



## **Statement of Common Ground**

**Between**

**BeFirst on behalf of the London Borough of Barking and Dagenham,  
the London Borough of Havering, the London Borough of Newham  
and the London Borough of Redbridge ('the East London Boroughs')**

**And**

**Oxfordshire County Council**

**Stage: East London Joint Waste Plan Regulation 19 Submission Plan**

**Date Made: January 2026**

**Version: For Signature**

## **1. Introduction**

- 1.1. It is a statutory requirement for each area Waste Planning Authority 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. The London Borough of Barking and Dagenham, the London Borough of Havering, the London Borough of Newham and the London Borough of Redbridge (‘the East London Boroughs’) are currently updating the East London Waste Plan (2012) by preparing a replacement East London Joint Waste Plan.
- 1.2. A ‘Statement of Common Ground’ (SoCG) is a written record of the progress made by plan-making authorities during the process of planning for strategic cross-boundary matters. It documents the strategic matters where effective cooperation has led to cross-boundary challenges and opportunities being identified, whether there is agreement between bodies in how these should be addressed, and how the strategic matters have evolved throughout the plan-making process. It is also a way of demonstrating at examination that plans are deliverable over the plan period, and based on effective joint working across local authority boundaries.
- 1.3. This SoCG addresses the key strategic matter of waste management between the signatories, BeFirst on behalf of the London Borough of Barking and Dagenham, the London Borough of Havering, the London Borough of Newham and the London Borough of Redbridge (‘the East London Boroughs’ or ‘ELBs’) and Oxfordshire County Council (OCC) relevant to the preparation of the East London Joint Waste Plan (ELJWP) Regulation 19 Submission Plan and its progression to public Examination.
- 1.4. Strategic matters overseen by other organisations may be addressed in separate SoCGs as appropriate. Where key strategic issues overlap between different organisations with whom the ELBs have signed SoCGs, these interrelationships are summarised in the Duty to Cooperate Statement of Compliance Submission Version (2025).
- 1.5. The document is intended to be ‘live’, updated as circumstances change. Please see the Governance Arrangements section of the statement for more details.

## **2. Parties Involved**

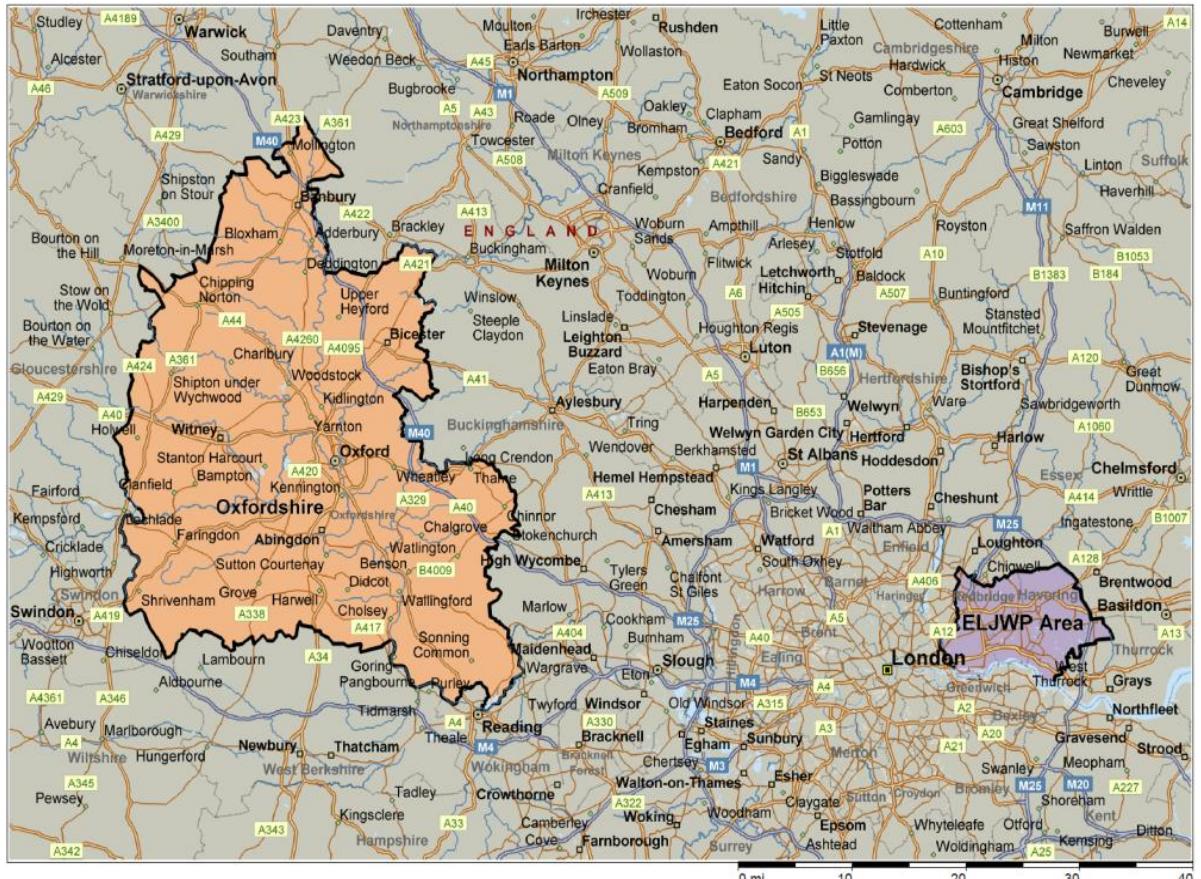
- 2.1. Barking and Dagenham Council, the Local Planning Authority for the London Borough of Barking and Dagenham, an outer London Borough in East London. Barking and Dagenham covers an area of approximately 3,611 hectares and is bordered by the London Boroughs of Newham, Redbridge and Havering, and sits across the River Thames from the Royal Borough of Greenwich and the London Borough of Bexley.
- 2.2. Newham Council, the Local Planning Authority for the London Borough of Newham, an inner London Borough in East London situated between three rivers: the Lea to the west, Thames to the south and Roding to the east. London Borough of Newham is bordered by several other London Boroughs, including LBTH, Hackney, Waltham Forest, Redbridge, and Barking and Dagenham. Across the River Thames lies the Royal Borough of Greenwich. Newham’s administrative boundaries also contain 65% of the London Legacy Development Corporation (LLDC) area, which acted as the planning authority for the Queen Elizabeth Olympic Park and surrounding area until the return of planning powers to the boroughs on 1<sup>st</sup> December 2024.

