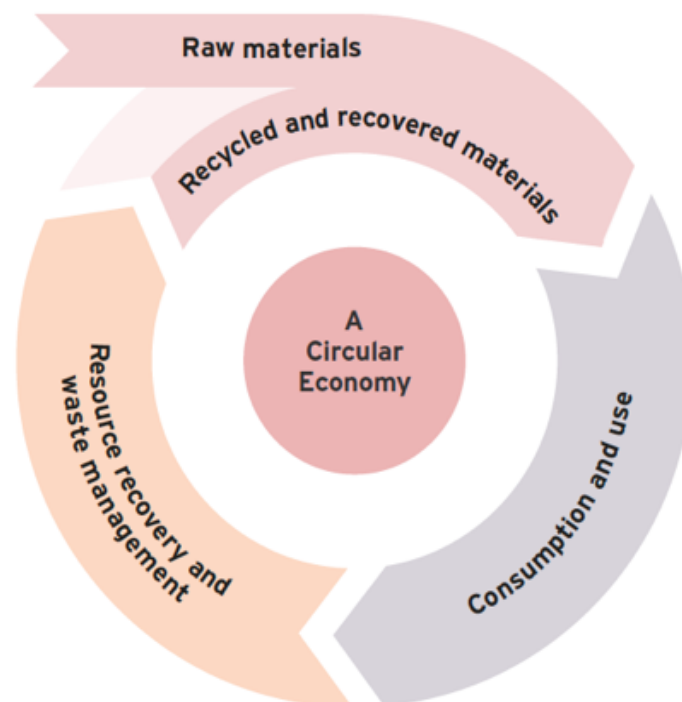


Figure 7 Circular Economy¹⁷

¹⁷ Source: Resources and Waste Strategy, DEFRA, 2018

2.63 The Circular Economy is another key tool for tackling the climate emergency. When applied to the built environment, circular economy principles significantly reduce greenhouse gas emissions by avoiding extraction of raw materials, reducing production of construction materials, retaining embodied carbon and eliminating waste.

2.64 The Environment Act 2021 requires Government to set long-term, legally-binding environmental targets¹⁸, including those for resource efficiency and waste reduction. In response to this requirement the Government has set the following targets in its Environmental Improvement Plan 2023, which build on existing recycling and landfill diversion targets:

- Eliminate avoidable waste by 2050 and double resource productivity by 2050;
- explore options for the near elimination of biodegradable municipal waste to landfill from 2028;
- eliminate avoidable plastic waste by 2042;
- seek to eliminate waste crime by 2042; and,
- halve 'residual' waste (excluding major mineral waste) produced per person by 2042. For the purposes of this target, 'residual' waste is defined as waste that is sent to landfill, put through incineration or used in energy recovery in the UK, or that is sent overseas to be used in energy recovery.

2.65 The EIP states that the targets will be achieved by the following actions:

- Implementation of packaging extended producer responsibility from 2024;
- introduction of a deposit return scheme for plastic and metal drinks containers from October 2025;
- implementation of consistent recycling collections between different councils;
- mandate recycling labelling for packaged products by 31 March 2026 except for plastic films which will be mandated by 31 March 2027;
- banning the supply of single-use plastics (e.g. plastic plates and cutlery) from October 2023;
- introduction of a mandatory digital waste tracking service to modernise existing waste record keeping;
- implementation of reforms to the waste carriers, brokers and dealers regime and bringing forward legislation to tackle abuse of certain types of waste exemptions; and,
- launching a call for evidence to support development of a plan to achieve the near elimination of biodegradable municipal waste going to landfill from 2028.

¹⁸ <https://www.gov.uk/government/publications/environment-bill-2020/august-2020-environment-bill-environmental-targets>

2.66 The target for the reduction in residual waste is enshrined in The Environmental Targets (Residual Waste) (England) Regulations 2023 which came into force on 30 January 2023. The waste target is for the reduction of residual waste (excluding major mineral wastes) on a kg per capita¹⁹ basis by 50% by 2042 from 2019 levels (574 kg per capita). Accordingly, the residual waste long-term target is that by the end of 31 December 2042 the total mass of residual waste for the calendar year 2042 does not exceed 287 kg per capita. Waste routes which will count as residual are:

- Sent to landfill in the United Kingdom;
- put through incineration in the United Kingdom;
- used in energy recovery in the United Kingdom; or
- sent outside the United Kingdom for energy recovery.

2.67 In July 2023 the Government published its waste prevention plan titled 'Waste prevention programme for England: Maximising Resources, Minimising Waste'. In this document the Government sets out how it '*will achieve strategic principle 2 of the Resources and Waste Strategy – to prevent waste from occurring in the first place and manage it better when it does.*'

2.68 The Plan also notes that:

- the Government intends to prepare a 'Waste Sector Decarbonisation Plan' that will set out how the waste sector will; contribute to the targets in the 6th Carbon Budget (see below);
- the National Model Design Code published in 2021²⁰ provides tools and guidance for planning authorities to embed circular economy principles in new development;
- NPPW expects planning authorities to ensure that new development includes proposals for handling waste arising from the construction and operation of development maximise reuse and recovery opportunities, and minimises off-site disposal; and,
- Chapter 2 of the NPPF recognises the need for the planning system to consider the prudent use of natural resources and waste minimisation in the pursuit of sustainable development.

¹⁹ Per head of population in England

²⁰ <https://www.gov.uk/government/publications/national-modeldesign-code>

Climate change

- 2.69 To achieve 'net zero' in carbon emissions by 2050 the Government has acknowledged that, overall, CO₂ emissions need to fall by around two thirds by 2035²¹.
- 2.70 The RWS includes plans to:
- Reduce the generation of greenhouse gas (GHG) emissions associated with breakdown of biodegradable waste by diverting it from landfill (with a focus on food waste); and
 - to increase recycling, which typically results in lower carbon emissions in comparison to manufacturing products from virgin materials.
- 2.71 In December 2020, the Climate Change Committee (CCC) published its Sixth Carbon Budget²² that considered measures required to achieve the UK Government target net zero carbon emissions by 2050. The UK Government accepted the report's key recommendation of a 78% reduction in UK territorial emissions between 1990 and 2035 which essentially brought the UK's previous target of 80% reduction by 2050 forward by 15 years²³.
- 2.72 The Committee's Sixth Carbon Budget noted that emissions associated with waste management accounted for 6% of UK GHG emissions in 2018. While they have fallen to 63% of 1990 levels, due to a reduction in biodegradable waste being landfilled, in recent years emissions have stopped falling due to a plateau in recycling and significant growth in carbon emissions from the fossil sourced component (i.e. oil based plastics) of Energy from Waste plant feedstock.
- 2.73 Broadly, the Committee's Budget concludes that the management of waste in accordance with the waste hierarchy is consistent with the achievement of reductions in carbon emissions and includes the following specific recommendations:
- A ban on landfilling biodegradable waste by 2025;
 - recycling increasing to 70% by 2030;
 - additional focus through the chain from manufacturing to the consumer to reduce the amount of waste; and,
 - All energy from waste facilities plants to be fitted with Carbon Capture and Storage (CCS) by 2040.

²¹ UK Industrial Decarbonisation Strategy, April 2021

²² The Sixth Carbon Budget The UK's path to Net Zero Committee on Climate Change December 2020 Presented to the Secretary of State pursuant to section 34 of the Climate Change Act 2008

²³ [UK enshrines new target in law to slash emissions by 78% by 2035](#), Government Press Release, April 2021

- 2.74 In 2021 the Environmental Services Association²⁴ published a Net Zero Strategy²⁵ that includes the following targets:
- Start fitting Carbon Capture, Utilisation and Storage (CCUS) technologies to EfW facilities from 2025, with all plants fitted with CCUS where feasible by 2040.
 - Ensure that all new plants are built with CCUS fitted or are CCUS-ready from 2025 onwards.

- 2.75 In March 2023, the Government consulted on updates to its '2009 Carbon Capture Readiness' requirements. The consultation considered the need for carbon capture relating to Energy from Waste facilities and noted that:

'Whilst the EfW sector is relatively small, we expect that it will represent a significant proportion of residual emissions from the power sector in the 2030s, as other forms of generation are rapidly decarbonised. It is therefore important that it is targeted with emissions reduction policies'

- 2.76 As part of this consultation, the Government proposed that Energy from Waste plants, which are of a size which require a Development Consent Order, should be included in 'decarbonisation ready' requirements and that this would be administered by the Environment Agency as part of the Environmental Permitting, rather than the planning consent, process.

- 2.77 In its June 2023 report, 'Progress in reducing emissions 2023 Report to Parliament', the CCC summarised its findings in regard to the progress made within the waste management sector to reducing emissions as follows:

'Greater strategic coordination of plans to decarbonise the waste sector is needed including: much greater emphasis on waste prevention, clarity on future residual waste capacity needs, and the suitability of incentives and interactions with other sectors such as waste as a feedstock for Sustainable Aviation Fuels. Energy from Waste (EfW) emissions are already higher than the Government's CBDP²⁶ anticipates and EfW capacity is set to increase in the coming years. A comprehensive systems-approach to control and reduce EfW emissions is urgently needed, including clarity on carbon pricing. We recommend a moratorium on additional EfW capacity until a review of capacity requirements has been completed and an updated assessment of residual waste treatment capacity requirements published.'

²⁴ The Environmental Services Association (ESA) is the trade association for the waste management industry in the UK.

²⁵ <http://www.esauk.org/application/files/7316/2496/7294/ESA-Net-Zero-Exec-Summary.pdf>

²⁶ CBDP = Carbon Budget Delivery Plan

Waste movement and net self sufficiency

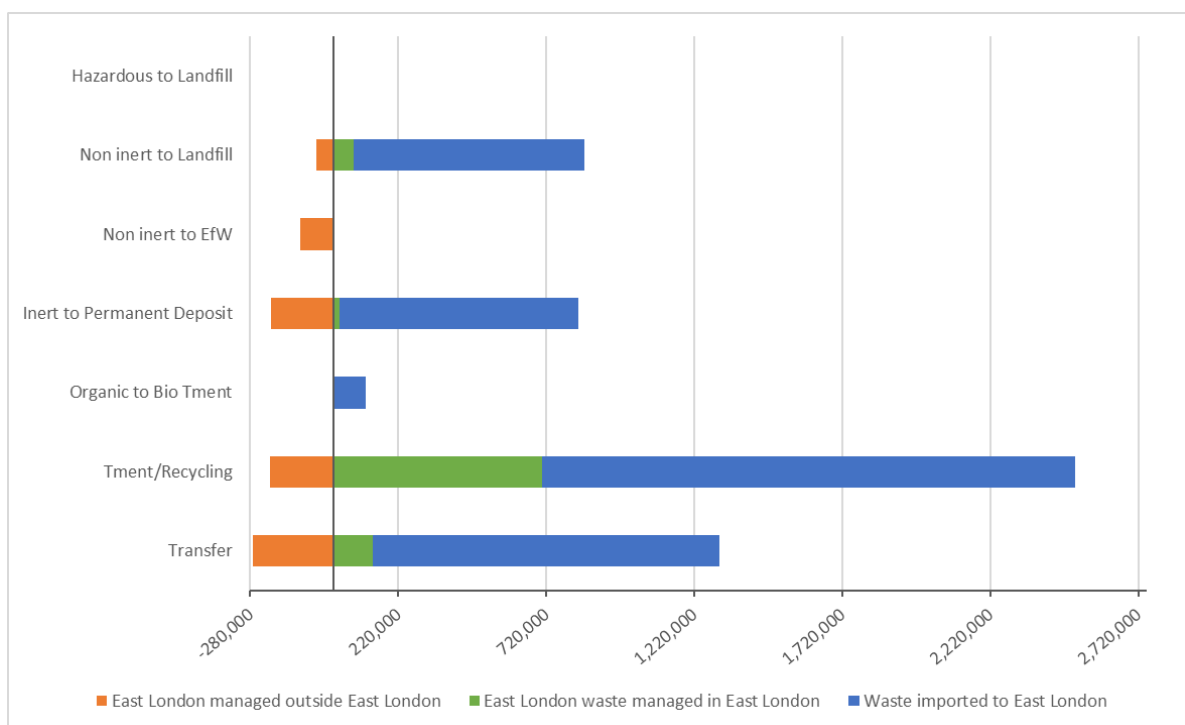
- 2.78 The 'proximity principle' is set out in paragraph 4 of Part 1 of Schedule 1 to the Waste (England and Wales) Regulations 2011. This is within the context of the requirement for mixed municipal waste collected from private households to be disposed of, or recovered, in one of the nearest appropriate installations, by means of the most appropriate methods and technologies, in order to ensure a high level of protection for the environment and public health.
- 2.79 This is to be achieved by establishing an integrated and adequate network of installations for disposal and recovery of mixed municipal waste collected from private households. The requirement also extends to where the collection includes similar types of waste collected from non-household sources (e.g. waste from offices and retail).
- 2.80 The network is to be designed in such a way as to enable movement towards the aim of self-sufficiency in the disposal and recovery of waste at a national²⁷ level. While giving consideration to geographical circumstances and/or the need for specialised installations for certain types of waste.
- 2.81 This principle is to be applied when decisions are taken on the location of facilities for the management of mixed municipal waste collected from private households and similar waste (see above) by disposal or recovery. This is recognised in NPPW that expects waste planning authorities to:
- 'plan for the disposal of waste and the recovery of mixed municipal waste in line with the proximity principle, recognising that new facilities will need to serve catchment areas large enough to secure the economic viability of the plant;'*
- 2.82 The NPPW requires local planning authorities, with responsibility as Waste Planning Authority for their area, to include policies in their development plans which set out an overall strategy for the pattern and scale of waste development, ensuring sufficient provision is made for infrastructure for waste management, and energy that may be produced (including heat).

