

Examination of the East London Joint Waste Plan

London Borough of Tower Hamlets: Response to Main Matter 2

Matter 2: The approach to meeting London Plan apportionments and any other arisings

Issue (iii)

Q1: Is the assessment of site capacities up to date, justified and based on a robust analysis of the best available data and information?

1. It is unclear if the assessment of site capacities is based on the best available data and information. LBTH considers that the site-by-site capacity assessment should clearly identify those sites where capacity has been safeguarded to accommodate waste from other authorities as a result of planning permissions or other agreements, and that it should clearly state whether such safeguarding has been factored into the surplus capacity data.
2. As part of discussions with the East London Joint Waste Planning Group (ELJWPG), representations to the East London Joint Waste Plan (ELJWP) Regulation 18 and 19 consultations and through the Statement of Common Ground for the London Borough of Tower Hamlets (LBTH) Draft Local Plan (LBTH submission document SCG06, Appendix 1 of this hearing statement), LBTH has consistently raised the issue of the transfer of waste capacity of the former McGrath House site on Hepscott Road in the Tower Hamlets part of the former London Legacy Development Corporation (LLDC) area to the 54-60 River Road site in LB Barking and Dagenham. The loss of the safeguarded site was approved by the LLDC as it was demonstrated that there was spare capacity at the River Road site to accommodate all the lost capacity from McGrath House.
3. The February 2018 planning committee report (LLDC planning reference: 16/00451/OUT) explicitly recommended that the lost capacity (26,353 tonnes per annum) should be assigned to LBTH to help the borough meet its apportionment targets, and that this should be formalised through the ELJWP process. Although this issue is noted in the Statements of Common Ground between the ELJWPG and LBTH, no agreement has yet been reached on the assignment of capacity and the recommendations of the LLDC committee report are not reflected in the draft ELJWP.
4. Appendix 3 of submission document SD10 (Assessment of Existing Waste Capacity) sets out the capacity for 54-60 River Road. It is unclear from the evidence whether the assessment of additional capacity for the River Road site considers the arisings from the former McGrath House site within the former LLDC area and makes an allowance for this capacity to be safeguarded for LBTH. Therefore, it is possible that the spare capacity on this site may be overstated in the evidence base.

5. This issue is set out in further detail in the 2026 Waste Topic Paper which forms part of the supporting evidence for the draft Tower Hamlets Local Plan 2023-38 and was submitted to the Secretary of State for examination alongside the Tower Hamlets Draft Local Plan on 16 February 2026 (LBTH submission document TPS08, Appendix 2 of this hearing statement). The matter of capacity at the River Road site is discussed from paragraph 5.5 onwards of the topic paper.

Issue (iv)

Q1: Is the Plan informed by effective and on-going work between strategic policy-making authorities?

6. No. It is LBTH's position that the ELJWP has not been informed by effective and on-going work between LBTH and the East London authorities.
7. As part of engagement with neighbouring authorities in the early stages of the review of the Tower Hamlets Local Plan, officers from LBTH approached the member boroughs of the East London Joint Waste Planning Group (ELJWPG) in 2023 to enquire about joining the ELJWPG or, should this not be possible, transferring some of LBTH's waste apportionment (as set out in the London Plan) to the ELJWPG to address LBTH's shortfall in capacity which was identified in the Waste Data Study (2023) (LBTH submission document RWE02). The study was carried out to inform the LBTH Regulation 18 Draft Local Plan and recommended that neighbouring waste authorities with surplus capacity be approached with a request for assistance with LBTH's identified shortfall.
8. The ELJWPG at the time indicated that accepting an additional borough as a member of the waste planning group would significantly delay the process of developing a new waste plan and was therefore not considered possible.
9. Based on this position and representations received on the Regulation 18 Draft Local Plan, LBTH commissioned a Waste Study Update in 2024 (LBTH submission document RWE01, Appendix 3 of this hearing statement) to provide a more comprehensive search for potential waste sites in the borough in order to test a scenario in which no nearby waste planning authority was able to assist Tower Hamlets in meeting its need. This study informed the policy approach for the LBTH Regulation 19 Draft Local Plan, which consisted of three principal elements:
 - a. Utilise additional identified capacity at Northumberland Wharf transfer station;
 - b. Include Onsite Segregation Facilities (OSFs) as a component of LBTH's total waste capacity; and
 - c. Introduce an 'area of search' aspect which included the potential capacity from industrial land as a component of total capacity.
10. Through the Regulation 19 consultation, the GLA and the Environment Agency raised objections to the untested use of OSFs towards meeting the borough apportionment, thereby reducing overall identified capacity. The ELJWPG requested further clarity on

LBTH's position as the use of areas of search did not align with the LBTH request for assistance.

11. The Waste Study Update (2024) was commissioned prior to the publication of the ELJWP Regulation 18 Draft Plan, and as such the surplus capacity identified in that draft plan which could theoretically be shared with Tower Hamlets was unknown. LBTH's position at the time was therefore to continue on the basis that no other boroughs would be able to assist with LBTH's waste apportionments.
12. LBTH's response to the ELJWP Regulation 18 consultation included a formal request for assistance from the ELJWPG in meeting LBTH's waste management needs in accordance with London Plan Policy SI8.
13. As part of engagement and discussions with the ELJWPG, following the Regulation 19 (2024) consultation, LBTH were provided with a list of criteria in Spring 2025 to demonstrate that LBTH required assistance and had explored all options to meet its requirements within its own boundaries. These criteria were discussed in the LBTH Waste Topic Paper (2025) which was consulted on as part of the Regulation 19 Focused Consultation (2025) on the LBTH Local Plan¹. LBTH's position is that the criteria have been met, but the ELJWPG responded that LBTH had not adequately addressed the criteria. In its response to the LBTH Regulation 19 Focused Consultation (2025), the ELJWPG requested that LBTH carry out a detailed assessment of all Local Industrial Locations (LIL) and Strategic Industrial Land (SIL) sites to demonstrate their suitability to accommodate waste uses.
14. The criteria provided by the ELJWPG have not been included in the proposed submission ELJWP under 'Providing for Unmet Needs for Waste Capacity from Elsewhere within London' (pg.54, paragraphs 4.11 and 4.12) and therefore do not form part of a wider strategic policy approach to addressing requests for capacity sharing. It is unclear whether they are intended as formal, consistent criteria against which any requests for capacity sharing will be assessed by the East London Waste Authority. LBTH considers that any approach to sharing capacity should be plan-led and clearly set out in policy, and that the submission Plan is not effective and therefore does not meet the test of soundness due to the omission of these criteria.
15. In response to the Regulation 19 (2025) representation from the ELJWPG, LBTH commissioned a Waste Land Availability Study (2026) (LBTH submission document RWE04, Appendix 4 of this hearing statement). The methodology and brief for this study were shared and agreed with the ELJWPG prior to the study being carried out. This study assessed whether there were available industrial sites in the borough with the capacity or potential to accommodate waste uses. This aligns with Part 4b of Part B of Policy SI8 in the London Plan (2021) which states that sites within Strategic Industrial Locations and Locally Significant Industrial Sites are suitable locations to manage borough's waste apportionment. The study concluded that there were no suitable sites available apart

¹ An updated Waste Topic Paper which also addresses the ELJWPG criteria was submitted to the Secretary of State alongside the LBTH Local Plan on the 16th February 2026 and forms Appendix 2 of this hearing statement.

from a site identified at Moody's Wharf. However, the site's landowner (Places for London) has earmarked the site for residential development and would only consider a short term lease for other uses. Given both the restricted size of the site and its potential for short-term temporary use, it is not considered that the site presents a viable long-term solution to meeting the borough's London Plan apportionment target.

16. A Statement of Common Ground (SoCG) has also been prepared with the ELJWPG on strategic waste matters related to the Tower Hamlets Local Plan. This sets out LBTH's efforts to seek to agree the assignment of surplus waste capacity within the ELJWP area to Tower Hamlets. As part of the SoCG (Appendix 1 of this hearing statement), LBTH sought agreement on an assignment of waste capacity from ELJWPG if the Waste Land Availability Study determines that no suitable sites were available; however, the ELJWPG have not agreed to this. Discussions are continuing with the ELJWPG to ascertain their position in regard to LBTH's outstanding request.
17. In summary, whilst LBTH acknowledges that the ELJWPG has continuously engaged with LBTH throughout the preparation of both the ELJWP and the Tower Hamlets Local Plan, the requests for assistance have not been reviewed beyond officer level as the ELJWPG did not consider that there was sufficient evidence informing LBTH's request. Although the LBTH Waste Land Availability Study (2026) has now concluded and was carried out using a methodology which was agreed with the ELJWPG, it is unclear whether the request for assistance has subsequently been taken to the elected members of each borough which forms part of the ELJWPG. LBTH does not consider that its requests for capacity sharing have been appropriately considered nor reflected in the draft ELJWP, and therefore it is LBTH's view that the work has not been effective.

Q2: How have the Boroughs worked with neighbouring authorities to consider necessary facilities when planning for hazardous waste (per paragraph 9.8.18 of the London Plan)?

18. Per paragraph 9.8.18 in the London Plan (2021), as hazardous waste forms part of Household, Industrial and Commercial (HIC) waste, it is included within the request to the ELJWPG for assistance with a shortfall of 192,370 tpa of HIC waste. As we have set out in our response to other questions on this matter, LBTH does not consider that this request has been appropriately considered through the preparation of the ELJWP.

Q3: Is the Plan justified, positively prepared and in general conformity with the London Plan (in particular paragraphs 9.8.6, 9.8.7 and 9.8.18) insofar as its approach to unmet waste needs from neighbouring areas is concerned in terms of:

- a) London Plan apportionments
- b) Construction, demolition and excavation waste
- c) Hazardous waste?

Is the Plan justified?

19. No. LBTH's evidence base including the Waste Land Availability Study (2026) identifies that no sites are available in Tower Hamlets with the potential to accommodate waste uses. As noted in our response to Matter 1(i) Q3 above, the IIA has not included a reasonable alternative which includes sharing capacity with LBTH or any other authorities which may be facing a shortfall in capacity. This demonstrates that the Plan is not justified in its approach as it has not taken into account the evidence provided and has not properly assessed all the reasonable alternatives.

Is the Plan in general conformity with the London Plan?

20. No. It is LBTH's view that the draft ELJWP is not in conformity with the approach in paragraphs 9.8.6 and 9.8.7 in the London Plan. The London Plan encourages boroughs with a surplus capacity to share this with boroughs who are facing a shortfall. The ELJWP has failed explicitly to acknowledge LBTH's shortfall in waste capacity and LBTH's ongoing requests for assistance from the ELJWPG with meeting its London Plan apportionment. In response to the ELJWPG's responses to LBTH Regulation 19 consultations and ongoing Duty to Cooperate discussions, LBTH has assessed capacity within SIL/LIL sites using a methodology jointly agreed with the ELJWPG and has demonstrated there is no capacity for new waste sites. This is outlined in the Waste Land Availability Study (2026) (LBTH submission document RWE04, Appendix 4 of this statement).
21. Paragraph 9.8.6 of the London Plan (2021) encourages boroughs to pool their apportionment requirements for HIC waste streams. The ELJWP has not demonstrated conformity with the London Plan as LBTH had requested 192,370tpa of HIC waste to be accommodated within the identified ELJWP surplus capacity of 1,122,508tpa but this is not reflected in the draft plan.
22. Whilst Construction, Demolition & Excavation (C,D&E) apportionments are not set in the London Plan, it should be recognised that in order to meet net self-sufficiency within London (according to paragraph 9.8.1) accommodations should also be in place to manage C,D&E waste. This is reflected in LBTH's request for 56,953tpa where the ELJWP identifies a surplus capacity for C,D&E waste of 980,000tpa.
23. Paragraph 9.8.7 of the London Plan sets out that pooled apportionments should demonstrate how they will be met through "joint waste Development Plan Documents, joint evidence papers or bilateral agreements". However, the ELJWPG has not adequately considered or agreed to LBTH's request for provision to be made for LBTH's shortfall in waste capacity in the ELJWP despite evidence documenting LBTH's shortfall in capacity.
24. The SoCG for the LBTH Draft Local Plan (Appendix 1 of this statement) includes a request for assistance should the Waste Land Availability Study determine that no suitable sites were available to support LBTH's London Plan apportionment. As noted in the SoCG, this is a matter which has not yet been agreed by the ELJWPG. Although it is acknowledged that the Waste Land Availability Study was not available at the time of

submission, it was made available to the ELJWPG on 23 February 2026. However, at the time of writing this statement, the ELJWPG has not formally provided written feedback on its findings or agreed to update the SoCG with an acknowledgement that LBTH has taken all necessary steps to identify capacity within the borough.

25. Given the LBTH shortfall was a known issue at the time of submission and one which has material impacts on the approach to site release in the ELJWP, the study and the LBTH request for assistance should have been given due consideration in a timely manner and all necessary steps taken to advance an agreement on capacity sharing. LBTH therefore considers that the plan is not in general conformity with the requirements of the London Plan.

Is the Plan positively prepared?

26. No. As discussed above, it is evident that the ELJWP has not been positively prepared as LBTH's identified unmet need for meeting the London Plan apportionment has not been considered or expressly accommodated within the draft ELJWP. The SoCG is clear that no agreement has yet been reached with the ELJWPG regarding the outstanding request for capacity sharing. Whilst LBTH has also approached other waste authorities in London including (as requested by the ELJWPG) the boroughs which form the South East London Waste Planning Group, there is currently no evidence that those authorities have surplus capacity which could be shared with Tower Hamlets.
27. Given there is identified surplus capacity within the ELJWP, it is LBTH's position that its identified shortfall in capacity should be resolved through an agreement with the ELJWPG to share its identified surplus capacity. This would be in line with legislative requirements including the proximity principle enshrined in Schedule 1 of the Waste (England and Wales) Regulations 2011. A positively prepared plan should recognise this position and make express provision for capacity sharing.
28. In addition to the overall issue of capacity shortfalls, the plan has not been positively prepared in respect of the transfer of capacity from the former McGrath House site on Hepscott Road to 54-60 River Road in LB Barking & Dagenham. The request for capacity sharing includes a site-specific request for 26,353tpa to be assigned back to LBTH to help meet the London Plan apportionment, but no agreement has yet been reached on this element of the request.
29. These requests have not been adequately considered and therefore LBTH considers that the plan as submitted has not been positively prepared, is not justified and is not in conformity with the policy approach in the London Plan (2021).

Appendices

Appendix 1: Statement of Common Ground between LBTH and the ELJWPG for the LBTH Draft Local Plan

Appendix 2: LBTH Waste Topic Paper (2026)

Appendix 3: LBTH Waste Study Update (2024)

Appendix 4: LBTH Waste Land Availability Study (2026)



Statement of Common Ground Between

**London Borough of Tower Hamlets and,
East London Joint Waste Planning Group**

Stage: Tower Hamlets Draft Local Plan (Submission)

February 2026

Executive Summary

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.

This Statement of Common Ground addresses the key strategic matter of waste capacity as relevant to the preparation of the Tower Hamlets Proposed Submission Version Local Plan and its progression to Examination in Public, and specifically Policy RW1.

This Statement of Common Ground (SoCG) is made between the London Borough of Tower Hamlets (LBTH) and the East London Joint Waste Planning Group (ELJWPG) to assist in the Examination in Public of the Local Plan.

It should be noted that the East London Joint Waste Planning Group are also preparing the East London Joint Waste Plan for submission. Whilst interconnected, a separate SoCG for this document has been prepared.

This document is intended to be a live document, updated as circumstances change. Please see the Governance Arrangements section of the statement for more details.

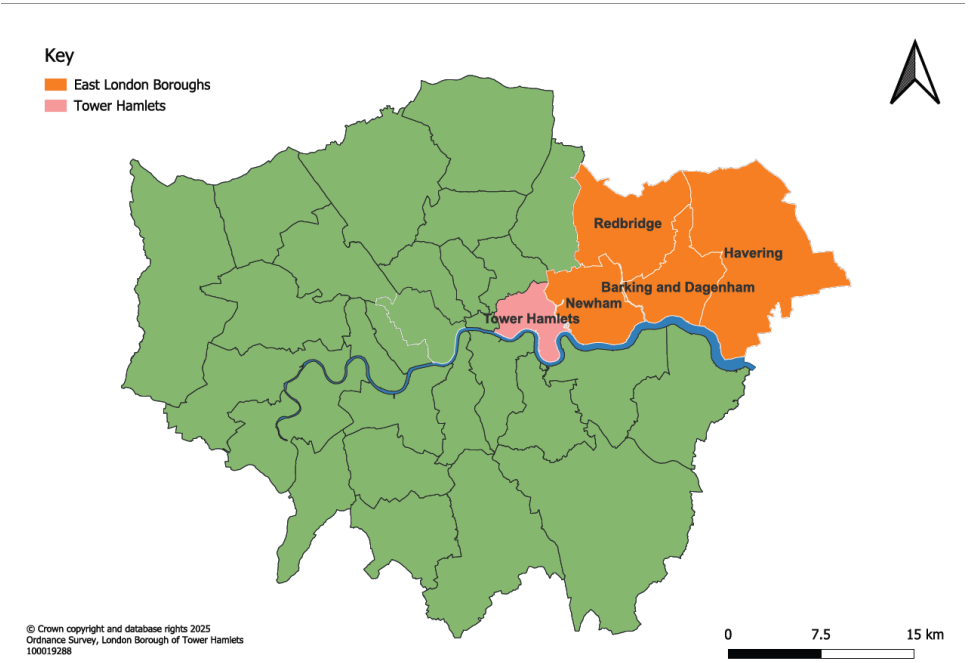
This SoCG contains the following sections:

1. Introduction
2. Context
3. Need for a Statement of Common Ground
4. Proposed modifications to LBTH's Regulation 19 Plan
5. Waste Capacity
6. Governance Arrangements
7. Signatories

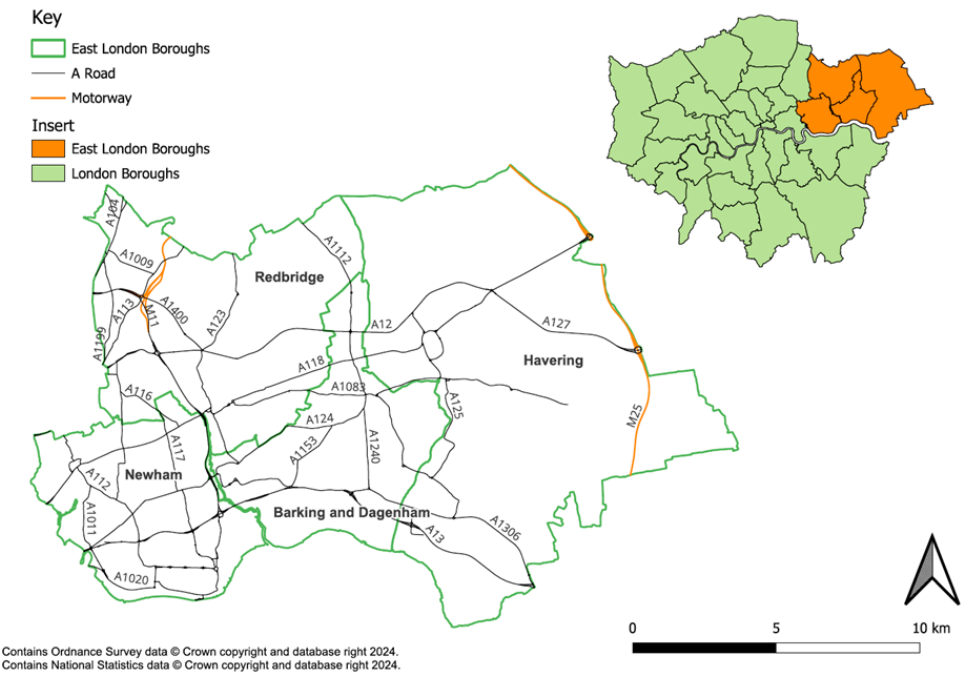
1. Introduction

- 1.1. Tower Hamlets Council is the Local Planning Authority for the London Borough of Tower Hamlets. Tower Hamlets is one of a few London authorities that is not within a wider waste planning group and is a unitary authority for waste planning matters. Tower Hamlets is an inner London borough, which borders five other London boroughs and the City of London: Hackney to the north, Newham to the east, Southwark, Lewisham and Greenwich to the south across the River Thames, and the City of London to the west. Tower Hamlets is known for its diversity,

multiculturalism and numerous historical and modern landmarks, including the Tower of London and Canary Wharf.



1.2. The ELJWPG is the statutory waste planning authority for the boroughs of Newham, Redbridge, Havering and Barking and Dagenham. It is made up of the councils of the four boroughs. Newham – one of the four boroughs - directly borders Tower Hamlets to the east.



2. Context

- 2.1. Tower Hamlets is a unitary waste planning authority, meaning that the borough is responsible, as far as possible, for meeting its waste apportionment on sites within its boundaries. In London, 12 boroughs both collect and dispose of waste, known as unitary authorities. Then there are four, statutory, sub-regional partnerships, which are responsible for jointly disposing of the waste collected by their members. These joint waste disposal authorities are East London Waste Authority (ELWA), North London Waste Authority (NLWA), Western Riverside Waste Authority (WRWA) and the West London Waste Authority (WLWA). Six boroughs have formed a voluntary waste partnership, the South East London Joint Waste Planning Group (SELJWPG).
- 2.2. Geographically, Tower Hamlets shares a boundary with LB Newham, a member of the ELJWPG. As part of engagement with neighbouring authorities, officers from Tower Hamlets approached the member boroughs of the East London Joint Waste Planning Group (ELJWPG) in 2023 to inquire about joining the ELJWPG. The ELJWPG indicated that adding an additional borough to the membership would significantly delay the process of developing a new waste plan and was therefore not considered possible at that time. Tower Hamlets responded to the East London Joint Waste Plan Regulation 18 consultation in September 2024, requesting assistance meeting Tower Hamlets unmet waste capacity needs.

Tower Hamlets Waste Evidence

- 2.3. LBTH has produced two waste studies, one in 2023 to support the Regulation 18 version of the Local Plan and one in 2024 to support the first Regulation 19 version of the plan. The 2023 Waste Study concluded that the borough had a shortfall in terms of waste management capacity to meet its London Plan apportionment. At that stage, the ELJWPG had not yet concluded their waste evidence base and therefore the identified surplus capacity. The ELJWPG were also not satisfied that Tower Hamlets had fully evidenced their capacity request and suggested further assessment of how Tower Hamlets could meet their unmet needs. LBTH officers commissioned a second Waste Study (2024) to investigate alternative solutions that would allow Tower Hamlets to meet its apportionment within the borough boundaries.
- 2.4. While LBTH's 2024 Waste Study concluded that the borough was able to meet its requirements within its boundaries, that assessment relied on the inclusion of on-site segregation facilities (OSFs) and areas of search. The use of OSFs to contribute towards meeting an authority's waste apportionment requirements had never been done previously.
- 2.5. The 2024 Waste Study also used areas of search to demonstrate that the borough was capable of meeting its capacity requirements for construction and demolition waste; however, this strategy relies on identifying industrial sites that are not

demonstrably 'available' or 'deliverable' to come forward as waste sites. Given the high level of pressure on the borough's industrial sites as evidenced in the Employment Land Review (2023), there was no guarantee that these sites would become available during the plan period.

- 2.6. Both studies also identified 'exempt sites' -sites that carry out waste processes that do not require an Environment Agency permit. Both studies count the capacity of exempt sites towards the borough's overall capacity for HIC (Household, Industrial and Commercial) waste but provide different capacity numbers. Both studies also acknowledge that determining capacity for exempt sites is challenging given the lack of data. The Waste Study (2023) identifies 12,630 tpa of capacity in exempt sites. The Waste Study Update (2024) identifies 38,610 tpa of capacity in exempt sites. Both the GLA and the Environment Agency, in their responses to the Regulation 19 consultation, objected to the use of exempt sites to meet the borough's waste capacity requirements.

Tower Hamlets proposed policy

- 2.7. As a result of the representations received as part of the Regulation 19 consultation (2024), LBTH revised its proposed waste policy RW1. It removed the OSFs from LBTH's waste capacity and revised down the amount of capacity to be attributed to exempt sites. Statutory stakeholders such as the GLA and the EA considered the inclusion of OSFs in the methodology to be unsound.

ELJWPG evidence and emerging plan

- 2.8. The ELJWPG is in the process of preparing the East London Joint Waste Plan (ELJWP). The ELJWPG published its Regulation 18 plan in July 2024 and its Regulation 19 plan in May 2025. The Regulation 19 Submission Plan proposes the release of four safeguarded waste sites across the Plan area. Following release of sites, it identifies a surplus waste management capacity of 1,122,508pa of HIC waste and 980,000tpa of C,D&E waste.
- 2.9. The draft ELJWP, at paragraph 4.11, explains that, in light of the identified surplus in C,D&E and HIC waste management capacity, the ELJWPG is 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.

3. Need for a Statement of Common Ground

- 3.1. The ELJWPG submitted a representation to LBTH's Regulation 19 (2024) consultation identifying an inconsistency both within Policy RW1 and between Policy RW1 and LBTH's representation to the ELJWP. Draft Policy RW1 identifies areas of search and OSFs as sites that can contribute to meeting LBTH's waste capacity requirements, and as such does not identify a shortfall in capacity.

However, paragraph 20.13 states that Tower Hamlets will work with the GLA and other boroughs to secure access to suitable capacity elsewhere in London.

- 3.2. The proposed policy approach to RW1 was revised to address this feedback as part of the Regulation 19 (2025) focused policies consultation which is discussed in Section 4. The evidence base and representations that were submitted to previous consultations informed the revised policy approach. The proposed policy approach has been revised to request that other London Boroughs transfer some of their surplus capacity to Tower Hamlets to help meet its apportionment, as set out in the adopted London Plan (2021) Policy SI 8.
- 3.3. The ELJWPG representation sets out that in their opinion any request for capacity from the group would require further, robust evidence to support that position than existed at the time. This includes undertaking a further Waste Land Availability Study to determine if industrial sites in the borough can accommodate LBTH's apportionment.
- 3.4. Whilst a separate plan-making process, it should be noted that Tower Hamlets also submitted a response to the East London Joint Waste Plan Regulation 19 consultation. Tower Hamlets objected to the release of safeguarded waste sites in the adopted ELJWP without first sharing waste capacity with LBTH, given LBTH's demonstrable shortfall and the ELJWP's surplus. A separate SoCG has been produced, focused on discussions on the East London Joint Waste Plan.

4. Modifications to LBTH's Regulation 19 plan (2024) & second Regulation 19 consultation (2025)

- 4.1. Following review of the GLA's representation to LBTH's Regulation 19 consultation (2024), through Duty to Cooperate discussions GLA officers encouraged LBTH to seek capacity from the ELJWPG given their large surplus and geographical proximity. GLA officers also explained that they had directed the ELJWPG to offer surplus capacity to LBTH, amongst other London Boroughs, given the expectation in para 9.8.6 of the London Plan that boroughs with a surplus of waste capacity (as is the case for the ELJWPG) will offer to share their capacity with boroughs facing a shortfall in capacity before considering site release.
- 4.2. Following those discussions, LBTH consulted on a revised waste policy as part of the second Regulation 19 consultation (2025). The revised waste policy removes on-site segregation facilities from the borough's waste management capacity and reduces the capacity from exempt sites. It removed areas of search on the basis that the borough does not have any available industrial sites that could accommodate waste facilities. It also proposes partnership working and cooperating with other WPAs to help meet its apportionment, as set out in London Plan (2021) Policy SI 8. Further detail is set out within the LB Tower Hamlets Waste Topic paper.

- 4.3. The ELJWPG submitted a response to the second Regulation 19 consultation (2025), raising concerns that the Duty to Cooperate discussions for LBTH's waste capacity needs are insufficient. They deemed it necessary that LBTH engage with other waste planning authorities rather than focusing solely on the ELJWPG. The ELJWPG also do not consider that LBTH has satisfactorily demonstrated why the identified waste management capacity deficits cannot be met on LBTH's Strategic Industrial Land (SIL) and Local Industrial Locations (LIL).
- 4.4. Additional discussions have been held with the ELJWPG and are outlined further in the Duty to Cooperate Statement.

5. Matters for Agreement

Waste Capacity Sharing

- 5.1. LBTH is facing a shortfall of 192,370tpa of HIC waste capacity and 56,953tpa of C,D&E waste capacity. The Regulation 19 version of the ELJWP indicates that the ELJWPG has a surplus capacity of 1,122,508tpa of HIC waste capacity and 980,000tpa of C,D&E waste capacity. Given the need for LBTH to meet its waste apportionment for its Local Plan to be considered sound, and the need for waste authorities with surplus capacity to offer that capacity to other waste authorities before releasing safeguarded waste sites, LBTH has requested assistance from the other waste planning authorities including ELJWPG in meeting its waste apportionment.
- 5.2. The ELJWPG provided LBTH with a set of criteria for boroughs to respond to in order to justify the sharing of waste capacity. LBTH responded to these criteria and the response is included in the LB Tower Hamlets Waste Topic Paper.
- 5.3. In addition to assistance with meeting the London Plan waste apportionment, the request for capacity sharing also accounts for the loss of a waste site in Tower Hamlets and the transfer of its capacity to the ELJWPG. Planning permission was granted by the London Legacy Development Corporation (LLDC) for the loss of a safeguarded waste site in the Tower Hamlets part of the LLDC (LLDC Planning Reference: 16/00451/OUT). This permission was granted on the basis that the capacity of the site was being re-provided within London, in this case in Barking and Dagenham (within the ELJWPG). The LLDC Planning Committee report from February 2018 recommended that the waste planning process for the ELJWP should formalise this and that the lost capacity (26,353 tpa) be 'transferred' back to Tower Hamlets to help meet its apportionment. No such transfer was included in the Regulation 19 ELJWP, nor is any reference made to the transfer of the capacity of that site from Tower Hamlets to Barking and Dagenham. The Waste Data Study (2023) also recommended that this lost capacity – 26,353tpa - be 'transferred' back to Tower Hamlets to help meet its apportionment, meaning that it would be specifically safeguarded within the ELJWP to process waste from Tower Hamlets.

Areas of agreement/disagreement:

1. The ELJWPG do not currently consider that LBTH has adequately demonstrated that the need for waste management capacity cannot be met within its own area or in consultation with other LPAs to which waste flows are already established. LBTH acknowledge ELJWPG's position with regards to the adequacy of evidence to demonstrate the lack of capacity within the borough, albeit consider the evidence available at both regulation 19 publications was proportionate.

Area of agreement: LBTH have agreed to undertake further evidence work which investigates whether there is, or is likely to be, any waste capacity within the borough's SIL and LIL to accommodate waste sites to meet LBTH's London Plan waste apportionment. A draft brief for this study was shared with the ELJWPG and the GLA who have provided feedback which has been reflected in the finalised brief. The ELJWPG agree that the brief and contained methodology forms an acceptable basis from which to produce adequate and proportionate evidence. At the time of writing work on this evidence has already commenced, with completion due in February 2026 and a meeting with the ELJWPG is arranged to discuss the findings and next steps.

2. The ELJWPG are of the view that Tower Hamlets' Duty to Cooperate discussions with other WPAs on waste capacity needs are insufficient. LBTH acknowledges ELWPG's position and have accordingly held discussions with the South East London Waste Planning Group (SELJWPG) who also are expected to have surplus capacity and with whom there are established waste flows from Tower Hamlets. These discussions supplement formal written requests for assistance.

Area of Agreement: To ensure there is not a singular focus on ELJWPG, a separate SoCG to reflect existing waste flows is being prepared with the South East London Waste Planning Group. LBTH have also formally written to other waste planning authorities including North and West London Waste Authorities to request assistance in meeting our apportionment.

- **Outstanding matter:** LB Tower Hamlets and the ELJWPG have not yet agreed on the sharing of waste capacity. ELJWPG considers that LB Tower Hamlets has not provided sufficient evidence to demonstrate that LB Tower Hamlet's waste apportionment cannot be met within the borough.
- **Outstanding matter:** It should be noted that, while most of the criteria reflect requirements for waste planning within the London Plan, LB Tower Hamlets consider that several of the criteria go above and beyond the expectations for waste planning in the London Plan, and the ELJWPG has not provided a justification for

these criteria. However, ELJWPG consider that the criteria reflect the adopted London Plan.

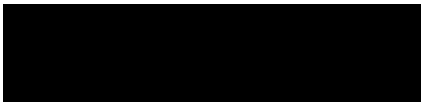
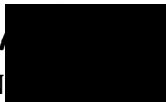
- **Outstanding matter:** LB Tower Hamlets and the ELJWPG have not yet agreed on the transfer of waste capacity for the site at McGrath House, Hepscott Road.

6. Governance Arrangements

- 6.1. This statement of common ground will be reviewed:
- a) whenever agreement is reached on any outstanding matters; or
 - b) at key milestones in progress towards addressing strategic matters, such as completion of further relevant evidence; or
 - c) at subsequent key stages of the plan making process.
- 6.2. The SoCG will be updated at the request of either party to reflect new evidence, revised higher order policy or other relevant factors.
- 6.3. Alongside the above, the parties involved will continue to engage on waste matters through the London Waste Planning Forum, which meets up to four times per year to discuss waste matters affecting London.

7. Signatories

- 7.1. We confirm that the information in this statement and referred to documents reflect the joint working to date undertaken between the London Borough of Tower Hamlets and the East London Joint Waste Planning Group towards addressing the identified strategic matters.

Signed on behalf of London Borough of Barking & Dagenham: 	Signed on behalf of London Borough of Tower Hamlets:  N Palit D 026
Date: 11.2.26 Position: Head of Planning and Assurance	Position: Plan-making manager

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Waste Topic Paper

February 2026

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1. Introduction

1.1. This waste topic paper provides a brief overview of the relevant national/local policy guidance that impacts on the emerging plan. This paper sets out the existing waste planning context, provides an overview of the current waste evidence base and summary of representations from previous consultations and explains how these have informed the proposed policies in the draft local plan. The proposed policy approach sets out the justification for requesting assistance from neighbouring boroughs in meeting LBTH's waste apportionment. This paper explains the policy approach that was subject to a further focused Regulation 19 consultation (summer 2025) which included a revised waste policy (Policy RW1 Managing our Waste) based on the considerations discussed within this topic paper.

2. Background

- 2.1. London Borough of Tower Hamlets (LBTH) is a unitary waste planning authority, waste collection authority and waste disposal authority. In our capacity as a waste planning authority, we have a statutory duty to prepare a waste local plan in line with legislation. This means that the borough is responsible for meeting its waste apportionment target as set out in the London Plan. This is being fulfilled through the inclusion of waste policies in the emerging Local Plan. Given the density of Tower Hamlets and the presence of competing land use priorities, meeting the apportionment target within the borough boundary has been particularly challenging.
- 2.2. Within the London Plan (2021), Policy SI8 encourages the need for 100% of London's waste to be managed within London to achieve net self-sufficiency by 2026. Paragraph 9.8.1 notes that London's current net self sufficiency figure currently stands at approximately 60% and that net self sufficiency applies to all waste streams with the exception of excavation waste.
- 2.3. Currently within the London context, many boroughs are grouped within individual waste planning groups as shown in the table below with information regarding their Local Plan status.

