



East London Joint Waste Plan

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Publication Stage Representation Form

Please return to Havering Town Hall, RM1 3BD by 30 June 2025.

Privacy Notice

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<https://consultation.havering.gov.uk/planning/east-london-joint-waste-plan-regulation-19>

Part A – Contact Details

	Personal details* <small>*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in the second column.</small>	Agent details (if applicable)
Title		
First Name		Marc / Natalya
Last Name		Acton Filion / Palit
Job Title (where relevant)		Principal Plan Making Officer / Plan-making manager
Organisation (where relevant)	London Borough of Tower Hamlets	
Address Please include post code	Tower Hamlets Town Hall 160 Whitechapel Road London, E1 1BJ	
Telephone Number		
Email address	localplan@towerhamlets.gov.uk	[REDACTED]

In which local authority do you live?	<input type="checkbox"/> Barking and Dagenham <input type="checkbox"/> Havering <input type="checkbox"/> Newham <input type="checkbox"/> Redbridge <input type="checkbox"/> Other Local authority <input checked="" type="checkbox"/> I am responding on behalf of an organisation
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Part B - Your representation (please use a separate sheet for each representation you wish to make)

Name or Organisation: London Borough of Tower Hamlets

1. Which part of the East London Joint Waste Plan does this representation relate to? (Please be as specific as possible)

Policy	X	Implementation Text / Paragraph / Table / Figure / Policies Map	X
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2. Do you consider the East London Joint Waste Plan: (please tick as appropriate)

a. Legally compliant	Yes	X	No	
b. Sound	Yes		No	X
c. Complies with Duty to Cooperate	Yes	X	No	

3. Please give details of why you consider the Waste Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

We have identified a number of concerns relating to procedural aspects and legal compliance. This includes the adequacy of the reasonable alternatives assessed as part of the IIA, and the lack of clarity over whether the representations we submitted at regulation 18 stage have been taken into consideration in preparation of the plan.

We have set out in our attached letter our concerns relating to the soundness of the plan.

We have outlined the duty to cooperate engagement that has taken place in the attached letter, noting some of the challenges we have faced through this process.

4. Please set out the modification(s) you consider necessary to make the East London Joint Waste Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Waste Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The plan should explicitly include the capacity and apportionment it is planning for. As the ELJWPG must offer capacity to boroughs that have a need before proposing release of safeguarded sites, assistance that can be offered to other boroughs should be included within the plan. Statements of Common Ground are not considered an effective mechanism for securing this assistance. Further detail is contained in our full response. Please see attached letter.

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. **After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

5. If your representation is seeking a modification, do you consider it necessary to participate in examination hearing session(s)? (please tick as appropriate)

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

LB Tower Hamlets are an adjoining borough to the East London Waste Authority and have existing waste imports and exports to the WPA. Tower Hamlets is seeking to formally request assistance from the ELJWPG to meet the borough's waste apportionment and have been engaging in discussions with the group for LBTH to take on the surplus capacity identified in the Regulation 19 Plan. For this reason, we believe it is appropriate and necessary for the council to put forward our current position and to reiterate the soundness and legal compliance concerns that have been identified in the Regulation 19 Plan.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

7. Do you wish to be notified about:

a. the submission of the Joint Waste Plan for independent examination

Yes No

b. the publication of the Inspector's report

Yes No

c. the adoption of the Joint Waste Plan

Yes No

If you have further questions about the consultation, please get in touch with the team at eljointwasteplan@havering.gov.uk