²⁷ England and Wales

2.83 Data shows that varying quantities of waste are routinely transported between East London and other Waste Planning Authority (WPA) areas²⁸. This cross-boundary movement is typical of the way in which waste is managed in general, as it has little regard for administrative boundaries. Certain, strategic, flows of waste from East London have been identified which may be important to the management of waste arising in East London over the Plan period and the WPAs hosting facilities to which their flows relate have been contacted to confirm that such flows may continue over the plan period.

2.84 Figure 8²⁹ displays the balance between imports and exports by waste management method and waste type to and from East London in 2022.

Figure 8: Waste import and export balance in East London 2022 by management method



and waste type where known (tonnes)

²⁸ See 'Identification of Strategically Significant Cross Boundary Waste Movements', BPP Consulting, April 2024

²⁹ Note that Figure 8 only includes waste managed at permitted sites in England and does not include any waste exported to Wales, Scotland or further afield as this is not reported in the WDI.

2.85 When planning for waste the NPPW expects WPA areas to assess whether the unmet needs of other areas could be met within their own areas.

Regional Policy – The London Plan

2.86 The administrative geography of London is overseen at a regional level by the Greater London Authority (GLA). There are thirty-three-administrative areas within London: twelve inner boroughs, twenty outer boroughs, and the City of London. Newham is the only inner borough within the ELJWP area.

2.87 The London Plan provides strategic planning policy for the whole of London and sets out how certain matters, including waste, should be addressed in borough Local Plans including waste local plans.

2.88 The London Plan states that London should manage as much of its waste within its boundaries as practicable, aiming to achieve waste net self-sufficiency by 2026 in all waste streams except for excavation waste. To meet this aim, the London Plan 2021 forecasts arisings of Local Authority Collected Waste (referred to as household waste) plus Commercial and Industrial waste (C&I waste) for London by borough to 2041 (collectively referred to as household, industrial and commercial waste (HIC)). These forecasts are used as a basis to apportion 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 should be managed within London (i.e. net self-sufficiency) by 2026 (Policy SI 8) is achieved. Excavation waste is excluded from the London Plan net self-sufficiency target as it is difficult to recycle and it is more difficult for London to provide sites for management or beneficial use.

2.89 The borough apportionments were derived through an assessment process that included 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. The quantities arrived at are referred to as the London Plan apportionments (LP apportionments for short). The types of capacity considered to count towards the management of apportioned waste (hereinafter referred to as 'qualifying capacity') is defined 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.

2.90 London Plan arisings and forecasts for the East London Boroughs are set out below in Table 7 below. The London Legacy Development Corporation does not have a separate waste apportionment within the London Plan 2021, and therefore waste management in its area is accounted for by the London Borough of Newham.

Table 7 London Plan Forecast Waste Arisings and Apportionments for the East London Boroughs

	Waste Arising		Waste Management Apportionments	
	2021	2041	2021	2041
Barking and Dagenham	214,000	230,000	505,000	537,000
Havering	229,000	249,000	370,000	393,000
Newham	244,000	260,000	383,000	407,000
Redbridge	196,000	216,000	151,000	160,000
Total	883,000	955,000	1,409,000	1,497,000

2.91 The apportionment targets for East London are significantly higher than the area's projected arisings which demonstrates how East London is expected make a major contribution to the London Plan 2026 net self-sufficiency target.

2.92 The London Plan also sets out management targets for waste generated in London in Policy SI 7 Reducing waste and supporting the circular economy. These targets reflect those in the London Environment Strategy (LES) 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
- meet or exceed the targets for each of the following waste and material streams:
 - construction and demolition – 95 per cent reuse/recycling/recovery
 - excavation – 95 per cent beneficial use (with 100% inert put to use)

- 2.93 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.’
- 2.94 The London Plan requires boroughs to allocate sufficient land and identify waste management facilities to provide capacity to manage the tonnages of waste apportioned in the plan and to plan for those waste streams not apportioned by the London Plan.
- 2.95 The London Plan includes a requirement for ‘referable applications’³⁰ to be submitted with a “Circular Economy Statement” that demonstrates how the development will come forward in a manner which is consistent with achieving a circular economy. This includes how much waste the proposed development is expected to generate and where it will be managed. The GLA has published further guidance on the content of Circular Economy Statements³¹.
- 2.96 The London Plan requires boroughs to “allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste”. This is in line with the NPPW which requires waste planning authorities to “identify sites and/or areas for new or enhanced waste management facilities”. The London Plan identifies existing facilities, Strategic Industrial Locations, Locally Significant Industrial Sites and safeguarded wharves as suitable for new waste facilities.
- 2.97 The London Plan makes clear that all existing waste sites should be safeguarded and retained in waste use. The London Plan defines existing waste sites as those with planning permission for waste use or those with an Environment Agency permit.
- 2.98 The London Plan requires compensatory capacity elsewhere in London if a waste site is redeveloped for another use. Compensatory capacity must be at or above the same level of the waste hierarchy of that which is lost, and that any loss of hazardous waste capacity must be replaced with hazardous waste capacity. Existing waste sites can only be released without re-providing capacity if it can be demonstrated that there is sufficient capacity elsewhere in London and the target of achieving net self-sufficiency is not compromised.

³⁰ Referable applications include those for developments providing 150 residential units, other types of development of 20,000sq.m in central London or 15,000sq.m outside Central London, developments 25m high adjacent to the Thames or 30m high elsewhere in London.

³¹ <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance>

2.99 The London Plan supporting text indicates that boroughs with surplus capacity share this with boroughs facing a shortfall before considering release of sites from safeguarding protection. The London Plan also acknowledges that it may not always be possible for boroughs to meet their apportionment within their boundaries and in these circumstances boroughs will need to agree the *‘transfer of apportioned waste’*.

2.100 Furthermore, the London Plan includes policy (Part G of Policy D4 Housing quality and standards) that requires housing to be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) food waste as well as residual waste.

2.101 In December 2018, the London Assembly declared a climate emergency, and called on the Mayor of London to do likewise and put in place specific emergency plans for London to achieve carbon neutrality by 2030. The Mayor declared a climate emergency shortly after the Assembly and set a target for London to be net zero-carbon by 2030.

Local Policy

Borough Local Plans and Related Plans and Guidance

2.102 Each Borough has prepared its own Local Plan that includes a Vision, Objectives and planning policies relating to all forms of development in its area. Policies in this Plan will supersede any policy relating to the management of waste included in the Local Plans.

Barking and Dagenham

2.103 Barking and Dagenham’s Core Strategy was adopted in 2010. Policy CR3 contains strategic-level sustainable waste management principles and defers waste planning to the ELWP, or national and London policies in the absence of a joint waste plan. A new Local Plan is being prepared and is currently being examined.

2.104 Other Plans and guidance relating to the management of waste in Barking and Dagenham are as follows:

- Barking and Dagenham Planning Advice Note (PAN3) – Waste and Recycling Provisions
- Barking and Dagenham Reduction and Recycling Plan April 2023 to March 2025

Havering

2.105 Havering's Local Plan was adopted in 2021. The Local Plan relies on the ELWP for the determination of applications for waste management and includes Policy 35: On-site waste management which concerns the provision of suitable arrangements for the separate storage and collection of waste in new development.

2.106 The Havering Reduction and Recycling Plan April 2023 to March 2025 sets out initiatives in Havering intended to reduce waste production and increase recycling.

Newham

2.107 Newham's Local Plan was adopted in 2018. Policy INF3: Waste and Recycling includes sustainable waste management principles, repeats key strategy points from the ELWP pertinent to the Borough, and includes design criteria. The Local Plan is currently being reviewed and a draft updated Plan was published for consultation in December 2022. The draft similarly contains policy relating to waste management which reflects the requirements of the 2021 London Plan policies.

2.108 Other Plans and guidance relating to the management of waste in Newham are as follows:

- Newham Recycling and Waste Collection Policy
- The Newham Recycling, Waste and Street Cleansing Strategy
- Newham Waste Management Guidelines for Architects and Property Developers
- Newham Reduction and Recycling Plan April 2023 to March 2025

Redbridge

2.109 Redbridge's Local Plan 2015-2030 was adopted in 2018. Policy LP17: Delivering Community Infrastructure includes safeguarding of existing waste sites and delivering the "ELWA Joint Waste Development Plan".

2.110 Other Plans and guidance relating to the management of waste in Redbridge are as follows:

- Redbridge Housing Design Supplementary Planning Document
- Redbridge Waste Reduction Strategy 2019
- Redbridge Reduction and Recycling Plan 2023-2025

London Legacy Development Corporation

2.111 The London Legacy Development Corporation (LLDC) is a Mayoral Development Corporation which covers parts of four London Boroughs including Newham (see Figure 5 below). The LLDC is both a local planning authority and a waste planning authority, however it has not been given a separate apportionment target in the London Plan. The LLDC Local Plan was adopted in 2020. It contains Policy S.7 which commits the LLDC to working with its constituent boroughs on matters of strategic waste management and planning, and taking account of their adopted local waste plans.

East London Waste Authority

2.112 The East London Waste Authority (ELWA) is a statutory 'Waste Disposal Authority' (WDA) that was established on 1 January 1986 with responsibility for the management of household waste collected by the East London Boroughs.

2.113 In 1996, ELWA developed its Integrated Waste Management Strategy (IWMS), aimed at dramatically increasing recycling and composting and reducing the amount of waste sent to landfill. In 2002, ELWA signed a 25-year contract with Shanks PLC (now Renewi), to deliver the IWMS. This involved investment of over £100 million in new and improved facilities, new ways to treat and transport waste.

2.114 In 2023, ELWA published its 'Joint Strategy for East London's Resources and Waste (2027-57)' which will supersede the IWMS. The Joint Strategy sets out the aims, objectives, priorities and actions for the Partner Authorities on preventing and reducing waste, increasing reuse and recycling, supporting improvements with infrastructure, and monitoring performance. The Joint Strategy covers a 30-year period from 2027 to 2057 to reflect the timing of the end of ELWA's long-term Integrated Waste Management Services contract, but work is already underway to meet the targets and ambitions set out in the document.

2.115 Reprourement of the new contract does not guarantee that existing facilities which manufacture Secondary Recovered Fuel (SRF) from residual household waste at the Mechanical Biological Treatment (MBT) facilities at Jenkins Lane and Frog Island, will continue to be utilised.

2.116 The ELWA Joint Strategy proposes a recycling target of 35% by 2030 which is less than the 50% target included in the LES. A reduced recycling target was accepted by the GLA in recognition of the issues associated with achieving high recycling rates in flatted development and the fact that 90% of new housing in East London in future will be in the form of flats. A review of this target is required in 2028.

2.117 The ELWA Joint Strategy anticipates *'separate food waste collections for street level properties and blocks of flats, in line with anticipated regulations and Government guidance'*.

2.118 ELWA also maintains a Waste Prevention Action Plan. The latest Waste Prevention Action Plan is for 2023/24 and includes various objectives relating to the reduction of the following waste streams:

- Bulky waste
- Textiles and nappies
- Food waste
- Electronics
- Mixed Organic Waste
- Other waste

Local Climate Change Strategies

2.119 London Borough Barking and Dagenham declared a climate emergency in 2019. London Borough of Havering declared a climate and ecological emergency in 2023. London Borough of Newham declared a climate emergency in 2019. London Borough of Redbridge have an action plan to be carbon neutral by 2030 and carbon zero by 2050.

3 Draft Vision and Objectives

The Draft Vision

- 3.1 The draft Vision below describes how the Boroughs propose waste will be managed in East London by 2041. The proposed 'Strategic Objectives' explain what will need to be achieved if the vision is to be realised.
- 3.2 The proposed Vision and Strategic Objectives have drawn on Local Plans and strategies in East London as well as the London Plan and national policies and strategies.
- 3.3 Planning policies are linked to the Vision and Strategic Objectives to ensure that development, that affects the way waste is managed and produced, will occur in a manner that helps achieve the Vision and Strategic Objectives.

East London Joint Waste Plan Draft Vision

By 2041, the principles of the circular economy will be fully integrated into all forms of development within East London, resulting in reduced waste production and increased emphasis on repair, refurbishment and reuse including that associated with built structures.

A network of accessible service providers for reuse, repair, and recycling will be in place. Remaining waste will be viewed and managed as a resource, with hazardous properties virtually eliminated in construction and demolition waste. Priority will be given to using recycled materials in construction, and development projects will prioritise waste minimisation.

Sustainable waste management in East London will contribute to the area's regeneration, positioning it as a key part of London's industrial engine and a thriving economic centre. Waste management facilities will be located to protect and enhance communities and the natural environment, and be resilient to climate change. Waste will be managed efficiently by maximising existing capacity of facilities, releasing underutilised or poorly located sites, minimising transportation and using infrastructure established for alternative means of waste movement, in particular via the River Thames.

Net zero in waste management will have been achieved in East London through an understanding, and reduction, of lifecycle carbon impacts and incorporating renewable energy in waste management and transportation.

Sending waste to landfill will be a last resort, occurring only in exceptional circumstances, and any landfill in East London will be considered a strategic resource with carefully managed capacity.

Strategic Objectives

East London Joint Waste Plan Strategic Objectives

Strategic Objective 1: Significantly Reduce Waste Production Overall

- Encourage the integration of circular economy principles and the adoption of best practice design and construction approaches, to achieve a significant reduction in waste production by 2041.