Authority	Local Plan Status
ELJWPG	The East London Joint Waste Planning Group consist of the London boroughs of Newham, Havering, Redbridge and Barking & Dagenham and are a WPA together. The ELJWP is currently following similar timescales to the emerging LBTH Local Plan and is due for submission in early 2026.
SELJWPG	The South East London Joint Waste Planning Group consist of the London boroughs of Bexley, Royal Borough of Greenwich, Southwark, Bromley, Lewisham and the City of London. They are not a WPA but a voluntary joint waste partnership and prepare a joint waste planning

	technical paper that is evidence for each individual LPA's local plan (that incorporates strategic and development management waste policies – no 'stand-alone' waste plans are produced).
Greenwich	Consultation on draft plan expected in late 2025.
Southwark	Adopted 23 February 2022.
Bromley	The Bromley Local Plan is currently under review. A Call for Sites exercise took place in 2021, followed by the Issues and Options (Regulation 18) consultation in 2023. The council's second Regulation 18 consultation on the Direction of Travel document took place between July and September 2025.
Lewisham	Adopted a new local plan in July 2025.
City of London	Examination in Public began March 2025 and is ongoing at the time of writing, with Main Modifications consultation anticipated early 2026.
WLWA	The West London Waste Authority consists of the London boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames along with the Old Oak and Park Royal Development Corporation (OPDC). The current West London Waste Plan was adopted in 2015 and at the time of writing, are currently at the Regulation 18 consultation for the updated Waste Plan.
WRWA	The Western Riverside Waste Authority (WRWA) is the statutory Waste Disposal Authority for the London boroughs of Hammersmith & Fulham, Royal Borough of Kensington and Chelsea, Lambeth, and Wandsworth.
NLWA	The North London Waste Authority (NLWA) is a statutory public waste authority consisting of the London boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest. The North London Waste Plan was adopted in March 2022.
Greater London Authority	A draft plan is expected to be published in 2026.

3. Legislative and Planning Policy Context

National Planning Policy for Waste (2014)

3.2. The National Planning Policy for Waste published in 2014 sets out the approach to working towards a more sustainable and efficient approach to waste use and management. This involves:

- Delivery of sustainable development and resource efficiency.
- Ensuring that waste management is considered alongside other spatial planning matters.
- Providing a framework for communities and businesses to take responsibility for waste management.
- Helping to secure the re-use, recovery and disposal of waste whilst mitigating health and environmental impacts
- Ensuring the design and layout of future developments allows for sustainable waste management.

3.3. This document sets out the government's detailed waste planning policies. It should be read in conjunction with the National Planning Policy Framework, the National Waste Management Plan for England and national policy statements for waste water and hazardous waste, or any successor documents.

National Planning Policy Framework (2024)

3.4. Chapter 2 of the NPPF (paragraph 8c) discusses the importance of minimising waste and pollution:

*an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, **minimising waste and pollution**, and mitigating and adapting to climate change, including moving to a low carbon economy [emphasis added].*

Waste Framework Directive & Waste regulations

3.5. Waste planning is also governed by legislation: the Waste Framework Directive (WFD) was incorporated into UK law via the Waste (Circular Economy) (Amendment) Regulations 2020. In addition, the Waste (England and Wales) Regulations 2011, paragraph 4 of Part 1 of Schedule 1, sets out the 'proximity principle' - the requirement for mixed municipal waste to be disposed of or recovered in one of the nearest appropriate installations.

Adopted London Plan (2021)

- 3.6. Policies SI7-9 within the London Plan discuss the need for reducing waste and supporting the circular economy, assessing waste capacity and managing net waste self-sufficiency and safeguarding waste sites.
- 3.7. Policy SI 7 aims for resource conservation, waste reduction and increase in material recycling and re-use and reduction in waste disposal.
- 3.8. Policy SI 8 lists the requirements for managing waste sustainably including planning for identified waste needs. The policy also covers the management and planning for the apportioned tonnages of waste as set out in the plan and identification of suitable sites for waste management.
- 3.9. The London Plan projects how much LACW (Local Authority Collected Waste) and C&I (Commercial and Industrial) (together referred to as Household, Industrial and Commercial or HIC) waste is likely to be generated in the capital over the next 20 years and 'apportions' an amount of these two waste streams to each borough. Apportionment is the percentage of London's total waste each borough must plan for in a development plan. Apportionments and arisings can be very different things, a borough may generate a high volume of arisings but have little land to deal with them, leading to it having a lower apportionment. Conversely, where it generates little waste itself (arisings) but has a larger amount of waste capacity it may have a higher apportionment.
- 3.10. The London Plan sets out borough level forecasted arisings of household, commercial and industrial waste 2021-2041. The 2021 figure lists LBTH's arisings as 260,000 tonnes and increases to 273,000 tonnes by 2041.
- 3.11. The London Plan sets out borough level apportionments of household, commercial and industrial waste 2021-2041. LBTH's apportionment is 2.4% of London's total waste to be managed in borough. The 2021 figure lists the borough's apportionment as 195,000 tonnes and increases to 207,000 tonnes by 2041.
- 3.12. Paragraph 9.8.1 in the London Plan also notes London's net self-sufficiency figure:
*In 2015, London managed 7.5mt of its own waste and exported 11.4mt of waste. London also imported 3.6mt of waste. This gives London a current waste net self-sufficiency figure of approximately 60 per cent. Around 5mt (49 per cent) of waste exported from London went to the East of England and 4.2mt (42 per cent) to the South East. The bulk of this waste is CD&E (Construction, Demolition & Excavation) waste. Approximately 1.3mt of waste was exported overseas. **The term net self-sufficiency is meant to apply to all waste streams, with the exception of excavation waste.** The particular characteristics of this waste stream mean that it will be challenging for London to provide either the sites or the level of*

compensatory provision needed to apply net self-sufficiency to this waste stream.

3.13. Given this, any waste arising and/or apportionment target will refer to C & D waste streams. LBTH's own arisings and capacity figures will be discussed in further detail within Section 4 of this topic paper.

3.14. To address matters in managing waste across London, Paragraph 9.8.3 states:

Waste contracts do not recognise administrative boundaries and waste flows across borders. Therefore, sufficient sites should be identified within London to deal with the equivalent of 100 per cent of the waste apportioned to the boroughs as set out in Table 9.2. The Mayor will work with boroughs, the London Waste and Recycling Board, and the London and neighbouring Regional Technical Advisory Bodies to address cross-boundary waste flow issues. Examples of joint working include ongoing updates to the London Waste Map, sharing data derived from Circular Economy Statements, the monitoring of primary waste streams and progress to net self-sufficiency, supporting the Environment Agency's annual monitoring work, and collaboration on management solutions of waste arisings from London. [emphasis added].

3.15. In addition to this, Paragraph 9.8.6 discusses the waste apportionments and the need for waste management facilities to meet capacity:
National policy guidance requires boroughs to have regard to the waste apportionments set out in the London Plan. The Plan's waste apportionment model defines the proportion of London's total household, commercial and industrial waste that each borough should plan for, and these apportionments are set out in Table 9.2. Part B3 requires boroughs to allocate sufficient land (sites and/or areas) and identify waste management facilities to provide the capacity to manage their apportioned tonnages of waste. Boroughs are encouraged to collaborate by pooling their apportionment requirements. Boroughs with a surplus of waste sites should offer to share these sites with those boroughs facing a shortfall in capacity before considering site release [emphasis added].

Adopted Development Plan Documents

3.16. The adopted LB Tower Hamlets Local Plan demonstrates that there is not enough capacity within existing waste facilities to meet the borough need. Given the recent return of planning powers from the LLDC back to Tower Hamlets, policies S7 and S8 in the current LLDC Local Plan will also apply to planning decisions within the relevant area. Both sets of policies (adopted LBTH Local Plan and LLDC Local Plan) will be superseded by the emerging Local Plan once it is adopted.

Tower Hamlets Waste Management Strategy

3.17. The Tower Hamlets Waste Management Strategy (2018-30) sets out the borough's approach to collecting waste and meeting environmental goals. It presents the ideas on how services are improved and how to respond to waste challenges in the borough. The strategy covers six priorities and aims to manage reduction of waste at a local level:

- Collaboration at the heart of change
 - Working together to reduce, reuse and recycle waste.
- Supporting people to love their neighbourhood
 - Design of services to accommodate and encourage waste management.
- Supporting people to reduce, reuse and recycle
 - Follow the three Rs within daily life to lower environmental impact.
- Making waste a resource
 - Provide opportunities for reuse of waste.
- Reducing carbon and improving air quality
 - Cutting emissions generated by waste management activities.
- Building our green economy
 - Capitalise on green opportunities for residents and businesses.

4. Existing Waste Context

LBTH Waste Arisings

- 4.1. Below is a table which indicates the average LBTH C, D & E arisings from 2017-2021 projections over the Local Plan period from the Waste Data Study (2023). This data has been calculated through applying the suggested methodology from the Waste PPG and calculating an average across the plan period which provides an approximate 'constant over time' projection for C, D & E arisings.

Table 1: Average LBTH C,D& E arisings 2017-2021 from the Waste Data Study (2023)

Waste stream	2026	2031	2036	2041
C&D	82,364	82,364	82,364	82,364
Excavation	373,498	373,498	373,498	373,498
Total C,D&E	455,862	455,862	455,862	455,862

- 4.2. As noted in the Waste Data Study (2023) paragraph 4.5:
The methodology for calculating C&D waste arisings is set out in paragraph 33 of the Planning Practice Guidance: Waste. It states, "Waste planning authorities should start from the basis that net arisings of construction and demolition waste will remain constant over time" and goes on to say that any significant planned regeneration or major infrastructure projects over the timescale of the Plan may be relevant.
- 4.3. With LBTH having London's highest housing target, the C&D arisings are correspondingly high. Therefore, providing for the predicted C&D arisings within the constraints of the borough presents a particular challenge because most of the borough is densely built-up and there are competing pressures from higher value land uses such as meeting housing and employment land needs.
- 4.4. It is important to note that there is no requirement to provide capacity to meet the excavation waste arisings. Given the nature and scale of excavation waste, the London Plan recognises that excavation waste self-sufficiency for London is not achievable.

LBTH Waste Capacity and Apportionment figures

- 4.5. As set out previously, within the London context, waste arisings and apportionment can differ significantly. It is the latter for which boroughs need to plan. The table below sets out the borough's waste capacity requirements from 2026-2041 (tonnes).

Table 1: LBTH Waste capacity requirements 2026-2041 (tonnes) from Table 9.2 in London Plan (2021) and Tower Hamlets Waste Data Update (2024)

Waste stream	2026	2031	2036	2041
Apportionment (LACW and C&I)	197,000	199,000	203,000	207,000

Existing Safeguarded waste sites

4.6. LBTH has the following existing safeguarded waste sites:

- Clifford House, Towcester Road (Strategic Industrial Land)
- Northumberland Wharf, Yabsley Street (Safeguarded wharf)
- Ailsa Street
- 455 Wick Lane (former LLDC area)

4.7. The table below lists the safeguarded waste sites with the maximum throughput capacity and waste management capacity from the Waste Data Study (2023).

4.8. It should also be noted that McGrath House, Hepscott Road, a former waste site, is not proposed for inclusion as a safeguarded waste site in the draft plan. This site was granted planning permission to relocate the waste capacity of the site to Barking in the London Borough of Barking and Dagenham which contributed to the loss of this safeguarded waste site for LBTH. This is explained in more detail in Chapter 5.

Table 3: Safeguarded waste sites in the borough alongside the maximum throughput capacity and waste

Site Name	Address	Site Area (ha)	Facility type	Input Waste type(s)	Maximum throughput (tonnes)	Waste Management Capacity
Towcester Road (Clifford Devlin)	Clifford House, Towcester Road, Bow, London, E3 3ND	0.014	Hazardous Waste Transfer Station	Hazardous	263	0
Northumberland Wharf Transfer Station (Cory)	Yabsley Street, Poplar, London, E14 9RG	0.841	Reuse and Recycling Centre (RRC) and Transfer Station	LACW/ C&I	158,181	2,000

Ailsa Street ¹	2 Ailsa St, Aberfeldy Village, London E14 0LE	0.529	Transfer and treatment	C, D & E		23,850 – 34,450
J B Riney & Co Ltd (Former LLDC area)	455 Wick Lane, Bow, London, E3 2TB	0.028	Transfer Station	C, D & E	64,610	0

4.9. Per Paragraph 9.8.4 in the London Plan, only capacity which ‘manages’ waste in line with the definitions listed below can contribute to meeting the waste management need in the borough.

Waste is deemed to be managed in London if any of the following activities take place within London:

- *waste is used for energy recovery*
- *the production of solid recovered fuel (SRF), or it is high-quality refuse-derived fuel (RDF) meeting the Defra RDF definition as a minimum which is destined for energy recovery*
- *it is sorted or bulked for re-use (including repair and re-manufacture) or for recycling (including anaerobic digestion)*
- *It is reused or recycled (including anaerobic digestion).*

4.10. It must also be noted that per paragraph 9.8.1, excavation waste is not included in the waste streams that go towards the London Plan as ‘the particular characteristics of this waste stream mean that it will be challenging for London to provide either the sites or the level of compensatory provision needed to apply net self-sufficiency to this waste stream.’

¹ Ailsa Street is a safeguarded waste site but is not currently operational. Its contribution towards apportionment targets is based on average throughputs per hectare, depending on the facility/technology.

5. Summary of Evidence Base

5.1. As part of the evidence base work, LBTH has commissioned two waste studies, the Waste Data Study (2023) and Waste Study Update (2024). The Waste Data Study (2023) identified a shortfall in meeting our need for waste management facilities. Following this we commissioned the Waste Study Update (2024) to test alternatives for managing waste in the borough to provide a more detailed review. Its purpose was to determine if no other boroughs had spare capacity to offer, how else LBTH might be able to meet its need entirely in the borough. However, following the publication of the Regulation 19 (2024) version of the plan, concerns were raised by statutory stakeholders relating to the proposed approach, which resulted in a second focused regulation 19 publication, focused on specific policies to address concerns raised – including a revised draft policy RW1. A summary of the evidence underpinning the proposed submission version policy is set out below.

Waste Data Study (2023)

5.2. Tower Hamlets commissioned a Waste Data Study (July 2023), prepared by Vitaka, to inform its Regulation 18 Draft Local Plan. The study indicated that there is a significant gap between the existing waste management capacity and the borough's need for capacity to manage waste generated.

5.3. Given the lack of available locations in the borough for new waste facilities, the Waste Data Study recommended that Tower Hamlets approach neighbouring waste authorities to request that some of their excess capacity be transferred to Tower Hamlets to help meet its apportionment, as set out in Policy SI8 the adopted London Plan (2021).

5.4. Paragraph 9.8.6 of the policy encourages boroughs to collaborate by pooling the apportionment requirements to ensure London achieves net self-sufficiency by 2026. Those boroughs which have identified surplus waste sites should also offer these sites to boroughs which are facing a shortfall in waste management capacity before considering the sites to be released for other uses.

McGrath House, Hepscoth Road

5.5. The study also identified the site at McGrath House, Hepscoth Road where planning permission was granted by the London Legacy Development Corporation (LLDC) for the loss of a safeguarded waste site in the Tower Hamlets part of the LLDC (LLDC Planning Reference: 16/00451/OUT).

5.6. This application was granted on the basis that the capacity of the site was being re-provided within London, in this case in LB Barking and Dagenham within the East London Joint Waste Planning Group (ELJWPG). The owner of the site (McGrath) was also the owner of the site in Barking and Dagenham (River Road) and demonstrated that there was spare capacity

within the River Road site to accommodate all of the waste processing from the LLDC site. They received agreement from the GLA that they could transfer the capacity from the LLDC site to River Road. The officer's report from May 2018 addressed the issues identified by the LLDC Planning Decisions Committee in February 2018. The Planning Committee report from February 2018 in paragraph 10.8 noted the below:

*It is true that the Hepscoth Road site has the capacity to contribute significantly towards Tower Hamlets' waste apportionment target, but it has been operating far below its practical capacity for a number of years, and is only treating small quantities of waste relevant to The London Plan apportionment (household and commercial & industrial waste). The site has a maximum throughput of 200,000 tonnes per annum. **The latest available information in the Environment Agency's Waste Data Interrogator, shows that in 2016 the Hepscoth Road site managed 26,353 tonnes of waste that counts towards Tower Hamlets' waste capacity apportionment.***

- 5.7. The Planning Committee report from May 2018 in paragraph 10.5 noted the below:

*In 2016 McGrath's Hepscoth Road site managed 26,353 tonnes of apportioned waste, compared to the site's maximum throughput capacity of 200,000 tonnes per annum. **LBTHs recent 'Waste Management Evidence Base Review 2017' states that the site's current contribution towards the borough's apportionment target has further reduced to 10,539 tonnes.***

- 5.8. The Planning Committee report from February 2018 recommended that the waste planning process for the East London Joint Waste Plan (ELJWP) should formalise this and that the lost capacity (26,353 tpa) be 'transferred' back to Tower Hamlets to help meet its apportionment. The Waste Data Study (2023) also recommended that this lost capacity – 26,353tpa - be 'transferred' back to Tower Hamlets to help meet its apportionment, meaning that it would be specifically safeguarded within the ELJWP to process waste from Tower Hamlets.

- 5.9. Despite the May 2018 report indicating that the capacity of the Hepscoth Road site has reduced to 10,539 tonnes, the Waste Data Study (2023) recommends that the capacity noted in the February 2018 report (26,353tpa) should be transferred back to Tower Hamlets to meet its apportionment targets. The figure of 26,353tpa was confirmed to be the overall waste capacity of the site in the Waste Data Study (2023). The figure of 10,539tpa was confirmed to be the operational number at the time. The Waste Data Study (2023) recommended that the overall waste capacity figure be put forward to be 'transferred' back to Tower Hamlets to meet waste apportionment targets.

Waste Study Update (2024)

- 5.10. Following consultation on LBTH's Draft Local Plan (Regulation 18), Tower Hamlets commissioned a Waste Study Update (May 2024), prepared by BPP, to include a more comprehensive search for potential waste sites in the borough in order to test a scenario in which no nearby waste planning authority was able to assist Tower Hamlets in meeting its need.
- 5.11. That search identified additional capacity at Northumberland Wharf and included Onsite Segregation Facilities (OSFs) as part of the waste capacity for Tower Hamlets. The inclusion of OSFs as part of a borough's waste capacity is untested – no local authority is known to have used OSFs to meet its waste planning requirements. OSFs were included as part of testing to see if it was possible for Tower Hamlets to meet its apportionment requirements within the borough if other boroughs did not have spare capacity.

Exempt sites

- 5.12. Both the Waste Study (2023) and the Waste Study Update (2024) identified 'exempt sites' - sites that carry out waste processes that do not require an Environment Agency permit. Both studies count the capacity of exempt sites towards the borough's overall capacity for HIC (Household, Industrial and Commercial) waste but provide different capacity numbers. Both studies also acknowledge that determining capacity for exempt sites is challenging given the lack of data. The Waste Study (2023) identifies 12,630 tpa of capacity in exempt sites. The Waste Study Update (2024) identifies 38,610 tpa of capacity in exempt sites.
- 5.13. Both the GLA and the Environment Agency, in their responses to the Regulation 19 (2024) publication, objected to the use of exempt sites to meet the borough's waste capacity requirements. It should be noted that exempt sites were included in the evidence base supporting the Regulation 18 draft Local Plan, and neither the GLA nor the Environment Agency raised a concern at that time. Exempt sites meet the London Plan definition of waste sites, and as such LBTH has included some capacity from exempt sites in its overall waste capacity. LBTH has applied the more conservative figure of 12,630 tpa that was included in the Waste Study (2023) towards the borough's waste apportionment, given the difficulty of obtaining accurate capacity levels for exempt sites, to ensure that the waste management capacity of such sites is not overstated.

Capacity of C, D & E waste

- 5.14. The Waste Study Update (2024) also investigated capacity for the management of Construction and Demolition Waste (C&D), giving a shortfall of 56,953tpa from the borough's apportionment to 2041. The study investigated the capacity of existing operational C&D processing facilities in the borough; however, in the search for sites, it identified an additional

5.28ha of available land in Strategic Industrial Locations and Local Industrial Sites that could be suitable for C&D waste facilities. Based on an estimate of 85,000 tpa per ha, it stated that this potential additional capacity could potentially meet the borough's demand to 2041.

6. Representations to Regulation 19 (2024)

- 6.1. As part of LBTH's first Regulation 19 consultation (16 September 2024 to 28 October 2024), the Council received representations for draft waste policy RW1 from the GLA, Environment Agency, ELJWPG, RB Greenwich, LB Southwark and the South East London Joint Waste Planning Group (SELJWPG).
- 6.2. Based on comments received, it was considered that further work would benefit some areas. Therefore, the Council undertook a second, focused policies consultation (Regulation 19) which ran between 20 June 2025 and 1 August 2025. Given the findings of further evidence and changes in the policy approach, the Council re-consulted on specific policies including draft policy RW1 – managing our waste.
- 6.3. In summary for the Regulation 19 (2024), the Greater London Authority (GLA) and the Environment Agency (EA) objected to the proposed use of On-site Segregation Facilities (OSFs) and exempt sites to meet LBTH's waste management requirements, whilst the ELJWPG requested further clarification. A number of other boroughs indicated they were unable to assist LBTH with meeting our waste apportionment.
- 6.4. An overview of representations received from key stakeholders is set out below. Further detail can be found in the Regulation 22 consultation statement.

Greater London Authority (GLA)

- 6.5. The GLA provided the following representation in response to the Regulation 19 publication in 2024:

LBTH is not part of a waste planning group. The East London Waste Plan is being reviewed and has established surplus capacity of ranging between approximately 0.63 and 1.0 million tonnes per annum (Mtpa) for apportioned waste management up to 2041. It is noted that LBTH have made contact with the East London Waste Planning Group requesting their assistance/to join through the Duty to Cooperate, however further clarity is required on the outcome of those conversations.

The Regulation 18 consultation identified a shortfall in the borough's apportionment and available waste capacity, stating that between 1.5 and 3.2 hectares of land is required to meet the capacity gap for apportionment up to 2041 (according to Waste Data Study 2023).

The draft Plan now states that the council has carried out a search for additional waste capacity and suggests LBTH have found sufficient capacity to meet its waste apportionment in the borough. However, LBTH are proposing to meet its waste apportionment via 'on-site segregation facilities'

and ‘exempted waste sites’. Paragraph 9.9.1 of LP2021 defines waste sites as those that have planning permission for a waste use or a permit from the Environment Agency. Therefore ‘on-site segregation facilities’ and ‘exempted waste sites’ cannot be counted. As such, it is considered that currently LBTH is not able to meet its waste apportionment over the Plan period and therefore it is the Mayor’s opinion that the proposed approach to waste management is not in general conformity with the LP2021. (Emphasis added.)

LBTH are proposing to safeguard Northumberland Wharf, Ailsa Street and 144 Wick Lane as set out in Table 15. However, it is noted that Clifford House, Towcester Rd (SIL site) is missing from safeguarding in the draft Plan. This omission should be corrected.

The Mayor welcomes amended policy wording to ensure that applications that propose replacement waste capacity have regard to their position in the waste hierarchy, however, it is not clear how each identified waste location refers to the ‘Waste Hierarchy Diagram’ as seen in Figure 22 of the draft Plan.

Environment Agency

- 6.6. At Regulation 19 consultation, the EA submitted comments raising concerns regarding the use of ‘On- Site Segregation Facilities’ and exempted waste sites towards the borough apportionment. It is further stated that according to the London Plan’s definition that waste management capacity is ‘land with planning permission for a waste use or a permit from the Environment Agency for a waste use,’ therefore storage and segregation of waste would not be considered waste operations. The EA recommended the removal of waste management capacity as accounted via On-Site Segregation Facilities and the removal of exempt sites from the capacity calculation.

East London Joint Waste Planning Group (ELJWPG)

- 6.7. The East London Joint Waste Planning Group requested clarity regarding LBTH’s waste position – whether it is requesting capacity from the ELJWPG or meeting its requirements using on-site segregation facilities and areas of search. Further clarity has since been provided through ongoing Duty to Cooperate discussions and a subsequent focused Regulation 19 consultation which included a revised proposed waste policy.

South East London Joint Waste Planning Group (SELJWPG)

- 6.8. Comments received from the SELJWPG noted that the joint waste planning technical paper has not been updated in several years and this work will need

to be done prior to any consideration of meeting other London borough's waste apportionment requirements.

RB Greenwich and LB Southwark

- 6.9. RB Greenwich and LB Southwark reiterated the overall response from SELJWPG and indicated that they were not in a position to provide waste capacity to LBTH at this time, but that the South East London Waste Plan may have surplus capacity once the Waste Technical Paper is updated.

7. Representations to Regulation 19 (2025)

- 7.1. As part of LBTH's focused Regulation 19 consultation which ran between 20 June 2025 and 1 August 2025. The Council received comments for draft waste policy RW1 from the GLA, Environment Agency and ELJWPG. As part of this consultation, LBTH also issued another set of letters to all London boroughs requesting assistance with waste capacity. More detail can be found in Appendix 2.
- 7.2. In summary, the GLA and the EA objected to Northumberland Wharf Transfer Station counting towards the borough's apportionment requirements. The EA reiterated their objection to exempt sites being included towards the borough's apportionment. The ELJWPG considered that LBTH's discussions with other waste planning authorities are insufficient.

Greater London Authority (GLA)

- 7.3. The GLA queried whether, despite the removal of specific reference to OSFs, they were still being used to contribute towards the borough's waste apportionment needs and more clarification is required by what is meant by 'small-scale waste management'. They noted that the supporting text mentions that the Ailsa Street site is located within a regeneration area and may be released for other uses. They stated that given the borough is not able to meet its waste apportionment requirements, this site should not be recommended for release for other uses unless compensatory capacity is sought.
- 7.4. They also objected to Northumberland Wharf Transfer Station counting towards the borough's waste management capacity.

Environment Agency

- 7.5. The EA have recommended that exempt sites and the Northumberland Wharf Transfer station should not count towards the borough's apportionment requirements. They consider that these sites are only permitted for transfer activities so would not meet the apportioned capacity per the GLA's policy requirements.

East London Joint Waste Planning Group (ELJWPG)

- 7.6. The ELJWPG considered that LBTH's discussions with other London waste planning authorities on waste capacity are insufficient. The ELJWPG deem it necessary for LBTH to engage with other waste planning authorities/groups rather than solely focusing on the ELJWPG, given the significant waste flows to LB Bexley. The ELJWPG do not consider that LBTH have satisfactorily demonstrated why the identified management capacity deficits cannot be met on LBTH SIL/LIL. The ELJWPG consider that a detailed land availability

assessment is required to assess the suitability, availability and deliverability of land in the borough. Engagement with landowners is also required to demonstrate the process has been thorough. The ELJWPG also considers that the Integrated Impact Assessment (IIA) does not adequately consider an alternative scenario in which designated industrial land is used to accommodate waste facilities.

8. Waste Capacity Shortfall

8.1. Taking into consideration the representations received from the GLA and Environment Agency in response to both Regulation 19 publications and based on the borough's capacity figures from evidence and apportionment as set out in the adopted London Plan (2021), the borough has a capacity shortfall which has been identified within the Waste Data Study (2023) and Waste Study Update (2024). This is shown below.

Table 5: Shortfall capacity figures identified within Waste Study Update (2024)

Waste stream	Shortfall figure (tpa)
C&D	56,953
HIC	192,370

8.2. The shortfall figure for C&D waste is calculated by taking the C&D waste arisings (as determined in the Waste Study Update (2024): 127,961tpa, multiplying it by 0.95 to recognise the London Plan's recycling and recovery target, and subtracting the capacity available from safeguarded sites that handle C&D waste: 64,610tpa.

8.3. The shortfall figure for HIC waste is calculated by taking the borough's London Plan apportionment: 207,000tpa by 2041, subtracting the capacity from safeguarded waste sites: 2000tpa, and subtracting capacity that is provided by exempt sites: 12,630tpa.

8.4. As stated in the Regulation 19 (2025) consultation by the GLA and EA, given that the majority of the waste processed on the Northumberland Wharf site is being trans-shipped to waste facilities elsewhere in London, the GLA objected to the counting of the site's full capacity towards the borough's waste management capacity. The Environment Agency also objected to the use of the full capacity of Northumberland Wharf on the basis that it only has a permit for transfer activities.

9. Partnership Working and Duty to Cooperate

- 9.1. As part of ongoing work for Duty to Cooperate, LBTH has participated in different avenues for partnership working. LBTH has engaged with relevant stakeholders constructively, actively, and on an ongoing basis. LBTH formally wrote to boroughs and Waste Planning Authorities to request assistance in meeting our waste apportionment twice during the plan-making process (14 October 2024 and 20 June 2025); these letters are included in Appendix 2. Appendix 3 sets out a full summary of the responses received. Detail on ongoing Duty to Cooperate discussions is included below. Further information can be found within the Duty to Cooperate statement.

London Waste Planning Forum

- 9.2. LBTH has routinely attended and participated in meetings of the London Waste Planning Forum on an ongoing basis, which provides a forum for co-operation between waste planning authorities in London and contact with authority representatives beyond London.

Greater London Authority (GLA)

- 9.3. LBTH has engaged with ongoing discussions with the GLA to discuss matters concerning the Council's request to the ELJWPG to seek their excess capacity (identified in their Regulation 19 plan and discussed in Chapter 8 of this paper) for our waste apportionment and their view on the ELJWPG criteria (discussed in Chapter 8 of this paper). The GLA has voiced their support in the Council's approach to requesting excess capacity from neighbouring authorities in particular the ELJWPG to meet the waste apportionment.

East London Joint Waste Planning Group (ELJWPG)

- 9.4. The ELJWPG consists of the east London boroughs of Barking & Dagenham, Havering, Newham and Redbridge. They work collectively to plan for waste and prepared the East London Waste Plan which was adopted in 2012. As the plan is outdated, the group have carried out a Regulation 18 consultation in summer 2024 and Regulation 19 consultation in May/June 2025. They have submitted their submission version plan to the Secretary of State for examination in January 2026.

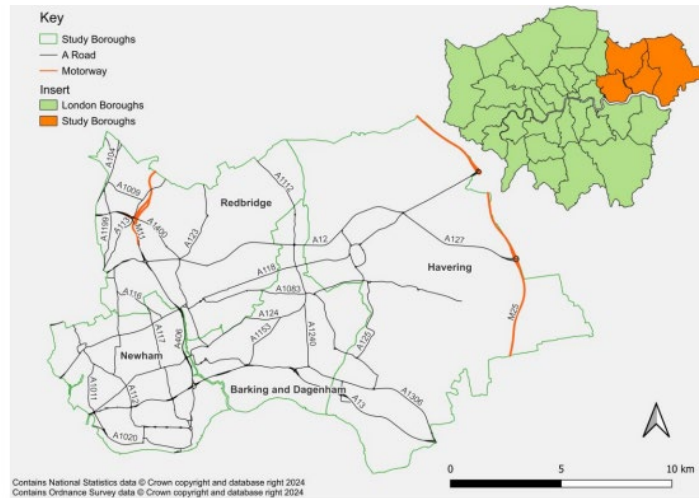


Figure 1: The area covered by the East London Joint Waste Plan (From Draft East London Waste Plan Regulation 19)

9.5. Tower Hamlets shares a boundary with LB Newham which forms part of the group.

Existing Waste Flows

9.6. According to the Waste Data Study (2023), a significant amount of waste is imported from other boroughs in London to LBTH's transfer station before its onward journey to be managed at other facilities. In 2020 and 2021, the Northumberland Wharf Transfer Station received 251,957 tonnes of imported waste from the East London Waste Authority. The most recent data from 2024 shows 172,600 tonnes of waste received into the Northumberland Wharf transfer station. By comparison, a transfer station located in Barking received 16,894 tonnes of waste according to the WDI (2024).

9.7. In 2021, LB Newham in total received 36,103 tpa² of recorded Local Authority Collected Waste (LACW) and Commercial & Industrial (C&I) (which together make up HIC waste) waste from Tower Hamlets. The Waste Data Study (2023) indicates that LBTH's mixed recyclables are taken to a Materials Recovery Facility (MRF) in Newham to be sorted before their onward journey to be reprocessed into new products. Given the established waste flows across the boundary with LB Newham and other East London boroughs, LB Newham are well-positioned to receive continued waste exports from Tower Hamlets and transfer some excess capacity which is detailed below.

9.8. It should be noted that Tower Hamlets is the only London borough that does not have a capacity sharing agreement with another waste planning

² Source: Waste Data Interrogator and ENV18 Tables 2017-2021

authority. The 'proximity principle' encourages waste to be disposed and recovered in nearby waste facilities as noted in the Waste Framework Directive. Therefore, given the geographical location, the ELJWPG would be the most appropriate joint waste planning group for LBTH to join. In addition to this, being adjacent to the boroughs within the ELJWPG means that transportation of waste does not need to go further afield thus reducing carbon emissions relating to waste management.

- 9.9. As part of engagement with neighbouring authorities, officers from Tower Hamlets approached the member boroughs of the East London Joint Waste Planning Group (ELJWPG) in 2023 to inquire about joining the ELJWPG or, should this not be possible, passing some of LBTH's waste apportionment (as set out in the London Plan) to the ELJWPG to address our borough's shortfall in capacity. The ELJWPG indicated that adding an additional borough to the membership would significantly delay the process of developing a new waste plan and was therefore not considered possible at that time. This email has been included in Appendix 4.

Consultation responses

- 9.10. A response from LBTH was also submitted in October 2024 as part of the ELJWPG's Regulation 18 consultation which is included in Appendix 5. The comments provided a summary of LBTH's shortfall in capacity in meeting the London Plan waste apportionment and a summary of our evidence base as discussed in this topic paper.
- 9.11. The comments formally requested assistance from the ELJWPG in meeting the waste management needs in accordance with London Plan policy SI8. LBTH also highlighted the concerns that the draft ELJWP proposes to release waste sites before it has been established whether other boroughs in London require additional capacity to meet their needs, which is premature.

Request to assist with waste management capacity shortfall

- 9.12. The ELJWP acknowledges that the waste apportionments for East London are significantly higher than projected waste arisings in recognition of East London's role in meeting London's overall target of net self-sufficiency.
- 9.13. The Proposed Submission ELJWP (Regulation 19) identifies a waste management apportionment of 1,497,000tpa by 2041 for the whole ELJWPG. The overall capacity within the ELJWPG is 2,619,508tpa, meaning that the authority has a surplus HIC waste management capacity of 1,122,508tpa.
- 9.14. The ELJWP also identifies a surplus capacity for Construction, Demolition and Excavation (C,D&E) waste of 980,000tpa.