Newham contains three Opportunity Areas: the Olympic Legacy (which also includes parts of the other Host Boroughs) Poplar Riverside (which crosses the boundary with LBTH) and Royal Docks and Beckton, which is also the home of London's only Enterprise Zone and Europe's largest regeneration area.

- 2.3. Redbridge Council, the Local Planning Authority for the London Borough of Redbridge, an outer London borough in the northeast, extending approximately 22 sq. miles. The borough sits entirely within the M25, north of the river Thames, and the City of London is approximately seven miles to the west. Redbridge shares boundaries with four other London boroughs: Waltham Forest (to the west), Newham (to the south), Barking and Dagenham (to the south-east) and Havering (to the east). Redbridge also adjoins the County of Essex (to the north-west) and Epping Forest District (to the north). Ilford Metropolitan Town Centre is the borough's primary centre, which lies within the south of the borough, and is designated as an Opportunity Area in the 2021 London Plan. Ilford Town Centre is also located within the Crossrail corridor, which also includes the smaller centres of Seven Kings, Goodmayes, and Chadwell Heath. All four centres have Elizabeth Line railway stations.
- 2.4. Havering Council, the Local Planning Authority for the London Borough of Havering, an outer London Borough situated in north east London. Over 50% of Havering is Green Belt. It borders the London Boroughs of Redbridge, Barking and Dagenham, the Essex authorities of Epping Forest District Council, Thurrock and Brentwood Boroughs, and on the other side of the River Thames, the London Borough of Bexley. Romford is the borough's only metropolitan town centre and also one of two Opportunity Areas in the borough, alongside London Riverside.
- 2.5. Oxfordshire County Council is the Minerals and Waste Planning Authority for the county of Oxfordshire. It is predominantly rural in nature, but is also renowned for its knowledge-based economy and research and development facilities. Within Oxfordshire there are five district and city authorities, and externally shares borders with Warwickshire to the north, Northamptonshire to the northeast, Buckinghamshire to the east, Berkshire to the south, Wiltshire to the southwest, and Gloucestershire to the west. Notable features of Oxfordshire include the Cotswolds Area of Outstanding Natural Beauty, the River Thames, and the Chiltern Hills, as well as significant cultural and academic institutions such as the University of Oxford.

### 3. Strategic geography

3.1. The map below shows the respective location of East London and Oxfordshire and transport connectivity between the two Plan areas.