Strategic Objective 2: All Built Development Will Contribute to the Achievement of a Fully Functioning Circular Economy by 2041

- Promote the use of circular economy principles in design, construction and development in the built environment, emphasising reduced waste production and increased reuse and repair practices.
- Encourage development to consider and minimise waste during construction and operation, following the waste hierarchy in priority order.
- Enable delivery of development which will help establish a viable and easily accessible network of re-use, repair, and recycling services.
- Foster a shift in perception such that waste materials are viewed as a valuable resource, ensuring sustainable waste management is integral to the development and use of all new development.
- Encourage development that prioritises the use of reused, reusable, recycled and recyclable materials and minimises the use hazardous materials which could result in the production of hazardous waste in construction projects in East London

Strategic Objective 3: Appropriately Locate Waste Management Capacity

- Locate, construct, and operate waste management facilities while protecting and enhancing communities, health, employment, and the natural environment, and ensuring resilience to climate change.

Strategic Objective 4: Contribute to East London's Regeneration and Economic Growth

- Leverage sustainable waste management in a manner that contributes to East London's regeneration and economic growth.
- Ensure high quality restoration and aftercare of landfill sites which maximises benefits to the community and the environment.
- Ensure waste is managed using methods and in locations that contribute to measurable improvements in the natural environment, including biodiversity, of East London.

East London Joint Waste Plan Strategic Objectives (continued)

Strategic Objective 5: Achieve Net Zero Waste Management

- Attain net zero in waste management by 2041 by ensuring that whole lifecycle carbon impacts are taken into account in proposals for the management of waste.
- Provide waste management capacity that minimises greenhouse gas production and supports the development of a low carbon economy and decentralised energy.
- Promote development which allows for the exclusive use of renewable energy sources in waste management operations and transportation.

Strategic Objective 6: Optimise Existing Waste Management Capacity

- Realise the full potential of existing waste management capacity in East London, using only the minimum land necessary while ensuring the capability to manage at least the apportionment in the London Plan is maintained.
- Review and release land occupied by poorly located or under-utilised waste management facilities for other uses.

Strategic Objective 7: Minimise Transportation and Establish Alternative Infrastructure

- Minimise the transportation of waste by locating facilities as close as possible to its source
- Safeguard and establish alternative transport infrastructure, including River Thames wharves, to allow movement without reliance on fossil fuel-powered vehicles.

Strategic Objective 8: Restrict Landfilling to Exceptional Circumstances

- Ensure the disposal of waste occurs only as a last resort and in exceptional circumstances.
- Ensure any landfill capacity is reserved solely for the disposal of waste which cannot be managed by any other means.

4 Future requirements for waste management capacity

4.1 In order to establish how much waste management capacity will be needed over the Plan period a study³² was completed that considered the requirements of the London Plan and how well the existing waste management capacity might meet those requirements. It is important to note that this study did not include existing capacity with temporary planning permission or very small sites and on this basis it may be considered to have underestimated existing capacity. The results of the study are set out below:

Management Capacity for Apportioned HIC³³ Waste

4.2 It is estimated that there is currently 2,561,000tpa of waste management capacity in East London which is more than sufficient to manage the London Plan apportioned forecast arisings to 2041. This is shown in Table 8 below.

Table 8: 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

³² East London Joint Waste Plan, Assessment of Existing Waste Management Capacity, BPP Consulting, February 2024

³³ Local Authority Collected Waste plus Commercial and Industrial waste

- 4.3 A sensitivity analysis was undertaken to account for the possible loss of MBT capacity after 2027 and this showed that this loss would not result in a capacity shortfall.
- 4.4 The surplus capacity for the management of apportioned waste at 2041 is estimated to range between c.0.63 Mtpa (without MBT) and c.1.0Mtpa.

Management Capacity for C, D & E Waste

- 4.5 Based on an extrapolation of the forecast for C, D & E waste arisings included in an earlier report completed in 2022³⁴, a revised estimate of 2,123,218 tpa was derived for C, D & E waste arising in 2022 through to 2041. Comparing this to an estimate of existing C, D & E waste management capacity of c.3,789,800tpa reveals a capacity surplus estimated to be approximately 1.67 Mtpa in 2041.

Management Capacity for Hazardous Waste

- 4.6 An updated forecast for hazardous waste arisings to 2041 suggests that 54,704tpa will be produced by 2041. This compares to existing hazardous waste management capacity of 39,000tpa which indicates there is a capacity deficit of approximately c.15,700tpa.
- 4.7 However, it should be noted that given the diverse nature of hazardous wastes, there is no policy expectation that individual Plan areas should be net self sufficient for the management of hazardous produced in the area. Instead, existing capacity should be safeguarded and additional capacity be sought in co-operation with other Plan areas. This is set out in the London Plan as follows:

"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)

- 4.8 Therefore, the estimated shortfall is not considered to be a barrier to release of other sites, or impose a requirement to provide for additional capacity through allocation in the ELJWP.

34 Evidence Base for the East London Joint Waste Plan, Anthesis, November 2022

Providing for Waste from Beyond the Plan Area

- 4.9 In light of the identified surplus in C, D & E Waste and HIC management capacity, as part of the consultation on this Plan, the Boroughs are inviting other boroughs, who have demonstrated that they are unable to meet their apportionments within their own areas to consider whether the surplus in east London might offer an opportunity for their apportionments to be met.

5 Sites for Waste Management

5.1 As noted in section 4.0 above, there is sufficient waste management capacity in East London to meet requirements for C, D & E Waste and HIC over the plan period. In light of this it is proposed that the Plan:

1. Does not allocate specific areas of land for the development of additional waste management facilities (this means the status of the sites allocated for the development of waste management capacity in the current adopted East London Waste Plan (Schedule 2 Sites) would fall away);
2. does not expressly safeguard several existing waste management sites where such safeguarding protection would hinder the wider development aims of the Boroughs. For example, where existing waste facilities are situated on land that has been earmarked by the Boroughs for other forms of development in their Local Plans; and,
3. safeguard all other existing waste sites with planning permission.

5.2 The sites proposed for safeguarding are listed in Appendix 1 with maps and further details included in Appendix 2. The safeguarding policy is included in section 6.0 below as Policy JWP2. JWP2 also sets out the circumstances when proposals for additional waste management capacity might be acceptable.

5.3 A separate study³⁵ has been prepared that assesses the sites proposed for release from safeguarding. In addition, the assessment of existing waste management capacity, outlined in Section 4.0 above, factored in the loss of these sites. These sites are listed in table 9 below.

Table 9: Existing Waste Sites Proposed for Release from Safeguarding inc Assessed Capacity in parenthesis where different

Borough	Site	Permitted Use	Waste Capacity (tpa)
Barking & Dagenham	Barking Eurohub, Box Lane, Barking	Transfer Station taking Non-Biodegradable Wastes	c313,500
Barking & Dagenham	Gallions Close, Barking, IG11 0JD	Recycling	c50,000 (500)
Barking & Dagenham	17-19 Thames Road, Barking IG11 0HS	Waste processing and recycling facility	Not operational
Barking & Dagenham	The Annex of Shed A, Box Lane, Barking IG11 0SQ	Non Haz Waste Transfer / Treatment	c36,000

³⁵ Safeguarded Sites for Release – Assessment Report, BPP Consulting, July 2024

Barking & Dagenham	Renwick Road Rail Hub, Barking	Non Haz Waste Transfer	c.300,000 ³⁶ (0)
Newham	12 Barbers Road, Stratford, E15 2PH	Waste separation & recycling centre	c107,000 (33,000)
Newham	Connolleys Yard, Unit 5c Thames Road, London, E16 2EZ	Metal Recycling Site	c35,000

5.4 The Boroughs have also identified additional existing waste management sites which might make good candidates for redevelopment. However, such sites are safeguarded and could only be redeveloped if the provisions of Policy JWP2, which sets out the limited circumstances in which safeguarded waste sites can be redeveloped, are satisfied. These sites are listed in Appendix 3.

³⁶ All capacity assessed to be transfer only.

6 Policies

- 6.1 The policies set out below will be applied when making decisions on the suitability of proposals for development in East London. All the policies apply to proposals relating to waste management and Policies JWP 1 and JWP 3 will apply to all forms of development. Parts of Policy JWP 2 will apply to proposals which involve the redevelopment of existing waste management facilities.
- 6.2 Relevant policies included in the adopted Local Plan of the Borough in which the proposal is located will also be applied. Such policies may relate to wider issues concerning the protection and enhancement of communities and the natural environment. In some cases, there may be overlap between the policies of the Borough's Local Plans and the policies in this Plan, where this occurs the latest policy to have been adopted will take precedence.
- 6.3 Table 10 below shows how the proposed Strategic Objectives of this plan would be implemented by the policies.

Table 10: Relationship Between Strategic Objectives and Policies

Strategic Objective	Related Policies
Strategic Objective 1: Establish a Fully Functioning Circular Economy by 2040	Policy JWP1: Circular Economy Policy JWP5: Energy from Waste
Strategic Objective 2: All Built Development Will Contribute to the Achievement of a Fully Functioning Circular Economy by 2041	Policy JWP1: Circular Economy Policy JWP4: Design of Waste Management Facilities
Strategic Objective 3: Appropriately Locate Waste Management Capacity	Policy JWP2: Safeguarding and Provision of Waste Capacity Policy JWP 3 Prevention of Encroachment
Strategic Objective 4: Contribute to East London's Regeneration and Economic Growth	Policy JWP2: Safeguarding and Provision of Waste Capacity Policy JWP4: Design of Waste Management Facilities
Strategic Objective 5: Achieve Net Zero Waste Management	Policy JWP1: Circular Economy Policy JWP4: Design of Waste Management Facilities Policy JWP6: Deposit of Waste on Land
Strategic Objective 6: Optimise Existing Waste Management Capacity	Policy JWP5: Energy from Waste
Strategic Objective 7: Minimise Transportation and Establish Alternative Infrastructure	Policy JWP4: Design of Waste Management Facilities
Strategic Objective 8: Restrict Landfilling to Exceptional Circumstances	Policy JWP1: Circular Economy

Policy JWP1: Circular Economy

Purpose of Policy

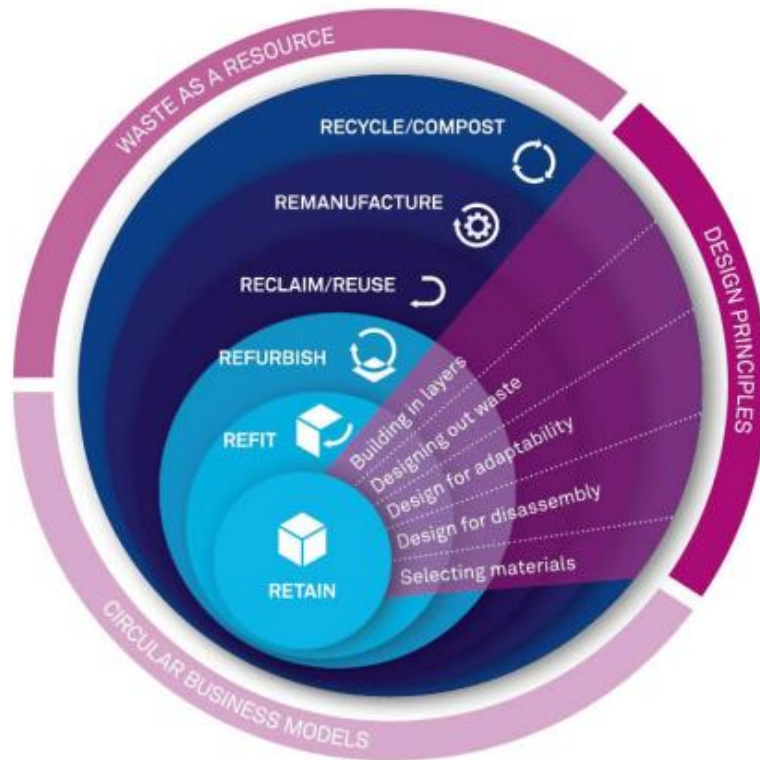
To encourage and support development that is consistent with the achievement of a circular economy by, amongst other things, requiring all forms of development (not just those concerned primarily with the management of waste) to demonstrate that it will not result in the production of waste that practically could have been prevented over its lifespan.

- 6.4 Many forms of development are key to facilitating a Circular Economy in the ways they provide for goods and materials to be re-used, repaired and refurbished. Examples include the following:
- Repair/refurbishment workshops;
 - other uses associated with repair of products e.g. tailors;
 - shops selling second hand goods;
 - lending libraries (e.g. 'Library of things');
 - hire shops; and
 - 'reuse hubs'.
- 6.5 While these types of development are considered 'everyday', they have a key role to play in a circular economy and it is important that their contribution is recognised. In many cases such development is covered by general land use classes, however where specific decisions are needed on proposals, support will be provided for development which incorporates such uses in suitable locations. Newham is currently exploring the concept of dedicated 'Circular Economy Construction Hubs' which may be developed to offer space for the storage, sorting, testing and redistribution of reclaimed construction materials; a centre for the repair, remanufacture and retail of reclaimed building components, and potentially consumer items (i.e. paint, timber etc); as well as related training and skills development (e.g. training in specific trades related to construction with emphasis on repair and use of reused, recycled and low carbon materials).