- 9.15. The ELJWPG (East London Joint Waste Planning Group) also indicated that they would consider transferring some of their excess capacity to Tower Hamlets if the borough could demonstrate that it was not possible to meet its waste apportionment within the borough.
- 9.16. Based on the shortfall figures, LBTH request that 56,935tpa of Construction, Demolition and Excavation (C, D&E) waste capacity be transferred to Tower Hamlets or safeguarded specifically to meet LBTH's waste requirements.
- 9.17. In addition to this, LBTH requested that 26,353tpa of Household, Industrial and Commercial (HIC) waste capacity also be transferred to Tower Hamlets to match the loss of the site in the Hepscott Road site in the former LLDC area, as was agreed in the committee report. The Tower Hamlets' Waste Data Study recommended that this lost capacity – 26,353tpa - be 'transferred' back to Tower Hamlets to help meet its apportionment, meaning that it would be specifically safeguarded within the ELJWP to process waste from Tower Hamlets.
- 9.18. Following discussions between LBTH, the GLA and the EA, Tower Hamlets has made the decision to use the more conservative figure for capacity from exempt sites set out in the 2023 Waste Study. In addition to this, in response to comments from the GLA and EA which objected to the use of the full capacity of Northumberland Wharf on the basis that it only has a permit for transfer activities, this capacity has been removed from the borough's overall capacity. As a result, LBTH's shortfall is 192,370tpa of HIC waste capacity, and this is the figure that LBTH is seeking assistance for from the ELJWPG. This would represent roughly 17.1% of the ELJWPG's surplus HIC waste capacity and roughly 5.8% of the ELJWPG's surplus C,D&E waste capacity.
- 9.19. As part of ongoing discussions with ELJWPG they have provided LBTH with a list of criteria they have produced to formally request some of their surplus capacity. These criteria have been drawn from the London Plan requirements with some notable changes. They were included within the Duty to Cooperate Statement draft that supported the East London Waste Plan at Regulation 19. More information can be found in the Statement of Common Ground with the ELJWPG. The list of criteria is addressed in the next section.

Addressing ELJWPG criteria

- 9.20. The ELJWPG provided LBTH with a set of criteria that at the time of sending, it intended to include in their Regulation 19 version of the ELJWP in order to assess requests from other waste planning authorities for requests for assistance in meeting their waste requirements. The full list of criteria can be found in Appendix 1.

9.21. It is noted that some criteria follow London Plan guidance, however, some criteria do not follow London Plan guidance, in particular, criteria 1(f). LBTH has provided commentary to the ELJWPG in relation to the criteria which are listed in the table below.

9.22. Whilst the criteria have not been included or referenced in the Regulation 19 ELJWP itself, but is instead included within an appendix to the Duty to Cooperate Statement, to demonstrate the Council's engagement and cooperation with the ELJWPG, a response to the ELJWPG's initial draft criteria has been included.

ELJWP proposed criteria	How proposed LBTH approach meets proposed criteria
1(a) 'Capacity within existing waste sites and how policy included in the source Borough's Local Plan requires new proposals to <u>maximise</u> capacity' (emphasis added)	It is worth noting in ELJWP criteria that London Plan policy SI8 part A(3) notes that <i>the waste management capacity of existing sites should be optimised</i> rather than maximised. In the draft Local Plan, policies RW1, RW2 and RW3 require existing sites to maximise capacity for waste management. It also covers the need for new developments to accommodate suitable and accessible space for all types of waste including recyclables, organics, residual and bulky waste. Policy RW1 specifies which existing sites in the borough are safeguarded for waste use over the plan period. The policy supports proposals for enhancing and maximising capacity at these sites. The policy also notes that applications for non-waste uses will only be permitted through legal agreements that secure the waste capacity within suitable alternative sites. The Agent of Change principle is also applied within this policy to ensure other non-waste proposed uses do not negatively impact the function and operations of existing and safeguarded sites.

	<u>Capacity of existing waste sites:</u> <table><tr><th>Site Name</th><th>Facility type</th><th>Input Waste type(s)</th><th>Maximum throughput (tonnes)</th><th>Waste Management Capacity</th></tr><tr><td>Northumberland Wharf Transfer Station (Cory)</td><td>Reuse and Recycling Centre (RRC) and Transfer Station</td><td>LACW/C&I</td><td>158,181</td><td>160,000</td></tr><tr><td>Towcester Road (Clifford Devlin)</td><td>Hazardous Waste Transfer Station</td><td>Hazardous</td><td>263</td><td>0</td></tr><tr><td>Ailsa Street (Site allocation)³</td><td>Transfer and treatment</td><td>C, D & E</td><td></td><td>23,850 – 34,450</td></tr><tr><td>J B Riney & Co Ltd (Former LLDC area)</td><td>Transfer Station</td><td>C, D & E</td><td>64,610</td><td>0</td></tr></table> <u>Tower Hamlet's apportionment:</u> The London Plan sets out borough level apportionments of household, commercial and industrial waste 2021-2041. Tower Hamlet's apportionment is 2.4% of London's total waste to be managed in borough. The 2021 figure lists Tower Hamlet's apportionment as 195,000 tonnes and increases to 207,000 tonnes by 2041.	Site Name	Facility type	Input Waste type(s)	Maximum throughput (tonnes)	Waste Management Capacity	Northumberland Wharf Transfer Station (Cory)	Reuse and Recycling Centre (RRC) and Transfer Station	LACW/C&I	158,181	160,000	Towcester Road (Clifford Devlin)	Hazardous Waste Transfer Station	Hazardous	263	0	Ailsa Street (Site allocation) ³	Transfer and treatment	C, D & E		23,850 – 34,450	J B Riney & Co Ltd (Former LLDC area)	Transfer Station	C, D & E	64,610	0
Site Name	Facility type	Input Waste type(s)	Maximum throughput (tonnes)	Waste Management Capacity																						
Northumberland Wharf Transfer Station (Cory)	Reuse and Recycling Centre (RRC) and Transfer Station	LACW/C&I	158,181	160,000																						
Towcester Road (Clifford Devlin)	Hazardous Waste Transfer Station	Hazardous	263	0																						
Ailsa Street (Site allocation) ³	Transfer and treatment	C, D & E		23,850 – 34,450																						
J B Riney & Co Ltd (Former LLDC area)	Transfer Station	C, D & E	64,610	0																						
1(b), 'that all existing waste sites (including those safeguarded by EA permits via the London Plan) are being	All safeguarded sites are listed in the draft Local Plan and under Policy RW1 are subject to appropriate release criteria specifically in Part 4 of the policy. The London Borough of Tower Hamlets is not proposing release of any waste sites in the borough. Subject to Part 4, applicants proposing to release a waste site																									

³ Ailsa Street is a safeguarded waste site but is not currently operational. Its contribution towards apportionment targets is based on average throughputs per hectare, depending on the facility/technology.

safeguarded subject to appropriate release criteria'	would need to demonstrate there would be no overall net loss of waste capacity across London per guidelines in the London Plan. It should be noted that, while Clifford House was excluded from the list of safeguarded sites in the Regulation 19 (2024) local plan, this was in error and the council has proposed a suggested change to return it to the list of safeguarded sites in the Regulation 19 (2025). In addition to this, as part of the Regulation 19 (2025), Policy RW1 explicitly states that all existing waste sites are being safeguarded.
1(c) 'whether any waste sites have been lost due to redevelopment in the source Borough since London Plan was adopted and how compensatory capacity has been provided'	Under a decision by the London Legacy Development Corporation's planning committee (LLDC Planning Reference: 16/00451/OUT), the site at Hepscott Road was lost due to residential redevelopment. To allow the redevelopment to proceed, the waste capacity was shifted to an existing waste site within Barking. The Officer report from May 2018 recommended that the waste planning process for the ELJWP (East London Joint Waste Plan) should formalise this and that the lost capacity (26,353 tpa) be 'transferred' back to Tower Hamlets to help meet its apportionment. The report recommends that LBTH seek the capacity back from the London Borough of Barking & Dagenham as the waste capacity was shifted to the River Road waste site in Barking and/or the ELJWPG. The figure of 26,353tpa was confirmed to be the overall waste capacity of the site in the Waste Data Study (2023). The figure of 10,539tpa was confirmed to be the operational number at the time. The Waste Data Study (2023) recommended that the overall waste <i>capacity</i> figure be put forward to be 'transferred' back to Tower Hamlets to meet waste apportionment targets. No other waste sites have been lost to redevelopment in Tower Hamlets since the London Plan was adopted.
1(d) 'Assessment of Strategic Industrial Locations and Locally Significant Industrial Sites to accommodate waste capacity and proposals to	Under Chapter 6 of the Waste Data Study (2023), an assessment of SIL and LIL (LSIS) sites was undertaken to ascertain whether these sites can meet the borough's growing need for waste capacity. As noted in the report, the borough has two SIL sites: Empson Street (10.7ha) and Fish Island (South) (8.91ha). Based on findings from the 2023 Employment Land Review, all of the borough's industrial sites have extremely low vacancy rates and high rents implying a significant undersupply of land for industrial uses.

release such land for non-industrial uses.'	The Tower Hamlets Employment Land Review (2023) (ELR) demonstrates that the borough has a significant shortfall in industrial land to meet demand over the plan period of the new Local Plan. This demand is predominantly for logistics facilities and manufacturing, and relying on this land for waste management could further reduce the borough's ability to meet that demand. The London Plan places a significant emphasis on the need for local authorities, particularly in Inner London, to adequately protect their industrial land to ensure that it can meet the logistics and other needs of Central London. LBTH have carried out a Waste Land Availability Study to determine whether any industrial sites in the borough are suitable and available for waste facilities. The majority of landowners either responded that their site was not available for waste uses or failed to respond entirely, indicated that they are not pursuing alternative uses. The study only identified one site where the owner (TfL) suggested that they might consider a waste use, amongst other uses. Ultimately as a public sector landowner they would be driven by best value. This site is known as Moody's Wharf and is owned by TfL. They have indicated a long term aspiration to deliver a residential development on the site, in line with the site allocation, as part of their Places for London programme. TfL has indicated they are open to considering short term interim leases for a range of uses for 4-5 years. The site is only 0.37ha and would therefore be suitable for only small scale waste operations. On the basis of the landowner's timetable, the site would also not be available for waste use at the end of the plan period and therefore cannot be counted towards the borough's waste management capacity against the borough's London Plan apportionment. Given the site's uncertainty and the likelihood of a residential development in the medium term, it is not justified to include this site in the borough's waste capacity. Tower Hamlets also has two safeguarded wharves: Orchard Wharf and Northumberland Wharf. Northumberland Wharf includes a waste transfer station. There is currently an extant permission for Orchard Wharf for cement and aggregates storage and therefore the site is not considered available for waste facilities. Given the extant permission for Orchard Wharf, there has been no assessment for further waste capacity given the unavailability of the site. Under criterion 1a in this table, the waste management capacity for the Northumberland Wharf site is noted.
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1(e) 'Whether any applications for waste uses in the source Borough have been refused and if so the reasons for refusal'	According to both the Waste Data Study (2023) and the Waste Data Update (2024), there have been no refused waste applications in the borough. A general search on the borough's planning register for planning applications since 2017 brought up no relevant records for proposals for new waste sites or expansion of existing sites. A further detailed search was carried out with locational data of all current waste sites, SIL and LSIS to confirm if any applications had been put forward. No relevant records were brought up during this exercise.
1(f) 'Demonstrating that <u>all options have been explored</u> to identify suitable locations for further waste sites within the source borough(s) (consistent with national policy and the London Plan) and other London boroughs to meet capacity requirements. This should include the results of any call for waste sites and how conclusions not to allocate sufficient land to meet the requirements for which surplus is being sought were reached.'	It is not clear which specific part of the London Plan policy this criterion is referencing – this appears to be an additional criterion devised by ELJWPG. Notwithstanding, the following sets out that LBTH consider we have met the criteria. LBTH carried out a call for sites between 6 July 2022 to 19 August 2022. No potential waste sites were submitted as part of this process. The Waste Study Update (2024) also carried out a search for locations within SIL and LIL sites in the borough that could come forward for waste uses in the future. Further to this, LBTH carried out a Waste Land Availability Study to determine if waste uses could be accommodated in industrial locations. The majority of landowners either responded that their site was not available for waste uses or failed to respond entirely, indicated that they are not pursuing alternative uses. The study only identified one site where the owner (TfL) suggested that they might consider a waste use, amongst other uses. Ultimately as a public sector landowner they would be driven by best value. This site is known as Moody's Wharf and is owned by TfL. They have indicated a long term aspiration to deliver a residential development on the site, in line with the site allocation, as part of their Places for London programme. TfL has indicated they are open to considering short term interim leases for a range of uses for 4-5 years. The site is only 0.37ha and would therefore be suitable for only small scale waste operations. On the basis of the landowner's timetable, the site would also not be available for waste use at the end of the plan period and therefore cannot be counted towards the borough's waste management capacity against the borough's London Plan apportionment. Given the site's uncertainty and the likelihood of a residential development in the medium term, it is not justified to include this site in the borough's waste capacity.

	The GLA support LBTH's proposed approach in requesting assistance from the East London Waste Planning Group given they have excess capacity and based on the proximity principle.					
Part 2: 'The proximity of historic and existing significant flows of waste and availability of capacity for which capacity is being sought between, the source borough(s) and the ELJWP boroughs, including comparisons with any other London borough(s) that may have surplus capacity available.'	Chapter 7 of the Waste Data Study (2023) discusses the existing flows of waste exports. The table shown below lists the borough's recorded LACW (Local Authority Collected waste) and C&I (Commercial and Industrial) waste exports over 2500 tpa between 2017-2021 to LB Newham.					
	WPA	2017	2018	2019	2020	2021
	Newham (WDI)	1,445	1,319	10,870	14,301	15,133
	Newham (ENV18)	25,306	23,123	21,238	20,094	20,970
	WPA	2017	2018	2019	2020	2021
	East London (Havering)	54,378	45,772	41,797	12,133	75,248
East London (Newham)	7,622	10,031	59,587	39,648	38,436	
East London (Barking and Dagenham)	4,536	2,898	0	31,249	4,706	
	This table lists the borough's recorded C, D&E waste exports over 5000 tpa between 2017-2021 to East London waste authorities and demonstrates that all of LBTH's significant waste flows are to the ELJWPG boroughs.					

Please see Appendix 7 for further information for Tower Hamlets exports and waste received according to the WDI 2023.

In addition to this, according to the Waste Data Study (2023), a significant amount of waste is imported from other boroughs in London to the borough's transfer station before its onward journey to be managed at other facilities. This is shown in the table below:

Origin	Site and Waste Type	2017	2018	2019	2020	2021
East London Waste Authority	Northumberland Wharf Transfer Station (HIC)	-	-	-	109,017	142,940
WPA not codeable (London, South London)	Northumberland Wharf Transfer Station (HIC)	148,215	153,766	158,181	-	-
WPA not codeable (London, South London)	J B Riney & Co Ltd (C,D &E)	64,610	3,849	1,705	-	-
Various	Towcester Road (Hazardous)	259	163	110	107	0
Total		220,868	161,350	159,996	109,125	142,940

	Tower Hamlets are formally requesting a transfer of 56,935tpa of C&D waste as well as the transfer of capacity of 192,370tpa of HIC waste from the ELJWPG. This is to match the loss of the Hepscott Road site in the former LLDC area to formalise a previous agreement and to ensure that the borough can meet its apportionment requirement. The capacity of the Hepscott Road site was 26,363tpa. In addition, in response to objections from the GLA and EA, LBTH has reduced the reliance on exempt sites, using the more conservative capacity estimate included in the 2023 Waste Study. Also, in response to comments from the GLA and EA which objected to the use of the full capacity of Northumberland Wharf on the basis that it only has a permit for transfer activities, this capacity has been removed from the borough's overall capacity. The use of this more conservative figure increases the borough's HIC waste capacity shortfall to 192,370 tpa. The ELJWPG has proposed the release of several safeguarded sites across the four boroughs and has identified a surplus of waste management capacity of 1,122,508tpa of HIC waste and 980,000tpa of C, D & E waste following release of sites.
Part 3: 'Any relevant changes to the London Plan 2021, in particular those affecting the sharing of capacity and quantities of waste that Boroughs are expected to plan for.'	Any changes and updates to the waste apportionment figures and waste policies within the London Plan will be taken into account in any future assessment of waste management capacity within the borough.

- 9.23. Following discussions with the ELJWPG and the representation received at Regulation 19 (2025), in their opinion any request for capacity from the group requires further, robust evidence to support that position. This includes undertaking a further Waste Land Availability Study to determine if industrial sites in the borough can accommodate LBTH's apportionment.
- 9.24. Whilst it is considered that LBTH's evidence base is proportionate – and no other statutory stakeholders have raised issues with the proportionate nature of evidence provided, in the interest of effective and constructive joint working with the ELJWPG, LBTH have carried out further study on availability of SIL and LIL sites. As part of this process, the ELJWPG were also involved in agreeing the methodology of the study and providing comments to the study brief which were included.
- 9.25. Iceni Projects Ltd were commissioned to undertake a Waste Land Availability Study to determine if there are industrial sites available in the borough to accommodate waste uses. The Study assessed all industrial designations in the borough and considered whether they would be suitable for waste facilities and available for development. Iceni sifted out the sites that would not be suitable and contacted the land owners of the remaining sites. The majority of landowners either responded that their site was not available for waste uses or failed to respond entirely, indicated that they are not pursuing alternative uses. The study only identified one site where the owner (TfL) suggested that they might consider a waste use, amongst other uses. Ultimately as a public sector landowner they would be driven by best value. This site is known as Moody's Wharf and is owned by TfL. They have indicated a long term aspiration to deliver a residential development on the site, in line with the site allocation, as part of their Places for London programme. TfL has indicated they are open to considering short term interim leases for a range of uses for 4-5 years. The site is only 0.37ha and would therefore be suitable for only small scale waste operations. On the basis of the landowner's timetable, the site would also not be available for waste use at the end of the plan period and therefore cannot be counted towards the borough's waste management capacity against the borough's London Plan apportionment. Given the site's uncertainty and the likelihood of a residential development in the medium term, it is not justified to include this site in the borough's waste capacity.
- 9.26. A Statement of Common Ground (SoCG) has also been prepared with the ELJWPG on strategic waste matters and to seek to agree the transfer of waste capacity to Tower Hamlets from the ELJWPG. As part of this SoCG, LBTH sought agreement on agreement on a transfer of waste capacity from ELJWPG if the Waste Land Availability Study determines that no sites are available; however, the ELJWPG have not agreed to this.
- 9.27. LBTH have also prepared a Statement of Common Ground with the ELJWPG regarding the emerging East London Joint Waste Plan.

9.28. Overall, our evidence indicates we have a shortfall in meeting London Plan apportionment. We are seeking assistance from all London boroughs as noted in letters sent in October 2024 and June 2025. As the ELJWPG has identified a substantial surplus and are proposing to release sites in their update of their waste plan combined with following the proximity principle set out in legislation we consider they are the most appropriate waste authority to provide assistance. In addition to this, the London Plan requirements (paragraph 9.8.6) require sharing of surplus capacity before release of sites. As previous requests to join the group were not accepted, discussions have been going through the Duty to Cooperate process.

London Borough of Newham

9.29. LB Newham submitted their proposed submission version Local Plan to the secretary of state in 2025 and hearings commenced in late 2025. LBTH's representation to LB Newham's Regulation 19 Local Plan consultation which was carried out in September 2024 identified several safeguarded waste sites in LB Newham that largely handle Tower Hamlets waste, that could be specifically safeguarded for LBTH's waste capacity requirements.

9.30. LBTH also raised concerns about the release of Beckton Riverside as a safeguarded waste site. As noted in Paragraph 9.8.6 in the London Plan, waste sites with surplus capacity should be shared with boroughs facing a shortfall in capacity before they are considered for site release. The comments relating to waste are below and the full comments that were submitted are included in Appendix 8:

Policy W1 of Newham's Regulation 19 Plan sets out the borough's strategic approach to waste management, including safeguarding sites for waste management. Point 3 of the policy indicates that 'existing waste sites within Newham will be safeguarded and should be retained in waste management use'. We welcome that safeguarding and note that the safeguarding of all waste sites in Newham is in accordance with the draft East London Joint Waste Plan (ELJWP), which does not identify any sites in Newham for release from waste safeguarding.

However, it is noted that despite the clear protection in the wording of the policy itself, Implementation Point W1.3 explains that the land at Beckton Riverside that is safeguarded for waste management in the adopted 2012 East London Waste Plan is no longer being safeguarded. This appears to be at odds with both the adopted East London Waste Plan, and the emerging (Regulation 18) ELJWP, neither of which identify Beckton Riverside for release from safeguarding. It is unclear what evidence has been provided to justify such a release.

9.31. To summarise, LBTH will continue to engage in discussions with LB Newham given Newham's membership of the ELJWPG and ensure that any safeguarded waste sites which manage and process LBTH's waste is taken

into account before they are considered for release for other uses. This is in accordance with London Plan guidance. This will be carried out through formal discussions with LB Newham and the wider ELJWPG and set out within a Statement of Common Ground.

South East London Joint Waste Planning Group

9.32. SELJWPG indicated in their representation to the Regulation 19 (2024) that they cannot confirm at this time whether there is spare capacity to help meet LBTH's waste apportionment capacity requirements.

9.33. As part of discussions with the group since the Regulation 19 (2025) consultation, SELJWPG confirmed that an update to the technical paper will be carried out once the draft London Plan is adopted with the updated borough apportionment targets. The most recent update to the technical paper was carried out in 2022. They also noted that once the technical paper is updated and if any surplus capacity is identified, a request by the City of Westminster for inclusion within the group and their need for assistance for their waste apportionment, will be prioritised.

9.34. A SoCG is currently being prepared with the SELJWPG to confirm the position.

Other engagement

9.35. LBTH also contacted all other London boroughs to explain the borough's waste context and to seek spare capacity to meet LBTH's waste apportionment capacity requirements. Some responses were received which are detailed in Appendix 3 of this paper, but no offers to assist meet LBTH's apportionment have been received.

9.36. LBTH have also engaged with the West London Waste Planning Group as part of the Duty to Cooperate process as they are in the early stages of updating the West London Waste Plan. A representation from LBTH has been submitted as part of the ongoing Regulation 18 consultation for the West London Waste Plan.

10. Proposed policy approach

- 10.1. The London Plan requirements relevant to waste management - set out within policy SI8 - have formed the starting point for the proposed policy approach. The policy approach is also supported by the local evidence base and has been further informed by representations received as part of both Regulation 19 consultations.
- 10.2. Part 1 of the proposed policy continues to safeguard existing waste sites in the borough and part 2 indicates that proposals which seek to maximise capacity of existing waste facilities will be supported. Parts 3 and 4 also make clear how applications which run counter to the objective of safeguarding such sites will be assessed. Parts 1-4 collectively seek to positively plan for meeting the borough's waste apportionment within the borough.
- 10.3. To ensure that draft policy RW1 in the LBTH draft local plan is in general conformity with the London Plan, the council revised the approach proposed at regulation 19 (2024) so that OSFs are not included in the waste capacity figures. Given the evidence indicating a shortfall of capacity within the borough to meet the London Plan apportionment, coupled with the findings from the Employment Land Review (2023) – which indicates that Tower Hamlets has a particularly large shortfall in industrial land to meet demand over the plan period – the proposed policy approach from Regulation 19 (2024) was revised to meet the London Plan apportionment through a partnership working approach, as set out within part 5. This approach was subject to consultation as part of the second Regulation 19 (2025) publication. The revised approach has been steered by comments from the statutory stakeholders such as the GLA and EA in particular stating - that use of OSFs and exempt waste sites is not in accordance with the London Plan and is an untested methodology. The revised policy approach has considered the guidance in the London Plan which noted in Paragraph 9.8.6 that boroughs are encouraged to pool their waste apportionment targets with other boroughs to ensure net self-sufficiency.
- 10.4. Other waste policies in the emerging Local Plan also address London Plan policies. Draft policy RW2 New and enhanced waste facilities encourages waste facilities to be expanded on existing waste sites and part (b) of the policy supports the development or expansion of waste facilities where 'they observe the 'Proximity Principle', dealing with waste as close to its source as possible.' The 'Proximity Principle' is established in the Waste Framework Directive to ensure waste is managed as near as possible to the site of production as transporting waste has significant environmental impacts.

Implementation

- 10.5. Given the proximity principle as noted in the Waste Framework Directive, the council is seeking capacity from the nearest Waste Planning Authority

which has identified surplus capacity – The East London Joint Waste Planning Group.

- 10.6. The calculation of the Waste shortfall has been set out within Section 8 of this paper. LBTH is requesting a transfer of **56,935tpa of C&D waste** and a transfer of capacity of **192,370tpa of HIC waste** from the ELJWPG. This is in response to the GLA and EA's objection to the waste capacity of Northumberland Wharf Transfer Station being included in the borough's waste management capacity. The transfer of capacity of HIC waste is to reflect the loss of the site in the Hepscott Road site in the former LLDC area to formalise a previous agreement and to ensure that the borough can meet its apportionment requirement as per the adopted London Plan (2021). The GLA have also indicated in discussions that we should be requesting capacity from the ELJWPG, given the significant surplus waste capacity in their waste planning area, which has also been formalised through their draft plan (recently submitted to the SoS for examination).
- 10.7. To support discussions with the neighbouring ELJWPG and in response to their Regulation 19 (2025) consultation representation, a Waste Land Availability Study has been carried out to determine if industrial sites in the borough can accommodate waste uses. The majority of landowners either responded that their site was not available for waste uses or failed to respond entirely, indicated that they are not pursuing alternative uses. The study only identified one site where the owner (TfL) suggested that they might consider a waste use, amongst other uses. Ultimately as a public sector landowner they would be driven by best value. This site is known as Moody's Wharf and is owned by TfL. They have indicated a long term aspiration to deliver a residential development on the site, in line with the site allocation, as part of their Places for London programme. TfL has indicated they are open to considering short term interim leases for a range of uses for 4-5 years. The site is only 0.37ha and would therefore be suitable for only small scale waste operations. On the basis of the landowner's timetable, the site would also not be available for waste use at the end of the plan period and therefore cannot be counted towards the borough's waste management capacity against the borough's London Plan apportionment. Given the site's uncertainty and the likelihood of a residential development in the medium term, it is not justified to include this site in the borough's waste capacity.
- 10.8. The revised policy approach notes cooperating with other Waste Planning Authorities in London to help meet the London Plan apportionment. As part of this, in addition to the ongoing discussions with the neighbouring ELJWPG, LBTH have also had ongoing discussions with the SELJWPG. This recognises existing waste flows from the Northumberland Wharf Transfer station to the recovery waste site in Belvedere, LB Bexley. A SoCG is being prepared to reflect discussions. Further to this, discussions with the WLWPA's (West London Waste Planning Authorities) are ongoing with a request for assistance submitted as part of the WLWP Regulation 18 consultation.

11. Conclusion

- 11.1. Taking into account the evidence outlined in this paper and the wider context of waste policy, the proposed policies presented in the draft Plan are considered to represent a proportionate approach to addressing the borough's requirements in respect of waste. It is considered that these policies strike a justified balance between seeking to meet the borough's waste apportionments as set out in the London Plan alongside meeting other London Plan policy requirements. LBTH have considered all feedback, representations submitted as part of the Regulation 19 consultations and additional evidence alongside Duty to Cooperate discussions with Waste Planning Authorities in London to put forward an appropriate approach in meeting the borough's apportionment.

12. Appendix 1 – ELJWPG criteria

Any requests to share capacity made by London Waste Planning Authorities will be assessed on a case by case basis taking into consideration the waste management context of the ELJWP area and 'source' Plan area at the time, including:

1. The provision of suitable evidence that insufficient capacity exists in the source borough(s). This should be demonstrated using the same methodology as used to calculate waste capacity in the ELJWP and provision of relevant information which includes:
 - a. Capacity within existing waste sites and how policy included in the source Borough's Local Plan requires new proposals to maximise capacity
 - b. That all existing waste sites (including those safeguarded by EA permits via the London Plan) are being safeguarded subject to appropriate release criteria
 - c. Whether any waste sites have been lost due to redevelopment in the source Borough since London Plan was adopted and how compensatory capacity has been provided
 - d. Assessment of Strategic Industrial Locations and Locally Significant Industrial Sites to accommodate waste capacity and proposals to release such land for non-industrial uses
 - e. Whether any applications for waste uses in the source Borough have been refused and if so the reasons for refusal
 - f. Demonstrating that all options have been explored to identify suitable locations for further waste sites within the source borough(s) (consistent with national policy^[1] and the London Plan) and other London boroughs to meet capacity requirements. This should include the results of any call for waste sites and how conclusions not to allocate sufficient land to meet the requirements for which surplus is being sought were reached
2. The proximity of historic and existing significant flows of waste and availability of capacity for which capacity is being sought between, the source borough(s) and the ELJWP boroughs, including comparisons with any other London borough(s) that may have surplus capacity available.
3. Any relevant changes to the London Plan 2021, in particular those affecting the sharing of capacity and quantities of waste that Boroughs are expected to plan for.

During the period of the ELJWP it is likely that the London Plan 2021 will be updated and any updates relating to the need for Boroughs to share capacity and meet apportionments will be taken into account in any assessment.

^[1] In particular see sections 4 and 5 of *National Planning Policy for Waste* (October 2014)

13. Appendix 2 – Letters Request for assistance meeting London Plan Waste Apportionment (14 October 2024 and 20 June 2025)

Via email

Housing and Regeneration
Tel 020 7364 5078
www.towerhamlets.gov.uk

14 October 2024

LB Tower Hamlets: Request for assistance meeting London Plan Waste Apportionment

Dear Sir/Madam,

LB Tower Hamlets is in the process of preparing a new Local Plan and is aiming to submit the plan to the Secretary of State to commence the Examination in Public process by early 2025.

The purpose of this letter is to ask if your council would be in a position to assist Tower Hamlets in meeting their waste needs, should this be required. Specifically, we require assistance with HIC waste capacity and CDE waste capacity. Our shortfall (at 2041) is:

- 5,000 tpa of HIC waste
- 56,935 tpa of CDE waste

LB Tower Hamlets context

Tower Hamlets is a highly urbanised borough with the fastest growing population in the country. We have the highest housing target in the London Plan of 34,730 homes and also the fourth highest target for small sites within one of London's smallest geographical boundary areas, which makes meeting the requirements for different needs, such as housing, employment and waste especially challenging. In particular, planning constraints and a lack of suitable and deliverable sites limit our ability to meet our needs in relation to Waste. Our [Proposed Submission Version Local Plan](#) has been produced given this context.

LBTH Waste Apportionment

As a unitary waste authority Tower Hamlets performs the roles of waste planning authority, waste collection authority, and waste disposal authority in the borough. In our capacity as a waste planning authority, we have a statutory duty to prepare a local waste plan in line with legislation. This is being fulfilled through the inclusion of waste policies in our emerging Local Plan, which seek to meet our apportioned waste targets, as set out in the adopted London Plan in accordance with Policy SI8.

As part of the evidence base work that has been undertaken to support the new Tower Hamlets Local Plan, the borough identified a significant shortfall in meeting our need for waste management capacity. As part of scenario testing, we commissioned another, more detailed, review to determine how we might potentially be able to meet our need entirely in the borough, if no other boroughs had spare capacity to offer. This study identified the inclusion of the waste management capacity of on-site segregation facilities towards meeting our household, industrial and commercial (HIC) waste apportionment. While the study is clear that these facilities meet the definition of a waste facility, this



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approach is untested. To meet our construction, demolition and excavation (CDE) waste requirement, the study carried out a search of available industrial sites in the borough that could be used for waste management; however, the study cautioned that the borough's very low level of industrial vacancies means that relying on available sites is risky given that the land area required may not remain available throughout the plan period. Further, this approach risks removing sites from general industrial use at a time when the borough is in particular need of industrial floorspace to meet demand.

Given the limitations of the approach taken in the updated waste study, Tower Hamlets approached the East London Joint Waste Planning Group (ELJWPG) to determine if the group could take on a portion of the borough's waste management requirement. The East London Joint Waste planning group recently published and consulted on a regulation 18 draft plan to review their existing joint waste plan – which demonstrated that the ELJWPG had excess capacity. LBTH submitted a formal representation to the East London Joint Waste Plan requesting that the ELJWP provide excess capacity to LBTH to help us meet our needs given the geographic proximity. We have been having ongoing discussions with the group as part of the Duty to Cooperate process both prior to publication of their plan and following the close of the consultation. We understand that the GLA has directed the ELJWPG to offer excess capacity to boroughs that can demonstrate that they are unable to meet their waste planning requirements. As such, we believe the ELJWPG will be accepting our request.

In the event that the East London Joint Waste Planning group are not able to meet our request, we would like to understand your borough's (or joint waste planning group's) potential capacity to assist us in meeting our waste needs. Specifically, we require assistance with HIC waste capacity and CDE waste capacity. Our shortfall (at 2041) is:

- 5,000 tpa of HIC waste
- 56,935 tpa of CDE waste

Providing this waste management capacity to us would allow Tower Hamlets to meet its waste requirements without relying on Onsite Segregation Facilities, which are difficult to monitor and safeguard, and sites that are not currently in waste use, which need to be protected for other competing land uses (i.e. industrial) in order to meet other relevant policies in the London Plan relating to the protection of SIL (Policies E4 and E5).

As previously mentioned, we are seeking to submit our plan for examination in early 2025, and so we would be grateful if you could confirm your position in respect to assisting our authority in meeting our waste needs **by no later than 31 December 2024**.

Please note that we are currently also inviting representations on our Proposed Submission Version Local Plan (Regulation 19) **until 28 October 2024**, and you may wish to formally submit your response as a representation to this – as this would enable you to attend hearings should you feel this is required. Full details of the consultation, including evidence base can be found here: [New Local Plan | Let's Talk Tower Hamlets](#)

In the meantime, if you feel you need more information, including detailed evidence or would like to discuss the matter with us before formally responding please let us know as soon as possible so that we can arrange a meeting in October.

For your information, a similar request has also been sent to all other London authorities. We also anticipate commencing the process of preparing Statements of Common Ground with relevant authorities following the end of the Regulation 19 consultation and will be in touch in due course to

discuss this.

Please send replies to natalya.palit@towerhamlets.gov.uk cc'ing localplan@towerhamlets.gov.uk

Kind regards,



Natalya Palit

Planmaking Manager

Strategic Planning Service | Planning & Building Control Division | Housing & Regeneration
Directorate

14. Appendix 3 – London Boroughs and response to LBTH's request for assistance for waste capacity

London Borough	Waste Plan	Formal response to LBTH for assistance with waste capacity
Barking and Dagenham	East London Waste Plan	Formal response received as part of the ELJWPG comments. The ELJWPG have stated that more robust evidence is required to support the position that LBTH will require assistance from neighbouring authorities in respect of waste apportionment capacity requirements.
Barnet	North London Waste Plan	No response received in regard to LBTH's communication to take on waste apportionment capacity requirements.
Bexley	South East London Waste Plan	Formal response received as part of the South East London Joint Waste Planning Group (SELJWPG) comments. The SELJWPG cannot confirm at this time whether there is spare capacity to help meet LB Tower Hamlets waste apportionment capacity requirements.
Brent	West London Waste Plan	No response received in regard to LBTH's communication to take on waste apportionment capacity requirements.
Bromley	South East London Waste Plan	Formal response received as part of the South East London Joint Waste Planning Group (SELJWPG) comments. The SELJWPG cannot confirm at this time whether there is spare capacity to help meet LB Tower Hamlets waste apportionment capacity requirements.
Camden	North London Waste Plan	No response received in regard to LBTH's communication to take on waste apportionment capacity requirements.
Croydon	South London Waste Plan	No response received in regard to LBTH's communication to take on waste apportionment capacity requirements.