#### 4. Background

- 4.1. The national policy context forming the background to this statement of common ground is detailed in the Duty to Cooperate Statement of Compliance Submission Version (2025), under '2: What is the Duty to Cooperate?'. It is noted that while the Government recently announced the Duty to Cooperate plan-making provisions are no longer in force<sup>1</sup>, there is still an expectation in national policy that bodies will co-operate with each other over strategic matters which have an impact on more than one plan making area.
- 4.2. The ELBs have prepared the ELJWP Regulation 19 Submission Plan and published it for consultation between 19th May and 30th June 2025. This is the version of the plan that the ELB consider to be 'legally compliant' and 'sound' and will be submitted to the Secretary of State for examination by an independent planning Inspector in late 2025/early 2026.
- 4.3. To inform the ELJWP Regulation 19 Submission Plan the ELBs previously consulted on the Draft ELJWP (July 2024) under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 between 29<sup>th</sup> July and 16th September 2024.
- 4.4. Oxfordshire County Council also responded to a Duty to Cooperate (DtC) letter in September 2024 regarding strategic waste movements.
- 4.5. A DtC Statement that reported engagement between the ELBs and DtC bodies was published as part of the ELJWP Reg. 19 consultation. The figure below provides an extract from the published DtC Statement of the relevant key strategic matter in relation to Oxfordshire at that time.

Figure 1: Extract from ELJWP Reg19 submission plan Duty to Cooperate Statement, Appendix 5

| <b>Oxfordshire County Council</b>   |
|---|
| <ul style="list-style-type: none"><li>• <b>Findings:</b><ul style="list-style-type: none"><li>○ Sutton Courtenay and Finmere landfill sites to close before 2041.</li><li>○ Future waste needs of London must be addressed within the Plan area.</li></ul></li><li>• <b>Outcome:</b><ul style="list-style-type: none"><li>○ Urged East London to identify alternative landfill options post-2031.</li></ul></li></ul> |

- 4.6. As part of the duty to cooperate process, the ELBs and OCC are in agreement that there are outstanding strategic matters related to the proposed approach taken to future waste management in the Reg 19 ELJWP, principally the management of hazardous waste, the management of non-inert residual waste by landfill and the source of waste managed at energy from waste facilities.

<sup>1</sup> Written Ministerial Statement relating to Reforming Local Plan-Making made to Parliament on 27 November 2025 (Statement UIN HCWS1104) confirmed that the Duty to Cooperate has not been 'saved' "...thereby removing this requirement for plans in the current system." <https://questions-statements.parliament.uk/written-statements/detail/2025-11-27/hcws1104>

## 5. Key Strategic Matters

- 5.1. The characteristics of certain types of waste management facilities can often mean that waste arising in one area may be managed at a facility located in another area. In particular for non-inert landfill the suitability of a site will be largely influenced by the underlying geology which varies across the country and in the case of EfW plants, their sizing often means they need to draw waste from further afield to achieve economies of scale. In the case of hazardous waste, arisings may not be sufficient in a particular plan area to gain a critical mass to make investment in a facility worthwhile.
- 5.2. This is recognised in National Planning Policy for Waste which states Waste Planning Authorities should when producing their Local Plans:

*"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;" (Para 4 bullet 2)*
- 5.3. Data<sup>2</sup> shows that strategically significant amounts of waste arising in East London are managed in other WPA areas (as are amounts from other WPA areas managed in East London). The movement of waste in this way is typical of how waste is managed. Such inter Plan area flows are expected to continue over the Plan period (to 2041), although the destination sites (and host WPAs) may change over time.
- 5.4. In particular, with regard to the requirement for residual waste to be managed by landfill it is anticipated that during the Plan period capacity at the remaining non-inert waste landfill in East London, Rainham, will cease to exist. In light of this, the ELBs have considered how the declining amount of residual waste may be managed in future and this is detailed in Appendix 1 of the Waste Topic Paper.

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<sup>2</sup> Strategic Significant Flows from East London in 2023 BPP Consulting September 2025

## 6. Issues and Record of agreements and/or disagreements

### ***OCC Concerns***

6.1. In its representation on the Submission Regulation 19 Draft ELJWP, OCC considered that there was insufficient information on how East London will meet future landfill and hazardous waste requirements and raised three strategic matters as follows:

#### Hazardous Waste Management Capacity

6.2. OCC consider that, in connection with provision of hazardous waste management capacity:

*"...the authority should try and seek to provide suitable waste management facilities within their own Plan area (for the management of hazardous waste) before looking to other Authorities to meet their needs. Therefore, Policy JWP2: Safeguarding and Provision of Waste Capacity could be strengthened to facilitate the permission of Waste Management sites for Hazardous waste where appropriate."*

It is also noted that OCC's response confirms that it is "*.. satisfied that the Plan does allow for the delivery of future hazardous waste sites.*" Therefore this is not a remaining outstanding strategic matter.