- 6.6 Goods and materials that have become waste will have been produced and transported usually using energy that was derived from fossil fuels and resulting in carbon emissions. The carbon associated with this energy is known as 'embodied carbon' and when waste materials are disposed of, it is not only the materials that are wasted but also the energy with an associated embodied carbon cost). Vast amounts of energy have been used in the production of materials e.g. steel, glass, concrete, used in the buildings (and in their construction). Waste relating to development activity is therefore intrinsically linked to carbon emissions and associated climate change.
- 6.7 It is increasingly acknowledged that even though older structures might not be as energy efficient during their use phase, the carbon footprint of constructing a new, energy efficient building may often exceed any savings achieved during its operational phase.
- 6.8 The quantity and the nature of waste resulting from built development relates directly to how a building is designed. It is expected that proposals will be accompanied by an assessment that shows why the service, e.g. housing, provided by the development is genuinely needed and cannot be met in a way that does not involve demolition of existing buildings and/or the construction of new ones. Consideration of whether existing development can be refurbished and/or put to the required use should occur at the earliest design concept stage. To a certain extent, this principle of re-purposing existing development is enshrined in the national approach to permitted development that, in certain circumstances, allows offices to be redeveloped for use as housing.
- 6.9 Where it is demonstrated that new development is necessary, issues needing consideration to ensure that the development is compatible with the circular economy, include:
- the efficient use of land – how well development is designed to ensure the use of the land where it is located is optimised;
 - the resilience of development i.e. will it last. This not only concerns sound construction but also relates to how easily a building can be adapted to meet different requirements over time;
 - how a building will be dismantled at the end of its life and whether components and materials can be easily reused and recycled;
 - consumption of materials, not just in construction but also in its use, and how renewable those materials are;
 - reduction of waste, through modular construction, project and materials management and procurement;
 - the management of waste arising from demolition and construction as high on the waste hierarchy as possible. This also relates to the materials used in construction, for example how easily surplus material can be re-used;
 - the design of the development to provide for waste which arises during its use and occupation to be managed in accordance with the waste hierarchy.

6.10 Figure 9 below illustrates approaches related to the circular economy and the built environment.

Figure 9 Circular Economy hierarchy for building approaches (from London Plan Policy D3 Figure 3.2)³⁷



³⁷ Source: Building Revolutions (2016), David Cheshire, RIBA publishing©

- 6.11 The optimal use of land is particularly important in the more built-up areas of East London and policies in the Boroughs' Local Plans seek to address this as appropriate.
- 6.12 Efficient modular off-site construction methods are now commonly used as a means of minimising the wastage of materials used in construction.
- 6.13 In 2023, the UK Government announced it's 'Simpler Recycling' initiative which is a plan to standardise recycling across England which includes the following:
1. Consistent Collection of Materials: Both local authorities and businesses in England are required to collect a consistent set of materials for recycling. These include dry recyclables such as glass, metal, plastic (including plastic film), paper and card, and organics like food waste and garden waste.
 2. Flexibility in Collection Methods: Local authorities have the flexibility in the method of collection for dry recyclables in terms of level of separation and number/type of container. An exemption would allow authorities to collect dry recyclables co-mingled.
 3. Weekly Food Waste Collection: Collection authorities will be required to collect food waste weekly. The preference is for food waste to be treated by anaerobic digestion.
 4. Fortnightly Residual Waste Collection: The government is proposing the requirement for residual waste to be collected at least fortnightly.
 5. Designing Business Premises for Waste Storage: Business premises must be designed with sufficient space for the storage of materials to be separately collected.
- 6.14 Where these requirements are not already in place, they will be brought in by March 2026 and this confirms the need for all buildings to be designed with sufficient space to allow for the separate collection and storage of these materials. All Boroughs provide separate collection of recyclable materials and the ELWA strategy anticipates *'separate food waste collections for street level properties and blocks of flats, in line with anticipated regulations and Government guidance'*.
- 6.15 Different storage and collection systems are needed for different types of development, for example, the Barking Riverside mixed use development incorporates a vacuum system for collecting waste from apartments. The system processes three fractions: residual, cardboard and dry recyclables and reduces the need for storage facilities (460 collection inlets replace 19,000 traditional bins) and vehicle movements.
- 6.16 Separate guidance has been prepared by the Boroughs to assist developers understand how waste will be collected and how buildings will need to be designed to allow for efficient and effective collection.

6.17 The London Plan recognises that ‘London should move to a more circular economy’. Policy SI 7 expects proposals for development which are of such as size and nature that they are referable to the Mayor, to be ‘net zero waste’. To demonstrate consistency with Policy SI 7, ‘Circular Economy Statements’ are required to be submitted with referable applications. The London Plan supports boroughs who adopt lower thresholds for requiring Circular Economy Statements in their Local Plans. The Boroughs propose to lower the thresholds in this Plan such that all proposals for major development should be accompanied by a Circular Economy Statement.

6.18 A shift in mindset is needed to ensure that circular economy principles are integral to thinking around the provision of built development that is needed to meet society’s needs. To that end, major waste proposals will be expected to provide opportunities to educate their employees and the local communities that they serve about the importance of moving towards a circular economy and how this can be achieved.

6.19 More detail on waste management and the Circular Economy is included in a separate Circular Economy Topic Paper. This includes information on other related policies and guidance prepared by the East London Boroughs.

Implementation

6.20 The documentation provided with planning applications should demonstrate how the development is designed to achieve:

1. The following rates of recycling:

Type of development	Dry Mixed Recyclables	Food Waste	Other wastes
Houses	50% ³⁸	50%	-
Flats	50%	50%	-
Shops	-	-	65%
Offices	-	-	65%
Light industrial	-	-	65%
Heavy industrial	-	-	65%

³⁸ ELWA Strategy Borough / LES Household Recycling Aspiration

2. Zero biodegradable or recyclable waste to landfill by 2026: and,
3. 95% recycling of Construction, Demolition and Excavation waste

6.21 In order to maximise the opportunities for residents to reuse and recycle their household waste, except for: Householder applications; reserved matters applications; minor extensions; and non-material amendments to current planning permissions. planning applications involving additional residential development should include the following details:

- Measures to be taken to show compliance with this policy and potential future collection arrangements e.g. food waste; and
- the details of the nature and quantity of any construction, demolition and excavation waste which will arise from the development and its subsequent management.

6.22 Major development proposals (including waste management) should include a Circular Economy Statement showing how the matters set out in Policy JWP1 have been taken into account. This statement should be prepared in accordance with the related GLA guidance³⁹ and, amongst other things, include a waste management audit outlining plans for waste handling throughout construction, including any demolition and refurbishment, as well as during the development's occupation and use. Where required, it is recommended that Circular Economy Statements be prepared alongside Whole Lifecycle Carbon Assessments.

6.23 Non major development proposals should be submitted with a Site Waste Management Plan which details how waste arising from construction, demolition and excavation will be minimised and then how any waste which does arise will be managed in accordance with the waste hierarchy. Site Waste Management Plans must include targets for retaining, reusing, or recycling materials arising for the development. Ideally these should link to online databases of reclaimed materials (e.g. the Excess Material Exchange⁴⁰) where developers list materials on web-based platforms and network locally to salvage and reuse materials.

³⁹ [Circular Economy Statement Guidance, GLA, 2022](#)

⁴⁰ [Excess Materials Exchange](#), London Borough of Enfield

- 6.24 Development proposals involving demolition will be required to be supported by a 'Pre-demolition Audit'. The 'Pre-demolition Audit' is a survey conducted on existing buildings, structures, and hard-standing surfaces before demolition or major redevelopment that identifies the type and volume of materials that will arise as a result of deconstruction. The audit will support preparation of Circular Economy Statements, Site Waste Management Plans and Whole Lifecycle Carbon Assessments.
- 6.25 Waste Management Strategies will be required to be submitted with non major development that considers the types of waste that will be produced during the occupation and use of the development and how this will be managed. A template of a Waste Management Strategy is included with the Tower Hamlets Reuse and Recycling Supplementary Planning Document. While this document was prepared by a different London Borough, it was prepared with the support of the London-wide waste advisory organisation 'ReLondon' and is currently considered to represent best practice. This document also includes information on best practice approaches to maximising recycling (e.g. provision of signage) and specifies the space that should be provided for storage of waste in development pending its collection for off site management. Similar related guidance prepared by the East London Boroughs should be referred to such as the Newham Waste Management Guidelines for Architects and Property Developers (2024). Thresholds for sizes of development requiring certain arrangements for waste management included in Local Plans should be followed.
- 6.26 Proposals for 'Circular Economy Construction Hubs' which provide dedicated space and facilities for the storage and repair of waste materials, as well as opportunities for the development of skills needed to achieve a circular economy e.g. repair workshops, will be encouraged.
- 6.27 Financial contributions from applicants for development which will rely on the use of the Council's waste management service for the collection and management of waste (mainly that from households) will be sought to assist with the provision of related infrastructure.

Policy JWP1: Circular Economy

- A. Development that constitutes or incorporates activities compatible with the circular economy will be encouraged.**
- B. All development should follow the principles of a circular economy during construction and operation phases, which includes:**
- 1. Preserving and repurposing existing structures where practical and appropriate; or**
 - 2. demonstrating that repurposing existing built development is not practicable or the best environmental option; and**
 - 3. reducing the generation of construction, demolition, and excavation waste and managing any such waste that arises from the development in accordance with the waste hierarchy and on the site of production where practicable; and**
 - 4. designing for flexibility and longevity, recyclability, repurposing and refurbishment; and,**
 - 5. sustainable construction methods, including maximising the use of reused, recycled and recyclable materials and techniques that reduce waste and facilitate the deconstruction and reuse of building components.**

For major developments, this should be demonstrated through the submission of a Circular Economy Statement. All proposals should set out how waste arising from demolition (if applicable) and construction will be managed in a Site Waste Management Plan which, as appropriate, should incorporate a Pre-demolition Audit.

- C. New development (not including minor householder applications) should include detailed consideration of waste arising from its occupation and/or use including how waste will be stored, collected and managed through a Recycling and Waste Management Strategy that demonstrates:**
- 1. Sufficient storage space will be provided to accommodate source separation and separate storage of recyclable materials;**
 - 2. in flatted development and houses in multiple occupation, sufficient temporary on site storage, including for separated recyclables (including food waste) and items for reuse, until it is collected;**
 - 3. storage and collection systems (such as dedicated spaces, storage areas, chutes, or underground waste collection systems) will ensure adequate and convenient access for all users and waste collection operatives, ease of maintenance and separation collection of recyclable materials and reusable items; and,**
 - 4. systems and infrastructure will be monitored and maintained including contingency arrangements for system/infrastructure failures.**
- D. Major waste sites should incorporate facilities for visitors to allow educational opportunities relating to the circular economy.**

Monitoring indicators:

- Circular Economy Statements; Waste Management Strategies; Site Waste Management Plans; Pre-demolition audits, submitted with applications/applications permitted
- Waste recycled; other recovery; diverted from landfill
- Quantum of development associated with CE e.g. repair workshops (see other examples of development included in the supporting text)

Policy JWP2: Safeguarding and Provision of Waste Capacity

Purpose of Policy

To ensure that:

- Existing consented waste management sites are generally safeguarded from loss to non waste uses;
- additional waste management capacity is consented on a limited basis, to meet specific needs in certain circumstances such that unnecessary capacity is not developed;
- existing waste management sites fulfil their potential to maximise the management of waste in accordance with the waste hierarchy and other relevant objectives; and,
- waste management facilities are only developed in locations where the environment and communities will be protected and enhanced.

Safeguarding of existing waste management capacity

6.28 The 2021 London Plan (Policy SI9) mandates that existing waste management sites can only be redeveloped for non-waste uses if an equivalent processing capacity is established elsewhere in London. This capacity should be based on the highest throughput achieved by the site in question over the past five years, or, if such data is unavailable, an appropriate assessment of potential capacity. The Environment Agency's Waste Data Interrogator tool is recommended for this assessment.

6.29 An assessment of the capacity for each site proposed for safeguarding in East London has been undertaken and is included in the separate Waste Management Capacity Assessment⁴¹.

6.30 The London Plan also makes it clear that loss of safeguarded waste sites should be plan-led and determined through plan-making, rather than ad-hoc (through applications).