Ealing	West London Waste Plan	No response received in regard to LBTH's communication to take on waste apportionment capacity requirements.
Enfield	North London Waste Plan	No response received in regard to LBTH's communication to take on waste apportionment capacity requirements.
Greenwich	South East London Waste Plan	Formal response received as part of the South East London Joint Waste Planning Group (SELJWPG) comments. The SELJWPG cannot confirm at this time whether there is spare capacity to help meet LB Tower Hamlets waste apportionment capacity requirements.
Hackney	North London Waste Plan	No response received in regard to LBTH's communication to take on waste apportionment capacity requirements.
Hammersmith and Fulham	Individual	No response received in regard to LBTH's communication to take on waste apportionment capacity requirements.
Haringey	North London Waste Plan	No response received in regard to LBTH's communication to take on waste apportionment capacity requirements.
Havering	East London Waste Plan	Formal response received as part of the ELJWPG comments. The ELJWPG have stated that more robust evidence is required to support the position that LBTH will require assistance from neighbouring authorities in respect of waste apportionment capacity requirements.
Harrow	West London Waste Plan	No response received in regard to LBTH's communication to take on waste apportionment capacity requirements.
Hillingdon	West London Waste Plan	No response received in regard to LBTH's communication to take on waste apportionment capacity requirements.
Hounslow	West London Waste Plan	No response received in regard to LBTH's communication to take on waste apportionment capacity requirements.

Islington	North London Waste Plan	No response received in regard to LBTH's communication to take on waste apportionment capacity requirements.
Kensington and Chelsea	Individual	No response received in regard to LBTH's communication to take on waste apportionment capacity requirements.
Kingston upon Thames	South London Waste Plan	No response received in regard to LBTH's communication to take on waste apportionment capacity requirements.
Lambeth	Individual	No response received in regard to LBTH's communication to take on waste apportionment capacity requirements.
Lewisham	South East London Waste Plan	Formal response received as part of the South East London Joint Waste Planning Group (SELJWPG) comments. The SELJWPG cannot confirm at this time whether there is spare capacity to help meet LB Tower Hamlets waste apportionment capacity requirements.
Merton	South London Waste Plan	No response received in regard to LBTH's communication to take on waste apportionment capacity requirements.
Newham	East London Waste Plan	Formal response received as part of the ELJWPG comments. The ELJWPG have stated that more robust evidence is required to support the position that LBTH will require assistance from neighbouring authorities in respect of waste apportionment capacity requirements.
Redbridge	East London Waste Plan	Formal response received as part of the ELJWPG comments. The ELJWPG have stated that more robust evidence is required to support the position that LBTH will require assistance from neighbouring authorities in respect of waste apportionment capacity requirements.
Richmond upon Thames	West London Waste Plan	No response received in regard to LBTH's communication to take on waste apportionment capacity requirements.

Southwark	South East London Waste Plan	Formal response received as part of the South East London Joint Waste Planning Group (SELJWPG) comments. The SELJWPG cannot confirm at this time whether there is spare capacity to help meet LB Tower Hamlets waste apportionment capacity requirements.
Sutton	South London Waste Plan	No response received in regard to LBTH's communication to take on waste apportionment capacity requirements.
Waltham Forest	North London Waste Plan	No response received in regard to LBTH's communication to take on waste apportionment capacity requirements.
Wandsworth	Individual	No response received in regard to LBTH's communication to take on waste apportionment capacity requirements.
Westminster	South East London Waste Plan	Formal response received as part of the South East London Joint Waste Planning Group (SELJWPG) comments. The SELJWPG cannot confirm at this time whether there is spare capacity to help meet LB Tower Hamlets waste apportionment capacity requirements.
City of London	South East London Waste Plan	Formal response received as part of the South East London Joint Waste Planning Group (SELJWPG) comments. The SELJWPG cannot confirm at this time whether there is spare capacity to help meet LB Tower Hamlets waste apportionment capacity requirements.

15. Appendix 4 – Email from ELJWPG (19/05/2023)

From: [REDACTED]
To: [REDACTED]
Subject: RE: East London Joint Waste Plan
Date: 19 May 2023 11:51:59

Good morning Tom,

We've had a chance to review your waste data study and discuss it as a group. Apologies for any inconvenience caused, but having reviewed your evidence and considering where we are in the process, we think it would actually end up delaying all our Plans if we were to widen the group to incorporate Tower Hamlets at this stage.

We have made this decision based on both the established nature of our group of authorities, which has political agreement from each of the boroughs. Our data study and the ultimate level of waste capacity is likely to change as we go through the Waste Plan process and therefore at this point, we aren't in a position to consider if your waste capacity needs can be met within the East London Joint Waste Plan.

We're also concerned that widening the group at this stage would require formal decisions from us all, and having taken a number of years for all boroughs to agree to proceed with the Waste Plan, we're worried that re-opening governance conversations may cause significant delays. Once our position is known in more detail, we are very happy to continue working with you, alongside other boroughs, via the duty to cooperate process in conversation with our appointed consultants and the GLA, to consider how we best share any available capacity with boroughs with deficits.

If you wish to discuss this further please let me know.

Kind regards,

Claire

Claire Laurence | She/Her

Principal Planner | **Planning Policy**

Inclusive Economy and Housing | Planning and Development

London Borough of Newham

Newham Dockside | 1000 Dockside
[REDACTED]
[REDACTED]

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16. Appendix 5 – LBTH response to East London Joint Waste Plan (Regulation 18 Consultation)

Housing & Regeneration

www.towerhamlets.gov.uk

East London Joint Waste Plan
FAO: Cara Collier
Development Planning Team
Havering Town Hall
Main Road
Romford
RM1 3BB

23 October 2024

LBTH Response to East London Joint Waste Plan (Regulation 18 Consultation)

Dear Waste Planning Team,

Thank you for providing the opportunity to respond to the East London Joint Waste Plan (ELJWP).

Summary

This letter is in response to the East London Boroughs letter dated 21 August 2024, which was sent to local authorities that may have a shortfall in waste management capacity. It gave those boroughs an opportunity to request assistance from the East London Joint Waste Planning Group (ELJWPG) in meeting their needs, in accordance with the requirement in London Plan policy SI8 - for boroughs with spare waste management capacity to offer it to boroughs that are unable to meet their waste management needs within their boundaries. In that context, this letter sets out how we are taking up that offer from the ELJWPG, in meeting the unmet need in Tower Hamlets.

While Tower Hamlets is a unitary waste authority and not part of the ELJWPG, the geographic proximity and the existing cross-boundary flows of waste mean that it is important for us to work effectively on this strategic matter.



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As part of the evidence base work being carried out for the new Tower Hamlets Local Plan, the borough identified a significant shortfall in meeting our need for waste management facilities. As part of scenario testing, we commissioned another, more detailed, review to determine, if no other boroughs had spare capacity to offer, how else London Borough of Tower Hamlets (LBTH) might be able to meet its need entirely in the borough. This was largely so that LBTH could continue to progress preparation of its regulation-19 plan, in advance of the draft ELJWP (Regulation 18) being published, and therefore without knowing the excess capacity the ELJWPG may be able to offer to LBTH.

As the options reviewed as part of this work are not optimal, we are formally requesting assistance from the ELJWPG in meeting our waste management needs in accordance with London Plan Policy SI8. The volume that we require and the detailed justification for it are set out in Section 3.

Given that the Tower Hamlets Local Plan has yet to be examined and adopted, we consider it may be premature for the ELJWP to propose release of waste sites before it has been demonstrated that neighbouring boroughs are able to meet their needs within their boundaries.

This is a particularly fortuitous time to review our waste management relationship as both the Tower Hamlets Local Plan and the ELJWP go through their respective plan review processes. Given that these plan reviews may not align in the future, it is important that we reach agreement on strategic waste management issues at this stage. We look forward to working further with the ELJWPG on planning for East London's waste.

We have set out our response under the following headings:

1. Background
2. Capacity and apportionment
3. Policies
4. Safeguarded and released sites
5. Conclusion

1. Background

Tower Hamlets is a unitary waste planning authority, meaning that the borough is responsible, as far as possible, for meeting its waste apportionment targets on sites within its boundaries. Given the density of Tower Hamlets and the presence of competing land use priorities, meeting the apportionment target has been particularly challenging.

The London Plan (at paragraph 9.8.6) expects boroughs with surplus waste management capacity to share this capacity with boroughs that are unable to meet their waste management needs within their boundaries before considering releasing sites from safeguarding. The London Plan also aims for net waste self-sufficiency for London, which recognises that while individual boroughs may not be able to meet their waste needs within their boundaries, London as a whole should be able to meet

its waste management needs without needing to rely on facilities outside of the Greater London boundary.

Waste planning is also governed by legislation: the Waste Framework Directive (WFD) was incorporated into UK law via the Waste (Circular Economy) (Amendment) Regulations 2020. In addition, the Waste (England and Wales) Regulations 2011, paragraph 4 of Part 1 of Schedule 1, sets out the 'proximity principle' - the requirement for mixed municipal waste to be disposed of or recovered in one of the nearest appropriate installations.

Tower Hamlets is currently in the process of developing a new Local Plan. We are now at the Regulation 19 consultation stage. As Tower Hamlets is a unitary waste planning authority, the policies in this plan aim to fulfill our waste planning requirements. The Proposed Submission Version Plan (Regulation 19) (policy RW1) includes 'areas of search', rather than site allocations, to meet the waste capacity requirements, given the lack of available sites. As such the amount of land that could come forward is an estimate based on current levels of vacancy within those areas.

Officers from Tower Hamlets approached the member boroughs of the East London Joint Waste Planning Group (ELJWPG) in 2023 to inquire about joining the ELJWPG or, should this not be possible, passing some of LBTH's waste apportionment (as set out in the London Plan) to the ELJWPG to address our borough's shortfall in capacity. It should be noted that Tower Hamlets is the only London borough that is a unitary waste planning authority; and given the geographical location of the borough, the ELJWPG would be the most logical joint waste planning group for us to join. The ELJWPG indicated that adding an additional borough to the membership would significantly delay the process of developing a new waste plan and was therefore not considered possible at that time. It would be helpful to understand in more detail what the implications would be of Tower Hamlets joining the ELJWPG during the waste plan-making process, and how the borough might join in the future.

The ELJWPG also indicated that they would consider transferring some of their excess capacity to Tower Hamlets if the borough could demonstrate that it was not possible to meet its waste apportionment within the borough. This is in line with discussions LBTH has had with the GLA, which supported our position that we should be seeking capacity from the ELJWPG.

2. Tower Hamlets Evidence Base

Waste Data Study (2023)

Tower Hamlets carried out a Waste Data Study (July 2023) to inform its Regulation 18 Draft Local Plan in 2023. This study demonstrated that the borough faced a shortfall of 192,370 tonnes per annum (tpa) by 2041. Given the lack of available locations in the borough for new waste facilities, the Waste Data Study recommended that Tower Hamlets approach neighbouring waste authorities to request that some of their excess capacity be transferred to Tower Hamlets to help meet its apportionment, as set out in the adopted London Plan (2021).

The Waste Data Study also identified a site where planning permission was granted for the loss of a safeguarded waste site in the Tower Hamlets part of the LLDC

(LLDC Planning Reference: 16/00451/OUT). This application was granted on the basis that the capacity of the site was being re-provided within London, in this case in Barking and Dagenham within the ELJWPG. The owner of the LLDC site (McGrath) was also the owner of the site in Barking and Dagenham (River Road) and demonstrated that there was spare capacity within the River Road site to accommodate all of the waste processing from the LLDC site. They received agreement from the GLA that they could transfer the capacity from the LLDC site to River Road. The waste planning process for the ELJWP should formalise this. Tower Hamlets' Waste Data Study recommended that this lost capacity – 26,353tpa - be 'transferred' back to Tower Hamlets to help meet its apportionment, meaning that it would be specifically safeguarded within the ELJWP to process waste from Tower Hamlets.

Waste Study Update (2024)

Following consultation on the Tower Hamlets' Draft Local Plan (regulation-18), Tower Hamlets commissioned a Waste Study Update (May 2024) to include a more comprehensive search for potential waste sites in the borough in order to test a scenario in which no neighbouring borough was able to assist Tower Hamlets in meeting its need. That search identified additional capacity at Northumberland Wharf and included Onsite Segregation Facilities (OSFs) as part of the waste capacity for Tower Hamlets. The inclusion of OSFs as part a borough's waste capacity, while a fully justified and sound approach, is untested – no local authority is known to have used OSFs to meet its waste planning requirements. OSFs were included as part of scenario testing to see if it was possible for Tower Hamlets to meet its apportionment requirements within the borough if other boroughs did not have space capacity.

The Waste Study Update also identified capacity for the management of Construction and Demolition Waste (C&D), giving a shortfall of 56,953tpa between the need in the borough to 2041 and the capacity of existing operational C&D processing facilities in the borough; however, in the search for sites, it identifies an additional 5.28ha of available land in Strategic Industrials Locations and Local Industrial Sites that *could* be suitable for C&D waste facilities. Based on an estimate of 85,000 tpa per ha, this potential additional capacity could potentially meet the borough's demand to 2041; however, it should be noted that there are competing demands on this available land given the multiple planning priorities in the borough. Tower Hamlets has a particularly large shortfall in industrial land to meet demand over the plan period. This has resulted in increasingly high industrial rents, as many different uses compete for limited stock, forcing out many longstanding local businesses and limiting the extent to which businesses in Tower Hamlets can grow and compete more widely.

3. Capacity and Apportionment

The ELJWP acknowledges that the waste apportionments for East London are significantly higher than projected waste arisings in recognition of East London's role in meeting London's overall target or net self-sufficiency.

The ELJWP identifies an overall waste management apportionment of 1,497,000tpa by 2041 for the whole ELJWPG. The overall capacity within the ELJWPG is 2,561,000tpa, meaning that the authority has a surplus capacity of 1,064,000tpa.

The ELJWP also identifies a surplus capacity for Construction, Demolition & Excavation (C,D & E) C,D&E waste of 1.64 million tpa. It should be noted that, because of the specific needs and relatively high volumes of excavation waste, it is usually excluded from boroughs' waste capacity requirements.

The supporting text of London Plan Policy SI8 (paragraph 9.8.6) expects boroughs with a surplus waste capacity to share this with boroughs facing a shortfall before considering release of these sites from safeguarding. The London Plan also acknowledges that it may not always be possible for boroughs to meet their apportionments within their boundaries and in these circumstances boroughs will need to agree the 'transfer of apportioned waste'. This has been reiterated in discussions with the GLA, which expects the ELJWPG to offer surplus capacity to other boroughs that are unable to meet their waste planning requirements within their boundaries. London Plan policy SI8 also encourages boroughs to collaborate by pooling their apportionment requirements.

The Waste (England and Wales) Regulations 2011, paragraph 4 of Part 1 of Schedule 1, sets out the 'proximity principle' - the requirement for mixed municipal waste to be disposed of or recovered in one of the nearest appropriate installations.

Given the level of surplus capacity identified in the ELJWP, Tower Hamlets is asking for a transfer of capacity of 26,363tpa of HIC waste to match the loss of the site in the Hepscott Road site in the LLDC area to formalise a previous agreement. 26,363tpa was the capacity of the Hepscot Road site at the time that permission was granted for the release of the site. This would also mean that the borough was not relying on the untested approach of using OSFs to meet its apportionment.

Tower Hamlets also requests a transfer of 56,935tpa of C&D waste to ensure that the borough is not relying on non-designated waste sites in industrial locations that could be better used for industrial intensification, in accordance with London Plan Policy E7 and to take advantage of good public transport accessibility.

The Tower Hamlets Employment Land Review (2023) demonstrates that the borough has a significant shortfall in industrial land to meet demand over the plan period of the new Local Plan. This demand is predominantly for logistics facilities and manufacturing, and relying on this land for waste management could further reduce the borough's ability to meet that demand. The London Plan places a significant emphasis on the need for local authorities, particularly in Inner London, to adequately protect their industrial land to ensure that it can meet the logistics and other needs of Central London. LBTH identifying areas of search in order to meet its own waste planning needs presents a conflict with the need to safeguard industrial land for waste management. Where other waste planning authorities have excess capacity on existing safeguarded waste sites, it would be aligned with the London Plan for these to be used for waste purposes ahead of SIL land currently in industrial uses.

In addition, there are several safeguarded waste sites in LB Newham that currently receive a significant proportion of their waste from Tower Hamlets. These are listed in the table below:

Site Name	Operator	Site Type	LBTH input	Distance to central LBTH	Comment
Unit J Prologis Park, E3 3JG	Bywaters (Leyton) Limited	MRF	14,263	1.8 miles	
Canning Town Depot E16 4TL	G B N Services Ltd	Skip Waste Recycling	4,800	3.6 miles	
Marshgate Sidings E15 2PJ	S Walsh & Son Limited	Waste transfer	6,781	1.8 miles	
Knights Road, E16 2AT	JRL Environmental	Physical Treatment	2,993	4.4 miles	
Marshgate Sidings E15 2PJ	DB Cargo (UK) Limited	Transfer & treatment	?	1.8 miles	166,577 All uncoded to WPA
9a Cody Business Centre E16 4TL	The Remet Company Limited	Metals & ELV recycling	?	3.6 miles	56,853 Uncoded to WPA
Stephenson Street, E16 4SA	Powerday (IOD Skip Hire Ltd)	Skip Waste Recycling	?	3.3 miles	53,747 All uncoded to WPA

Given that these are existing, safeguarded waste sites that currently process a significant proportion of Tower Hamlets' waste, we consider that these sites should be specifically safeguarded in the ELJWP to contribute to meeting Tower Hamlets' waste requirements (for C&D waste, and for HIC waste if the ELJWPG prefers this approach to safeguarding capacity for Tower Hamlets at the River Road site in Barking). The use of these sites to meet Tower Hamlets' waste requirements represents a more sustainable option than safeguarding new industrial sites in Tower Hamlets, as that would require extensive redevelopment and would prevent those sites from being used for more intensive employment uses that reflect the high level of public transport accessibility the sites benefit from.

4. Policies

Tower Hamlets supports most of the policies in the ELJWP, particularly:

- JWP1, which aligns with LBTH's approach to the circular economy;
- JWP3, which aligns with Policy RW1 of the Draft Tower Hamlets Local Plan in terms of ensuring that new development in close proximity to a safeguarded waste site does not prejudice the current or future operations of the site; and
- JPW4, which seeks to ensure that the development of new waste management facilities does not have a negative impact on nearby sensitive receptors, noting that several waste sites in LB Newham are located in close proximity to the boundary of Tower Hamlets.

However, we object to the implementation of Policy JWP2, which safeguards provision of waste capacity in the area and particularly does not permit the loss of safeguarded waste sites unless compensatory capacity is provided or 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. While the policy wording in and of itself is in accordance with the London Plan, the ELJWP is proposing to remove several sites from safeguarding, without demonstrating where compensatory

capacity will be provided within London. Further, the ELJWP is proposing to remove sites from safeguarding without first offering capacity to neighbouring and other London boroughs that are unable to meet their waste planning requirements within their boundaries.

5. Safeguarded and released sites

Appendix 1 lists the safeguarded waste sites in the ELJWPG. There is a total of 44 waste sites listed in the four boroughs, including several in Newham in close proximity to the Tower Hamlets boundary. Appendix 3 lists sites with potential for release from safeguarding. Six total sites have been identified as having potential for release from safeguarding, with a total reduction in apportioned waste capacity of 176,279tpa and a reduction in C,D&E waste capacity of 128,576tpa. The supporting text of London Plan Policy SI8 is clear that boroughs with surplus waste capacity should share this with boroughs facing a shortfall before releasing sites from safeguarding. It should be noted, however, that the surplus capacity listed for both HIC waste and C,D&E waste in the Plan appears to be based on the capacity following release of the six sites, meaning that the ELJWPG would continue to have a substantial surplus capacity.

It should be noted that the Newham Local Plan – Submission Version, currently out for consultation, identifies the potential for the release of waste sites within Newham as part of the ELJWP. Implementation point W1.3 of policy W1 suggests that safeguarded waste sites in Beckton Riverside can be released as part of the Local Plan. However, no sites within LB Newham have been identified for release as part of the ELJWP. If the sites at Beckton Riverside – and any other locations – are proposed for release, this should be set out in the ELJWP alongside the implications for overall capacity.

Paragraph 2.55 of the ELJWP indicates that local plans would take precedence over the waste plan where there is a discrepancy. Given the need to plan for specific waste capacities and the need for evidence to support the release of safeguarded sites, it is unclear how sites would be released in a local plan where this had not been accounted for in the waste plan.

We appreciate the opportunity to provide a response to the ELJWP, and it is essential that we be given the opportunity, through the Duty to Cooperate, to respond to any additional release of waste sites that happens outside of the ELJWP. We will also be submitting a representation to the LB Newham consultation on the Proposed Submission Version Local Plan (Regulation 19), which is currently being consulted on.

We welcome the assessment of reasonable alternatives in the Integrated Impact Assessment of the ELJWP, including the alternative of providing more capacity than their apportionment. In future consultations, we would support the assessment the additional reasonable alternative of taking on some of the waste apportionments of neighbouring boroughs (such as Tower Hamlets) that are unable to meet their own requirements within their boundaries.

6. Conclusion

Tower Hamlets welcomes the opportunity to continue to work closely with neighbouring boroughs on waste management matters. In accordance with London Plan Policy SI8, and to account for a shift of capacity as part of a planning permission, Tower Hamlets would welcome a transfer of 26,363tpa of HIC waste capacity and a transfer of 56,935tpa of C,D&E waste capacity. This would allow the borough to meet its waste requirements without relying on OSFs, which are difficult to monitor and safeguard, and sites that are not currently in waste use, which need to be protected for other competing land uses (i.e. industrial) in order to meet other relevant policies in the London Plan relating to the protection of SIL (Policies E4 and E5).

The capacity we are requesting could come from the ELJWPG as a whole, or can be transferred from individual boroughs within the group. In the case of the HIC waste capacity, it may be preferable to transfer the capacity from LB Barking & Dagenham to reflect the transfer of capacity from the Hepscott Road site to the River Road site.

As Tower Hamlets progresses through Regulation 19 consultation, and then Submission of our Local Plan, it will be essential to ensure that we have more certainty around our waste management capacity. As Tower Hamlets, the ELJWPG and Newham all carry out reviews of their respective plans, it is important that we continue to work together under the Duty to Cooperate and engage with the GLA on waste planning matters. This is a particularly significant time for all parties, which presents an opportunity to address a strategic matter in a sustainable and effective way.

Yours Sincerely,

Marc Acton Filion

[Redacted signature block]

17. Appendix 6 – LBTH response to East London Joint Waste Plan (Regulation 19 Consultation)

East London Joint Waste Plan
FAO: Cara Collier
Development Planning Team
Havering Town Hall
Main Road
Romford
RM1 3BB

17 June 2025

LBTH Response to East London Joint Waste Plan (Regulation 19 Consultation)

Dear Waste Planning Team,

Thank you for providing the opportunity to respond to the East London Joint Waste Plan (ELJWP).

Summary

This letter is in response to the Regulation 19 consultation on the East London Joint Waste Plan. It raises several key issues of soundness, which are listed below. LBTH has requested assistance from the East London Joint Waste Planning Group (ELJWPG) and, at the time of writing this response, the ELJWPG has not agreed to provide assistance. LBTH is requesting a transfer of 34,370 tonnes per annum (tpa) of Household, Commercial and Industrial (HIC) waste capacity and 56,953tpa of Construction and Demolition (C&D) waste capacity.

The NPPF sets out four tests of soundness against which development plan documents should be assessed:

Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other



authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

The ELJWP does not meet this test. Given their large surplus waste capacity, it must be considered practical for them to meet LBTH's unmet waste capacity needs. This point is addressed in more detail in the Capacity and Apportionment section of this response. Further detail regarding the discussions between LBTH and the ELJWPG is provided in the Summary of Duty to Cooperate Discussions section of this response.

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.

The ELJWP does not meet this test. The Integrated Impact Assessment fails to appropriately test an alternative scenario in which the ELJWP safeguards waste capacity specifically for neighbouring authorities facing a shortfall. This point is addressed in more detail in the Integrated Impact Assessment section of this response. The evidence also does not recognise the existing waste flows from LBTH to the ELJWP area and vice versa; this point is addressed in more detail in the Evidence section of this response.

Effective – deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.

The ELJWP does not meet this test. While LBTH clearly set out its capacity shortfall in our response to the Regulation 18 consultation on the ELJWP, the ELJWPG has deferred action on this matter and has not addressed it in their proposed submission ELJWP.

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

The ELJWP does not meet this test. Paragraph 33 of the NPPF expects development plan documents to be informed by a Sustainability Appraisal that meets the relevant legal requirements. The IIA published as part of this consultation does not assess the reasonable alternative of safeguarding waste capacity for neighbouring authorities facing a shortfall; more detail on this point can be found in the Integrated Impact Assessment section of this response. Paragraph 22 of the NPPF expects strategic policies to look ahead and anticipate and respond to long-term requirements. LBTH has set out its requirement in terms of waste management capacity and the ELJWP has not responded to that requirement.

In addition to the requirement to be consistent with national policies, Section 24(1)(b) of the Planning and Compulsory Purchase Act 2004 requires development plan documents within London to be in conformity with the London Plan. Paragraph 9.8.6 of the London Plan states that boroughs with a surplus of waste sites should offer to share these sites with those boroughs facing a shortfall in capacity before considering site release.

It is also important to note that the objections that LBTH raised in its response to the ELJWP Regulation 18 consultation (attached to this response at Appendix 2) have not been included in the Consultation Statement. Therefore, it is not possible to determine whether these objections were considered in drafting the Regulation 19 plan.

We have set out our response under the following headings:

1. Background
2. Summary of Duty to Cooperate Discussions
3. Consultation Statement
4. Integrated Impact Assessment
5. Capacity and apportionment
6. Policies
7. Safeguarded and released sites
8. Conclusion

1. Background

Tower Hamlets is a unitary waste planning authority, meaning that the borough is responsible, as far as possible, for meeting its waste apportionment on sites within its boundaries. Given the density of Tower Hamlets and the presence of competing land use priorities, meeting the apportionment has been challenging.

The adopted London Plan (at paragraph 9.8.6) expects boroughs with surplus waste management capacity to share this capacity with boroughs that are unable to meet their waste management needs within their boundaries, before considering releasing sites from safeguarding. The London Plan also aims for net waste self-sufficiency for London, which recognises that while individual boroughs may not be able to meet their waste needs within their boundaries, London as a whole should be able to meet its waste management needs without needing to rely on facilities outside of the Greater London boundary.

Waste planning is also governed by legislation: the Waste Framework Directive (WFD) was incorporated into UK law via the Waste (Circular Economy) (Amendment) Regulations 2020. In addition, the Waste (England and Wales) Regulations 2011, paragraph 4 of Part 1 of Schedule 1, sets out the 'proximity principle' - the requirement for mixed municipal waste to be disposed of or recovered in one of the nearest appropriate installations.

Tower Hamlets is currently in the process of developing a new Local Plan. We have completed a first Regulation 19 consultation (in 2024) and are preparing to carry out a second Regulation 19 consultation focused only on several policies, one of which is RW1 – Managing our waste, which sets out the borough's waste apportionment and capacity, and safeguards sites for waste. As Tower Hamlets is a unitary waste planning authority, the policies in our emerging plan aim to fulfil our waste planning

requirements. The Proposed Submission Version (2025) of Policy RW1 is attached to this response as Appendix 3.

2. Summary of Duty to Cooperate Discussions

In 2023, Tower Hamlets asked to join the ELJWPG, but was informed that adding an additional borough to the group at that time would add an unreasonable delay in the plan-making process.

Given the lack of certainty regarding the sharing of waste capacity from the ELJWPG and other neighbouring waste planning authorities, LBTH sought to plan for waste self-sufficiency. Our 2024 Waste Study Update included untested strategies to find waste capacity within the borough, including the use of On-site Segregation Facilities. The GLA and the Environment Agency objected to this approach and instructed Tower Hamlets to request assistance from the ELJWPG given their significant surplus.

We have formally requested assistance from the ELJWPG in meeting our waste capacity requirements. The ELJWPG asked that we respond to a list of criteria in order to demonstrate that we require assistance and have explored all options to meet our requirements within our boundaries. We provided a response that addressed all of the ELJWPG's criteria; however, the ELJWPG responded that we had not adequately addressed the criteria, including requesting that we carry out a detailed assessment of all LSIS and SIL sites to demonstrate that each would not be suitable for use as a waste site. Given the relatively small volume of waste capacity that we are requesting and the very high level of surplus capacity within the ELJWPG, our initial response to the criteria was proportionate. It should also be noted that the criteria have not been included in the proposed submission ELJWP.

Further detail regarding Duty to Cooperate discussions between LBTH and the ELJWPG can be found in Appendix 1.

3. Consultation Statement

LBTH submitted a detailed response to the Regulation 18 consultation on the ELJWP (Appendix 2). However, there is no reference to LBTH in the Consultation Statement published as part of this Regulation 19 consultation, nor have LBTH's objections been identified or responded to in the Consultation Statement. This has made the process of responding to the regulation 19 consultation on the ELJWP particularly challenging. It is not clear why the previous response from LBTH has not been taken into account.

Given the omission of the LBTH representation, we are unable to determine whether our response to the Regulation 18 consultation has been considered in developing the proposed submission version of the ELJWP.

4. Integrated Impact Assessment

As part of our response to the Regulation 18 consultation on the ELJWP, we recommended that the Integrated Impact Assessment (IIA) test a reasonable

alternative in which the ELJWP provided capacity assistance to LBTH (and other authorities that may have requested assistance). The assessment of Policy JWP2 includes an alternative (Need Alternative 1) that would make provision for additional waste management capacity above the ELJWPG's London Plan apportionment.

Given that the ELJWPG has invited authorities to request capacity assistance, it is not clear how this represents an alternative to the policy approach in the Proposed Submission ELJWP. If authorities request capacity assistance, the ELJWPG will need to make provision for additional waste management capacity above the London Plan apportionment. Further, the ELJWP identifies a substantial surplus capacity, meaning that it is already planning for additional waste management capacity above the London Plan apportionment.

Para 5.156 of the IIA explains that Need Alternative 1 would likely result in waste travelling further, if the sites were to deal with waste from outside the plan area. Tower Hamlets already exports a significant proportion of its waste to the ELJWP and receives waste imports from the ELJWP, therefore it is unlikely that providing for LBTH's apportionment shortfall would result in longer waste trips. In addition, the ELJWP is LBTH's nearest neighbouring waste planning authority. Without support from the ELJWP, Tower Hamlets would need to seek support from a further waste planning authority, resulting in significantly longer waste trips.

Para 5.156 also explains that Need Alternative 1 could have negative effects on all IIA objectives, where East London's environment and communities would be under additional pressure to allocate and/or identify less suitable sites for waste development to come forward. As explained above, the ELJWPG has a significant surplus of waste management capacity. It would not need to allocate or identify any additional sites for waste development in order to meet LBTH's shortfall.

5. Evidence

As part of this Regulation 19 consultation, the ELJWPG has published a Waste Topic Paper to provide a summary of the evidence underpinning the ELJWP. This topic paper provides a brief summary of cross-boundary waste movements into and out of the ELJWPG (para 5.25). It identifies 16 facilities that received potentially strategically significant quantities of waste from the ELJWPG in 2022. The Waste Topic Paper does not identify the facilities within the ELJWPG that receive strategically significant quantities of waste from other waste planning authorities. It should be noted that LBTH's Waste Data Study (2023) identifies two sites in LB Newham that receive strategically significant volumes of HIC waste from Tower Hamlets. While not identifying specific facilities, the Waste Data Study (2023) also shows that LB Havering, LB Newham and LB Barking & Dagenham receive strategically significant volumes of C&D waste from Tower Hamlets. The LBTH Waste Data Study (2023) also shows that the Northumberland Wharf Transfer Station in Tower Hamlets receives strategically significant volumes of HIC waste from the ELJWPG (142,940 tonnes in 2021).

The Waste Topic Paper also omits any reference to LBTH's formal request for the sharing of waste capacity or to the discussions that LBTH and the ELJWPG have had in regards to waste capacity sharing and LBTH's request to join the ELJWPG.

Given that the evidence base for the ELJWP omits these strategically significant flows of waste, and LBTH's request for capacity sharing, it cannot be considered to be adequate or proportionate.

6. Capacity and Apportionment

Section 4 of the Proposed Submission ELJWP sets out the area's waste capacity requirements and the capacity within its waste sites.

The ELJWP identifies an overall waste management apportionment of 1,497,000tpa by 2041 for the whole ELJWPG. The overall capacity within the ELJWPG is 2,619,508tpa, meaning that the authority has a surplus capacity of 1,122,508tpa. This represents a small increase in the capacity reported in the Regulation 18 version of the ELJWP.

The ELJWP acknowledges that there may be a loss of Mechanical Biological Treatment (MBT) capacity after 2027 as a result of renegotiations of contracts, though it is unclear why this capacity would be lost given that the site is safeguarded and is not proposed for release. Even with the loss of MBT capacity (and after removing capacity from sites proposed for release) the ELJWP identifies a surplus HIC waste management capacity of 680,000tpa in 2041.

The Proposed Submission ELJWPG also includes a revision to the level of C,D&E waste arisings from the Regulation 18 version. It identifies a safeguarded capacity of 3,185,500tpa in 2041 and a surplus capacity of 980,000tpa.

The supporting text of London Plan Policy SI8 (paragraph 9.8.6) expects boroughs with a surplus waste capacity to share this with boroughs facing a shortfall before considering release of sites from safeguarding. The London Plan also acknowledges that it may not always be possible for boroughs to meet their apportionments within their boundaries and in these circumstances boroughs will need to agree the 'transfer of apportioned waste'. This has been reiterated in discussions with the GLA, which expects the ELJWPG to offer surplus capacity to other boroughs that are unable to meet their waste planning requirements within their boundaries. London Plan policy SI8 also encourages boroughs to collaborate by pooling their apportionment requirements.

The Waste (England and Wales) Regulations 2011, paragraph 4 of Part 1 of Schedule 1, sets out the 'proximity principle' - the requirement for mixed municipal waste to be disposed of or recovered in one of the nearest appropriate installations.

Paragraphs 4.11 and 4.12 of the Proposed Submission ELJWP set out how the ELJWPG intends to share capacity with other boroughs and authorities that are unable to meet their waste capacity requirements within their boundaries. Para 4.11 explains that neighbouring boroughs have been invited to request capacity from the

ELJWPG and para 4.12 explains that any agreements on sharing capacity will be formalised in a Statement of Common Ground. It should be noted that the criteria that the ELJWPG officers shared with LBTH on 28 January 2025 do not appear to be included in the Proposed Submission ELJWP.