#### Provision of Non-hazardous Landfill Capacity

6.3. In connection with provision of non-hazardous landfill, given:

- i. the anticipated non hazardous landfill requirements in East London to 2041
- ii. the historic flows of waste from East London to non-hazardous waste landfill in Oxfordshire; the expectation that these non hazardous waste landfill sites will cease to operate by 2030 and before the end of the ELJWP period; and,
- iii. the fact that Oxfordshire Minerals & Waste Local Plan - Part 1 Core Strategy (2017) makes no provision for additional non-hazardous landfill capacity,

OCC states that it "*...would expect the ELJWP to demonstrate how it is going to manage their future non-hazardous waste arisings over their Plan period, and preferably within their own Plan area.*"

#### Policy JWP5: Energy from Waste: Inclusion of Express Limitation to London Waste Only

6.4. In connection with Policy JWP5: Energy from Waste, OCC suggests the policy and supporting text should be strengthened to ensure the any future waste source material required for use as fuel does not require regional imports i.e. that the feedstock waste would be sourced from London only.

### ***ELBs' Response***

#### Provision of Non-hazardous Landfill Capacity

6.5. Historic flows of waste from East London to non-hazardous landfill sites in Oxfordshire are set out in the table below.

**Table 1: Waste Flows to Oxfordshire Non-hazardous Landfill from East London 2021-2023 (WDI)**

| Waste Type   | 2021           | 2022          | 2023          |
|--------------|----------------|---------------|---------------|
| Non-inert    | 13,924         | 11,227        | 3,943         |
| Inert/C+D    | 99,933         | 30,486        | 58,990        |
| <b>Total</b> | <b>113,857</b> | <b>41,713</b> | <b>62,933</b> |

6.6. This waste was transported to a single landfill at Sutton Courtenay, with less than 5,000 tonnes of non-inert waste being managed there in 2023. Railway sidings (Appleford Sidings) have been developed in the vicinity of the landfill, making it viable for waste from London to travel there by rail. The Oxfordshire landfill permission expires in 2030 and will no longer be receiving waste.

6.7. Through the inclusion of Policy JWP6 Deposit of Waste on Land in the ELJWP, the ELBs are seeking to enable the possible development of additional capacity for non-inert landfill within the Plan area during the Plan period. As the supporting text states:

*"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 allocated 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." (Para 6.114)*

6.8. Therefore it would not be correct to imply that the ELJWP does not address the issue directly.

6.9. In addition to this the ELBs have undertaken an extensive DtC enquiry exercise engaging other WPAs hosting non-inert landfill capacity within the wider South East. This has found that there are sufficient sites capable of accommodating the predicted reducing need for non-inert landfill of residual waste predicted to arise in the Plan area over the Plan period. This is summarised in the updated Waste Topic Paper and Section entitled "Requirements for landfill" (Paras 4.9 & 4.10) acknowledges the need to monitor landfill availability and "*....maintain ongoing liaison with relevant WPAs to ensure sufficient capacity is planned for..*". We also refer to the additional information provided in the Response Schedule which shows the range of sites most recently utilised to receive waste from East London and the expectation that total tonnages ought to decline to meet the national residual waste reduction target by 2042.

## Policy JWP5: Energy from Waste: Inclusion of Express Limitation to London Waste Only

6.10. This suggestion is noted. There is an existing clause (4) in Policy JWP5: Energy from Waste that states:

*"4. the use will be consistent with the proximity principle and not result in long distance vehicle movements."*

6.11. It is considered that this clause provides a sufficient and appropriate limitation on sourcing of waste to any such proposed facility that is consistent with national policy.

6.12. It should also be noted that the ELWA contract for the management of residual Local Authority Collected Waste (LACW) has recently been awarded to Cory Topco Ltd<sup>3</sup>, ensuring that the residual LACW arising in East London will be managed at an EfW plant located within London. It is anticipated that residual LACW will be moved by barge from an existing facility located at Barking to the Riverside complex in LB Bexley for treatment. As this contract is intended to be in place until 2037 at least (with an option to extend by a further five years), this greatly reduces the likelihood that a new EfW plant will need to be developed within the Plan area itself during the Plan period. This market position is reflected by the fact that the prospective developers of a consented EfW plant at London Sustainable Industries Park (LSIP) in LB Barking & Dagenham have asked for that site to not be identified for safeguarding on the basis that the consented facility is no longer likely to be deliverable/commercially viable.