⁴¹ See Updated East London Capacity Assessment, May 2024, BPP Consulting

- 6.31 Applicants seeking permission to redevelop an existing safeguarded waste site for a non-waste use in East London will need to prove that other existing waste sites already provide sufficient capacity to meet both the apportionment targets for the borough in which the proposal is located and the net self-sufficiency target for the city as a whole or that they have secured appropriate compensatory, replacement capacity before the change in use will be permitted. Replacement capacity can be achieved either by enhancing an existing safeguarded waste site or through securing a compensatory site to handle at least the maximum annual throughput, as per Policy JWP3 requirements.
- 6.32 Replacement capacity must be at least equivalent in terms of: Type of waste managed (LACW, C&I, C, D & E, Hazardous); throughput (lower throughput for management further up the hierarchy than that being lost may be acceptable); and position on the waste hierarchy.
- 6.33 There must also be no existing, or proposed developments that could constrain the operation of the replacement site such that the required capacity might not be realistically achievable.
- 6.34 Boroughs will enforce this through conditions or legal agreements to ensure that compensatory capacity is confirmed and delivered before releasing a safeguarded waste site for a different use. As per Policy SI 9 of the 2021 London Plan, this additional capacity should be located in London and ideally within the Plan area.
- 6.35 The provision of compensatory capacity in East London for the loss of waste capacity outside of the Plan area will not typically be permitted unless there is clear justification. Such justification should include the following:
- the compensatory provision is necessary for London to manage its waste sustainably and achieve net self-sufficiency;
 - existing safeguarded sites within that plan area are either unavailable or unsuitable, and the capacity lost cannot be replaced through adapting or intensifying existing facilities within the plan area;
 - no suitable sites are available for the development of waste capacity within the plan area in which the waste site is proposed for redevelopment; and,
 - the proposed compensatory provision would manage waste as high up the waste hierarchy as practically feasible.
- 6.36 Development of new waste management capacity that reduces overall throughput of an existing site may be acceptable where this enables management further up the waste hierarchy. This should be demonstrated through supporting evidence including:
- A list of the types of waste that would be managed at the facility;
 - The type of management that will be undertaken and its place on the hierarchy;
 - How the waste being managed will be managed as high up the hierarchy as practicable;
 - Management arrangements to ensure that the waste hierarchy is applied;

Need for additional capacity and waste hierarchy

- 6.37 'Waste management capacity' is the amount of waste that can be managed at a site or facility (generally measured in tonnes per annum throughput, or, for permanent disposal in landfill, may be overall volume in cubic metres).
- 6.38 The most recent waste management capacity assessments⁴² demonstrate that there is a surplus of capacity necessary for the management of current and forecast future waste arisings in East London. Therefore, there is no need for development of additional capacity to meet the London Plan apportionments within the Plan area. The capacity of sites that are safeguarded for waste use⁴³ exceeds that required over the Plan period. This will provide a degree of flexibility should waste management requirements change.
- 6.39 However, there may be scope for development of additional capacity, including through intensification of existing sites, to provide for management further up the waste hierarchy, for example waste managed through MBT to RDF, might otherwise be managed through a MRF and recycled. The potential loss of MBT capacity (as contracts end) may also require provision of replacement or new capacity.

Location

- 6.40 The London Plan (Policy SI8 B4) identifies suitable locations for waste management as existing waste sites, especially transfer facilities, where capacity can be maximized, Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs), and safeguarded wharves with existing or potential for waste management.
- 6.41 While existing capacity is adequate to meet management needs over the Plan period, development of new capacity, for example to move waste management up the waste hierarchy or to provide compensatory capacity, might be acceptable where it is located on existing waste sites, or on industrial land identified as suitable in Borough Local plans, where these are consistent with other policies of the development plan including those protecting the environment, health and amenity.

⁴² See Updated East London Capacity Assessment, May 2024, BPP Consulting

⁴³ See Appendices 1 and 2.

Implementation and Monitoring

Safeguarding of existing capacity

- 6.42 At the time of the Plan's adoption, safeguarded existing waste sites will be those listed in Appendix 1 and detailed in Appendix 2. The current sites proposed to be safeguarded are shown in Appendices 1 and 2 and are sites with planning permission. During the plan period changes may occur, such as new sites being permitted, which will result in a change to the details of safeguarded capacity in East London. These changes will be recognised in a change to the list and details of sites which will be reported on an annual basis in the Boroughs' Authority Monitoring Reports.
- 6.43 The Boroughs will require applicants for development that would result in loss or reduction in capacity of existing waste management sites and facilities (with planning permission) to demonstrate that either there is sufficient capacity remaining to meet forecast needs or that compensatory capacity has been secured, preferably within the Borough, the Plan area, or in London. This will be applied through condition for retention, and provision, of on-site capacity and/or legal obligations securing off-site provision. Through the plan-making process a number of existing waste sites have been identified as being surplus to requirements whose re-development will achieve wider planning objectives and so are no longer safeguarded for waste use and so are not included in Appendices 1 and 2.
- 6.44 In exceptional cases it may be possible to demonstrate that the capacity proposed to be is not actually required to meet the objectives of this Plan and the London Plan, for example if up to date monitoring of the London indicates that net self-sufficiency in London has been achieved.
- 6.45 Due to pressures for development on land in East London, some of the safeguarded existing waste management sites have been identified which may be more suitable for release if the provisions of Policy JWP2 can be demonstrated at the time of any proposal for re-development. The status of these sites in terms of planning policy is no different to other safeguarded sites but these have been identified in Appendix 3 for information.

Application of the Waste Hierarchy and Lifecycle Assessment

6.46 In most cases, management of waste in accordance with the waste hierarchy results in the least impact, on environment and communities. However, there may be circumstances where it is appropriate to deviate from the waste hierarchy. An example of this is the management of food waste by Anaerobic Digestion. Anaerobic Digestion is within the 'other recovery' tier of the waste hierarchy. LCA studies⁴⁴ have shown that management of food waste in this way is the best option and so is more acceptable than recycling (which is not practicable for food waste). Policy JWP2 allows for other such instances where LCA demonstrates that waste is better managed at a lower level of the waste hierarchy.

⁴⁴ LCA is widely used to compare different waste management options, such as recycling, landfilling, composting, and incineration. LCA evaluates all aspects of the management option and compares the impacts on the environment of each aspect.

Policy JWP2: Safeguarding and Provision of Waste Capacity

Safeguarding existing capacity

A. Existing waste sites safeguarded from non-waste development are detailed in Appendix 2 (hereinafter referred to as "safeguarded waste sites").

B. Development that would lead to the loss and/or constrain current and future operation and development of safeguarded waste sites will not be permitted unless:

- 1. it can be demonstrated that equivalent, suitable, and appropriate compensatory capacity is provided within the borough where the site is located, or if this is demonstrated not to be possible, elsewhere in East London, or finally, elsewhere in London; or**
- 2. it has been demonstrated that the capacity of the facility to be lost is not required for the wider London Plan objective for net self sufficiency to be met.**

Overarching need for new capacity

C. Proposals for management of LACW and C&I waste which would result in waste management capacity exceeding the London Plan apportionment for East London and any proposals for the management of other waste streams, will not be permitted unless they would:

- 1. Result in waste being dealt with further up the hierarchy unless a life cycle assessment demonstrates that the method of management proposed is appropriate; and,**
- 2. subject to clause a. above, increase the throughput of an existing waste management facility; or**
- 3. consolidate waste management activities taking place at more than one site in East London at a single location (subject to cumulative impacts being acceptable and compliance with other policies in the Development Plan); and**
- 4. provide appropriate compensation for the loss of existing capacity elsewhere which is needed for London to be net self-sufficient in waste management overall.**

Waste hierarchy and location

D. Subject to Clause C above, proposals for waste management uses, including changes to the operation and layout of safeguarded waste sites, will be permitted where it is demonstrated that:

- 1. The waste to be managed could not practically be avoided or managed by a means further up the waste hierarchy unless a life cycle assessment demonstrates that the method of management proposed is appropriate; and,**
- 2. by-products and residues are minimised;**
- 3. any proposed decrease in the throughput of safeguarded waste sites would result in waste being managed further up the waste hierarchy.**
- 4. The proposal will:**
 - i. Minimise transportation of waste by being well located in relation to the sources of waste to be managed; and,**
 - ii. have good access to railheads and wharves and utilise non road modes of transportation or demonstrate why this would not be practicable; and,**
 - iii. Subject to criteria i., have good access to the road network and will not cause unacceptable adverse impacts on road safety or unacceptable adverse effects on the road network; and,**
 - iv. avoid creating an undue amenity impact on existing permitted non-waste uses, or land allocated, or land with permission for non-waste uses that could conflict with the proposed waste management use; and,**
 - v. for energy from waste facilities, be close to current or future heat users or networks and locations where resultant carbon may be captured for use; and,**
 - vi. for operations which generate bioaerosols (like composting), be situated at least 250m from sensitive receptors.**
- 5. In the following priority order, the proposal is situated:**
 - i. On a safeguarded existing waste site; or**
 - ii. where it is demonstrated that the use could not be located on a safeguarded existing waste site, in a Strategic Industrial Location (SIL); or**
 - iii. where it is demonstrated that the use could not be located in a SIL, in a Local Industrial Location (LIL) as appropriate.**

6. Were it is demonstrated that SIL and LIL is not available, and that the proposal is consistent with all other policies in the Development Plan, proposals may be permitted in the following locations:

- i. In or near safeguarded waste sites especially where this enables synergistic relationships between facilities; or,**
- ii. Local Plan allocations identified as suitable for industrial uses; or,**
- iii. previously developed, contaminated, or brownfield land not allocated for other non-industrial uses; or,**
- iv. redundant agricultural and forestry structures and their surroundings; and,**
- v. where composting or anaerobic digestion is proposed, farm properties where the resulting compost/digestate will be utilised on adjacent land.**

E. Proposals on greenfield land will not be permitted unless it can be demonstrated that the proposed waste management development is particularly needed in that location.

Monitoring indicators:

- Loss of existing capacity (tonnes/annum) and reasons for the loss (consistent or not consistent with Policy JWP2)
- Size/extent of existing waste sites (ha)
- Site details (based on Appendices 1 and 2)
- Waste management capacity total (tonnes/annum)
- Waste management capacity by type/position on hierarchy (disposal, recovery, recycling, preparation for re-use)

Policy JWP 3 Prevention of Encroachment

Purpose of Policy

To ensure that existing safeguarded waste management facilities are safeguarded from nearby development that may limit or hinder their operation.

- 6.47 Existing waste management facilities can be adversely affected by non-waste development in proximity to them, even where this does not involve direct loss of an existing site. Some non-waste uses, such as residential, can be sensitive to the impacts of waste management, including noise, odour and transport and are unlikely to be compatible with a nearby existing waste use. This can lead to unacceptable living conditions and resultant complaints, which may lead to constraints being imposed, such as restriction of operating hours or vehicle movements, which can reduce their current and future operations, with associated effects on available capacity.
- 6.48 The 'agent of change' principle in national policy (NPPF para 193) and the London Plan (Policy D13) reflects this and requires new development that may be sensitive to the impacts of existing businesses (particularly noise but also other nuisances) to mitigate this through design.
- 6.49 The distance from an existing waste site at which such issues may arise will depend on site specific circumstances, including existing mitigation measures employed by the operation. Waste use is subject to Environmental Permitting which includes measures to reduce and mitigate the potential effects of operations on amenity and the environment. In general, a 250m radius around safeguarded sites is an appropriate distance for consideration of potential effects of new development on safeguarding, and the sensitivity and compatibility of non-waste development.
- 6.50 Planning applications for development within 250m of safeguarded sites will need to demonstrate that impacts, e.g. noise, dust, light and air emissions, that may reasonably arise from the activities taking place at a safeguarded site would not be experienced at a level which was unacceptable to the occupants of the proposed development and that vehicle access to and from the facility would not be constrained by the development proposed. Measures to mitigate potential adverse effects should be incorporated into design and layout.

Implementation

- 6.51 The Boroughs will automatically scrutinise applications within 250m of existing waste sites to assess their potential effect on safeguarding of those sites and their capacity. Applicants for non-waste development within 250m of an existing waste site will be required to demonstrate that sensitivity to existing waste uses has been assessed and measures have been incorporated to ensure any unacceptable adverse effects are mitigated. Non waste development that is beyond 250m of an existing waste site but is of a nature that may make it especially sensitive to the operations of the waste site e.g. schools, hospitals, may also be required to demonstrate that they would be designed to avoid any unacceptable adverse impacts from the waste site.
- 6.52 In addition, it may be that development within 250m will be unlikely to be affected by an existing operation, depending on the type of activity, the type of waste, and the characteristics of the facility e.g. if it is enclosed within a building.

Policy JWP 3 Prevention of Encroachment

Proposals for non-waste development in proximity to safeguarded waste sites must demonstrate that they would not prejudice the current or future operation of the site, including through incorporation of measures to mitigate and reduce their sensitivity to operation of the safeguarded waste site through applying the 'Agent of Change' principle.

Monitoring indicators:

- Number of applications refused due to inadequate consideration of effects on safeguarded waste sites
- Complaints received relating to the operations of existing waste sites

Policy JWP4: Design of Waste Management Facilities

Purpose of Policy

To ensure waste management facilities are designed in a manner that protects and enhances host communities and the local environment which includes having regard to the need for climate change mitigation and adaptation.

- 6.53 It is not anticipated that there will be a need for new waste management capacity to be developed over the Plan period. However, there will continue to be investment in existing waste sites and facilities, and inevitable change in requirements over time, including some re-configuration and re-development.
- 6.54 Where new waste capacity is developed, it should be of high quality and contribute to the achievement of other national and development plan policies and objectives including reducing greenhouse emissions, efficient resource use, and protection of the environment, amenity and health. Such requirements are set out in the London Plan (Policy SI8). This applies not only to their operational impacts but also to the 'whole life-cycle' carbon emissions associated with construction materials.
- 6.55 The policies of the Plan focus any new development on existing waste sites, industrial and previously-developed land, and so adverse effects on soils and biodiversity are likely to be limited. Biodiversity gain (of at least 10%) is now a mandatory requirement and so applications will be required to be supported by a biodiversity assessment quantifying the existing pre-development value (previously-developed sites may host habitat of value), and consideration of how a minimum of 10% gain may be achieved (to be included within a Biodiversity Gain Plan).
- 6.56 Development design is crucial in managing and reducing adverse impacts on the environment and amenity. Enclosure of waste operations within a building, where operationally feasible, will be required as the best means of reducing noise, dust and odour. In exceptional cases, if it is shown that this is not a practicable option, other mitigation such as acoustic screening and operational management measures will be required. Re-configuration and intensification of existing waste sites may present opportunities to improve the design and performance of the facility. Environmental permitting provides the appropriate mechanism for control of operational impacts and should be assumed to operate efficiently though it is good practice for applicants to consider these matters in tandem with the planning application⁴⁵.