A statement of common ground is not an appropriate mechanism to agree the sharing of waste capacity given that the ELJPW is proposing the release of safeguarded waste sites. Capacity that is safeguarded for other authorities should be set out in the 'Future Requirements for Waste Management Capacity' section of the ELJWP to ensure that sufficient sites are safeguarded in the future to meet neighbouring authorities' requirements. Paragraph 9.8.6 of the London Plan is clear that surplus capacity should be offered to boroughs facing a shortfall in their capacity *before* proposing the release of safeguarded sites. Therefore, capacity sharing must be agreed and set out within the ELJWP itself, rather than deferred to be agreed through statements of common ground after proposing the release of safeguarded sites.

Given LBTH's evidenced shortfall in waste management capacity and the high level of surplus capacity in the ELJWPG, we have requested a transfer of 34,370tpa of HIC waste management capacity to ensure that the borough is able to meet its waste apportionment.

Tower Hamlets also requested a transfer of 56,935tpa of C&D waste to ensure that the borough is able to meet its C&D waste arisings for the plan period, given that the use of 'areas of search' is not realistic in the Tower Hamlets context. To date the ELJWPG have yet to agree to assist LBTH in meeting our shortfall despite their significant surplus capacity, and they continue to propose to release safeguarded waste sites as part of the proposed submission ELJWP.

The Tower Hamlets Employment Land Review (2023) demonstrates that the borough has a significant shortfall in industrial land to meet demand over the plan period of the new Local Plan. This demand is predominantly for logistics facilities and manufacturing, and relying on this land for waste management could further reduce the borough's ability to meet the logistics and manufacturing demand. The London Plan places a significant emphasis on the need for local authorities, particularly in Inner London, to adequately protect their industrial land to ensure that they can meet the logistics and other needs of Central London more broadly. The ELJWPG contend that LBTH should be adopting an approach of using 'areas of search' as part of its proposed waste policy. However, LBTH using areas of search in order to meet its waste planning needs presents a conflict with the need to safeguard industrial land for logistics and manufacturing. Where other waste planning authorities have excess capacity on existing safeguarded waste sites, using these sites for waste purposes ahead of SIL currently in industrial uses would align with the London Plan.

There are several safeguarded waste sites in LB Newham that already currently receive a significant proportion of their waste from Tower Hamlets. These are listed in the table below:

Site Name	Operator	Site Type	LBTH input	Distance to	Comment
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				central LBTH	
Unit J Prologis Park, E3 3JG	Bywaters (Leyton) Limited	MRF	14,263	1.8 miles	
Canning Town Depot E16 4TL	G B N Services Ltd	Skip Waste Recycling	4,800	3.6 miles	
Marshgate Sidings E15 2PJ	S Walsh & Son Limited	Waste transfer	6,781	1.8 miles	
Knights Road, E16 2AT	JRL Environmental	Physical Treatment	2,993	4.4 miles	
Marshgate Sidings E15 2PJ	DB Cargo (UK) Limited	Transfer & treatment	?	1.8 miles	166,577 All uncoded to WPA
9a Cody Business Centre E16 4TL	The Remet Company Limited	Metals & ELV recycling	?	3.6 miles	56,853 Uncoded to WPA
Stephenson Street, E16 4SA	Powerday (IOD Skip Hire Ltd)	Skip Waste Recycling	?	3.3 miles	53,747 All uncoded to WPA

Given that these are existing, safeguarded waste sites that currently process a significant proportion of Tower Hamlets' waste, we consider that these sites should be formally safeguarded in the ELJWP to contribute to meeting Tower Hamlets' waste requirements (for C&D waste, and for HIC waste if the ELJWPG prefers this approach over safeguarding capacity for Tower Hamlets at the River Road site in Barking). While estimating an overall capacity number from these sites is challenging given the uncoded waste inputs, together these sites have the capacity to accommodate all of LBTH's shortfall.

Capacity shifted from LBTH to ELJWPG

In February 2018 the London Legacy Development Corporation (LLDC) granted permission for the redevelopment of a safeguarded waste site within Tower Hamlets (though at that time under the planning authority of the LLDC). This site (known as the Hepscott Road site) had capacity for 26,353tpa of HIC waste. This loss of waste capacity in Tower Hamlets was granted on the basis that the capacity would be shifted to a site in Barking (the River Road site) within the ELJWP area (LLDC Planning Reference: 16/00451/OUT).

Given this shift in waste capacity, the Waste Data Study (2023) recommends that this capacity be formally safeguarded for Tower Hamlets through the ELJWP to help ensure that Tower Hamlets can meet its apportionment.

7. Policies

Tower Hamlets does not wish to raise any concerns regarding policies JWP1, JWP3, JWP4, JWP5, and JWP6.

However, we continue to object to the implementation of Policy JWP2, which safeguards provision of waste capacity in the area and particularly does not permit the loss of safeguarded waste sites unless compensatory capacity is provided or 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. The ELJWP is proposing to remove sites from safeguarding without first offering capacity to neighbouring and other London boroughs that are unable to meet their waste

planning requirements within their boundaries. Therefore, Policy JWP2 cannot be considered to be in conformity with the London Plan.

8. Safeguarded and released sites

Appendix 1 of the ELJWP lists the safeguarded waste sites in the ELJWPG. There is a total of 66 waste sites listed in the four boroughs, including several in Newham in close proximity to the Tower Hamlets boundary. Table 9 lists four sites to be released from safeguarding, with a total capacity of 462,500tpa (though the table does not specify, except for Old Bus Depot, whether this is HIC waste capacity, C,D&E waste capacity or other types of waste capacity). The surplus set out in Table 8 is the surplus capacity following release of these sites.

Appendix 4 lists sites with potential for release from safeguarding in the future. These are in addition to the four sites identified for release from safeguarding as part of this plan in Table 9. Six total sites have been identified as having potential for release from safeguarding, with a total reduction in apportioned HIC waste capacity of 176,279tpa and a reduction in C,D&E waste capacity of 128,576tpa. The supporting text of London Plan Policy SI8 is clear that boroughs with surplus waste capacity should share this with boroughs facing a shortfall before releasing sites from safeguarding. Paragraph 5.4 explains that the ELJWPG will retain a surplus capacity of at least the amount of these six sites to facilitate their future release.

It should be noted that the Newham Local Plan – Submission Version, which underwent Regulation 19 consultation in 2024 and received Full Council approval to be submitted to the Secretary of State for Examination in Public in April 2025, identifies the potential for the release of waste sites within Newham. Implementation point W1.3 of policy W1 suggests that safeguarded waste sites in Beckton Riverside can be released as part of the Local Plan. However, this site has been identified for release as part of the ELJWP. If the site at Beckton Riverside – and any other locations – is proposed for release, this should be set out in the ELJWP alongside the implications for overall capacity. We raised this as a concern in our response to both the Regulation 18 version of the ELJWP and the Regulation 19 consultation on the Newham Local Plan. This matter does not appear to have been addressed in the Proposed Submission ELJWP, which only identifies one site – Connolleys Yard – for release from safeguarding.

The ELJWP indicates that local plans would take precedence over the waste plan where there is a discrepancy. Given the need to plan for specific waste capacities and the need for evidence to support the release of safeguarded sites, it is unclear how sites could be released in a local plan where this had not been accounted for in the waste plan.

All safeguarded waste sites proposed for release in local plans should be included in the ELJWP and their potential loss of capacity be included in the overall capacity assessment for the ELJWPG.

9. Conclusion

Appendix 1:

Duty to Cooperate Discussions

Officers from Tower Hamlets approached the member boroughs of the East London Joint Waste Planning Group (ELJWPG) in 2023 to inquire about joining the ELJWPG or, should this not be possible, passing some of LBTH's waste apportionment (as set out in the London Plan) to the ELJWPG to address our borough's shortfall in capacity. It should be noted that Tower Hamlets is the only London borough that is not part of a waste planning group; and given the geographical location of the borough, the ELJWPG would be the most logical joint waste planning group for us to join. The ELJWPG indicated that adding an additional borough to the membership would significantly delay the process of developing a new waste plan and was therefore not considered possible at that time. LBTH requested further information regarding how the borough might join the ELJWPG in the future, but this information has not been provided.

The ELJWPG also indicated that they would consider transferring some of their excess capacity to Tower Hamlets if the borough could demonstrate that it was not possible to meet its waste apportionment within the borough. This is in line with discussions LBTH has had with the GLA, who have indicated seeking assistance from other boroughs is the approach we should take. The GLA continue to support our position, i.e. that we should be seeking capacity from the ELJWPG given the significant surplus capacity that they have evidenced.

In our response to the Regulation 18 consultation on the ELJWP in October 2024 (attached as Appendix 2), we set out the level of waste capacity that we would need to ensure that Tower Hamlets does not have a shortfall. At the time this was calculated as 26,363tpa of HIC waste capacity. However, following discussions with the GLA and the Environment Agency, LBTH removed the majority of the capacity in exempt sites from its overall waste management capacity, which increased the shortfall in HIC waste management capacity to 34,370tpa. The request for C&D waste management capacity remains at 56,953tpa.

From late 2024 to early 2025, following submission of our representation and the conclusion of the Regulation 18 consultation, we engaged in discussions with the ELJWPG regarding how we should agree the transfer of capacity. The ELJWPG indicated that they would agree the transfer through a Statement of Common Ground but explained that we would have to make a formal submission that met a set of criteria. The ELJWPG officers explained that these criteria would be included in the Regulation 19 version of the ELJWP, but that they would share them with us in advance in order to allow us to make a formal request as early as possible. It should be noted that these criteria do not appear to have been included in this Regulation 19 version of the ELJWP.

ELJWPG officers explained that the criteria and a formal request process were necessary given the number of requests the ELJWPG had received to share capacity. However, the Duty to Cooperate Statement published as part of this Regulation 19 consultation implies that only Tower Hamlets has requested assistance meeting its waste capacity requirement.

In March 2025, LBTH made a formal request to the ELJWPG to share capacity, setting out how the borough met all of the criteria that the ELJWPG officers had provided. The ELJWPG officers responded in April 2025 explaining that the evidence provided did not adequately demonstrate that the borough was facing a shortfall and required assistance to meet its apportionment. Given the relatively small amount of waste capacity the borough is requesting and the very high surplus of capacity identified in the ELJWP, LBTH considers the evidence provided to be proportionate, but has responded to the ELJWPG with responses to their concerns.

Tower Hamlets Evidence Base

Waste Data Study (2023)

Tower Hamlets carried out a Waste Data Study (July 2023) to inform its Regulation 18 Draft Local Plan in 2023. This study demonstrated that the borough faced a shortfall of 192,370 tonnes per annum (tpa) by 2041. Given the lack of available locations in the borough for new waste facilities, the Waste Data Study recommended that Tower Hamlets approach neighbouring waste authorities to request that some of their excess capacity be transferred to Tower Hamlets to help meet its apportionment, as set out in the adopted London Plan (2021).

The Waste Data Study also identified a site where planning permission was granted for the loss of a safeguarded waste site in the Tower Hamlets part of the LLDC (LLDC Planning Reference: 16/00451/OUT). This application was granted on the basis that the capacity of the site was being re-provided within London, in this case in Barking and Dagenham within the ELJWPG. The owner of the LLDC site (McGrath) was also the owner of the site in Barking and Dagenham (River Road) and demonstrated that there was spare capacity within the River Road site to accommodate all of the waste processing from the LLDC site. They received agreement from the GLA that they could transfer the capacity from the LLDC site to River Road. The waste planning process for the ELJWP should formalise this. Tower Hamlets' Waste Data Study recommended that this lost capacity – 26,353tpa - be 'transferred' back to Tower Hamlets to help meet its apportionment, meaning that it would be specifically safeguarded within the ELJWP to process waste from Tower Hamlets.

Waste Study Update (2024)

Following consultation on the Tower Hamlets' Draft Local Plan (Regulation 18), Tower Hamlets commissioned a Waste Study Update (May 2024) to include a more comprehensive search for potential waste sites in the borough. This was in order to test a scenario in which no neighbouring borough was able to assist Tower Hamlets in meeting its need. That search identified additional capacity at Northumberland Wharf and included Onsite Segregation Facilities (OSFs) as part of the waste capacity for Tower Hamlets. The inclusion of OSFs as part of a borough's waste capacity is untested – no local authority is known to have used OSFs to meet its waste planning requirements. OSFs were included as part of scenario testing to see if it was possible for Tower Hamlets to meet its apportionment requirements within the borough if other boroughs did not have surplus capacity.

The Waste Study Update (2024) also relies – to a greater extent than the 2023 Waste Study – on capacity from exempt sites. Exempt sites are those that carry out waste processing functions that do not require an Environment Agency permit. These can meet the definition of waste sites in the London Plan where they have a planning permission that allows for waste processing activities. However, given the lack of Environment Agency data, it can be difficult to accurately measure the level of capacity on these sites.

The Waste Study Update also identified capacity for the management of Construction and Demolition Waste (C&D). It indicates a shortfall of 56,953tpa between the need in the borough to 2041 and the capacity of existing operational C&D processing facilities in the borough. However, in the search for sites, it also identifies an additional 5.28ha of available land in Strategic Industrial Locations and Local Industrial Sites that could be suitable for C&D waste facilities. Based on an estimate of 85,000 tpa per ha, this potential additional capacity could potentially meet the borough's demand to 2041; however, it should be noted that there are competing demands on this available land given the multiple planning priorities in the borough. Tower Hamlets has a particularly large shortfall in industrial land to meet demand over the plan period. This has resulted in increasingly high industrial rents, as many different uses compete for limited stock, forcing out many longstanding local businesses and limiting the extent to which businesses in Tower Hamlets can grow and compete more widely.

LBTH's Regulation 19 Consultation (2024)

The 2024 Regulation 19 version of LBTH's local plan included a version of Policy RW1 that was based on the conclusions of the Waste Study Update (2024). It included, within LBTH's list of waste sites, OSFs, areas of search and exempt sites; and stated that LBTH was capable of meeting its waste capacity requirements – including its London Plan apportionment – within the borough boundaries. This was in an attempt to be self-sufficient at managing our own waste, to avoid the need to ask for assistance.

LBTH consulted on the Proposed Submission Local Plan (Regulation 19) in Autumn/Winter 2024. We received several responses to Policy RW1, including from the GLA, the EA and the ELJWPG.

The GLA and the EA both objected to the use of OSFs and exempt sites in calculating the borough's waste management capacity. They also encouraged the borough to work with neighbouring authorities – and specifically the ELJWPG given proximity – to meet our waste capacity requirements.

The ELJWPG responded that the borough's approach was inconsistent: the policies stated that the borough was able to meet its waste capacity requirements within its boundaries while LBTH was requesting support from the ELJWPG.

Second Regulation 19 Consultation (2025)

Given that several issues of soundness that were raised by statutory stakeholders as part of the Regulation 19 (2024) consultation, LBTH is undertaking a second Regulation 19 (2025) consultation in Summer 2025. This consultation is limited to

three policies, of which RW1 is one. RW1 has been revised to remove OSFs and areas of search and to reduce the reliance on exempt sites by using the Waste Data Study (2023)'s exempt sites capacity level.

This revised policy states explicitly that LBTH will need to work with neighbouring authorities to meet its waste requirements. These proposed revisions are based on discussions with the GLA, the EA and the ELJWPG.

18. Appendix 7 – Tower Hamlets- Data on waste received and exported

This data has been collated from the Waste Data Interrogator 2023 (the most recent data) on Tower Hamlets imports from other London Boroughs and other WPAs.

WPA	Type of Waste	Amount of waste received (tonnes)
London (WPA not codeable)	HIC	166,354
London (WPA not codeable)	Inert/C+D	165
LB Newham	HIC	38
East Sussex	Inert/C+D	990

This data has been collated from the Waste Data Interrogator 2023 (the most recent data) on Tower Hamlets exports to other London Boroughs and other WPAs.

WPA	Type of Waste	Amount of waste exported (tonnes)
Bexley	HIC	161,138
Greenwich	HIC	8
London (WPA not codeable)	HIC	1636
London (WPA not codeable)	Inert/C+D	316
Wandsworth	HIC	1686
Kent	HIC	1853

19. Appendix 8 – LBTH Submission for LB Newham Regulation 19 consultation

Housing & Regeneration

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Planning Policy Team
Newham Dockside
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E16 2QU

12 June 2025

**LBTH Representation on the LB Newham Draft Submission Local Plan
(Regulation 19 Consultation)**

Dear Planning Policy Team,

Thank you for providing LB Tower Hamlets with the opportunity to submit a representation to your Draft Submission Local Plan consultation (Regulation 19 Plan).

Overall, we support the principles and objectives of the Regulation 19 Plan and recognise that our two boroughs share many of the same challenges and opportunities. The primary aim of submitting this representation is to seek further information specifically regarding the proposed release of safeguarded land for waste management at Beckton Riverside. There appears to be a discrepancy between Newham's draft plan (Regulation 19) this aspect would be welcomed.

We wish to have the opportunity to participate in hearing sessions should this be deemed necessary, which we believe is justified given both boroughs continue to cooperate on a number of strategic cross-boundary matters through the Duty to Cooperate. The purpose of this letter is to seek clarification on the aforementioned matter and express support for many of the policies in the Plan.

This letter is set out under the following headings:

1. Background

2. Support for policies
3. Matters requiring clarification
4. Conclusion

1. Background

As you will likely be aware, Tower Hamlets is currently in the process of producing a new Local Plan. This is currently undergoing Regulation 19 consultation, and we are intending to submit our Plan to the Secretary of State early in 2025. As part of our Regulation 19 consultation, we have published a Duty to Cooperate statement, which sets out key strategic matters and how Tower Hamlets has engaged with prescribed bodies and neighbouring local authorities on these matters. This includes the extensive engagement that we have had with LB Newham on numerous strategic cross-boundary issues.

2. Support for policies and site allocations

LB Tower Hamlets wishes to express support for several policies and site allocations.

Policies

- HS1 – We support the redevelopment of Gallions Reach Retail Park as this has been identified in the Tower Hamlets Retail and Town Centre Study as a major leakage of spending out of the borough to out of town retail centres.
- HS5 – It should be noted that Hackney Wick has been designated as a night time economy centre of local significance in the Tower Hamlets Draft Local Plan. There is an opportunity for synergy in the night time economy between Hackney Wick and Stratford.
- J1 – We support the continued designation of Fish Island/Bow Goodsyard as Strategic Industrial Land, the safeguarding of the railhead, and the protection of the site for industrial uses, and we would welcome closer working on plans for redevelopment on the site across both sides of the borough boundary to ensure that both boroughs benefit from enhancements to the public realm and the introduction of sustainable industrial uses. We are aware there is an extant planning application (24/00122/OUT) – which is to be determined by the LLDC given its location - and we would wish that Newham ensure that determination of this application is in conformity with the adopted and emerging Newham policies as well as London Plan policies in relation to protection of SIL. As part of redevelopment here we would expect to see modern and sustainable industry, alongside place-shaping principles which deliver good growth (e.g. public realm improvements, permeability, legibility, quality design, safety etc.) to be implemented across the site regardless of the administrative boundary. This is reflected in our draft local plan and we would hope is reflected as part of any pre/application discussions with applicants.
- H1 – We note that LB Newham is proposing to use a stepped housing trajectory, which in the short term would suggest that their delivery is below

their London Plan target. However, we recognise that this is due to the complex and large scale nature of the sites that they have allocated.

Site Allocations

- N2.SA4 – We support the inclusion of bridge crossings over the River Lea to Tower Hamlets and welcome the opportunity to work further with LB Newham to deliver these crossings.
- N4.SA4 – We support the significant additional greenspace that is proposed on this site and the new crossings of the railway line, which will improve connectivity for residents of Tower Hamlets.
- N4.SA5 – We support the proposed bridge connections across the River Lea to Tower Hamlets, as well as the proposed greenspace along the riverfront and the improved crossings of the A13.
- N7.SA2 – We support additional connectivity through the site and additional greenspace, which will benefit Tower Hamlets residents. We also support the height strategy for the site, which includes lower heights towards Three Mills and the Tower Hamlets boundary.
- N7.SA3 – We support the proposed new bridge across the River Lea to Tower Hamlets and the proposed greenspace along the river.
- N8.SA9 – We support the proposed new bridge across the River Lea to Tower Hamlets.

3. Matters requiring clarification

Policy W1 of Newham's Regulation 19 Plan sets out the borough's strategic approach to waste management, including safeguarding sites for waste management. Point 3 of the policy indicates that 'existing waste sites within Newham will be safeguarded and should be retained in waste management use'. We welcome that safeguarding and note that the safeguarding of all waste sites in Newham is in accordance with the draft East London Joint Waste Plan (ELJWP), which does not identify any sites in Newham for release from waste safeguarding.

However, it is noted that the clear protection in the wording of the policy itself, Implementation Point W1.3 explains that the land at Beckton Riverside that is safeguarded for waste management in the adopted 2012 East London Waste Plan is no longer being safeguarded. This appears to be at odds with both the adopted East London Waste Plan, and the emerging (Regulation 18) ELJWP, neither of which identify Beckton Riverside for release from safeguarding. It is unclear what evidence has been provided to justify such a release.

London Plan Policy SI8 expects boroughs with a surplus of waste sites to offer to share these sites with those boroughs facing a shortfall in capacity before considering site release. Tower Hamlets is facing a shortfall in capacity and

explained this to officers from LB Newham and the other members of the East London Joint Waste Planning Group in meetings in early 2023. We are keen to continue to work with Newham (alongside the other boroughs within the ELJWPG) to ensure that the approaches taken in our respective plans (as well as the East London Joint Waste Plan which is being progressed concurrently) remain in conformity with the adopted London Plan.

As you will be aware, Tower Hamlets provided a detailed representation to the Regulation 18 consultation on the ELJWP (dated 16 September 2024), which sets out in detail the shortfall Tower Hamlets is facing and how much capacity should be allocated from the East London boroughs.

We consider that the release of safeguarded waste sites – as a strategic matter - is best addressed through the ELJWP, particularly as it is currently going through the plan-making process.

4. Conclusion

Overall, we support the principles and objectives of the LB Newham Draft Submission Local Plan. We have noted where further clarification would be welcomed around the proposed release of safeguarded waste sites in Beckton Riverside on the basis that this appears to be in conflict with the emerging East London Joint Waste Plan. We consider that releasing safeguarded waste sites is best addressed through the ELJWP and we welcome further discussion of waste management as part of that process. We look forward to continue conversations with Newham as part of ongoing discussions of strategic matters as part of the Duty to Cooperate.

Tower Hamlets broadly supports the policies in the LB Newham Draft Submission Local Plan, and we have set out in Section 4 where we wish to particularly express support.

We look forward to continuing to work closely with LB Newham on strategic matters as we both move forward in the plan-making process.

All the best,

Plan-making Team
Localplan@towerhamlets.gov.uk

Tower Hamlets welcomes the opportunity to continue to cooperate with neighbouring boroughs on waste management matters. In accordance with London Plan Policy SI8, Tower Hamlets requests a transfer of 34,370tpa of HIC waste capacity and a transfer of 56,935tpa of C,D&E waste capacity. This would allow the borough to meet its waste requirements.

The capacity we are requesting could come from the ELJWPG as a whole, or can be transferred from individual boroughs within the group. In the case of the HIC waste capacity, it may be preferable to transfer the capacity from LB Barking & Dagenham to reflect the transfer of capacity from the Hepscott Road site to the River Road site.

The safeguarding of capacity to meet LBTH's needs should be clearly set out in section 4 of the ELJWP, in an additional clause in Policy JWP2, or in an additional policy that establishes the ELJWPG's approach to sharing capacity.

As Tower Hamlets progresses through Regulation 19 consultation, and then Submission of our Local Plan, it will be essential to ensure that we have more certainty around our waste management capacity. As Tower Hamlets, the ELJWPG and Newham all carry out reviews of their respective plans, it is important that we continue to work together under the Duty to Cooperate and engage with the GLA on waste planning matters. This is a particularly significant time for all parties, which presents an opportunity to address a strategic matter in a sustainable and effective way.

Yours Sincerely,

Marc Acton Filion
Plan-making officer

A solid black rectangular box used to redact the signature of Marc Acton Filion.



Tower Hamlets Waste Data Update

Management Requirements for Construction,
Demolition & Excavation Waste in Tower Hamlets to
2042

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1.0	Client Review	Alan Potter (Partner)	23.05.2024	Tom Walsh (client contact)	27.06.2024
1.1	Consultation Draft	Alan Potter (Partner)	13.09.2024		

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Introduction

BPP Consulting has been contracted to produce an update to the Tower Hamlets Waste Data Study¹, forecast of construction, demolition and excavation (C, D & E) waste arising in Tower Hamlets. This will inform policies included in the emerging Tower Hamlets Local Plan which runs to 2041. The client has requested the forecast extend through to 2042.

1.1 Principal Data Sources

The principal data source used to generate this C, D & E waste baseline update is listed below.

Waste Data Interrogator

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

1.2 Advice on Data

The principal source of advice with respect to the use of data to inform production of a plan evidence base is the national Planning Practice Guidance (PPG) available at <https://www.gov.uk/guidance/waste>. This states that:

"Assessing waste management needs for Local Plan making is likely to involve:

- understanding waste arisings from within the planning authority area, including imports and exports*
- identifying the waste management capacity gaps in total and by particular waste streams*
- forecasting the waste arisings both at the end of the period that is being planned for and interim dates*
- assessing the waste management capacity required to deal with forecast arisings at the interim dates and end of the plan period."*

Paragraph: 022 Reference ID: 28-022-20141016

It includes a section entitled "Using data to monitor and forecast waste needs", which articulates the following principles should waste planning authorities adopt when using data to plan for waste management:

- Make clear assumptions on how data were handled, as well as their impact (including on forecasting)*
- Provide data to an appropriate level of significance, based on their explicit assumptions. In practice, data quoted to more than 2 or 3 significant figures will not be helpful and spurious accuracy stemming from precise figures should be avoided*
- Plan for a range of each type of waste rather than a specific single figure."*

Paragraph: 036 Reference ID: 28-036-20141016 Revision date: 16 10 2014

¹ Tower Hamlets Waste Data Study, Vitaka Consulting (July 2023).

1.3 Data Presentation

In order to respect the need to avoid "spurious accuracy", the following approach has been taken:

1. Where actual tonnage data has been accessed, this has been used in the computations.
2. Where data has been subject to computation, this has been included to 3 significant figures.
3. Where percentages have been used to generate data, the percentages are presented as whole numbers, however the computations actually use the full value. This means that values presented may not always precisely correspond to the values computed when applying the percentage value presented in this report.
4. Final values discussed in the text are rounded to the nearest 500.

Methodology

The 2023 study estimated C, D & E waste arisings from London Borough Tower Hamlets (LBTH) in 2021 by identifying:

- Construction & Demolition waste as waste coded under Chapter 17 (Construction & Demolition Waste) plus EWC codes 19 12 09 (minerals such as sand, stones) and 20 02 02 (soil and stones); and
- Excavation waste as waste coded under EWC code 17 05 04 only.

The resulting data for C, D & E waste arising from LBTH in 2021 is reproduced in Table 1 below, alongside data generated using the same method for 2022.

Table 1: LBTH C, D & E Waste arisings estimates in 2021 vs 2022 (tonnes)

Source: Vitaka & WDI 2022

Category	Management Route	2021 (Vitaka)	2022 (BPP)
C&D	Landfill	1,073	37
	Transfer	26,881	23,689
	Treatment	62,906	37,893
	MRS	1,130	697
	Sub-total	91,990	62,316
Excavation	Landfill	151,123	19,053
	R2L	17	18
	Transfer	15,346	508
	Treatment	35,153	6,246
	Sub-total	201,638	25,825
	Total CDE	293,628	88,141

As shown in Table 1 the tonnage of C, D & E waste reported as arising in LBTH has fallen by c205,500 tonnes in a single year. This significant decrease may be explained by the following:

- Marshgate Sidings (S Walsh Ltd) site reported receiving c17,000 tonnes of inert/C+D waste from LBTH in 2021 but only c7,000 tonnes in 2022. Another site located at Marshgate Sidings operated by DB Cargo reported receiving c166,500 tonnes of inert/C+D waste from London (WPA uncodeable) in 2022, an increase of c58,000 tonnes from that reported in 2021. Given the close proximity of both sites it is possible that the DB Cargo site managed a tonnage of waste from LBTH previously managed at the S Walsh site.
- Silt Lagoons in LB Havering classed as non-hazardous landfill, reported receiving c45,500 tonnes of inert/ C+D waste from LBTH in 2021 and only c15,500 tonnes in 2022 (a decrease c30,000 tonnes). It also reported receiving c11,000 tonnes of inert/C+D waste from London (WPA uncodeable) waste in 2022 as compared with c1,500 tonnes in 2021. Therefore, a proportion of the additional tonnage attributed to London in 2022 (9,500 tonnes) may have originated from LBTH.
- Calvert Landfill site (Buckinghamshire) that received c27,500 tonnes of inert/ C+D waste from LBTH in 2021 reports no inputs from LBTH in 2022. However, c46,000 tonnes of waste is

reported under East London Waste Authority (ELWA) which, as confirmed by the Environment Agency, should be coded under London (WPA uncodeable) as compared with c24,500 tonnes in 2021. A proportion of the additional tonnage (c21,500 tonnes) could have arisen from LBTH.

The above analysis shows that a significant tonnage of waste previously reported as originating from LBTH may have not been accounted for in the WDI 2022 due to waste not being recorded below regional level. Section 3 addresses this shortfall.

1.4 Composition of Tower Hamlets C, D & E Waste Arisings 2022

Table 2 below shows C, D & E waste arisings from LBTH in 2022 by composition².

Table 2: C, D & E Waste Arisings Composition from Tower Hamlets in 2022

Source: WDI 2022

Category	Type	Tonnes
C&D	Inert	59,040
	Non-inert	3,276
Excavation	Inert	25,825
	Non-inert	0
Total		88,141

² Note that although Vitaka had identified excavation waste as 17 05 04 only, 19 12 09 minerals (for example sand, stones) and 20 02 02 (soils and stones) would have been recategorised as inert excavation waste and 17 05 06 (dredging spoil) as non-inert excavation waste. However, none of these waste types were reported as arising in Tower Hamlets in the WDI2022.

Accounting for waste reported in WDI but not attributed below London

Data quality of the WDI relies on operators of permitted sites to report inputs down to origin Waste Planning Authority (WPA) level. A number of sites do not report inputs to that level, preferring to report at regional level only i.e. to London only. This means that there is a potential for an underestimation of the tonnage of waste arising in LBTH that is not attributed down to or below regional level.

The WDI 2022 reports nearly 9 million tonnes of waste from London that is not attributed down to WPA level below London. In addition, over 4 million tonnes were mis-attributed to ELWA, which the Environment Agency has now explained ought also to be counted as waste arising in London not attributed down to WPA level³. The total tonnages are set out by type in Table 3 below:

Table 3: Totals of waste not attributed below London region received at permitted sites in England (tonnes)

Source WDI 2022 Environment Agency

	Hazardous	Hhold/Ind/Com	Inert/C+D	Grand Total
Tonnes Reported as Received	198,724	5,634,830	7,331,425	13,164,979

Given the substantial tonnage of waste to be attributed, an assessment has been undertaken to establish if an amount might reasonably be considered to arise from LBTH itself. Given household, industrial and commercial (HIC) waste is subject to London Plan apportionments, and hazardous waste is also reported through the Environment Agency Hazardous Waste Interrogator, the focus of this exercise is on accounting for the C, D & E waste tonnage of nearly 7.5 million not attributed below London in 2022.

One approach taken to reattribute these wastes is to consider the tonnages accepted at sites within each WPA, on the presumption that C, D & E waste will not travel far. However, given the compact nature of London, the inner city in particular with numerous administrative boundaries within a short distance of each other and WPAs that have few if any suitable waste management sites available, it is not considered appropriate to apply this approach in this case.

Given that the GLA data on employment in the construction sector has been used as a proxy for construction activity within LBTH for the purposes of forecasting arisings, this dataset has been referenced to establish a proxy for allocating the arisings between Boroughs across London. Table 4 sets out the employment values for 2021, the most recent estimate, with the Boroughs grouped according to the waste planning areas that exist.

³ Email from Dr Matthew Caple 15th April 2024.

Table 4: Construction Sector Employment Values

Source GLA Labour Data Statistics

Borough	Employment n	Percentage	Waste Plan Area
Barking and Dagenham	4,000	2.1%	ELWP
Havering	8,000	4.3%	
Newham	8,000	4.3%	
Redbridge	6,000	3.2%	
Sub Total		13.9%	
Brent	7,000	3.7%	WLWP
Ealing	7,000	3.7%	
Harrow	6,000	3.2%	
Hillingdon	7,000	3.7%	
Hounslow	4,500	2.4%	
Richmond upon Thames	2,500	1.3%	
Sub Total		18.2%	
Barnet	8,000	4.3%	NLWP
Camden	9,000	4.8%	
Enfield	8,000	4.3%	
Hackney	4,000	2.1%	
Haringey	3,500	1.9%	
Islington	5,000	2.7%	
Waltham Forest	4,500	2.4%	
Sub Total		22.4%	
Croydon	7,000	3.7%	SLWP
Kingston upon Thames	3,000	1.6%	
Merton	4,500	2.4%	
Sutton	6,000	3.2%	
Sub Total		10.9%	
Hammersmith and Fulham	2,500	1.3%	Western Riverside
Kensington and Chelsea	2,250	1.2%	
Lambeth	5,000	2.7%	
Lewisham	3,000	1.6%	
Wandsworth	4,500	2.4%	
Sub Total		9.2%	
Bexley	6,000	3.2%	SE London
Bromley	7,000	3.7%	
Greenwich	4,500	2.4%	
Southwark	4,000	2.1%	
Sub Total		11.5%	
City of London	7,000	3.7%	Central London
Westminster	14,000	7.5%	
Tower Hamlets	5,000	2.7%	
Grand Total		187,250	100.0%

Applying the above percentages to the unattributed inert/C+D waste total gives the tonnages of waste displayed in Table 5 below.

Table 5: Waste not attributed below London region, allocated across London sub-regions using Construction Sector Employment data as proxy

Source Table 3 & Table 4

London Sub-region	Tonnes
Central London	
City of London	271,263
Westminster	549,857
Tower Hamlets	197,948
East London	1,017,972
North London	1,644,416
South East London	841,785
South London	802,632
West London	1,331,194
Western Riverside	675,385
Total	7,331,356

Hence, to ensure that the tonnage of waste not attributed below London is planned for i.e. not orphaned, it is proposed to add a further c200,000 tonnes to the total of 88,141 tonnes actually attributed to LBTH to give a total of 286,089 tonnes for management from LBTH as a sensitivity.

1.5 Composition of Re-attributed C, D & E waste from Tower Hamlets

In order to estimate the material type of C, D & E waste reattributed to Tower Hamlets the tonnages reported under the Inert/ C+D category not attributed below London as a whole have been interrogated and split between material type⁴ as shown in Table 6 below.

Table 6: Allocation of Inert/ C+D Waste from Waste Unattributed below London

Source: WDI 2022

Category	Type	Tonnes
C&D	Inert	38%
	Non-inert	7%
Excavation	Inert	55%
	Non-inert	<1%

Applying the proportions shown in Table 6 to the re-attributed non-hazardous C, D & E waste from LBTH (c200,000 tonnes) provides the profile shown in Table 7 below.

⁴ It is noted that although the WDI classes wastes under Inert C+D category this includes non-inert waste codes.