6.13. For clarification, a summary of the key matters raised by OCC in response to the ELJWP Regulation 19 consultation, and the ELB's response are provided below:

| Issue                  | OCC comments  | ELB response   |
|------------------------|---|--|
| Hazardous Waste        | Insufficient information on how East London will meet hazardous waste needs.<br><br>Policy JWP2 should be strengthened to facilitate permission of hazardous waste facilities within the Plan area. | While Table 11 of the Capacity Assessment shows a predicted deficit, hazardous waste is diverse and limited in quantity. London Plan states net self-sufficiency not required at borough level, rather Boroughs should work with neighbours to secure regional facilities, therefore, no specific allocations in ELJWP are required.<br><br>JWP2 allows capacity to be developed in certain circumstances. |
| Non-hazardous Landfill | Managing future needs after historic landfill flows and site closure  | Recent historic flows of non-inert waste were small (<5,000 tonnes in 2023).<br><br>Policy JWP6 provides for possible new landfill within East London. As no suitable voids currently exist the ELBs have also engaged in DtC with other WPAs and identified sufficient capacity in the  |

<sup>3</sup>

<https://eastlondonwaste.gov.uk/articles/News+and+Public+Statements/Ratification+of+Residual+Waste+Contract+Award+Decision>

|                         |  |   |
|-------------------------|--|---|
|                         |  | wider South East. No objection has been raised by the host WPA to these enquiries and no other WPAs engaged through DtC identified the need to enter into a Statement of Common Ground.<br><br>Issue therefore addressed.   |
| Energy from Waste (EfW) | Concerns about imports from other regions and consistency with proximity principle | Clause (4) in Policy JWP5 already requires consistency with proximity principle and avoidance of long-distance transport.<br>Residual LACW contract with Cory Topco Ltd for the use of Riverside (to 2037) ensures management within London by river transport.<br>Unlikely need for additional EfW to be developed in East London during Plan period. One consented site (LSIP) requested to be withdrawn. |

Record of agreements and/or disagreements:

6.14. The ELBs and OCC agree that:

- A proportion of East London's waste has been managed at a non-hazardous landfill facility in Oxfordshire, but the permission for this site is due to expire in 2030 and the Oxfordshire Minerals and Waste Local Plan (2017) makes no further provision for the management of East London's waste following this closure.
- ELJWP acknowledges that Oxfordshire will have no additional capacity to manage East London's non hazardous waste via non-inert landfill following the closure of Sutton Courtenay landfill.
- ELJWP policy JWP5 ensures that any new energy from waste capacity developed in East London will only be provided for the management of waste arising within proximity to the proposed facility.

**In light of the above, there is no need for any modifications to the Submission Draft ELJWP.**

## **7. Governance agreements**

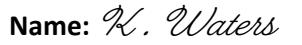
7.1. This Statement of Common Ground will be reviewed:

- i. Whenever agreement is reached on any outstanding matters. Or
- ii. At each subsequent key stage of the plan making process, as the ELJWP progresses towards adoption.

7.2. Alongside the above, the parties involved will continue to engage on waste matters

## 8. Signatories

8.1. We confirm that the information in this statement and referred to documents reflects the joint working to date undertaken between the ELB and Oxfordshire County Council towards addressing the identified strategic matters.

|  |  |
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| <p><b>Signed on behalf of London Borough of Barking and Dagenham:</b></p>  <p><b>Name:</b> Marilyn Smith</p> <p><b>Date:</b> 4/2/26</p> <p><b>Position:</b> Head of Planning and Assurance</p>            | <p><b>Signed on behalf of Oxfordshire County Council:</b></p>  <p><b>Name:</b> Jason Sherwood</p> <p><b>Date:</b> 02/02/2026</p> <p><b>Position:</b> Head of Regulatory Planning &amp; Enforcement</p> |
| <p><b>Signed on behalf of London Borough of Havering:</b></p>  <p><b>Name:</b> K. Waters</p> <p><b>Date:</b> 03/02/2028</p> <p><b>Position:</b> Assistant Director of Planning</p>                        |  |
| <p><b>Signed on behalf of London Borough of Newham:</b></p>  <p><b>Name:</b></p> <p><b>Date:</b> 03/02/2026</p> <p><b>Position:</b> Interim Planning Policy Manager</p>                                 |  |
| <p><b>Signed on behalf of London Borough of Redbridge:</b></p>  <p><b>Name:</b> Robert Lancaster</p> <p><b>Date:</b> 04/02/2026</p> <p><b>Position:</b> Director of Planning &amp; Building Control</p> |  |