Implementation

⁴⁵ NPPF para 194

- 6.57 Applicants will be required to demonstrate that the design of development contributes to the achievement of policy objectives through preparation and submission of supporting evidence.
- 6.58 Planning applications should be supported by appropriate evidence e.g. a Climate Change Assessment, setting out measures considered, and incorporated, to improve energy efficiency and incorporate renewable and low carbon energy into the development and operation (including vehicles and transport) and achieve net zero⁴⁶, to reduce water consumption, and to adapt to the likely effects of climate change including extreme rainfall, drought and heatwave events.
- 6.59 As a minimum requirement, all major waste proposals must achieve net-zero carbon standards in alignment with London Plan Policy SI2. This can be accomplished by following the Mayor's energy hierarchy:
- Be Lean: Optimize energy use and manage demand during operation.
 - Be Clean: Utilize local energy resources efficiently and cleanly (including secondary heat).
 - Be Green: Maximize opportunities for on-site renewable energy production, storage, and usage.
 - Be Seen: Monitor, verify, and report on energy performance.
- 6.60 Additionally, major and minor proposals must achieve a minimum 35% reduction beyond Part L 2013 standards on-site.
- 6.61 Where requirements for net zero and other enhancements cannot be delivered on-site, applicants may be required to contribute to wider Borough schemes including for carbon and air quality offsetting.
- 6.62 While Biodiversity Gain Plans are required to be submitted and approved prior to commencement, it will often be sensible to prepare drafts of such plans beforehand for submission with the planning application.

⁴⁶ Consistent with London Plan Policy SI2B requirement for energy strategy

Policy JWP4: Design of Waste Management Facilities

- A. Proposals for waste management development will only be permitted which have been designed to address the following during their construction and operation (including associated vehicle movements):**
- 1. The emission of greenhouse gases is minimised by working towards net zero where practicable or, where this isn't practical, an appropriate contribution will be made to the relevant Borough's carbon offset fund;**
 - 2. measures to avoid unacceptable adverse impacts arising from noise, dust, litter, vermin, vibration, odour, bioaerosols, external lighting, visual intrusion, traffic or associated risks to the environment and health and wellbeing of local communities;**
 - 3. storage and management of waste (other than by landfill) within a building or an appropriate level of protection is provided with respect to impacts on the local environment and amenity;**
 - 4. efficient use of energy and water;**
 - 5. 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;**
 - 6. contributions to green and blue infrastructure, community benefits (including Public Rights of Way), and biodiversity enhancement and net gain where required.**
 - 7. protecting the best and most versatile agricultural land and soil quality more generally;**
 - 8. achievement of a BREEAM 'Excellent' rating or its equivalent unless it is demonstrated that this isn't practical;**
 - 9. preference being given to non-road transport where practicable; and,**
 - 10. measures to control and reduce vehicle emissions, through the use of low emission vehicles, installation of vehicle charging points and scheduling and management of vehicle routing.**
- B. Proposals for development must demonstrate that opportunities will be provided for residents of the Borough in which the proposal is located, to access employment in both the construction and operational stages in accordance with relevant Local Plan policy and related guidance.**
- C. Proposals that have an adverse effect on the integrity of sites designated as Special Areas of Conservation (SAC), Special Protection Areas (SPAs) or Ramsar sites will not be permitted, in line with The Conservation of Habitats and Species Regulations 2017 (as amended). Any mitigation required to avoid adverse effects on their integrity, for example due to pollution risk or disturbance, must be detailed in, and secured as part of the grant of planning permission.**

Monitoring indicators:

- Climate change assessments submitted with applications/applications permitted
- Reduction in carbon emissions from existing/re-configured waste sites committed to in climate change assessments
- Developments with operations enclosed within buildings

Policy JWP5: Energy from Waste

Purpose of Policy

To ensure energy from waste facilities are developed appropriately including utilisation of the maximum amount of energy produced.

- 6.63 Energy from Waste (EfW) generally takes the form of plants that incinerate waste and capture the heat to generate electricity. 'Surplus' heat may also be captured and utilised in heating, or cooling, of other development sometimes via the use of district heating schemes. Other forms of energy from waste such as pyrolysis and gasification are sometimes classed as 'Advanced Thermal Treatment'.
- 6.64 In terms of the waste hierarchy, EfW is classed as 'Other Recovery' and so, as a means of managing waste is generally less preferred than recycling but more preferred than disposal. To qualify as 'recovery', energy from waste plants must achieve a minimum level of energy efficiency as defined by 'R1' status⁴⁷. Without R1 status such plants are technically classed as disposal.
- 6.65 At present there are facilities in East London which manufacture refuse derived fuel from residual waste arising in East London for incineration in elsewhere. Indeed, the assessment of future waste management capacity requirements indicates that there is no clear need for EfW capacity to be developed in East London, and the Boroughs are currently unaware of any specific proposals for such capacity. However, this form of waste management has certain characteristics which need particular consideration and so Policy JWP 5 is included to address these matters in the event that an application for planning permission for such a facility was received.

⁴⁷ The 'R1' value relates to the energy efficiency factor of an incinerator which determines the extent to which an incinerator uses waste as a fuel to generate energy. The minimum R1 value is 0.65 for municipal waste incinerators permitted and in operation after 31 December 2008. For further information see <https://www.gov.uk/guidance/waste-incinerator-plant-apply-for-ri-status>

- 6.66 The burning of waste leads to the release of carbon dioxide, therefore, the more energy that can be recovered, the less carbon dioxide is emitted per energy unit. Policy SI 10 (E) 3) of The London Plan expects EfW facilities to meet a minimum performance of 400g of CO₂ equivalent per kilowatt hour of electricity produced (this is known as the 'Carbon Intensity Floor'). To maximise their efficiency, it's important for Energy from Waste facilities to be designed and located in such a way that excess heat can be fully exploited. This could be through district heating or by a nearby industry that can utilise the process heat. This kind of EfW is known as Combined Heat and Power (CHP). The Borough Local Plan include separate policies related to developments that deliver heat and cooling to buildings near a CHP facility.
- 6.67 The combustion of the biogenic elements of residual waste can generate low-carbon renewable energy, whereas burning non-biogenic waste, which includes materials like oil-based plastics, does not. The split of biogenic and non-biogenic materials in residual waste is currently thought to be roughly equal, but this is likely to shift during the Plan period as measures like separate food waste collection from households and businesses are put into place. However, non-biogenic waste generally has high calorific value and so may be required to ensure EfW plants are viable.
- 6.68 The Sixth Carbon Budget of the Government's Climate Change Committee suggests that all EfW facilities should implement carbon capture and storage by 2040 to meet the national goal of net-zero carbon emissions by 2050. Considering that EfW plants have a minimum lifespan of 30 years, any EfW development proposal must account for this, as retrofitting Carbon Capture, Utilization, and Storage (CCUS) may not be feasible once the plant is operational. The Committee's budget also indicates that the required carbon reduction in waste management is anticipated to result from increased recycling, which should not be undermined by the creation of extra EfW capacity.
- 6.69 EfW results in the production of solid ash residues. In the case of mass burn incineration two types of ash are produced: 'bottom ash' (heavy material that falls through the grate) and 'air pollution control (APC) residues' (ash collected by emission control systems). Bottom ash can easily be recycled into an aggregate and technologies are now being developed which utilise the APC residue in the manufacture of construction materials avoiding the need for landfill.

Implementation

- 6.70 To ensure that waste managed at EfW facilities is genuinely residual, proposals will need to be submitted with a Waste Hierarchy Statement. Such a statement should include:
- A list of the types of waste that would be managed at the facility and the reason why they cannot be managed further up the hierarchy;

- Details of the information that will be collected and retained that includes the sources of the waste after waste, that would be managed at higher levels of the hierarchy, has been removed;
- the arrangements to be put in place to ensure that as much waste, that could be managed at higher levels of the hierarchy, as is reasonably possible is removed from the waste to be managed at the facility, including any contractual measures put in place to secure the removal of such waste and that such waste is actually subject to management further up the hierarchy;
- the arrangements to be put in place to ensure that suppliers of waste work to a written environmental management system which includes establishing a baseline for the removal of waste that could be managed at higher levels of the hierarchy and working to specific targets for continuously improving and reporting on the percentage of such waste removed;
- the arrangements to be put in place for suspending and/or discontinuing supply arrangements from suppliers who fail to work to and report on compliance with any environmental management systems relating to waste reporting;
- the provision of an annual waste composition analysis of the waste received at the facility, with the findings submitted within one month of sampling being undertaken; and,
- the form of records to be kept for the purpose of demonstrating compliance with the matters above and the arrangements in place for provision of data and inspection of such records by the authorities.

Policy JWP5: Energy from Waste

Proposals for waste sites that use waste as a fuel source to produce energy will only be permitted where it is demonstrated that:

- 1. They qualify as recovery, rather than disposal, operations;**
- 2. the waste used as fuel will be waste that cannot be reused, recycled, or composted (as detailed in a Waste Hierarchy Statement);**
- 3. solid by-products (e.g. bottom ash) from the process will be recycled or used as raw materials; and,**
- 4. the use will be consistent with the proximity principle and not result in long distance vehicle movements;**
- 5. the facility will operate as a combined heat and energy plant such that the facility is as energy efficient as possible; and,**
- 6. the release of non-biogenic gaseous carbon emissions will be minimised, with mechanisms to capture for use and/or storage if use is not viable.**

Monitoring indicators:

- EfW capacity total (tonnes/annum)
- EfW capacity with heat utilisation
- Mass (g) of CO₂ equivalent per kilowatt hour of electricity produced
- EfW capacity with CCUS
- Production and management of ash

Policy JWP6: Deposit of Waste on Land

Purpose of Policy

To ensure that the landfill of non-inert waste is minimised (in accordance with the waste hierarchy) and that potential impacts of landfill, including any reworking and restoration and aftercare are properly managed.

Non-inert Waste Landfill

- 6.71 The deposit of non-inert waste on land for disposal may occur as backfilling of old mineral workings (landfill), or by deposit on land where the ground levels have not been artificially changed (landraise).
- 6.72 The disposal of waste is at the bottom of the waste hierarchy as the least preferred form of waste management, and non-inert waste should be sent to landfill only if it cannot be handled using methods higher up the Waste Hierarchy. In exceptional circumstances it may be demonstrated that there are certain types of waste (e.g. some hazardous wastes) which cannot practically be managed by any other means and so landfill⁴⁸ is the only option. These wastes are generated in comparatively limited amounts and are handled at specific landfill sites designated for hazardous waste or within specially constructed cells at non-inert landfill sites.
- 6.73 Non-inert landfill has been undertaken in East London at Rainham for some time, although it is anticipated that the current site will close during the Plan period. No specific provision for additional non-inert landfill is proposed in this Plan. In East London, there are currently no additional suitable voids created by mineral working which would be appropriate for non-inert waste landfilling. Therefore, any provision would involve the creation of new void space either by extracting material for other purposes like engineering, or by altering the land's natural contours, or a combination of these two methods. Policy JWP6 has been included in this Plan to help determine any proposals that might be received for new non-inert waste landfill capacity.

⁴⁸ Landfill should also be taken to mean land raise.

- 6.74 Landfilled non-inert waste usually results in the production of landfill gas (including methane) and leachate, both of which need proper containment and management to ensure they do not cause pollution of the environment or harm to human health. In light of this, the provision of new capacity is largely reliant on the presence of certain geological and hydrogeological conditions needed to minimise the risk of groundwater pollution. While being a potential pollutant, landfill gas can be beneficial when captured and put to use as a fuel to produce energy.
- 6.75 In addition to generating more void space, the reworking (or 'mining') of current or historical and restored landfill sites could potentially free up land for development and/or result in the extraction of recyclable or recoverable materials that were previously discarded. Older landfills might also require reworking to remove waste causing pollution and/or to prevent the uncontrolled release of pollutants. However, there are significant risks associated with the reworking of landfill sites as materials may have been disposed of without being recorded. After the closure of landfills, other developments, such as housing, may have taken place nearby, which could be sensitive to any modification activity, and the need to avoid negative impacts must be considered. Generally, the modification of landfills containing hazardous waste is not recommended due to the potential impacts on communities and the natural environment.
- 6.76 The restoration of landfill sites will offer opportunities to enhance the environment for example by providing wildlife habitats and/or recreational opportunities e.g. country parks.

Deposit of Inert Waste on Land for Beneficial Purposes

- 6.77 Some inert waste (mainly excavation waste e.g. soils and subsoils) is of a nature that lends itself for use in engineering operations such as landscaping and site restoration. To mitigate their impacts on landscape and visual amenity, voids created by mineral working frequently require restoration by backfilling.
- 6.78 In waste hierarchy terms, the beneficial use of inert waste on land is classed as 'other recovery'. Policy SI 7 of The London Plan expects that 100% of inert excavation waste will put to a beneficial use.

Implementation

Non-inert waste

- 6.79 Proposals for non-inert landfill will need to demonstrate that the waste to be disposed is genuinely residual (following removal of all material that cannot be recycled or recovered) and cannot be managed by a means further up the waste hierarchy. This will require the submission of a Waste Hierarchy Statement as detailed under Policy JWP5 above.
- 6.80 The need for non-inert landfill capacity must be justified by showing that there will be enough residual waste for disposal to ensure the site's timely completion. Non-inert landfill sites should be filled in sections and progressively restored for beneficial uses such as agriculture, recreation, or biodiversity.
- 6.81 Proposals for non-inert landfill development must demonstrate how landfill gas would be managed, and its potential for energy generation maximised, during the operational and aftercare phases.
- 6.82 Any proposals for the reworking of old landfill sites will require a site investigation to identify and evaluate the presence of hazardous materials. Proposals would need to address the potential for negative impacts related to the release of leachate and landfill gas, the handling of hazardous materials, and potential impacts on existing restoration and aftercare arrangements.
- 6.83 Proposal for restoration should consider whether habitats can be protected and enhanced, and where possible contribute to delivery of Local Nature Recovery Strategies.
- 6.84 The provisions of this policy will equally apply to proposals to extend existing non-inert landfill sites.