Table 7: Composition of Reattributed Non-hazardous C, D & E waste from Tower Hamlets

Category	Type	Tonnes
C&D	Inert	75,355
	Non-inert	13,739
Excavation	Inert	108,276
	Non-inert	578
Total		197,948

The re-attributed waste by material type from LBTH shown in Table 7 has been added to the C, D & E waste baseline from LBTH shown in Table 2 to produce a sensitivity baseline as shown in Table 8 below.

Table 8: Non-hazardous C, D & E Waste Baseline arisings in Tower Hamlets including reattributed Waste from London

Source: Table 4 plus Table 11

Category	Type	Tonnes	
C&D	Inert	134,395	151,410
	Non-inert	17,015	
Excavation	Inert	134,101	134,679
	Non-inert	578	
Total C, D & E waste		286,089	

Table 8 shows that by adding the re-attributed waste from LBTH to the C, D & E waste arisings attributed to LBTH produces an arising **value of c286,000 tonnes as a starting baseline to forecast** from. It is worth noting that the value arrived at, is similar to that of 293,000 tonnes in 2021

Forecasting C, D & E Waste

The PPG states when looking to forecast C, D & E waste:

“Waste planning authorities should start from the basis that net arisings of construction and demolition waste will remain constant over time as there is likely to be a reduced evidence base on which forward projections can be based for construction and demolition wastes.”

Hence, the starting point for any assessment is that there will be no growth in arisings over the Plan period. This would simply project forward the values shown in Table 8 for the Plan period (to 2041).

In addition, the growth rates indicated in the GLA employment projections in the construction sector have been used to generate a sensitivity forecast (bottom row Table 9). This produces the forecast shown in Table 9 below.

Table 9: Forecast Non-hazardous C, D & E waste arisings for Tower Hamlets based on Non-hazardous C, D & E waste arisings plus reattributed Non-hazardous C, D & E waste from London applying growth rate based on construction sector employment projections

Source: Table 8 plus GLA sector growth rates⁵

		2022	2026	2031	2036	2041
C&D	Inert	134,395	142,462	151,871	154,587	158,407
	Non-inert	17,015	18,036	19,228	19,571	20,055
Excavation	Inert	134,101	142,150	151,539	154,248	158,060
	Non-inert	578	613	653	665	682
Total C, D & E waste		286,089	303,260	323,291	329,072	337,204
Growth Rate p.a.			1.50%	1.32%	0.36%	0.49%

Table 9 shows that C, D & E waste arisings could increase to from c286,000 tonnes in 2022 to c337,000 tonnes at 2041 if the sensitivity growth scenario occurs. However, it is considered that this is unlikely to be the case due to various factors driving down per unit waste reduction in construction. This includes:

- the need to separate plasterboard offcuts from other waste types going to landfill creating cost pressure that should reduce onsite wastage,
- the increased segregation of materials at source to reduce disposal costs,
- the move to offsite fabrication reducing waste generation on each construction site - particularly when operating in space constrained sites such as those in urban areas like London.
- all new development in London over a certain threshold being required to be accompanied by Circular Economy statements (and approach) by London Plan Policy SI7.
- A sector initiative to drive towards Zero Avoidable Waste in Construction⁶ to meet the Government's Resources and Waste Strategy (2018) stated ambition 'to eliminate avoidable

⁵ <https://www.london.gov.uk/business-and-economy-publications/london-labour-market-projections-2017>

⁶ *The Routemap for Zero Avoidable Waste in Construction* <https://www.constructionleadershipcouncil.co.uk/wp-content/uploads/2021/07/ZAW-Interactive-Routemap-FINAL.pdf>

waste of all kinds by 2050' in England, plus the residual waste reduction target adopted into law by *The Environmental Targets (Residual Waste) (England) Regulations 2023*.⁷

The sensitivity forecast is considered to be worst-case, and not a reliable basis to plan future provision on. Therefore a static forecast using the arising value of c286,000 tpa, as per PPG advice.

1.6 Profiling the Re-attributed C, D & E waste from Tower Hamlets

In order to estimate the management profile of C, D & E waste reattributed to Tower Hamlets the tonnages reported under inert/ C+D waste not attributed below London as a whole have been interrogated to arrive at the management profile shown in Table 10.

Table 10: Non-hazardous Inert/ C+D Waste from Waste Unattributed below London by Waste Management Profile 2022

Source: WDI 2022 Inputs

Category	Waste Type	Recycling ⁸	Recovery ⁹	Landfill	Transfer	Mobile Plant
C&D	Inert	48%	<1%	1%	35%	<1%
	Non-inert ¹⁰	13%	0%	<1%	3%	0%
	Subtotal C&D	60%	<1%	1%	38%	<1%
Excavation	Inert	30%	45% ¹¹	0%	25%	<1%
	Non-inert	0%	0%	<1%	0%	0%
	Subtotal Excavation	30%	45%	<1%	25%	<1%

Applying the proportions shown in Table 10 to the tonnage of Non-hazardous C, D & E waste from London re-attributed to LBTH (197,948 tonnes) gives the management profile by tonnage shown in Table 11 below.

Table 11: Waste Management Profile of re-attributed Non-hazardous C, D & E waste from London (tonnes)

Source: Table 7 + Table 10

Category	Waste Type	Recycling	Recovery	Landfill	Transfer	Mobile Plant
C&D	Inert	35,851	219	499	26,709	202
	Non-inert ¹²	1,753	0	14	398	0
	Subtotal C&D	37,604	219	513	27,107	202
Excavation	Inert	31,984	49,003 ¹³	0	26,842	216
	Non-inert	0	0	1	0	0

⁷ <https://www.legislation.gov.uk/en/uk/si/2023/92/made>

⁸ Inputs to Treatment & Metal Recycling Sites

⁹ Inputs to Recovery to Land.

¹⁰ 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.

¹¹ including 36% reported as managed at sites permitted as landfills, but taken to be used for restoration purposes which is classed as recovery.

¹² As footnote 9.

¹³ including 38,644 tonnes reported as managed at sites permitted as landfills, but taken to be used for restoration purposes which is classed as recovery.

	Subtotal Excavation	31,984	49,003	1	26,842	216
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To establish a final management profile of attributed LBTH and reattributed London C, D & E waste, the values in Table 11 have been combined with the tonnages attributed directly to LBTH to produce the management profile by tonnes shown in Tables 12 (tonnes) and Table 13 (%).

Table 12: Non-hazardous C, D & E Waste attributed to Tower Hamlets plus reattributed Non-hazardous C, D & E Waste from London Combined Waste Management Profile 2022 (tonnes)

Category	Waste Type	Recycling	Recovery	Landfill	Transfer	Mobile Plant	Total
C&D	Inert	72,595	219	536	48,968	202	122,520
	Non-inert	3,599	0	14	1,828	0	5,441
	Subtotal C&D	76,194	219	550	50,796	202	127,961
Excavation	Inert	38,230	10,377	57,697	27,351	216	133,870
	Non-inert	0	0	1	0	0	1
	Subtotal Excavation	38,230	10,377	57,698	27,351	216	133,872

This corresponds to the management profile shown in Table 13 below:

Table 13: Non-hazardous C, D & E Waste attributed to Tower Hamlets plus reattributed Non-hazardous C, D & E Waste from London Combined Waste Management Profile 2022

Category	Waste Type	Recycling	Recovery	Landfill	Transfer	Mobile Plant
C&D	Inert	57%	<1%	<1%	38%	0%
	Non-inert	3%	0%	<1%	1%	0%
	Subtotal C&D	60%	<1%	<1%	40%	0%
Excavation	Inert	29%	51% ¹⁴	0%	20%	<1%
	Non-inert	0%	0%	<1%	0%	0%
	Subtotal Excavation	29%	51%	<1%	20%	<1%

To summarise the management profile for Non-hazardous C& D waste is as set out below:

- 60% was managed at recycling facilities;
- <1% was recovered (either through incineration or recovery to land);
- <1% was disposed at permitted landfills;
- 40% was managed at intermediate sites and transferred on for recovery or disposal; and
- 0% was managed via mobile plant (normally for recycling or reuse).

The management profile for Non-hazardous excavation waste is as set out below:

- 29% was managed at recycling facilities;
- 51% was recovered (through recovery to land including use in restoration or operational needs on permitted landfills);
- <1% was disposed at permitted landfills;

¹⁴ including 43% reported as managed at sites permitted as landfills, but taken to be used for restoration purposes which is classed as recovery.

- 20% was managed at intermediate sites and transferred on for recovery or disposal; and
- <1% was managed via mobile plant (normally for recycling or reuse).

This compares with the following targets set in the London Plan for C, D & E waste generated in London 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 beneficially used.¹⁵

When the different categories of site are assigned by activity, performance against the London Plan targets as shown in Table 14 is indicated. The major uncertainty is the final destination for waste managed at sites classed as waste transfer initially.

Table 14: Non-hazardous C, D & E Waste attributed to Tower Hamlets plus reattributed Non-hazardous C, D & E Waste from London Combined Waste Management Profile 2022 (%)

Category	Activity	Recycling	Recovery	Landfill	Transfer	Mobile Plant	Total
C&D	Recovery inc recycling	60%	0%	-	40%	0%	>60%
	Other	-	-	0%		-	<40%
Inert Excavation	Recovery inc recycling	29%	51%	0%	20%	0%	>80%
	Other	-	-	-		-	<20%
All Excavation	Recovery inc recycling	29%	51%	0%	20%	0%	>80%
	Other	-	-	-		-	<20%

¹⁵ London Plan Footnote 164.

Capacity Requirement for C, D & E Waste Management

1.7 Existing Management Capacity

The assessment of existing permitted sites presented in the Vitaka report included a site located at 455 Wick Lane, Bow, London, E3 2TB listed as a transfer station taking non-biodegradable wastes. The site is identified as accepting C,D & E waste principally. The site profile in Appendix A identifies it as having a licensed capacity of 49,999 tpa, with a peak of waste managed in the 5-year period 2017-2021 of 64,610 tonnes. However, data for the past three years shows no inputs, but Vitaka reports that contact established with the operator J B Riney & Co Ltd confirmed its intention to *"retain the permit and option to transfer waste at the site in the future."*

Given that stated intention, the capacity offered by the site at its peak of 64,610 tpa has been counted. Given the permit allows the acceptance and sorting of inert waste, and output data for the year 2017 shows that 94% of the outputs went for recovery it is considered such capacity counts towards the London Plan targets for C&D waste.

1.8 Quantifying the Management Capacity Gap

The London Plan specifically excludes excavation waste from the aim of overall net self sufficiency on the following basis: *"The particular characteristics of this waste stream mean that it will be challenging for London to provide either the sites or the level of compensatory provision needed to apply net self-sufficiency to this waste stream."* (Para 9.8.1). Provision for arising of excavation waste may be disregarded providing that it can be demonstrated the hazardous waste arisings within the Borough are effectively provided for by management facilities elsewhere. This has been established in the accompanying waste flows review report.

Hence the capacity requirement for C, D & E waste arising in Tower Hamlets is taken to solely relate to the C&D waste component. This is estimated as follows:

$$\begin{aligned} &127,961 \text{ tonnes (arising in Table 12)} \times 95\% \text{ (London Plan recycling/recovery target)} = 121,563 \\ &\text{tpa} \\ &\text{minus } 64,610 \text{ tpa (JB Riney site capacity)} \\ &= \underline{56,953 \text{ tpa}} \end{aligned}$$

It should also be noted that there are four U1 construction exemptions registered in the Borough which are taken to provide capacity for c600 tonnes each giving total of 2,400 tonnes.

1.9 Landtake of Facilities to Provide for the Management Capacity Gap

C & D Waste Recycling Capacity covers both the sorting of C & D waste delivered in skips into components for onward recycling and the actually processing of the hard element of C& D waste - principally demolition waste- by converting it into recycled aggregate.

In relation to the former activity, BPP Consulting reviewed capacities of a number of recycling facilities located in London¹⁶. This found that a waste use intensity of c.85,000 tonnes per annum

¹⁶ Provision of Compensatory Capacity for Existing Waste sites in NLWP submitted in support of Planning Application for Redevelopment of Montagu Industrial Estate

per hectare (tpa/ha) is achievable on a site occupying c4 hectares. This is a combination of an enclosed processing facility i.e. building and external yard space for vehicle parking and storage of materials. The key table is reproduced in Appendix 1.

Wrt recycled aggregate production sites, this requires an area to receive/store feedstock (hardcore) and an area where a crusher can operate and an area where the resultant product can be stored prior to removal for use. This is often entirely external yard space. An example site managing up to 15,000 tpa of mixed inert material for screening and crushing occupies an area of c0.5 hectares (see Appendix 1). The site area would not need to be doubled to double annual throughput, just the intensity of use of the plant and associated vehicle movements. It is estimated that up to 25,000 tpa might be processed through the site giving a tonnes/hectare value of 50,000t/ha.

The above calculations suggest that **an area of land of between 0.65 and 1 hectare** would be needed to provide a single site to meet the identified need. Alternatively the need could be met through provision of a number of smaller sites and facilities. Evidence presented in Appendix 1 shows skip waste recycling operations occupying industrial units of c0.16 hectare processing c10,000 tpa. That means 6 x c0.16hectare sites might be needed to provide for the required recycling capacity.

1.10 Providing for the Management Capacity Gap

The Regulation 18 Plan proposes the identification of three areas of search for additional waste management capacity as follows:

- The Highway (LIL) with a total area of 2.7 hectares and an assumed land area availability of 0.65hectares.
- Empson Street SIL with a total area of 10.07 hectares and an assumed land area availability of 2.42 hectares.
- Fish Island SIL with a total area of 9.21 hectares and an assumed land area availability of 2.21 hectares.

Given the identified land need is 0.65 hectares for a single site or 1 hectare for a number of small sites (each occupying c0.16 hectare), the identified need could be met on either of the identified areas of search. In order to demonstrate this possibility, an internet search of property availability within each AoS was conducted, (See Appendix 2 for Particulars) and yielded the following:

- The Highway (LIL) - 2x units occupying 0.0468ha and 0.0612ha respectively.
- Empson Street SIL 2 x unit occupying 0.29 ha and 0.62 ha including open yard space.
- Fish Island SIL - no units were found.

1.11 Conclusion

The above demonstrates there is availability of potentially suitable units within the Areas of Search identified and therefore there is a reasonable prospect for the necessary facilities to be delivered, were operators be attracted to the prospect.

Appendix 1: Supporting Evidence

Table 4: Waste use intensity factors from Case Study Sites (tpa/ha)

Source: Supplementary Case Study Report (BPP Consulting 2022)

	Area (ha)	tpa/hectare using Consented Capacity (tonnes)	tpa/hectare using 5 year peak (tonnes)
Case Study 1: Old Oak Sidings LB Hammersmith			
Internal Floor area	0.47	3.4 M	704,993
Internal Floor area + vehicle manoeuvring external yard	1.6	1.0 M	207,032
Total Site Area inc external yard	3.9	410,256	84,960
Case Study 2: Hannah Close LB Brent			
Internal Floor area	1.18	991,525	162,282
Internal Floor area + vehicle manoeuvring external yard	1.7	688,235	112,643
Total Site Area inc external yard	n/a as inc rail sidings	-	-
Case Study 3: River Road LB Barking & Dagenham			
Internal Floor area	1.3	369,230	267,480
Internal Floor area + vehicle manoeuvring external yard	2.5	192,000	139,089
Total Site Area inc external yard	n/a as inc. concrete batching and wharf	-	-

Stuarts Topsoil . LB Bexley

Inert screening & crushing facility



Links Waste Management, East Sussex
Skip Waste Recycling in Industrial Unit (c10,000tpa)



Appendix 2: Example Property Particulars



**aston
rose**
chartered surveyors

4 Tenterden Street, London W1S 1TE
020 7629 1533
agency@astonrose.co.uk astonrose.co.uk

TO LET - MODERN INDUSTRIAL UNIT, E1



Modern industrial unit, available for short-term let

6,586 sq ft

**Unit 3
Highway Trading Estate
London E1W 3HR**

Location
The Highway Trading Estate is located on The Highway, approx. two miles east of the City.

Terms
Lease for a term to be agreed. Term certain until 1st January 2021, thereafter there will be a six week Landlord's rolling break option. *This site is going to be demolished and redeveloped.*

Rent
£45,000 per annum (£6.83 per sq ft) inclusive of service charge.
Priced for a quick deal!

Rates
Interested parties are advised to make their own enquires with the relevant rating authority. Rates payable are estimated at £34,615.50 per annum.

Energy Performance Certificate (EPC)
The property has an Energy Asset Rating of D (88).

Legal Costs
Each party is to be responsible for their own legal and professional costs incurred in a transaction.

Viewing
Strictly by appointment through the sole agents, Aston Rose:

Harry Batt


Subject to Contract
January 2020

The particulars shown above are believed to be correct, but accuracy cannot be guaranteed and they are expressly excluded from any contract.

TO LET

WAREHOUSE / STORAGE UNIT

5,040 sq ft

**Unit 5
Highway Trading Estate
London E1W 3HR**



Location

The Highway Trading Estate is located approximately two miles west of Canary Wharf and two miles east of central London. It is an established estate situated just off the Highway (A1203), which connects the Limehouse area with the City of London. The estate boasts trade occupiers such as Screwfix and Euro Car Parts.

The A13 (Commercial Road) is within a short distance. DLR and London overground rail services are available from Limehouse station, which is within a 5-minute walk of the estate.

Description

The property comprises a single storey end of terrace warehouse/storage unit of steel portal frame construction with brick elevations. Internally it provides storage space, WC's and offices at ground and first floor level.

Amenities include:

- Insulated roof lining
- Translucent roof lights
- 3 Phase power supply
- Steel palisade fenced yard
- Up and over loading door
- Parking area
- Minimum eaves height 5.19m
- Max eaves height 5.77m

Planning Services

All prospective tenants are advised to make their own investigations as to the planning and condition and availability of services.

Terms

A new flexible lease is available for a term of three years. The lease must be excluded from the security of tenure and compensation provisions of the 1954 Landlord and Tenant Act and will contain provisions for a mutual rolling break option, which is subject to three months prior notice.

Rent

£75,600 per annum exclusive. (£15 per sq ft).

Service charge

There is an estate charge payable by the tenants. We understand this is currently running at £1.41 per sq ft per annum.

Rates

Interested parties are advised to make their own enquires with the relevant rating authority. Rates payable are estimated at £24,840 per annum. (£4.93 per sq ft).



EMPSON STREET, BROMLEY-BY-BOW, E3 3ND

INDUSTRIAL OPEN STORAGE OPPORTUNITY 6,877 SQ FT ON A TOTAL SITE AREA OF 1.53 ACRES



STRETTONS
EST. 1931



GERALDEVE
A NEWMARK COMPANY

Location

The site is located in the heart of Bromley-by-Bow, just 2.5 miles north of Canary Wharf and 4.3 miles east of City of London. Transport links to the site are unrivalled, with immediate access onto A12, allowing further connectivity to the A11 and A13. Public transport links are also strong, with Bromley-by-Bow underground station 0.4 miles to the north providing access to the District Line. In addition, Devons Road DLR station is 0.5 miles to the west of the site, providing access to Stratford Station in 6 minutes.

The surrounding area is characterised largely by industrial accommodation, let to a variety of occupiers.

Description

The property comprises a regular shaped, fully secure yard extending to a total of 153 acres. Access to the site is via a gated entrance off Epsom Street or Towcester Road. The yard is predominantly concrete surfaced with 2 warehouses/covered storage facilities on site. The site benefits from incoming electricity, water supplies and drainage. The site has the benefit of 24/7, unrestricted access.





Tower Hamlets Data Update

Management Requirements for Hazardous Waste in Tower Hamlets to 2042

Version Description: Consultation Draft

Version: 1.1

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1.0	Client Review	Alan Potter (Partner)	22.05.2024	Tom Walsh (client contact)	27.06.2024
1.1	Consultation Draft	Alan Potter (Partner)	13.09.2024		

While due care and diligence has been exercised in the preparation and production of this report, BPP Consulting LLP and its subcontractors exclude to the fullest extent lawfully permitted, all liability for any loss or damage however arising from reliance on its contents.

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1. Introduction

BPP Consulting has been contracted to produce an update to the Tower Hamlets Waste Data Study¹, this includes an update of hazardous waste arisings in 2022. This will be used to inform formulation of the waste policies for inclusion in the emerging Tower Hamlets Local Plan which runs to 2041. The client has requested the forecast extend through to 2042.

1.1 Principal Data Sources

The principal data source used to generate this hazardous waste baseline update is listed below.

The EA Hazardous Waste Interrogator

Legislation requires that the relevant waste regulation authority² be notified when hazardous waste is moved. The notification takes the form of a consignment note that details the quantities and destination of the waste. This means that the following movements of hazardous waste are recorded and reported to the relevant regulatory body:

- From producer sites directly to disposal/treatment facilities;
- from producer sites to transfer facilities for bulking up and onward management; and,
- from treatment facilities to final disposal sites.

This data is then aggregated by the Environment Agency and made available in the HWI that is published on an annual basis with a delay of c9 months.

1.2 Advice on Data

The principal source of advice with respect to the use of data to inform production of a plan evidence base is the national Planning Practice Guidance (nPPG) available at <https://www.gov.uk/guidance/waste>. This states that:

"Assessing waste management needs for Local Plan making is likely to involve:

- *understanding waste arisings from within the planning authority area, including imports and exports*
- *identifying the waste management capacity gaps in total and by particular waste streams*
- *forecasting the waste arisings both at the end of the period that is being planned for and interim dates*
- *assessing the waste management capacity required to deal with forecast arisings at the interim dates and end of the plan period."*

Paragraph: 022 Reference ID: 28-022-20141016

It includes a section entitled "Using data to monitor and forecast waste needs", which articulates the following principles should waste planning authorities adopt when using data to plan for waste management:

¹ Tower Hamlets Waste Data Study, Vitaka Consulting (July 2023).

² For England this is the Environment Agency.

- *Make clear assumptions on how data were handled, as well as their impact (including on forecasting)*
- *Provide data to an appropriate level of significance, based on their explicit assumptions. In practice, data quoted to more than 2 or 3 significant figures will not be helpful and spurious accuracy stemming from precise figures should be avoided*
- *Plan for a range of each type of waste rather than a specific single figure."*

Paragraph: 036 Reference ID: 28-036-20141016 Revision date: 16 10 2014

1.3 Data Presentation

In order to respect the need to avoid "spurious accuracy", the following approach has been taken:

1. Where actual tonnage data has been accessed, this has been used in the computations.
2. Where data has been subject to computation, this has been included to 3 significant figures.
3. Where percentages have been used to generate data, the percentages are presented as whole numbers, however the computations actually use the full value. This means that values presented may not always precisely correspond to the values computed when applying the percentage value presented in this report.
4. Final values discussed in the text are rounded to the nearest 500.

2. Methodology

The previous data study estimated hazardous waste arisings from London Borough Tower Hamlets (LBTH) in the period 2017-2021 using the Environment Agency's (EA) Hazardous Waste Interrogator (HWI). The resulting data for hazardous waste arising in LBTH is shown in Table 1 below with the addition of 2022.

Table 1: LBTH Hazardous Waste arisings estimates from 2017-2022

Source: HWI 2022

	2018	2019	2020	2021	2022
Tower Hamlets to Tower Hamlets	12	154	7	12	7
Tower Hamlets to elsewhere	12,939	31,097	14,138	15,360	9,657
Total	12,927	31,251	14,145	15,372	9,664
Growth Rate p.a.	-	141.74%	-54.74%	8.67%	-37.13%

Table 1 shows a total of c9,500 tonnes of hazardous waste was produced in LBTH in 2022. It also shows that hazardous waste arisings have fluctuated over the 5-year period, with a large increase in arisings in 2019 of c142% in a single year followed by a large decrease in 2020 of c-55%. Virtually all hazardous waste produced in LBTH was managed at facilities located outside the Borough.

To understand why arisings increased, the composition of hazardous waste arisings have been considered. The principal arisings between 2018 and 2022 are presented in Table 2 and visually in Figure 1.

Table 2: Principal Hazardous Waste Component Arisings in Tower Hamlets 2018-2022

Source: HWI

Hazardous Waste Type/Source	2018	2019	2020	2021	2022
C, D & E Waste	10,544	29,000	11,936	12,924	6,876
Infectious Clinical Waste	467	567	851	1,008	801
Vehicle Maintenance inc ELV components	600	596	484	507	727
Wastes containing other dangerous substances	<100	-	-	-	324
WEEE	328	422	327	340	290
Oil/Water Separator Waste	396	152	172	<100	125
Total	12,334	30,738	13,771	14,779	9,142

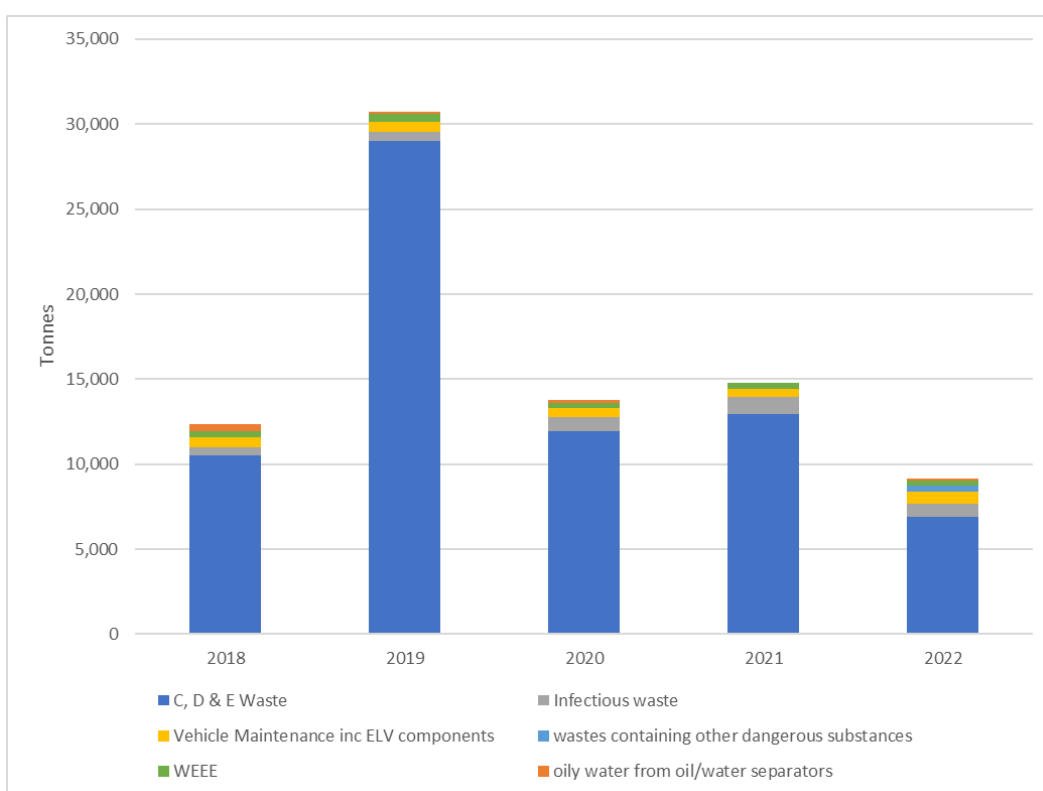


Figure 1: Principal Hazardous Waste Arisings in Tower Hamlets 2018-2022

Source: HWI

Table 2 and Figure 1 shows that the largest principal and dominant hazardous waste type is C, D & E waste. The remaining five waste streams show little variation across the years. The principal waste types that make up hazardous C, D & E waste have been further analysed to determine any trends as shown in Figure 2 below.

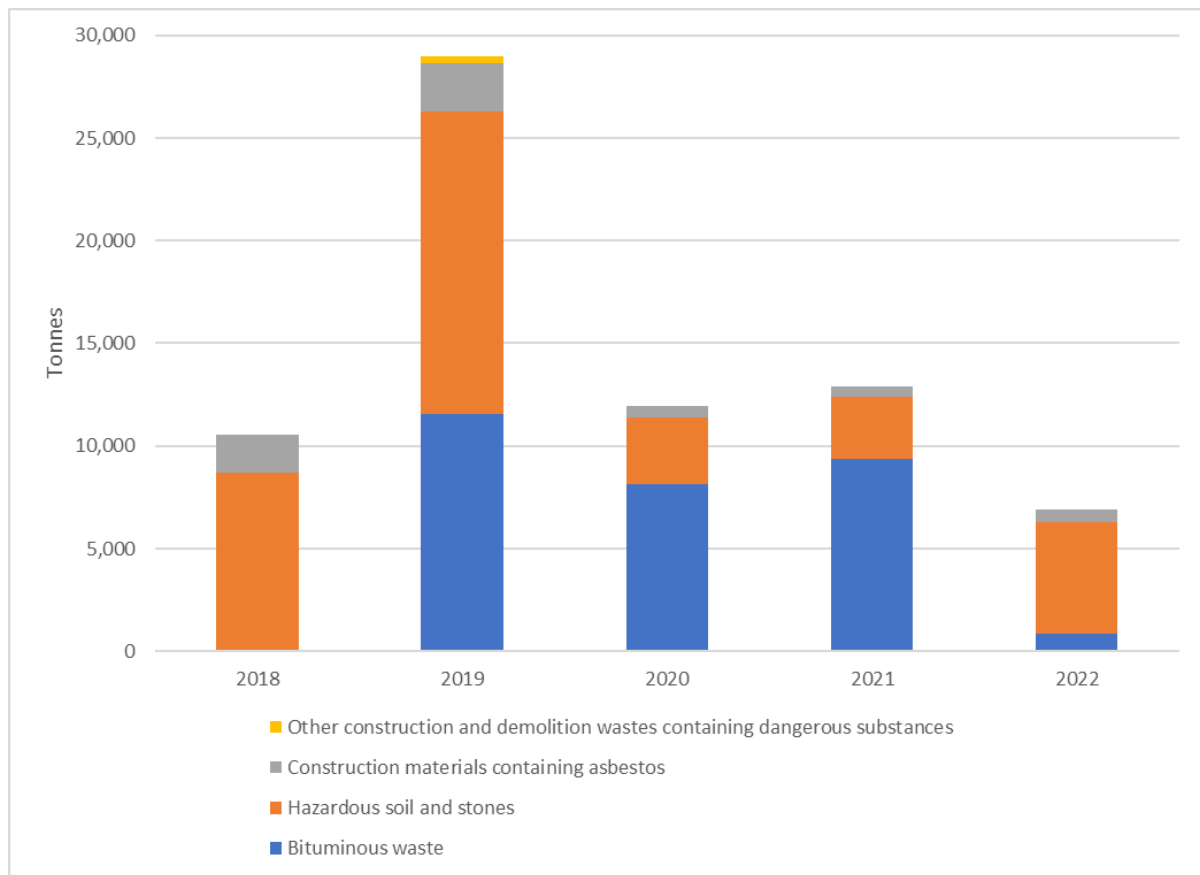


Figure 2: Hazardous C, D & E Waste (2018-2022) by type

Figure 2 shows the principal source of fluctuation in hazardous C, D & E waste arising in 2019 (the peak year) is hazardous soils and stones and bituminous waste. Hazardous soils and stones arise principally from redevelopment of brownfield sites that are contaminated. The rise of bituminous waste, particularly in 2019 may be due to the fact that the Environment Agency reclassified road planings as hazardous, especially given no bituminous waste was classed as hazardous in 2018. Given it is not possible to predict when contaminated sites will be redeveloped each year and there is little fluctuation of arisings of the other hazardous C, D & E waste types, it is suggested that arisings of this waste stream is kept constant through to 2042 taking the average of hazardous C, D & E waste arisings across the five year period of c14,500 tonnes.

3. Forecasting Hazardous Waste

The 2013 National Policy Statement for Hazardous Waste³ remains the most current review of hazardous waste arisings in England. It states that arisings of hazardous waste are expected to increase for the following reasons:

- Continuing consumer demand for consumer durables containing hazardous materials.
- Increasing use of producer responsibility schemes, such as those provided for Waste Electrical and Electronic Equipment (WEEE) which require the separate collection of WEEE resulting in more hazardous items being removed from the mixed municipal waste stream, being collected separately as hazardous waste.
- Changes to the list of hazardous properties in the revised Waste Framework Directive and changes to the European Waste List, leading to increases in the amount of waste classed as 'hazardous'. There are still uses in which components that become hazardous waste may be unavoidable for the foreseeable future. For example, the use of oil in internal combustion engines.

It should also be noted that the identification of persistent organic pollutant (POPs) bearing materials such as furniture may also lead to an increase in reported hazardous arisings. See for example, the Environment Agency's recent determination on furniture that might contain POPs being unsuitable for landfilling⁴.

The Tower Hamlets Waste Data Study did not exclude hazardous waste from the other waste stream arisings values so had not included a forecast specifically for hazardous waste arisings in LBTH.

However, given the variability in arisings of hazardous C, D & E waste in particular it is suggested to take an average of the arisings over the period of c14,500 tonnes and hold it constant to 2042.

The remaining other wastes have been held constant given the small variability in arisings seen historically. Table 3 shows the profile of hazardous waste arisings for which a static growth can be projected forward for the period (2042).

Table 3: Hazardous Waste Arisings in Tower Hamlets 2022

Source: Baseline Arisings discussion above

Hazardous Waste Type/Source	2022
Construction, Demolition & Excavation	14,256
Other wastes ⁵	1,988
Total Projected Arisings	16,244

³ National Policy Statement for Hazardous Waste: A framework document for planning decisions on nationally significant hazardous waste infrastructure Defra June 2013

⁴ Environment Agency on GOV.UK website: Identify and dispose of waste containing persistent organic pollutants March 2015

⁵ Including the sub 100t waste types.

Table 3 shows that the hazardous baseline arising value for 2022 from LBTH is c16,000 tonnes for which a static growth can be assumed for the Plan period.

One should be mindful of the following when considering hazardous waste arisings:

1. As stated in the London Plan the element that arises within the apportioned HIC waste streams is already counted within the apportionment:
9.8.18 ... Hazardous waste makes up a component of all waste streams and is included in the apportionments for household, commercial and industrial waste set out in Table 9.2.
2. The element that arises within the CDEW stream is impossible to predict as it arises on an ad-hoc basis according to the nature and ground conditions of new development and the quantity of and contamination by hazardous materials such as asbestos within the existing building stock. Both elements can be expected to reduce over time as historically contaminated ground is remediated and hazardous material such as asbestos within the building stock is removed and replaced with non-hazardous materials.

4. Profiling Existing Hazardous Waste Management Methods

The management routes for LBTH's hazardous waste arisings in 2022 is set out in Table 4 below using the fate categorisation in the HWI.

Table 4: East London Hazardous Waste Management Routes 2022

Source: HWI 2022

Recycling	Recovery ⁶	Incin without recovery	Landfill	Transfer
42%	44%	3%	4%	7%

Table 4 shows that of the total hazardous waste:

- 42% was recycled & 44% was recovered (which may include recycling and/or energy recovery);
- 3% was incinerated without energy recovery;
- 4% was managed at sites permitted as landfills⁷; and
- 7% was transferred on for an undetermined final fate.

The destinations of hazardous waste arising in LBTH outside LBTH which accounts for virtually all arisings has been assessed in the accompanying waste flows review report.

