

Greater London Authority  
City Hall  
The Queen's Walk  
London  
SE1 2AA

28/02/2018

Dear Mr Mayor,

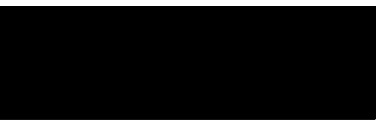
**Re: Draft London Plan consultation response**

Please find enclosed the East London Waste Authority's (ELWA) response to the consultation on your draft London Plan, with particular focus on areas relating to waste management.

ELWA is a statutory Waste Disposal Authority providing waste disposal functions for the London Boroughs of Barking & Dagenham, Havering, Newham and Redbridge. This represents a population of over 1,000,000 across approximately 400,000 households. We are currently responsible for around 450,000 tonnes of household and commercial waste annually.

ELWA supports the response provided by the London Waste Planning Forum (LWPF) and asks you to consider our comments as additional to those.

Yours sincerely,

  
Sharon Lea  
Interim Managing Director

## **DRAFT LONDON PLAN**

### **Consultation Response from the East London Waste Authority**

#### **Chapter 4 – Housing**

##### Policy H1

- ELWA considers the housing targets to be very challenging for its Constituent Councils and from a waste disposal perspective additional properties on this scale will significantly increase the waste tonnage to be managed. The Authority will plan accordingly in light of these targets and trusts that the Mayor will support the provision of appropriately specified facilities to meet demand.
- The Mayor has set out challenging recycling targets in his draft London Environment Strategy (LES). London will be better placed to meet or contribute towards these targets if provision is made within new housing stock for waste and recycling facilities/containment – adequate space and ease of use are key. We are pleased to see this addressed at 3.1.8 (Policy D1 - Chapter 3) and elsewhere but more detail could be provided on how this will be enforced/applied at the planning stage of new developments.

#### **Chapter 9 - Sustainable Infrastructure**

##### Policy S13

- Although it is referenced, more weight could be given to the option of sourcing heat through Energy from Waste plants as this would tie in to other policies on managing waste within London.

##### Policy S17

- ELWA has previously given views regarding the Mayor's ambitious recycling targets in response to the draft London Environment Strategy consultation. To repeat, the Authority has concerns over whether those targets can actually be achieved without support above and beyond what is set out in the Strategy or the Plan, and questions the perceived wisdom of tonnage recycled being the primary measure of performance.
- Boroughs with historic and current low levels of recycling due to lack of garden waste, a predominance of either high rise or terrace properties and transient communities would need financial support to deliver a step change in recycling levels together with national direction on collection policies.
- The Plan acknowledges that CD&E waste data is unreliable or unavailable but misses the opportunity to address this and potentially increase

London's recycling performance through improved scrutiny/monitoring of this waste stream.

Policy S18

- The requirement for waste to be managed within London is noted. The Authority accordingly expects support from the Mayor in meeting this requirement.
- Referring again to comments previously made in response to the draft LES, Energy from Waste should be treated more positively as a legitimate and necessary means of waste disposal rather than an undesirable last option.
- Regarding apportionment targets, there need to be clear incentives for Boroughs to work together on this. Simply 'encouraging' collaboration would be insufficient to make any difference. Waste projections do need to be accurate as East London is already densely populated and has ambitious housing growth plans - it would be detrimental for Boroughs to have to identify more land for waste planning purposes than is really required to meet apportionment targets.