Inert Waste

- 6.85 Proposals involving the deposit of inert waste on land solely for disposal are not acceptable. Proposals will need to demonstrate how the inert waste will be used in a manner that results in a beneficial outcome. To qualify as recovery (rather than disposal), proposals need to demonstrate how the project will incorporate the least possible amount of inert waste material required to accomplish the intended result.
- 6.86 Proposals will need to demonstrate that the inert waste to be deposited consists of material that could not be recycled, for example it does not contain materials such as brick and concrete that could be used as a recycled aggregate. The deposit of hard inert construction waste e.g. brick and concrete for use in hardstandings and site roads is acceptable as material used in this way is considered to have been recycled for use as an aggregate.

6.87 In some cases, the need for the deposit of inert material may have been identified as part of a construction project and suitable material excavated as part of a different project may be used to fulfil that need. In such cases the “The Definition of Waste: Development Industry Code of Practice” (DoWCoP) may apply which would mean that the excavated material is not defined as waste and its deposit would therefore not be subject to Policy JWP6.

Policy JWP6: Deposit of Waste on Land

A. Proposals for the use of land for the disposal of non-inert waste to land will only be permitted where the following is demonstrated:

- 1. The waste cannot be practically managed by other means further up the waste hierarchy; and**
- 2. there is a management plan and end date for the operation, ensuring the timely completion and restoration of the site; and**
- 3. fugitive emissions of landfill gas are minimised and energy recovery is maximised; and**
- 4. a management system demonstrating how any leachate will be managed is provided; and,**
- 5. restoration and aftercare of the site will be of a high quality that ensures demonstrable benefits to the environment and local communities.**

B. Proposals for the permanent deposit of inert waste on land will be permitted where it is demonstrated that:

- 1. the waste will be deposited for a beneficial purpose, such as restoring landfill sites/mineral workings, rather than as part of a disposal operation; and**
- 2. if the waste is intended for use in an engineering operation (other than landfill site restoration), it must be demonstrated that there is no local demand for its use in mineral working restoration; and,**
- 3. the minimum amount of waste necessary will be used to achieve the intended benefit.**

C. Proposals for the reworking of old landfill sites will be permitted provided they meet the criteria in Part A above, and that:

- 1. Hazardous waste was not disposed at the site; and,**
- 2. any materials extracted will be managed as far up the waste hierarchy as practicable.**

Monitoring Indicators

- Non-inert landfill capacity
- Type and quantity of non-inert waste landfilled
- Landfill gas production and related energy production
- Quantity of inert excavation waste deposited for beneficial use

6. Policies Map

The Policies Map for the Plan comprises the maps shown in Appendix 2 of existing waste sites which are proposed for safeguarding.

7. Glossary

A	
Advanced Thermal Treatment (ATT)	Technologies that employ pyrolysis or gasification to process residual wastes. ATT facilities produce a gas (usually for energy recovery) and a solid residue which can often be recycled for secondary use.
Agent of change	A developer proposing new development within an area that is of such a nature that it might be impacted by existing development or impact on that development (e.g. housing proposed within an industrial area). The 'agent of change principle' sets out a position that an applicant for planning permission (i.e. the 'agent of change') is responsible for managing the impact of that change.
Aggregates and soils recycling	Rubble, hardcore and soil from construction and demolition projects can often be used on-site in place of primary aggregate. Alternatively, it can be taken to purpose-built facilities for crushing, screening and re-sale.
Agricultural waste	This mostly covers animal slurry/by products and organic waste, but also scrap metals, plastics, batteries, oils, tyres, etc. The regulations for this waste stream mean farmers cannot manage all of their own waste within the farm (historically the case). The agricultural waste regulations affect whether or not waste can be burnt, buried, stored, used on the farm or sent elsewhere.
Amenity	Amenity is a broad concept and is not specifically defined in Planning legislation. It is a matter of interpretation by the local planning authority and is usually understood to be the pleasant or normally satisfactory aspects of a location which contribute to its overall character and the enjoyment of residents, business users and visitors. Amenity can be adversely affected by development impacts such as noise, dust, odour and visual change.
Anaerobic Digestion (AD)	A process comprising the breakdown of organic material in the absence of air. It is carried out in an enclosed vessel and produces methane that powers an engine used to produce electricity. The useful outcomes of AD are electricity, heat, and the solid material left over called the digestate. Both the heat and the electricity can be used or sold if there is a market and the digestate can either be sold or used for agricultural purposes (land spread). AD can only be used for some biodegradable parts of the waste stream e.g. sewage sludge, agricultural waste and some organic municipal and industrial waste.
Annual Monitoring Report (AMR)	The AMR reports progress in meeting the milestones of the adopted Local Development Scheme and monitors the impact of policies when the plans are adopted. The AMR is formally known in legislation as the 'Authority Monitoring Report'.
B	

Best and most versatile agricultural land	Land categorised as being of grades 1, 2 or 3a under the Agricultural Land Classification system.
Bioaerosols	Airborne material containing biological material from animals, plants, insects or microorganisms. They are produced wherever biological material is being processed, milled, or chopped and are commonly associated with organic waste composting facilities
Biodegradable waste	Any waste that is capable of undergoing natural decomposition, such as food and garden waste, paper and cardboard.
Biodiversity	The variety of all life on earth (mammals, birds, fish, invertebrates, plants, etc). In planning, it is often used to refer to nature conservation.
C	
Catchment	The geographical area served by a particular waste management activity. This will vary according to the adequacy of transport links and the economics of transporting different types of waste
Circular Economy	A circular economy is an alternative to a traditional linear economy (make, use, dispose) in which we keep resources in use for as long as possible, extract the maximum value from them whilst in use, then recover and regenerate products and materials at the end of each service life
Climate change adaptation	Adjustments to natural or human systems in response to actual or expected climatic factors or their effects, including from changes in rainfall and rising temperatures, which mitigate harm or exploit beneficial opportunities
Combined heat and power facilities (CHP)	CHP plants generate electricity as well as providing local heat, and sometimes even cooling, to various types of users.
Commercial and Industrial (C & I) Waste	Waste generated by business and industry, for example: wholesalers; catering establishments; shops and offices; factories and industrial plants. Generally, businesses are expected to make their own arrangements for the collection, treatment and disposal of waste generated by their actions. Waste from smaller businesses where local authority collection arrangements have been set up is considered as LACW.
Composting	The breaking down of organic matter aerobically into a stable material that can be used as a fertiliser or soil conditioner. This can be undertaken commercially in open air (in 'windrows') or inside containment ('in-vessel'), and at a smaller scale by households at home or collectively by communities.
Conservation Area	An area designated by the LPA because of its special architectural or historic interest, the character and appearance of which it is desirable to preserve or enhance.
Contaminated Land	Contaminated land is land that has been polluted or harmed in some way making it unfit for safe development and usage unless cleaned.
Construction,	The combined waste produced from earth moving, demolition of buildings/structures and construction of new buildings/structures. It

Demolition and Excavation (C, D & E) Waste	mostly comprises brick, concrete, hardcore, subsoil and topsoil, but can also include timber, metals and plastics.
D	
Decentralised Energy	Local renewable energy and local low-carbon energy usually but not always on a relatively small scale that may encompass a range of technologies.
Development Plan	The development plan has statutory status as the starting point for decision making. Section 38(6) of the Planning & Compulsory Purchase Act 2004 and Section 70(2) of the TCPA 1990 require that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. For waste proposals within London the development plan comprises the London Plan, Borough Local Plans and DPDs, joint Waste Plans as well as neighbourhood plans.
Disposal	Disposal means any waste management operation which is not 'recovery' even where the operation has a secondary consequence, the reclamation of substances or energy
Dry Mixed Recyclables (DMR)	Typically composed of: Paper - e.g. dry paper waste, newspapers, office paper and magazines Cardboard – e.g. corrugated cardboard, cereal boxes and card Metal cans – e.g. clean, empty drinks cans and food tins Plastic – e.g. packaging films, rinsed out milk bottles, empty drinks bottles & clean salad trays, rinsed out margarine tubs & microwaveable meal trays
E	
Energy from Waste (EfW)	The process of managing waste to generate energy - usually in the form of electricity or heat usually by means of thermal treatment. Many wastes are combustible, with relatively high calorific values – this energy can be recovered through processes such as incineration with electricity generation, gasification or pyrolysis. EfW generally falls within the 'other recovery' category in the waste hierarchy.
Energy Recovery	Covers a number of technologies, though most energy recovery is through incineration. Many wastes are combustible, with relatively high calorific values – this energy can be recovered through processes such as incineration with electricity generation (and where possible heat recovery), gasification or pyrolysis.
European Site	Sites designated for their nature conservation importance (under the EC Birds Directive and EC Habitats and Species Directive) and protected by the Habitats Regulations. This includes Special Protection Areas (SPAs) for birds, and Special Areas of Conservation (SACs) under the Habitats Directive.
G	
Gasification	A technology that converts carbon-containing material (including waste) into gas (mostly methane) at high temperature. The gas can either be

	used as a substitute for natural gas or used to power electricity generation.
Green Belt	A national planning designation, which aims to prevent urban sprawl by keeping land around certain cities and large built-up areas permanently open or largely undeveloped, defined more fully in the NPPF.
Greenfield land	Land that has not been developed. Not to be confused with Green Belt.
Greenhouse gas (GHG)	GHGs trap heat in the atmosphere. Many gases exhibit greenhouse properties, including carbon dioxide, methane, water vapour, and nitrous oxide.
Green and blue infrastructure	A network of multi-functional green space or wetlands and waterways, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.
H	
Habitats Regulation Assessment (HRA)	An assessment under the Habitats Regulations to test if a plan or project could significantly harm the designated features of a 'Habitat site'. Proposals affecting proposed SACs, potential SPAs, Ramsar Sites (wetlands of international importance) also require HRA.
Hazardous waste	Controlled waste that is dangerous or difficult to treat, keep, store or dispose of, so that special provision is required for dealing with it. Hazardous wastes are the more dangerous wastes and include toxic wastes, acids, alkaline solutions, asbestos, fluorescent tubes, batteries, oil, fly ash (flue ash), industrial solvents, oily sludges, pesticides, pharmaceutical compounds, photographic chemicals, waste oils, wood preservatives. If improperly handled, treated or disposed of, a waste that, by virtue of its composition, carries the risk of death, injury or impairment of health, to humans or animals, the pollution of waters, or could have an unacceptable environmental impact. It should be used only to describe wastes that contain sufficient of these materials to render the waste as a whole hazardous within the definition given above. Defined in the Hazardous Waste (England and Wales) Regulations 2005 (as amended).
Heritage assets	A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Designated Heritage assets are the most protected and include listed buildings, scheduled ancient monuments, registered parks and gardens, registered battlefields, and World Heritage Sites.
Household waste	This is waste from a domestic property, caravan, and residential home or from premises forming part of a university or school or other educational establishment and premises forming part of a hospital or nursing home.
I	

Incineration	This is the controlled burning of waste usually in purpose-built plant and is subject to stringent standards for emissions. Ash residues are often landfilled but bottom ash may also be used in building materials. Incineration that involves the capture of energy falls within the category 'Energy from Waste'.
Inert waste	Inert waste means waste that does not undergo any significant physical, chemical or biological transformations when untreated. Inert waste will not dissolve, burn or otherwise physically or chemically react, biodegrade or adversely affect other matter with which it comes into contact in a way likely to give rise to environmental pollution or harm human health. The total leachability and pollutant content of the waste and the ecotoxicity of the leachate must be insignificant, and in particular not endanger the quality of surface water and/or groundwater. Non-inert (including non-hazardous) waste is all other waste other than as identified above.
L	
Landfill and landraise	The term landfill relates to waste disposal mainly below ground level (by filling a void) whereas landraise refers to waste disposal mainly above pre-existing ground levels. They are generally the least preferred method of waste management in the waste hierarchy.
Listed buildings	A building of special architectural or historic interest in a list compiled by the Secretary of State under the Planning (Listed Buildings & Conservation Areas) Act 1990, thereby having statutory protection. Listing of buildings includes the interior as well as the exterior of the building, and any nearby buildings or permanent structures within the curtilage (e.g. wells, outbuildings). Historic England is responsible for designating buildings for listing in England.
Local Authority Collected Waste (LACW)	All waste collected by a local authority. It includes household waste and business waste and construction and demolition waste where collected by the local authority. LACW is the definition that is used in statistical publications produced by Defra, which previously referred to 'municipal' waste.
Local Development Scheme	The timetable for the preparation of Local Plans.
Local Nature Reserves (LNRs)	An area designated by local authorities, in consultation with Natural England under the National Parks & Access to the Countryside Act 1949, to provide opportunities for educational use and public enjoyment, in addition to protecting wildlife or geological and physiographical features of special interest.
Local Planning Authorities (LPAs)	The public authority whose duty it is to carry out specific planning functions for a particular area.