⁶ Includes transfer for onward recovery. Recovery captures recycling and energy recovery amongst other activities.

⁷ A number of landfills host soil decontamination facilities, that receive soils contaminated to hazardous levels and treat them so they cease to be hazardous and then use the resulting non-hazardous soils for restoration purposes. However inputs to such facilities may still be classed as landfill in the WDI.

5. Capacity Requirement for Hazardous Waste Management

The assessment of existing permitted site presented in the 2023 Waste Data study included a site located Clifford House, Towcester Road, Bow, London, E3 3ND listed as a hazardous waste transfer station. The site profile in Appendix A identifies it as having a licensed capacity of 1,785 tpa, with a peak of waste managed in the 5-year period 2017-2021 of only 263 tonnes. However a more recent search of the internet indicates that site has since been vacated⁸, and the previous occupants have relocated out of Tower Hamlets. A search of the Environment Agency permit register indicates the permit for the site no longer exists, so confirms the more recent finding. Given the site would have been classed as an Existing Waste Site due to existence of the environmental permit, the site is taken to now ceased to exist.

In the absence of any existing capacity, there is a predicted deficit in capacity within Tower Hamlets to manage the forecast hazardous waste arisings. However it should be noted that given the diverse nature of hazardous wastes, there is no policy expectation that individual Plan areas be net self sufficient for the management of hazardous waste forecast to be produced. Rather that existing capacity be safeguarded and additional capacity be sought in co-operation with other Plan areas. This is set out in the London Plan as follows:

"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)

Therefore the indicated presence of a shortfall does not impose a requirement to provide for additional capacity within Tower Hamlets, providing that it can be demonstrated the hazardous waste arisings within the Borough are effectively provided for by management facilities elsewhere. This has been established in the accompanying waste flows review report.

⁸ <https://www.strettons.co.uk/insights/selling-industrial-office-space-and-1.8-acre-yard-in-bow/>



Tower Hamlets Waste Data Update

Management Requirements for Apportioned HIC
Waste in Tower Hamlets to 2041

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1.1	Consultation Draft	Alan Potter (Partner)	13.09.2024		

While due care and diligence has been exercised in the preparation and production of this report, BPP Consulting LLP and its subcontractors exclude to the fullest extent lawfully permitted, all liability for any loss or damage however arising from reliance on its contents.

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1. Introduction

BPP Consulting has been contracted to produce an update to the Tower Hamlets Waste Data Study¹, assessment of management requirements for waste apportioned to Tower Hamlets through the London Plan. This will inform policies included in the emerging Tower Hamlets Local Plan which runs to 2041.

1.1 The London Plan Apportionments

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. The collective term used is household, industrial and commercial waste, or HIC waste for short. These forecasts, together with assessment of ability to accommodate waste management capacity, were used as a basis to allocate quantities of HIC waste for management to each Borough so that the overall goal of managing the equivalent of 100 per cent of London's waste being managed within London (i.e. net self-sufficiency) by 2026 (Policy SI 8) is achieved (excluding excavation waste²). The quantities arrived at are referred to as the London Plan apportionments (LP apportionments for short).

The LP apportionments were allocated to each Borough through a process that included assessment of existing capacity in each Borough along with a number of other factors considered to determine the ability of a particular Borough to provide additional management capacity at the time³. 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.

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

- ensure that there is zero biodegradable or recyclable waste to landfill by 2026
- meet or exceed the municipal waste recycling target of 65 per cent by 2030⁴

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

¹ Tower Hamlets Waste Data Study, Vitaka Consulting (July 2023).

² The London Plan specifically excludes excavation waste from the aim of overall net self sufficiency on the following basis: "The particular characteristics of this waste stream mean that it will be challenging for London to provide either the sites or the level of compensatory provision needed to apply net self-sufficiency to this waste stream." (Para 9.8.1)

³ The methodology applied is set out in *London Plan Waste Forecasts and Apportionments Task 4 – Updating the apportionment method Methodology Report* (SLR/LUC August 2017).

⁴ London Plan Footnote 163: Based on the EU definition of municipal waste being household waste and other waste similar in composition to household waste. This includes business waste collected by local authorities and by the private sector.

2. HIC Waste Apportioned to Tower Hamlets

Table 1 sets out the tonnages of waste forecast to arise within Tower Hamlets in 2021 and 2041 in the London Plan evidence base, and the resultant apportionments.

It is notable that, in contrast to the previous versions of the London Plan, Tower Hamlets is expected to provide for the management of less HIC waste than it is forecast to produce. This is with the knowledge of the very constrained nature of the Borough, with competing demands for land, it having the highest population density in London which is anticipated grow, and the London Plan annual housing target has been revised upwards from 2,885 units per year to 3,931 units per year since 2015. The Borough is now positioned the highest with a requirement to deliver approximately 9% of the total annual housing target set for London and this is far greater than the borough's objectively assessed housing need of 2,428. However, given that London housing need is strategic, Tower Hamlets is required to not only meet its local need but also part of London's strategic housing need. Thus, the new target would mean that Tower Hamlets will need to accommodate approximately 9% of Greater London's overall minimum housing target by 2025 within just 1.3% of the capital's geographical land area.

Given the finite nature of land and the ongoing pressure to provide more housing, it is unclear why the apportionment has gone up over time. One might expect it to remain static at worst and fall at best to reflect the anticipated reduced availability of land.

Table 1: HIC waste apportioned to Tower Hamlets vs Forecast (tonnes)

Source: Table 9.1 & Table 9.2 of London Plan (2021)

	2021	2041
HIC waste Arising Forecast	260,000	273,000
London Plan Apportionment	195,000	207,000
Difference	-75,000	-66,000
% difference	75%	76%

3.

1.2 Accounting for Hazardous Waste

The London Plan recognises that the tonnage of hazardous waste arising within the apportioned HIC waste streams is counted within the apportionment in the following terms:

9.8.18 ... Hazardous waste makes up a component of all waste streams and is included in the apportionments for household, commercial and industrial waste set out in Table 9.2.

Given this needs to be provided for separately, and is accounted for in a separate report⁵, this tonnage ought to be deducted from the tonnage of apportioned HIC waste to be provided for. The hazardous waste report found this to be c2,000 tonnes. Hence the totals to be provided for in 2041, 2021 already having passed, is reduced to 205,000 tpa.

⁵ *Hazardous Waste Management Requirements in LB Tower Hamlets to 2042* BPP Consulting May 2024

4. Capacity Requirement For Apportioned HIC Waste Management

1.3 Existing Management Capacity

The assessment of existing permitted sites presented in the Vitaka report included a site located at Northumberland Wharf listed as a household, commercial and industrial waste transfer station and a household waste amenity site. The site is identified as accepting HIC waste principally. The site profile in Appendix A identifies it as having a combined licensed capacity of 44,499 tpa, with a peak of waste managed in the 5-year period 2017-2021 of 158,181 tonnes. Table 6.1 of the Vitaka report identifies 2,000 tonnes of HIC waste recycling capacity, which is understood to be primarily resulting from the operation of the household waste amenity site. It is also understood that the site is used to accept some source separated food waste along with residual waste that is transferred on to the Belvedere EfW plant in LB Bexley via the river.

There is no limitation on the types of waste the site may be used for, and there is no reason why, at least in theory, the use to transfer recyclable materials i.e. DMR could not be increased, particularly if there are MRFs located on the river or its tributaries. In this regard it is notable that the MRF currently used to receive LACW sourced DMR from Tower Hamlets operated by Bywaters is located directly on the River Lea.

The London Plan includes facilities that undertake:

- 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

as qualifying capacity for the purposes of meeting the management requirements for the apportionments. Given waste transfer involves the bulking of waste materials, it is considered that all capacity the site provides should be counted towards meeting the apportionments. This argument is further strengthened by the fact that all the residual waste is simply moved across the river to the Belvedere EfW plant to be subjected to a qualifying capacity process (energy recovery in London), so it is in effect merely an extension to/facilitating that. Hence it is considered that the Wharf provides c160,000 tpa of capacity for the management of apportioned waste. When this is deducted from the 207,000 tonnes apportioned to be managed in 2041, that leaves 47,000 tpa to be provided for.

1.4 Waste handled by 'exempt' activities

An 'exempt' activity is a waste management operation that meets certain limiting criteria which means that the activity is exempt from needing an environmental permit. To qualify as exempt the operation must be registered with the Environment Agency or, in a limited number of cases, the Local Authority Environmental Health department. Each registration lasts only three years so relatively good information is available on the number of exemptions registered at any one time.

Being registered as an exempt activity does not remove the need for planning permission, and therefore it is assumed that these activities operate within planning law and have the appropriate

consent where it is required. They may relate to activities that are ancillary to a wider non-waste specific use or to temporary use that does not require express planning consent.

Waste managed at exempt sites was counted as contributing towards C&I waste arisings in the point of production based national commercial⁶ and industrial waste production estimation methodology (known as 'Reconcile') applied in 2009. This was done by extrapolating from the numbers of exemptions registered. However, unlike permitted facilities, there is no requirement for exempt facility operators to report actual tonnages received but there are tonnage limits specified for each exempt activity.

Therefore, an estimate of the tonnage that may be managed at each can be made taking the number of exemptions registered within a particular Waste Plan area. For the purpose of estimating C&I waste that is handled through exempt sites, the national Reconcile method considered whether an exemption is likely to handle a significant volume of material not captured elsewhere in the management chain, to identify the activities that could make a notable contribution to C&I waste generation estimates. From a total of 57 types of exempt activity, the Reconcile methodology selected 21 for inclusion in the previous national estimates.

For the 21 selected exempt activities, a total annual tonnage per exemption was estimated following an assessment of the theoretical annual throughput based on the specified limits and a degree of expert judgment. The assumed annual throughput per type of exempt activity was then multiplied by the number of exemptions registered against each activity to generate a total tonnage managed value. This value was included in the national total for C&I waste arisings in 2009. While the national method identified 21 exempt activity types that might manage C&I waste, only 8 types were registered in Tower Hamlets at mid 2024. Using the national estimates for tonnages managed at each type, tonnages have been estimated for Tower Hamlets as set out in Table 2 below.

Table 2: Tonnage attributed to registered exempt activities within LB Tower Hamlets

Source: Applying Defra Reconcile Estimation Method 2014 to EA Exemption Register downloaded 22.05.2024

Exemption Code	Exemption Types	Number of Registered Exemptions in Tower Hamlets	Assumed Capacity Per Exemption (tpa)	Tonnes Managed per annum
T13	Anaerobic digestion at premises not used for agriculture	1	1,000	1,000
D6	Disposal by incineration	1	10	10
T4	Preparatory treatments (baling, sorting, shredding)	4	5,000	20,000
T9	Recovering scrap metal	5	2,500	12,500
T6	Treating waste wood and waste plant matter	1	2,000	2,000
T23	Aerobic composting and associated prior treatment	1	400	400
U10	Spreading waste to benefit agricultural land	1	200	200
U9	Using waste to manufacture finished goods	1	2,500	2,500
				38,610

⁶ New Methodology to Estimate Waste Generation by the Commercial and Industrial Sector in England DEFRA Project Report Final EV0804 August 2014

This gives an estimated total quantity of HIC waste being managed through exemptions within the Borough of just under **40,000 tpa**. All the above activities would qualify under the London Plan definition as involving the management of waste within London through reuse or recycling activities. Therefore, this capacity should also be counted towards the management capacity available within the Borough for the HIC waste apportionment.

Accounting for the tonnage of apportioned waste managed through methods that meet the London Plan qualifying criteria, and the capacity provided at the 15 locations where exempt activities take place involving HIC waste, **current qualifying capacity stands at c.200,000 tonnes per annum.**

1.5 Management Capacity Provided at Onsite Segregation Facilities

The third bullet point in paragraph 9.8.4 of the London Plan clearly states that the sorting *or bulking* of waste for onward recycling, should be counted as qualifying management capacity.

The management of waste in most flatted development in Tower Hamlets involves householders separating recyclable and non recyclable wastes and then depositing the recyclable materials into on-site segregation facilities (OSF). In Tower Hamlets, OSF range from designated areas for parking wheeled storage containers (Eurobins) (including bin stores) through to integrated Underground Recycling and Residual Waste Management Systems with centralised bulking facilities.



Figure 1 Communal Recycling Bins in Tower Hamlets

Such facilities are required for dry mixed recyclables to be separated from the household waste stream for collection for onward management outside the Borough. Furthermore, planning policy in the adopted Tower Hamlets Local Plan requires new flatted development to provide facilities which allow for the storage and bulking of separate waste streams. The Reuse, Recycle and Waste Supplementary Planning Document provides guidance to ensure the delivery of the adopted Local Plan policies with regard to the storage and management of recyclables and waste, and the implementation of high-quality on-site waste management systems.⁷

⁷ <https://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Supplementary-guidance/SPD/RRW-SPD.pdf>

1.6 The Case for OSF Being Classed as Existing Waste Sites

Paragraph 9.9.1 of the London Plan defines an existing waste site as follows:

'...land with planning permission for a waste use or a permit from the Environment Agency for a waste use.'

A 'permit from the Environment Agency' equates to an environmental permit for the management of waste by virtue of the Environmental Protection Act 1990 (EPA 1990). Section 33 of the EPA 1990 (as amended) states:

'Prohibition on unauthorised or harmful deposit, treatment or disposal etc. of waste.

(1) Subject to subsections (1A), (1B), (2) and (3) below and, in relation to Scotland, to section 54 below, a person shall not—

(a) deposit controlled waste or extractive waste, or knowingly cause or knowingly permit controlled waste or extractive waste to be deposited in or on any land unless an environmental permit authorising the deposit is in force and the deposit is in accordance with the licence;

(b) submit controlled waste, or knowingly cause or knowingly permit controlled waste to be submitted, to any listed operation (other than an operation within subsection (1)(a)) that—

(i) is carried out in or on any land, or by means of any mobile plant, and

(ii) is not carried out under and in accordance with an environmental permit.

(1A) Paragraphs (a) and (b) of subsection (1) above do not apply in relation to a waste operation that is an exempt waste operation.'

Hence, to be lawful, any deposit of controlled waste must be undertaken in accordance with an environmental permit (or licence) unless the operation is expressly exempt from the need for a permit.

Given that source segregated recyclables are classed as controlled waste by regulations⁸, unless specifically exempted, any location at which they are deposited should be covered by an environmental permit, and hence would be classed as an existing waste site.

Householders do not require environmental permits for the carrying out of a waste operation involving only household waste or for managing waste within their own property⁹. However, OSFs are located in places which are not within individual householder's control and therefore this exclusion (as opposed to exemption) does not apply.

⁸ See [The Controlled Waste \(England and Wales\) Regulations 2012](#) S.I. 2012/811, amended by S.I 2012/2320, 2015/1360, 2018/942, 2019/188, 2020/904.

⁹ See regulation 8(3)(b) of the above regulations and paragraph 3.20 Environmental Permitting Guidance [The Waste Framework Directive For the Environmental Permitting \(England and Wales\) Regulations 2007 Updated October 2009 Version 2.0](#)

Currently, OSF locations are generally not required to be covered by an environmental permit due to a specific exemption from permitting that covers storing waste at the place where it is produced (NWFD 2)¹⁰ or storing waste at a collection point (NWFD 4)¹¹. While the application of these exemptions don't need to be formally registered with the Environment Agency, certain conditions apply that the activities must comply with to remain eligible. If the conditions are not met, then an environmental permit would need to be in place (and as a consequence the operation would be regarded as an 'existing waste site' under the London Plan definition). It should be noted there is nothing to stop the operator of an OSF from seeking an environmental permit on a precautionary basis, should it wish to do so.

The above demonstrates how OSF are de-facto existing waste sites that could be said to provide sorting and bulking capacity that can be counted towards meeting the London Plan waste management apportionments.

Given c20,000 tpa of DMR is collected from Tower Hamlets households in 2022, and c88% of housing is flatted¹², it has been taken that the combined capacity offered by OSFs located is at least c.17,600 tpa of the DMR (20kx0.88). This only reflects current performance to achieve 20% and given the Council's stated ambition to achieve 23% recycling by 2024/5 and an ongoing initiative to improve the capture rate at the OSF, this value should be taken to be an absolute minimum.

Accounting for the capacity provided for the bulking of HIC waste for onward recycling, **current qualifying capacity is considered to stand at c220,000 tonnes per annum.**

¹⁰ <https://www.gov.uk/government/collections/waste-exemptions-storing-waste#exemptions-you-do-not-need-to-register>

¹¹ <https://www.gov.uk/government/collections/waste-exemptions-storing-waste#exemptions-you-do-not-need-to-register>

¹² *Tower Hamlets Reduction and Recycling Plan (RRP) April 2023 to March 2025*

5. Conclusion

The above demonstrates that there is sufficient capacity available within Tower Hamlets to ensure that the tonnage of HIC waste apportioned to the Borough in 2041 may be managed in accordance with the London Plan.

In particular qualifying capacity exists as follows:

- Northumberland Wharf :160,000tpa
- Exemptions: 40,000 tpa
- Onsite Segregation Facilities: c.17,600 tpa

This gives a total management capacity of 217,600 tpa, as compared with the tonnage of 205,000 apportioned to Tower Hamlets at 2041 (once hazardous waste is deducted). If OSF are not counted as providing LP qualifying capacity, the total existing capacity is only marginally (5,000 tpa) below that required at 2041.



FEBRUARY
2026

Tower Hamlets Waste Land Availability Study

Final Report

Iceni Projects Limited on behalf of
Tower Hamlets Borough Council

February 2026

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Tower Hamlets Waste Land Availability
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FINAL REPORT

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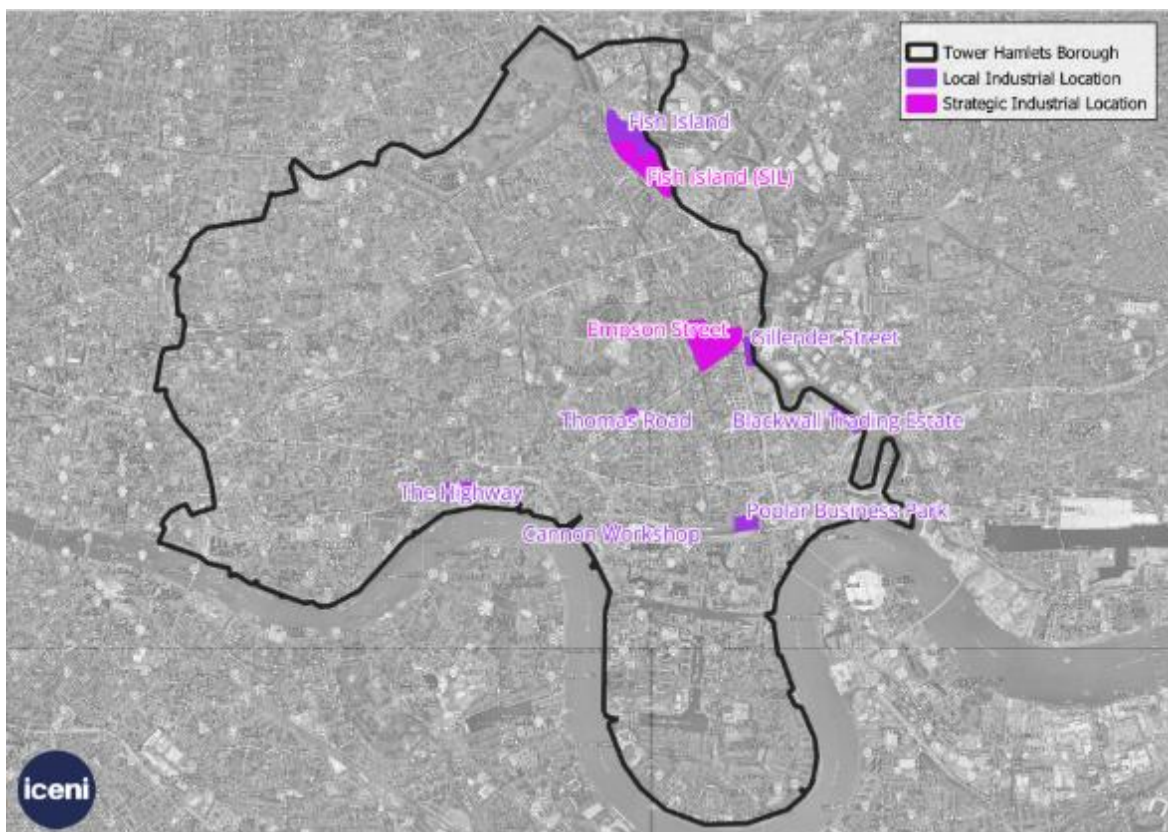
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APPENDIX 1. SITE PHOTOGRAPHS

1. INTRODUCTION

- 1.1 In December 2025, Iceni Projects was appointed by the London Borough of Tower Hamlets (LBTH) to undertake a Waste Management Land Availability Study (WLAS).
- 1.2 The purpose of this study was to identify whether there are any sites within the borough's Strategic Industrial Land (SIL) or Locally Significant Industrial Sites (LSIS)/Local Industrial Locations (LIL) that could accommodate waste functions during the local plan period (2023-2038) and thereby count towards the borough's overall waste processing capacity.

Table 1.1 Strategic Industrial Land (SIL) and Locally Significant Industrial Sites in Tower Hamlets



Source: Iceni based on LBTH Data

- 1.3 This is to inform discussions with other London Waste Planning Authorities, regarding the sharing of capacity. In particular, the study aimed to address concerns raised by the East London Joint Waste Planning Group (ELJWPG).

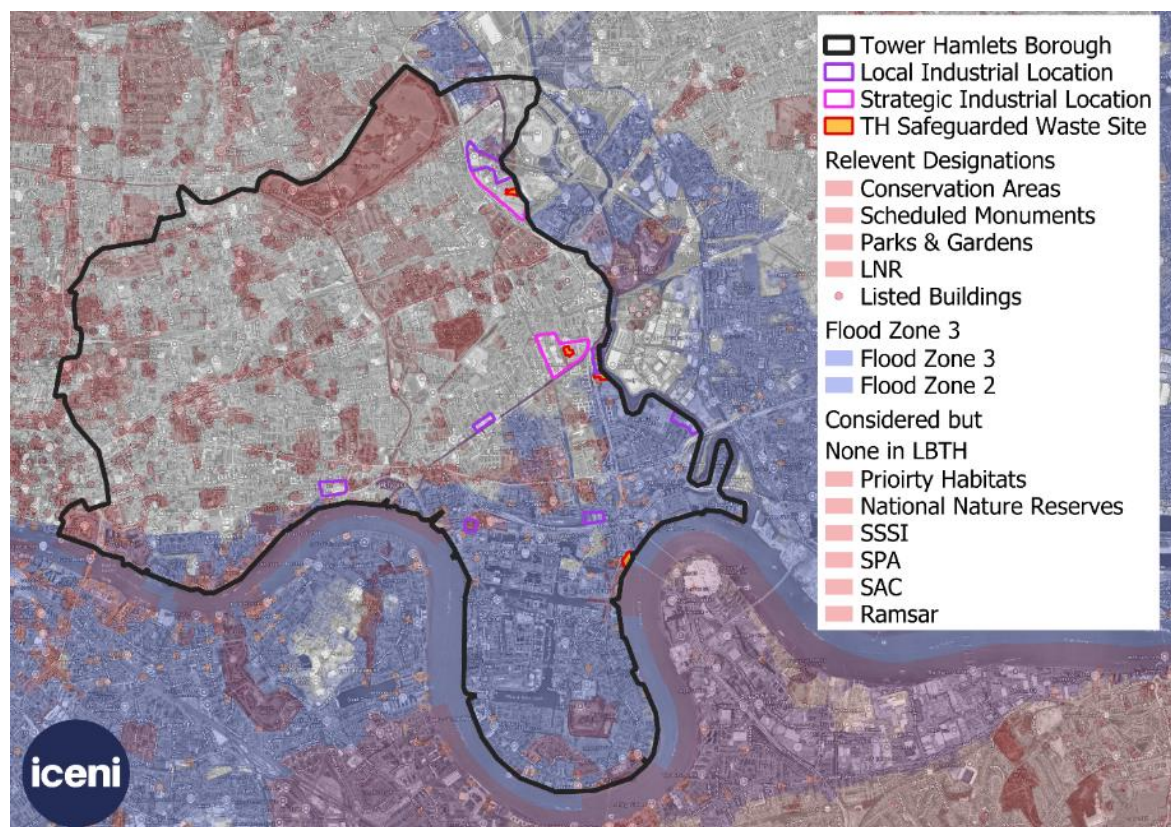
Background

- 1.4 The LBTH Regulation 19 (2025) Local Plan Consultation was undertaken in summer 2025. It included draft policy RW1: 'Managing our waste', which explains that the borough could not meet its waste apportionment with sites within its boundaries and will instead meet it through partnership working.
- 1.5 Subsequently, LBTH requested assistance from all London boroughs during both Regulation 19 consultations in October 2024 and June 2025, and specifically sought assistance from both ELJWPG and SELJWPG, given the anticipated surplus capacity in both.
- 1.6 In response to the Regulation 19 (2025) consultation, the GLA raised an issue of general conformity with the London Plan, stating that the borough must demonstrate that it can manage its full London Plan waste apportionment either by securing sites within the borough or by agreeing a capacity-sharing arrangement with another London waste planning authority before submitting the Local Plan for examination.
- 1.7 Despite the Council's Employment Land Review (2023) not identifying any suitable sites for waste, nor did any come forward through a call for sites process, ELJWPG – one of the waste planning authorities with surplus capacity that LBTH had requested assistance from - did not consider this provided adequate justification to meet its need and did not consider the LBTH draft Local Plan to be sound.
- 1.8 The ELJWPG requested that further evidence be produced to support LB Tower Hamlets' request for assistance in meeting its London Plan waste apportionment. This evidence is set out herein. Specifically, this report examines the potential for waste use in the borough's industrial employment locations.

2. SITE IDENTIFICATION AND ASSESSMENT METHODOLOGY

- 2.1 We have initially undertaken a desktop review of each of the nine SIL and LSIS sites using GIS to identify parcels that are entirely unsuitable for waste uses—for example, where access, parcel capacity or proximity to sensitive receptors is prohibitive, or where there is a flood risk. We have also flagged other constraints, such as environmental or heritage constraints.
- 2.2 We have access to a range of GIS layers, including Environment Agency and Historic England layers. We also received access to a range of local policies, including conservation areas and flood mapping. For flood mapping, we recognise that Waste Treatment facilities are classified as “Less Vulnerable” in the NPPF.

Table 2.1 Constraint Map



Source: Iceni Projects based on LBTH, Environment Agency and English Heritage

- 2.3 The designations used were conservation areas, scheduled monuments, parks and gardens, local nature reserves, listed buildings and flood zones 3 and 2. We also considered many more designations that did not feature in Tower Hamlets, including Priority Habitats, National Nature Reserves, SSSI, SPA, SAC, and RAMSAR. For environmental

designations, these would preclude the use of waste sites, while heritage designations would affect the likelihood of waste use coming forward.

- 2.4 We have also avoided double-counting sites which were already allocated as safeguarded waste sites.
- 2.5 Because the sites we have examined are all allocated industrial sites, many of these designations do not feature. The only overlap was with Listed Building (Cannon Workshop and Gillender Street), Conservation Area (Empson Road, Gillender Street, The Highway and Cannon Workshop),
- 2.6 Neither of these designations is an absolute constraint to development or use, but they would restrict operations, and therefore, waste sites are unlikely to come forward on them. Therefore, the sites were not fully discounted on these grounds, but their suitability is restricted.
- 2.7 Similarly, areas which are prone to flooding are not fully discounted. Still, mitigation measures, particularly for flood zone 2, may deter developers or operators from bringing such a site forward.
- 2.8 Using a combination of GIS, aerial photographs and Google Streetview, we identified underused parcels and outdated buildings with the potential for redevelopment. However, this was only a guide to help us focus our attention during our physical visits to the sites.
- 2.9 We identified eight areas from the desktop assessment across four Local or Strategic Industrial Sites. These were at Fish Island (x3 in SIL and 1xLSIS), Blackwall Trading Estate, The Highway (x2) and Empson Street.

Site Assessments

- 2.10 Although the desktop assessment identified 8 plots, we had committed to visit all SIL and LSIS sites. This was to ensure that all identified sites had a confirmed status through a physical site visit. It also ensured that missed opportunities during the desktop assessment were not fully discounted.
- 2.11 Specifically, the site assessments were intended to verify current use and access, utilities (including overhead cables), plot arrangement, HGV routing, and neighbouring sensitivities such as residential or educational, etc.

- 2.12 We are mindful that some uses will be more “neighbour-friendly” than others, so where there is adjacency to say residential uses, this was flagged without necessarily excluding the sites on that basis.
- 2.13 Further sites were identified as having potential for future use as a waste facility, while others dropped out. The sites that remained under consideration after the site visits are detailed in Section 3 of this report.

Discounted Sites

- 2.14 We concluded that the following local and strategic industrial sites are not suitable or likely to be available for a waste site:
- **Cannon Workshop** – This was a fully functional office and light industrial site with no notable level of vacancy. This is within a conservation area and is a Grade II-listed building (Quadrangle Stores at West India Dock), which includes the entry arch, which may not be suitable for HGV traffic. The site is also in flood zone 2, which, while not prohibitive for a waste site, would likely require some mitigation. This would increase costs and might not be possible because the building is listed and located in a conservation area.
 - **Poplar Business Park** – This site is a recently built and or renovated light industrial and office location. It is surrounded by high-end residential development. There is a low vacancy rate on the site, and it was built to a high standard. There are no current opportunities to redevelop the site, and it would be unlikely that waste use would be accepted given the site's high quality and surrounding uses. This site is also within flood zone 3, which would likely increase mitigation costs.
 - **Thomas Road** – The site is a modern trading and industrial estate. Although the site is fully functional, there were two "to let" signs for units, which are considered unlikely to be appropriate or large enough for waste facilities. Furthermore, the existing layout is not conducive to large HGVs entering or turning within the site, even if the vacant units were made available.
- 2.15 Two sites identified as part of the desktop assessment were subsequently removed upon site assessment. Both these sites were cement or aggregate work found at the Highway and Fish Island. During the site visits, these were found to be fully operational and a key asset to the construction industry.
- 2.16 Furthermore, the Fish Island site, known as Bow Goods Yard, is subject to a wider Masterplan exercise being led by Network Rail. If delivered, the area in question (referred to as Bow Works) is earmarked to re-provide and enhance the existing uses, including increased rail freight capacity.

2.17 At the end of the site assessment process, a total of 11 sites were identified as being suitable for waste sites. Full site assessments are provided later in the report for the following site:

- Towcester Road - Empson Street - 1.27Ha
- Brickfield Road - Empson Street - 1.89Ha
- Iceland Road - Fish Island - 0.33Ha
- Maverton Road Storage Area - Fish Island - 0.34Ha
- Wick Lane - Fish Island - 0.71Ha
- Riverbank Business Park - Fish Island - 0.82Ha
- Safestore - Gillender Street - 0.74Ha
- Cable Street - The Highway - 0.48Ha
- Heckford Street - The Highway - 1.26Ha
- Tripleseal, Lanrick Road - Blackwater Trading Estate - 0.61Ha
- Moody's Wharf, Lanrick Road - Blackwater Trading Estate - 0.37Ha

Post-Site Assessment

2.18 For each suitable site, we have sought to establish ownership for each parcel. Our intention was then to contact the owners to understand their intentions and timing regarding whether they will be improving existing industrial uses, intensifying activity (including potential co-location of waste functions), disposing of or redeveloping their assets.

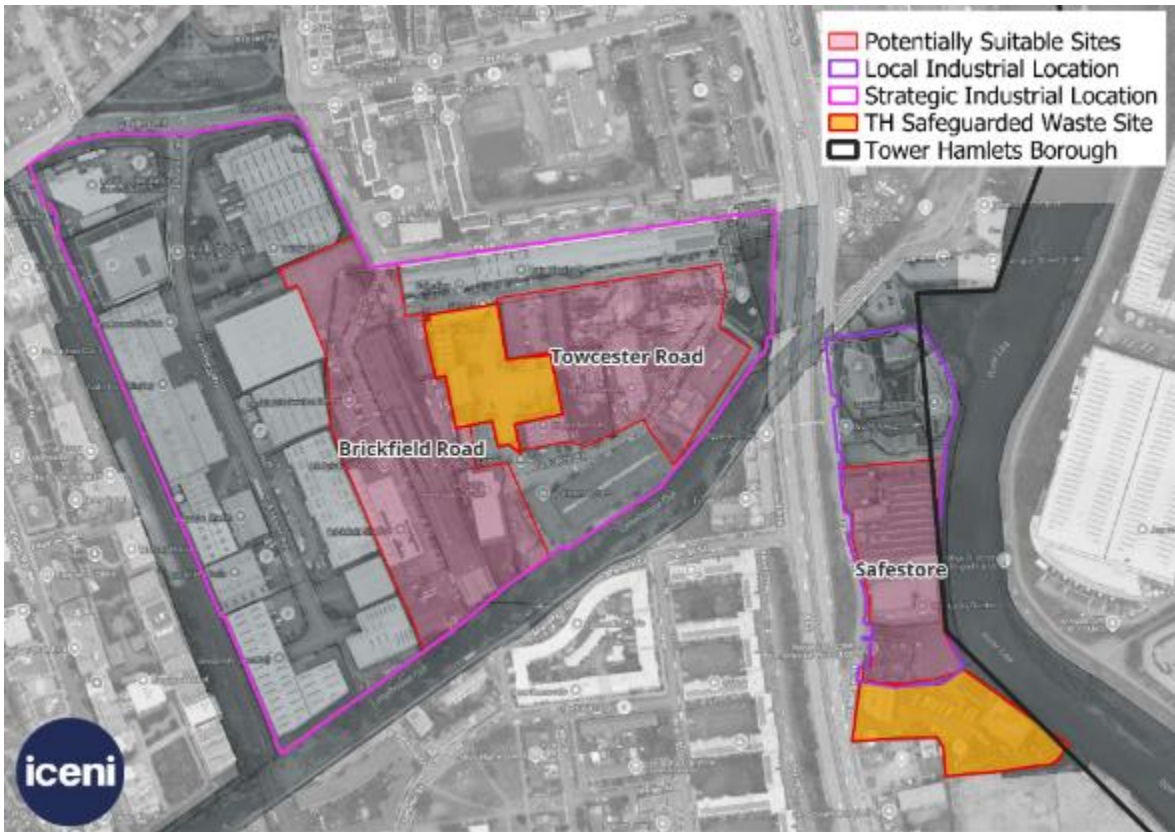
2.19 As mentioned, we can also use this exercise to identify any lease events that could release capacity during the plan period. For example, they may not know what will happen on sites immediately, but in the medium to long term, they suspect it will become vacant.

2.20 This initially relied on the Council's information about the owner of each title deed in the borough, although only postal addresses were available. This elicited only moderate responses, so we followed up by obtaining additional contact details, such as email and telephone numbers, and approached owners from multiple fronts.