Local Plan	A plan for the future development of a local area, drawn up by the LPA in consultation with the community. In law this is described as the development plan documents adopted under the Planning & Compulsory Purchase Act 2004. Current core strategies or other planning policies, which under law would be considered to be DPDs, form part of the Local Plan. The term includes old policies which have been saved under the 2004 Act.
Local roads	These are taken to include: A roads (not including trunk roads and primary routes). B roads – which are roads intended to connect different areas, and to feed traffic between A roads and smaller roads on the network. Classified unnumbered roads which are smaller roads intended to connect together unclassified roads with A and B roads, and often linking a housing estate or a village to the rest of the network. Similar to ‘minor roads’ on an Ordnance Survey map and sometimes known unofficially as C roads. Unclassified roads which are local roads intended for local traffic. The vast majority (60%) of roads in the UK fall within this category.
M	
Mass burn incinerator	Large, complex facilities which are used to burn waste at very high temperatures.
N	
National Planning Policy Framework (NPPF)	The NPPF sets out the Government’s planning policies for England and how these are expected to be applied.
National Planning Policy for Waste (NPPW)	Adopted in October 2014, this document sets out the Government's waste planning policies for England.
Net self-sufficiency	To provide enough waste management facilities to manage the equivalent amount of waste arising within the Plan area.
Non-inert waste	A waste that will biodegrade or decompose, releasing environmental pollutants. Examples include: wood and wood products, paper and cardboard, vegetation and vegetable matter, leather, rubber and food processing wastes.
O	
Open space	All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.

Other Recovery	Other recovery is not specifically defined in the revised Waste Framework Directive, although 'energy recovery' is referenced as an example. It can be assumed by their exclusion in the definition of recycling, that processing of wastes into materials to be used as fuels or for backfilling can be considered 'other recovery'.
P	
Plan area	The geographical area covered by the East London Joint Waste Plan i.e. the area covered by the London Boroughs of Barking and Dagenham, Havering, Newham, and Redbridge
Pollution	Anything that affects the quality of land, air, water or soils, which might lead to an adverse impact on human health, the natural environment or general amenity. Pollution can arise from a range of emissions, including smoke, fumes, gases, dust, steam, odour, noise and light.
Planning Practice Guidance (PPG)	Government guidance intended to assist practitioners in interpreting national planning policy.
Public Rights of Way (PRoW)	PRoW are paths that all members of the public can legally use: footpaths – for walking, running, in mobility scooters or powered wheelchairs; bridleways – for walking, horse riding, bicycles, mobility scooters or powered wheelchairs; restricted byways – for any transport without a motor and mobility scooters or powered wheelchairs; byways open to all traffic – for any kind of transport, including cars (but mainly used by walkers, cyclists and horse riders).
Pyrolysis	The combustion of waste in the absence of oxygen, resulting in the production of liquid, gas, char, whose after-use depends on the type of waste incinerated.
R	
Receptor	Existing land uses that could be affected by the proposed development at the site allocations. Some examples of receptors include: Residential dwellings; hospitals; commercial premises; and, footpaths.
Recovery	Recovery means any waste management operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy.
Recovery facilities	A facility that recovers value, such as resources and energy, from waste prior to disposal, includes energy from waste, biological treatment and physical treatment facilities.
Recovery to Land	This is considered to be the use of inert material for a genuine beneficial use such as landscape and/or amenity improvements.

Recycling	Recycling means any recovery operation by which waste materials are reprocessed into products, materials or substances whether for the original or other purposes. Includes the reprocessing of organic material but not energy recovery or the reprocessing into materials that are to be used as fuels or for backfilling operations.
Renewable and low carbon energy	Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass, ground and air, and geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).
Residual waste	The elements of the waste streams that remain following recovery operations. Residual waste usually needs to be managed by disposal e.g. landfill.
Restoration	Process of returning a site or area to a desirable condition following waste management use or mineral extraction.
Reuse	Re-using products and materials as part of the circular economy, avoiding generation of waste and the need for re-processing or disposal. The top priority on the waste hierarchy. The commercial sector can reuse products designed to be used a number of times, such as reusable packaging. Householders can buy refillable containers or reuse plastic bags. Reuse contributes to sustainable development and can save raw materials, energy and transport costs.
S	
Safeguarding	The process of protecting sites and areas that are used or have potential for waste development from other forms of development that may prevent or constrain such uses in the future
Sites of Special Scientific Interest (SSSI)	A site which is of special interest by reason of any of its flora, fauna, or geological or physiographical features and has been designated by Natural England under the Wildlife and Countryside Act 1981.
Special Areas of Conservation (SAC)	SACs are designated under the retained EU Habitats Directive. SACs are areas which have been identified as best representing the range and variety within the European Union of habitats and (non-bird) species listed on Annexes I and II to the Directive.
Special Protection Areas (SPAs)	A site designated under the retained EU Directive on the Conservation of Wild Birds (2009/147/EC) to protect wild birds, their eggs, nests and habitats.
Strategic Industrial Locations	Sites identified (including in the London Plan, Policy E5) as critical to the economy and which can accommodate concentrations of industrial, logistics and related activities and land uses.

Sustainability Appraisal (SA)	A process of analysing and evaluating the environmental, social and economic impacts of the plan or programme, often in conjunction with an SEA.
Sustainable Waste Management	Waste management in line with the waste hierarchy in which waste generation is avoided as far as possible, materials and products are re-used, recycled or have as much value recovered from them as possible, before disposal is considered. This is delivered through product design, behaviour and choices, and through provision of sufficient waste management capacity of the required type, where possible proximate to where waste arises.
Supplementary planning documents	Planning documents which expand upon policy or provide further detail to policies in development plan documents, but do not have development plan status
T	
Thermal treatment	A waste management operation that involves the use of heat to process waste and generally involves the production of energy. Incineration is a thermal treatment but 'Energy from waste' is the term more generally used to describe waste management involving incineration.
Tonne	Metric Ton. 1000 kilos, equal to 2004 lbs.
tpa	Tonnes per annum
mtpa	Million tonnes per annum.
W	
Waste	Any substance or object that the holder or the possessor either discards or intends or is required to discard.
Waste arisings	This is the amount of waste produced in a given area during a given period of time, usually reported as tpa.
Waste Disposal Authority (WDA)	A local authority responsible for managing the waste collected by the collection authorities and the provision of household waste recovery centres.
Waste Hierarchy	A conceptual framework for management of waste, which ranks waste management options according to what is best for the environment. The most preferable option is preventing waste generation as far as possible, followed by preparing materials for re-use, recycling and composting, recovering as much value from them as possible including energy. Disposal to landfill or incineration without energy recovery is the least-preferred option.

Waste Planning Authority (WPA)	The local authority responsible for waste development planning and control. These are unitary authorities, including National Park Authorities, and county councils in non-unitary areas.
Waste streams	Waste produced by different sectors and with different composition such as 'commercial and industrial' or 'hazardous'.
Waste transfer	Process where waste is taken from waste producers, and taken for treatment, recycling and/or disposal.
Wastewater	Water discharged to sewers and includes waste in liquid form as well as surface water runoff. This raw wastewater is collected in sewers and transferred to wastewater treatment works where it is treated in such a way that produces largely reusable sewage sludge and effluent that is discharged to watercourses.

8. Appendices

Appendix 1 – List of Safeguarded Sites

London Borough of Barking and Dagenham

Location	Operator	Facility Type
2 Choats Road	S U C Exc Uk Ltd	Physical Treatment
12-14 River Road	E L G Haniel Metals Ltd	Metal Recycling
60 River Road	Cory Barking Operations Ltd	Non-Haz Waste Transfer
72-76 River Road, Docklands Wharf Transfer Station	Multi Services Kent Limited	Haz Waste Transfer
75 - 77 Chequers Lane	R White Waste Management Ltd	Haz Waste Transfer
Alfred's Way, Barking	Creek Metals Limited	Metal Recycling
Barking Transfer Station	Shukco/Suez	Non-Haz Waste Transfer
Barking Waste Transfer and Recycling Facility	Biffa Waste Services Ltd	Non-Haz Waste Transfer
Frizlands Lane Reuse & Recycling Centre	ELWA/Renewi	Non-Haz Waste Transfer
Hitch Street AD Plant	ReFood UK Limited	Anaerobic Digestion
Media Park	SH & WS Company Limited	Non Haz Waste Transfer / Treatment
Old Bus Depot, Perry Road	Manns Waste Management Ltd	Non Haz Waste Transfer / Treatment
Organic Waste Treatment Facility, Choats Road	East London Biogas Opco limited	Anaerobic Digestion
Pinns Wharf	Corbyn Construction Ltd	Storage - Metal Reprocessing
Unit A 13 River Road	Abbott Car Care	Vehicle depollution facility
Units 4-10 Atcost Road	Wastecare Limited	Temporary storage installation

London Borough of Havering

Location/Site Name	Operator	Facility Type
All Seasons Nursery	M R Services (Essex) Ltd	Physical Treatment
Frog Island Waste Management Facility	Shanks/Renewi	Biological Treatment
Gerpins Lane Reuse & Recycling Centre	ELWA/Renewi	CA Site
Grove Farm, Brook Street,	R J Skip Hire Ltd	Non-Haz Waste Transfer

Brentwood CM14 5NG		
Rainham MRF Coldharbour Lane	Veolia	Material Recycling Facility
Salamons Way, Rainham	Craven, Peter	Non-Haz Waste Transfer
Silt Lagoons, Rainham and Wennington Marshes	Land & Water Remediation Limited	Non-Hazardous LF

London Borough of Newham

Location/Site Name	Operator	Facility Type
32 Stephenson Street	Powerday Plc	Transfer
Bywaters Recycling & Recovery Centre, Unit J Prologis Park	Bywaters (Leyton) Ltd	Transfer
Canning Town Depot	G B N Services Limited (formerly Orion)	Treatment
Cody Road, Canning Town,	The Remet Company Limited	Metal Recycling
EMR Silvertown, Unit 6, Standard Industrial Estate	EMR	Metal Recycling
Jenkins Lane Reuse and Recycling Centre	ELWA/Shanks/Renewi	Household Waste Amenity Site
Jenkins Lane Waste Management Facility	Renewi UK Services Limited	Treatment
Knights Road, E16 2AT	JRL Environmental Limited	Physical Treatment
London Teleport Site Pier Road, Newham	The Metal Recycling Company	Metal Recycling
Marshgate Sidings	D B Schenker/D B Cargo	Treatment
Marshgate Sidings	S Walsh & Son Limited	Transfer
Plaistow Wharf	Keltbray Environmental Ltd	Non-Haz Waste Transfer
Silvertown Recycling Centre	Harrow Green Ltd	Physical Treatment

London Borough of Redbridge

Location/Site Name	Operator	Facility Type
1a Wanstead Park Road	Kwik Body Works Ltd	Vehicle depollution facility
7 Juniper Road	Dial - A - Spare Ltd	Car Breaker
Chigwell Road Reuse and Recycling Centre	ELWA/Renewi	CA Site
GB Macks 45-47, Roebuck Road, Hainault Business Park	G & B Compressor Hire Ltd	Non-Haz Waste Transfer
Iford Recycling Centre	ELWA/Renewi	CA Site
Ley Street Depot	Redbridge London	Non-Haz Waste Transfer

	Borough Council	
Unit U, Pegasus Works	N R M Metal Recycling Limited	Metal Recycling
Woodford Service Centre	Rentokil Initial U K Ltd	Clinical Waste Transfer

Appendix 2 – Maps of Safeguarded Sites

See separate document

Appendix 3 – Sites with Potential for Release from Safeguarding

Borough	Site Name	Reason	Assessed Capacity			Planning Status
			Apportioned Waste	C, D & E Waste	Hazardous	
Barking & Dagenham	Old Bus Depot, Perry Road (Manns Waste Management)	City Market relocation	22,128	56,647	0	Permanent Permission for Materials Reclamation Facility
	Barking Waste Transfer and Recycling Facility (Biffa)	Located within Castle Green site allocation subject to masterplan	108,712	0	0	Permanent Permission for Waste Transfer Station (89/00279/TP)
	Alfred's Way, Barking (Creek Metals)	As above	0	27,091	0	Change of use including end of life vehicle scrapping (2013)
Havering	Off Crow Lane, Romford (Crow Metals)	Potential for re-location for longer term regeneration aims of the area	25,436	245	4,320	Permanent Permission for recycling, processing, storage and distribution of scrap metal (excluding car stripping and breakages) (P0962.11)
	Land At York Road, Rainham (Kilnbridge Construction Services Ltd)	Potential for re-location for longer term regeneration aims of the area	0	44,593	0	Permanent Permission as use as Recycling and Waste Transfer Facility & Depot (P1524.00)
Redbridge	Ilford Recycling Centre (Renewi UK Services Limited)	May not be required for ELWA contract	20,000	0	0	Permanent Permission (1847/94)
Totals			176,276	128,576	4,320	

Appendix 4 – Replacement of Policies in the East London Waste Plan

The table below shows how it is proposed that policies in the 2012 East London Waste Plan are replaced by those in the East London Joint Waste Plan

East London Waste Plan (2012) Policies		Proposed Replacement Policies in the East London Joint Waste Plan	
W1	Sustainable waste management	JWP1	Circular Economy
W2	Waste Management Capacity, Apportionment & Site Allocation	JWP2	Safeguarding and Provision of Waste Capacity
		JWP3	Prevention of Encroachment
W3	Energy recovery facilities	JWP5	Energy from Waste
W4	Disposal of inert waste by landfilling	JWP6	Deposit of Waste on Land
W5	General Considerations with regard to Waste Proposals	JWP4	Design of Waste Management Facilities