2.21 Due to the General Data Protection Regulations, we cannot publish the owners of sites' details.

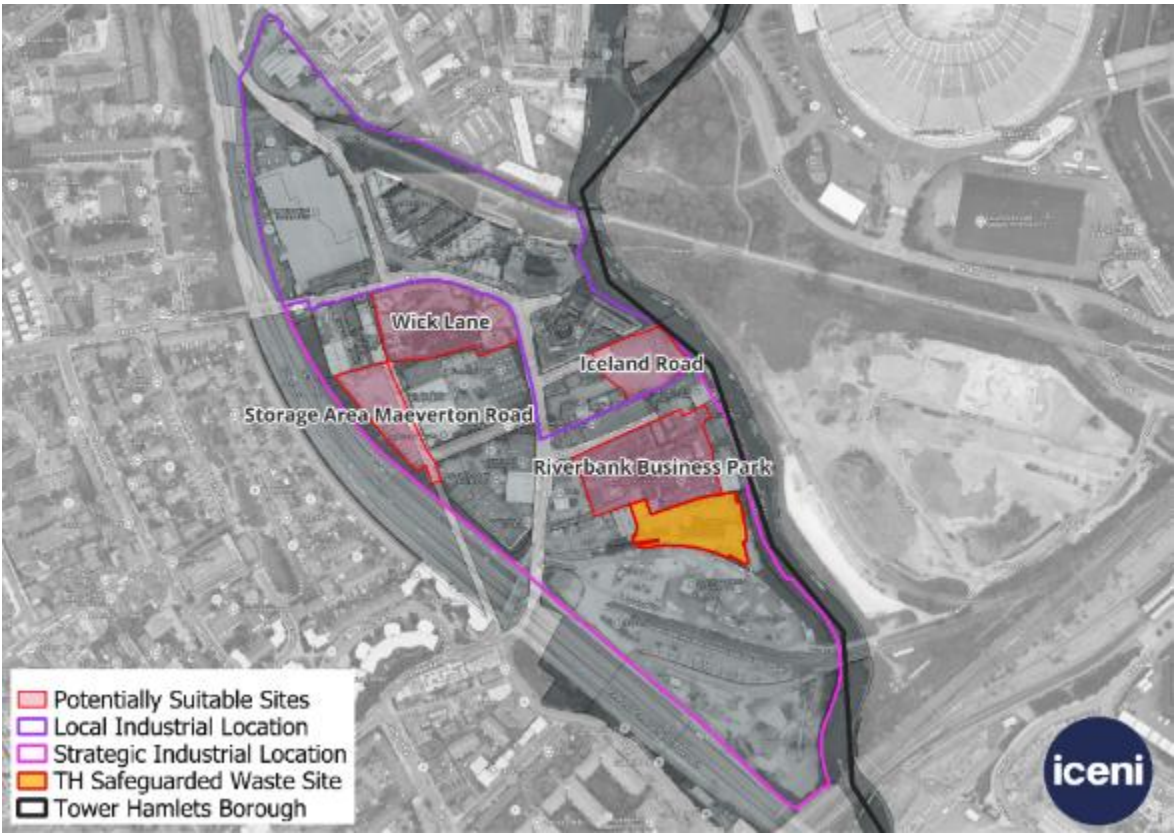
3. SITE PROFORMAS

- 3.1 The following summaries outline our assessments of each site. This information is drawn from both the desktop review (as set out above) and the physical site visits.

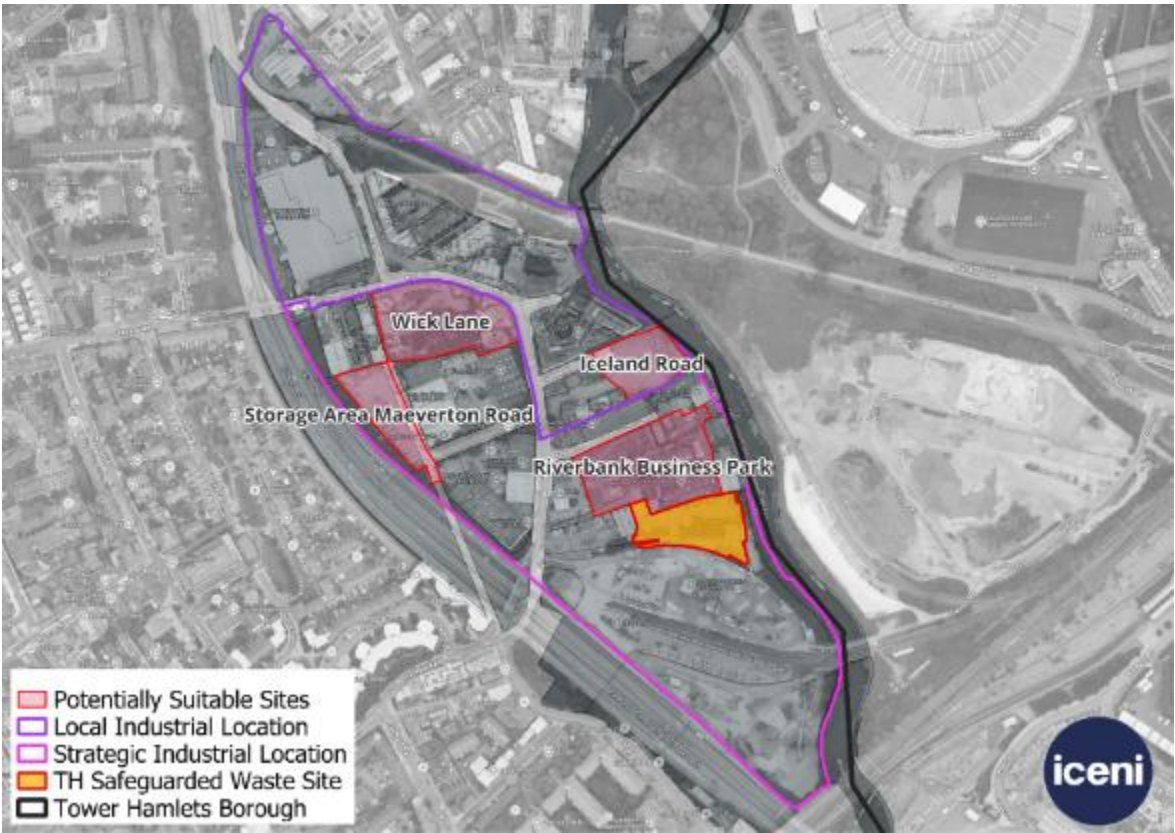
Empsom Street, Bow	
Plot Name(s)	Towcester Road and Brickfield Road
	
Site Size	The sites comprise two parcels at Brickfield Road (1.89ha) and Towcester Road (1.27ha), on a wider 10ha site.
Planning / Policy Status	The site is designated as a Strategic Industrial Location and includes an area already safeguarded for waste use. Planning app. PA/24/00568/A1 for Demolition of existing buildings and structures, and the redevelopment of the site to provide flexible industrial floorspace (Use Class E(g)(ii)/E(g)(iii)/ B2/ B8), with ancillary offices, central yard space, landscaping, and other associated works. Retention, refurbishment and change of use of the MOT garage to provide flexible industrial floorspace (Use Class E(g)(ii)/ E(g)(iii)/ B2/ B8) and a circular economy hub. An Environmental Impact Assessment accompanies this application. – granted October 2025. This application covers the eastern part of the site, including the safeguarded waste site

Location	The site is in the Bromley-by-Bow/Coventry Cross Estate Area, adjacent to the A12.
Site Description	The site is part of a large industrial area, most of which is of inferior quality. The eastern part of the site, Towcester Road, is largely vacant, derelict, and semi-cleared, with industrial buildings and areas used for fly-tipping and parking for the adjoining units, which include a Sweets Warehouse, Studio Space, and an antique furniture dealer. The central part of the site, Brickfield Road, includes a large, derelict, linear warehouse and car breakers' yards in poor condition. It also includes a large multi-floor warehouse used for offices, which is operational but in poor condition. The western part of the site is in much better quality, having been redeveloped, and includes modern warehouse and industrial uses. Although some buildings appear vacant, they are modern enough to be filled.
Clustering Uses / Occupiers	No clustering. The wider Empson Street industrial estate includes small breaker yards and a large Sweets Cash and Carry. On the western part of the site, occupiers include Shurgard and Augustus Martin Printers.
Existing Uses – Noise pollution / air pollution / odour / HGV traffic / land contamination / significant traffic / dust/ vibration/attracts vermin or birds.	Heavy goods vehicle traffic to the western part of the site. Very little traffic to the central and eastern parts of the site, and internal roads are in very poor condition.
Adjacencies / Sensitivities, including visual intrusion	Adjacent to A12 to the East and Canal/Limehouse Cut to the South
Proximity to residential	Some residential units are located north of the site, but an ageing industrial frontage blocks access to the internal area.
Quality of public realm / Circulation and Parking	Poor public realm in the east and central parts; HGVs currently accessing surrounding sites, but the roads are narrow and poor. Empson Street itself is residential on the northern side and has parking on both sides, although an HGV could still get down.
Vacancy Rate	+80% in the eastern and central parts.
Accessibility – road / suitable for HGV	HGVs currently access the western part. Access and circulation to the site's Eastern parts are poor. The site is very close to the A12, which would provide northbound exit and entry only from the South.
Public Transport Access	There are buses along Devas Street to Mile End and Canning Town. Bromley By Bow on the Hammersmith and City and District lines, and Devon Road DLR are short walks away.

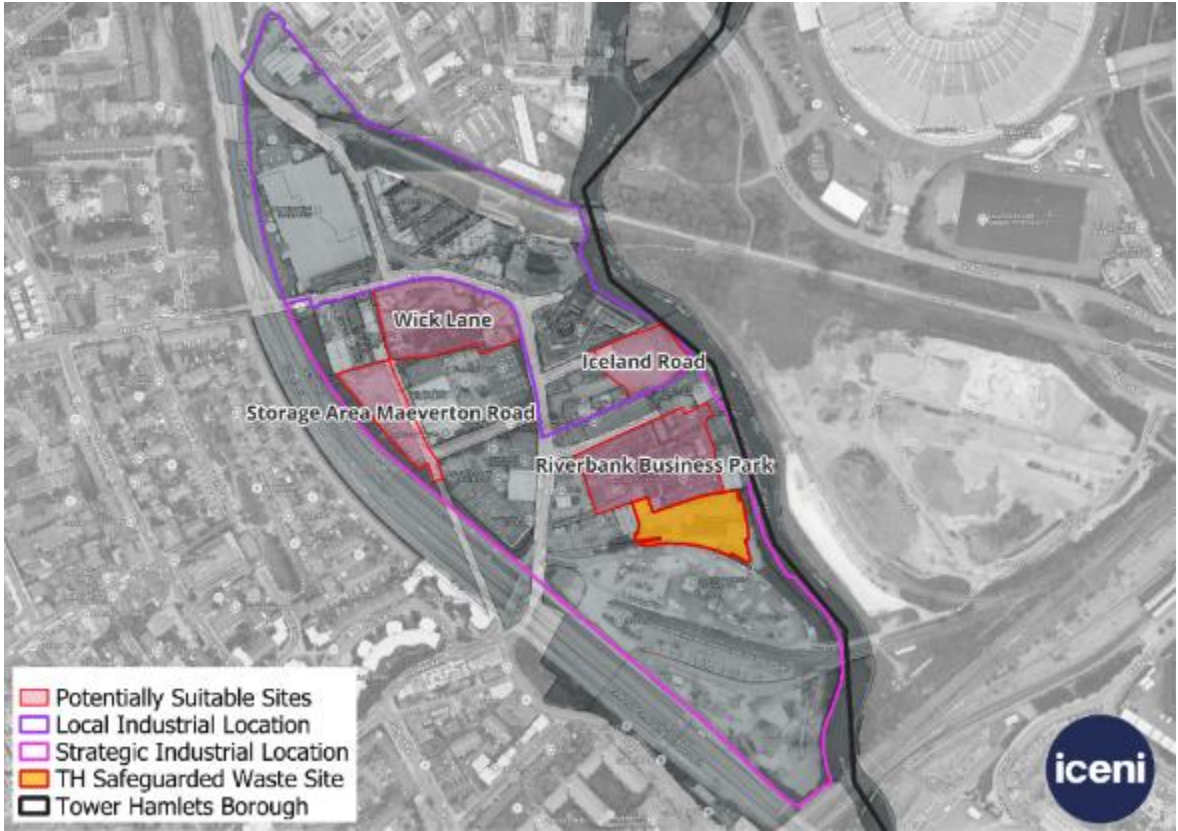
Environmental Designations	The central part of the site is within the conservation area. The mill building has historic canal wharves, but these are not in use or maintained.
Heritage Designations	The wharf building on Brickfield Road has an overhang onto the Limehouse Cut. While the building could be demolished, any development that replaces it would need to justify the harm to the conservation area. It is unlikely that a modern waste facility would be that justification.
Physical constraints – slope, groundwater, water courses, utilities, tree coverage	None, although fly-tipping might be an issue.
Ownership	The site has a range of owners, all of whom are in the private sector.
Development Opportunities	Both Brickfield Road and Towcester Road are largely vacant and derelict, and there is an opportunity to bring them forward. However, the recent application covers Towcester Road, including the waste safeguarded site. This might just be extending the existing safeguarded site to increase capacity.
Availability / Site Marketing	The site is not marketed and is vacant; however, it has planning permission for Class E uses as part of a larger site.
Recommendation	Contact owners, however, have planning permission from Oct. 2025 that covers much of the eastern site.
Owners Response	Ownership of both parts of the plots is fragmented, including an investment fund. One owner on Towcester Road suggested they were not interested in selling any of their site, while another on Brickfield Road was looking to acquire more space in the development. Other parts of the site have recently changed ownership, and the new owners have yet to make contact.

Fish Island, Hackney Wick	
Plot Name(s)	Wick Lane
	
Site Size	The vacant site comprises 0.7 Ha of a wider 9.2 Ha site.]
Planning / Policy Status	Strategic Industrial Location – planning app. 23/00406/FUL for the erection of two two-storey buildings for flexible industrial use (Class E(g)(ii), E(g)(iii), Class B2 and B8) with ancillary office space, yard space, soft and hard landscaping and other associated works – granted permission November 2024. Development has not yet commenced, and the permission expires in November 2027.
Location	Large, long-term vacant site in Fish Island, which, although a SIL, has seen a lot of residential development, particularly the northern part of the wider site, where this site is located.
Site Description	Site vacant and cleared with site hoardings around it – no works currently underway.
Clustering Uses / Occupiers	Adjoining new build residential to the north and east (across Wick Lane), and industrial parks, a safe storage warehouse, and poorer quality industrial units to the south
Existing Uses – Noise pollution / air pollution / odour / HGV traffic / land	Heavy goods vehicle traffic to the industrial parks adjacent

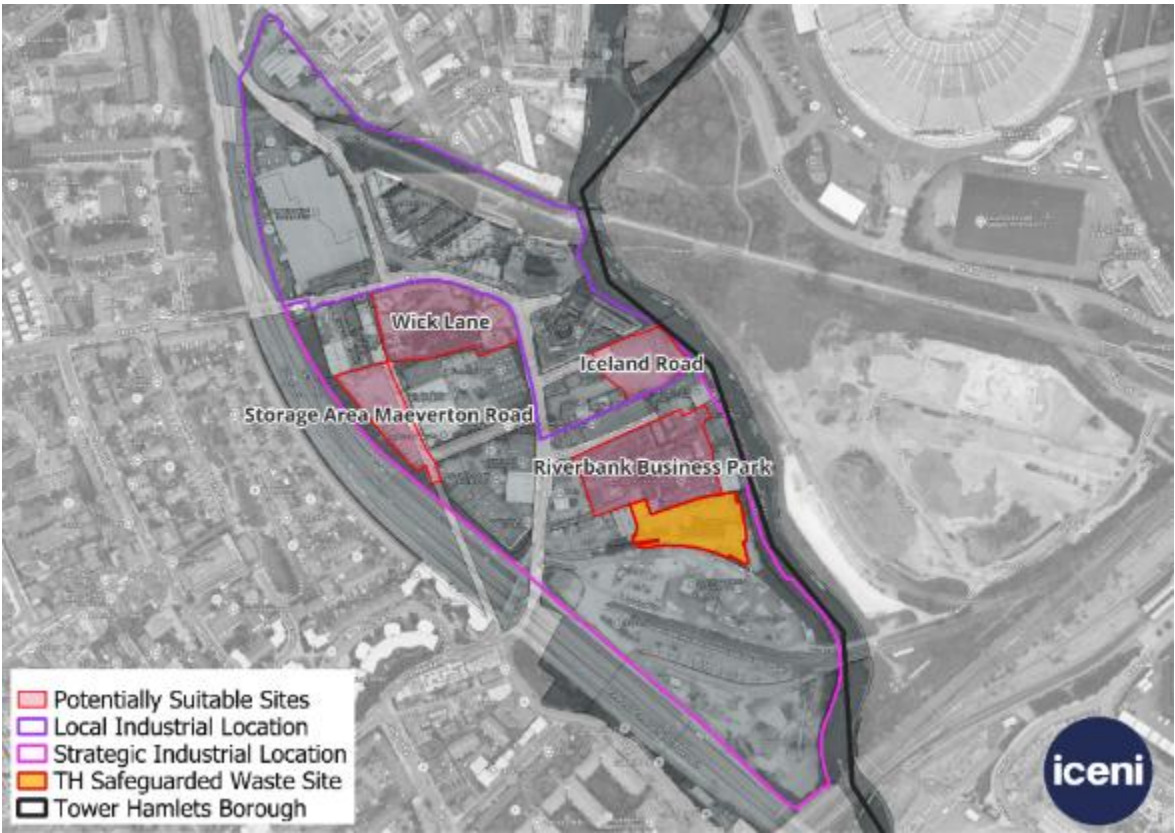
contamination / significant traffic / dust/ vibration/attracts vermin or birds.	
Adjacencies / Sensitivities, including visual intrusion	Residential dwellings to the north and east overlooking the site
Proximity to residential	Adjoining residential units opposite on Wick Lane
Quality of public realm / Circulation and Parking	Poor public realm and circulation. There is currently no parking on site, although there are car parks in neighbouring industrial areas and on-street parking.
Vacancy Rate	100%
Accessibility – road / suitable for HGV	Suitable for HGV with access off Wick Lane, and potentially from a roundabout, but the area is becoming increasingly residential.
Public Transport Access	339 bus runs on Wick Lane – frequently Pudding Mill Lane on the DLR and Hackney Wick on the Overground are within walking distance. 30 min walk to Stratford Station
Environmental Designations	None
Heritage Designations	None
Physical constraints – slope, groundwater, water courses, utilities, tree coverage	Appears flat but is steep around the edges – large blocks at the entry restrict access.
Ownership	Segro Properties Limited owns the entire site.
Development Opportunities	The whole site is developable – it has planning permission for mixed-use industrial redevelopment, but there is no obvious marketing.
Availability / Site Marketing	No obvious site marketing, but the site is vacant and cleared.
Recommendation	Continue to consider and approach Segro.
Owners Response	The site owner has not responded to any requests.

Fish Island, Hackney Wick	
Plot Name(s)	Maverton Road
	
Site Size	The vacant site comprises 0.34ha of a 9.2ha wider site.
Planning / Policy Status	Strategic Industrial Location planning app. PA/25/01350/N for 16 electric vehicle (EV) charging points; five car parking spaces; eight canopy modules; an ancillary unit providing toilet facilities, a small retail area and waiting/ seating area; landscaping; and associated works – submitted August 2025 and pending.
Location	Low-density site on Fish Island. The site immediately overlooks the A12 and is adjacent to a poorer-quality trading estate.
Site Description	Currently used as a builders' yard with an ad hoc car park.
Clustering Uses / Occupiers	An adjoining industrial park, which is mostly trade counters
Existing Uses – Noise pollution / air pollution / odour / HGV traffic / land contamination / significant traffic / dust/ vibration/attracts vermin or birds.	Heavy goods vehicle (including cement mixers) traffic to the adjacent industrial parks, as well as traffic on the A12, is also noisy and polluting.
Adjacencies / Sensitivities, including visual intrusion	Adjacent to A12, industrial and trade counter uses

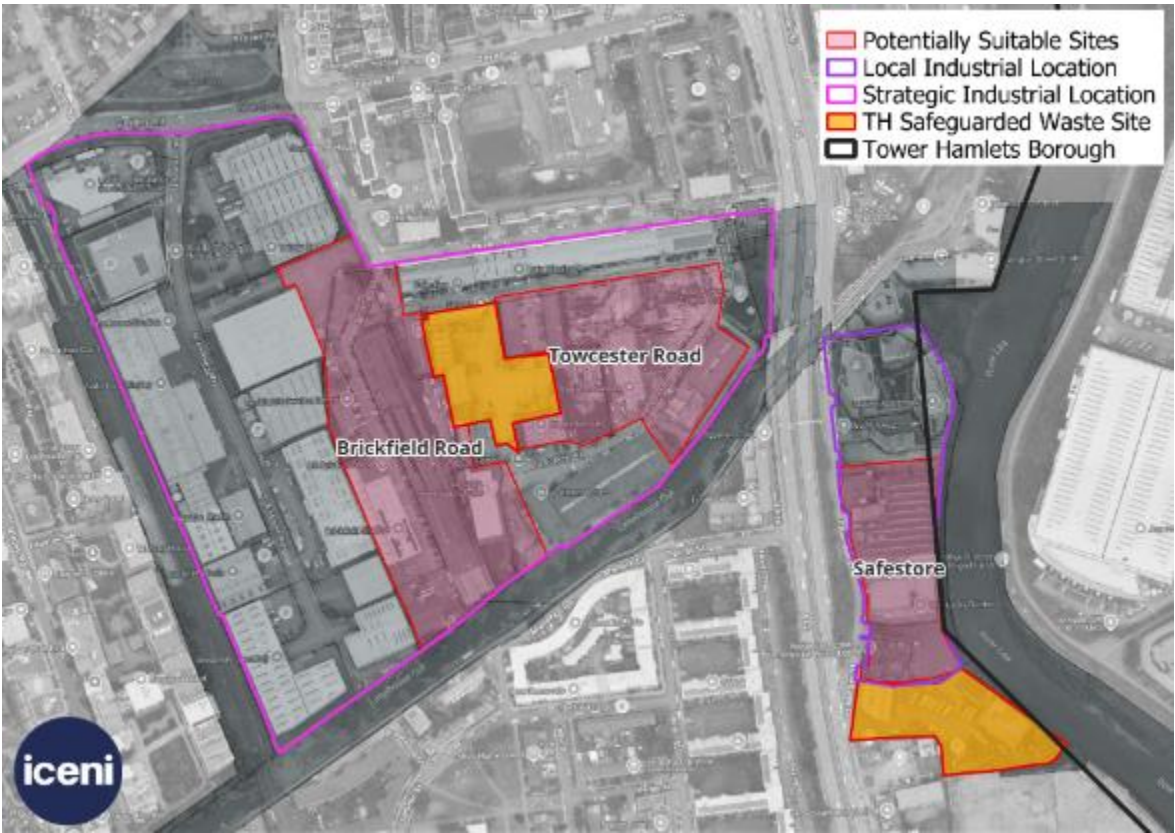
Proximity to residential	Residential units are not immediately adjacent, though some are within the wider Fish Island site.
Quality of public realm / Circulation and Parking	Very poor public realm and circulation. Lots of on-street parking, which, twinned with HGV traffic, causes congestion.
Vacancy Rate	Used as a builder's yard/engineers storage yard (J.B. Riney & Co / Haley) – 0% vacant but low-density usage (open storage)
Accessibility – road / suitable for HGV	Suitable for HGV, but the wider area is becoming increasingly residential. Access to the site off Maverton Road, but the road is narrow, although still used by HGVs
Public Transport Access	339 bus runs on Wick Lane – frequently Pudding Mill Lane on DLR and Hackney Wick 30 min walk to Stratford Station
Environmental Designations	None
Heritage Designations	None
Physical constraints – slope, groundwater, water courses, utilities, tree coverage	None other than adjacency to a major road
Ownership	J.B. Riney & Co Ltd, although now sold to Goldsmiths
Development Opportunities	The site is in use but not fully commercial, serving as a storage yard for a nearby engineering company. The site is also not fully utilised as a storage area.
Availability / Site Marketing	The site is currently used as a storage yard. It is understood that TfL has been pushing for the site to be developed as an EV charging hub for vehicles serving the industrial uses in the wider area. This relates to the August 2025 Planning Application.
Recommendation	Continue to consider and approach land owners.
Owners Response	According to the previous owner, the site was sold. The named buyer did not agree to this, and therefore, further information has been sought.

Fish Island, Hackney Wick	
Plot Name(s)	Iceland Road
	
Site Size	The vacant site comprises 0.33ha of a 5.4ha wider site.
Planning / Policy Status	Within a Local Industrial Location with a full application (LL/18/00095/FUL) pending for the redevelopment of the site to provide non-residential floorspace/yard-space together with associated refuse stores, plant, secure cycle stores and car parking, and residential dwellings including affordable housing, together with the provision of landscaped public open space, refuse stores, plant, secure cycle stores and car parking for people with disabilities submitted in June.
Location	Within the Fish Island Local Industrial Area, the site is at the Northeast edge, which is home to many new residential uses.
Site Description	Site is vacant and cleared with marketing boards for residential development (Sanctuary)
Clustering Uses / Occupiers	The site is vacant but within a wider industrial mixed-use area with some residential and trade counters.

Existing Uses – Noise pollution / air pollution / odour / HGV traffic / land contamination / significant traffic / dust/ vibration/attracts vermin or birds.	Heavy goods vehicle traffic to the industrial parks opposite Wick Lane
Adjacencies / Sensitivities, including visual intrusion	Residential dwellings adjoining and overlooking the site. Also adjacent to the Lighthouse Pub
Proximity to residential	Residential units are immediately adjacent.
Quality of public realm / Circulation and Parking	Poor public realm and circulation. On-street parking makes direct access to the site difficult.
Vacancy Rate	100%
Accessibility – road / suitable for HGV	Very poor access for HGVs due to on-street parking
Public Transport Access	339 bus runs on Wick Lane – frequently Pudding Mill Lane on DLR and Hackney Wick 30 min walk to Stratford Station
Environmental Designations	None
Heritage Designations	None
Physical constraints – slope, groundwater, water courses, utilities, tree coverage	None
Ownership	Sanctuary Homes
Development Opportunities	The site is vacant and is likely to come forward under the pending planning application.
Availability / Site Marketing	Being marketed for residential by Sanctuary Homes
Recommendations	Unlikely to come forward due to a pending residential application, and current access is poor. Not one to progress.
Owners Response	n/a

Fish Island, Hackney Wick	
Plot Name(s)	Riverbank Business Park
	
Site Size	The site comprises 0.82 Ha of a wider 9.2 Ha site.
Planning / Policy Status	Strategic Industrial Location
Location	Large, underused site on Fish Island, a broader strategic industrial location. The site is adjacent to the river.
Site Description	The site is fragmented and has several uses. Still, it is generally a poor-quality industrial unit (including converted older buildings) and storage containers that could be moved to another site.
Clustering Uses / Occupiers	The northern section of the site is used for storage containers, while the southern half contains light-industrial sheds, converted mill buildings, and trade counter units.
Existing Uses – Noise pollution / air pollution / odour / HGV traffic / land contamination / significant traffic / dust/ vibration/attracts vermin or birds.	None from the existing uses, although there is HGV traffic to the industrial parks adjacent, and noise from the A12
Adjacencies / Sensitivities, including visual intrusion	Residential dwellings nearby, as well as the Canal

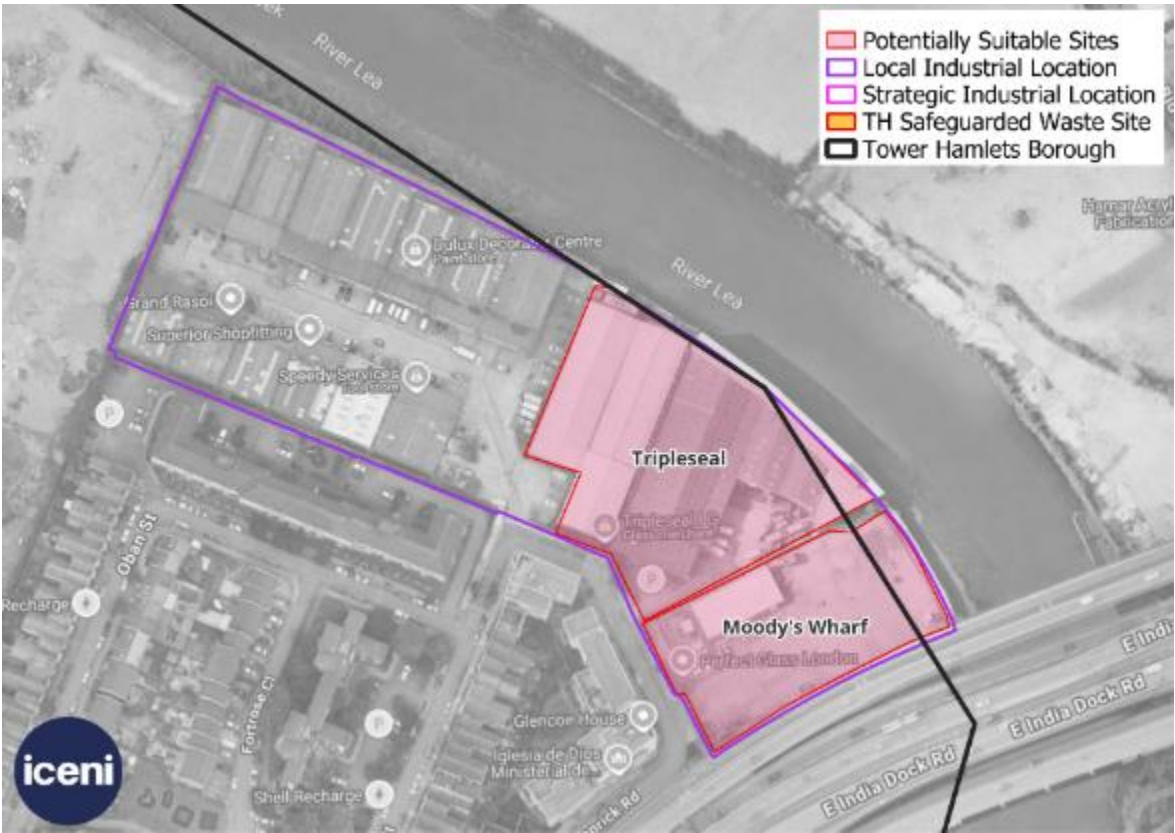
Proximity to residential	Residential units are not immediately adjacent, though some are within the wider Fish Island site, with more planned.
Quality of public realm / Circulation and Parking	Very poor public realm and circulation. There is on-street parking throughout the site, although this is not managed well.
Vacancy Rate	0% vacant, although there may be pockets of units
Accessibility – road / suitable for HGV	Suitable for HGV with access off Wick Lane, and potentially from a roundabout, but the area is becoming increasingly residential.
Public Transport Access	339 bus runs on Wick Lane – frequently Pudding Mill Lane on the DLR and Hackney Wick on the Overground are within walking distance. 30 min walk to Stratford Station
Environmental Designations	None
Heritage Designations	None
Physical constraints – slope, groundwater, water courses, utilities, tree coverage	None
Ownership	The site has a range of owners, all of whom are in the private sector.
Development Opportunities	Although the entire site is occupied, it is in poor condition and may be subject to redevelopment. There are immediate opportunities with the storage containers area, which can be moved to another site, but this is not large enough in its own right.
Availability / Site Marketing	No obvious site marketing, but the site is underused.
Recommendation	Continue to consider and approach site owners to check on availability.
Owners Response	Ownership is fragmented, but respondents said it was recently leased for a 20-year term. In contrast, another said waste was not part of the long-term plan (post 2030) and that they would look at intensification opportunities and would be averse to waste safeguarding, as it would reduce redevelopment opportunities.

Gillender Street, Bromley by Bow	
Plot Name(s)	Safestore, Gillender Street
	
Site Size	The site is 0.7ha of a wider 1.3ha site.
Planning / Policy Status	No planning application. Local industrial Location.
Location	East of Bow Creek and next to the River Lea, and east of the A12.
Site Description	A large self-storage unit that could be redeveloped in time. There is also a former Warehouse and Fire station building.
Clustering Uses / Occupiers	The site is used as a self-storage unit.
Existing Uses – Noise pollution / air pollution / odour / HGV traffic / land contamination / significant traffic / dust/ vibration/attracts vermin or birds.	There is noise from the adjacent A12.
Adjacencies / Sensitivities, including visual intrusion	Adjacent to the River and A12
Proximity to residential	The closest residential units are across the A12, with no direct access.

Quality of public realm / Circulation and Parking	Poor public realm, HGV accessing surrounding sites currently
Vacancy Rate	0%
Accessibility – road / suitable for HGV	Access off the A12 slip road (Gillender Street). Can only enter the site from the north and exit to the south.
Public Transport Access	There is a bus stop near the site's access point, with regular buses to Crossharbour. The nearest station is Bromley-by-Bow, which serves the Circle, District, and Hammersmith & City lines.
Environmental Designations	The site is in flood zone 3 and a conservation area.
Heritage Designations	A Grade II listed building occupies the North West corner of the site: Dowgate Wharf, P B Burgoyne and Company Limited Warehouse.
Physical constraints – slope, groundwater, water courses, utilities, tree coverage	River and major road adjacent to the site
Ownership	Safestore Properties Limited
Development Opportunities	There is no obvious short-term opportunity, a large self-storage unit that could be redeveloped in time.
Availability / Site Marketing	Not available currently or being marketed
Recommendation	Contact Safestore Properties Limited to see if the site could become available.
Owners Response	The site's owners said the site is not for sale and is key to their operations.

The Highway, Shadwell	
Plot Name(s)	Heckford Street and Cable Street
	
Site Size	The sites comprise two parcels of land: Heckford Street (1.26ha) and Cable Street (0.48ha) on a wider 2.7ha site.
Planning / Policy Status	The area is a local industrial site: the western part, Heckford St, is already cleared and is being marketed by Segro for eight new warehouses, although development hasn't commenced.
Location	The site is located between Limehouse and Shadwell on a busy part of the East London road network.
Site Description	There are four distinct parts of the site. The western part, Heckford Street, is cleared and being marketed by Segro; the site has been fully cleared, and no works are underway. The central part of the site includes a service entrance for the Rotherhithe tunnel and an operational Holiday Inn hotel. The South East is an operational Cement Plant, and Cable Street in the North East is a historic industrial building in poor condition. However, it also includes some quaint homes in good condition (Bere Street and Cranford St), possibly linked to former industrial uses.
Clustering Uses / Occupiers	The Heckford Street has been cleared. The Cable Street building houses many artistic studios, including music and dance.
Existing Uses – Noise pollution / air pollution / odour / HGV traffic / land	Noise pollution from Cement Trucks, but the site is also adjacent to two major roads.

contamination / significant traffic / dust/ vibration/attracts vermin or birds.	
Adjacencies / Sensitivities, including visual intrusion	Nearby residential sensitivities across The Highway, as well as listed buildings (The Royal Foundation of St. Katherine's)
Proximity to residential	Residential units surround the site on three sides, with the 4 th side (east) facing the Royal Foundation of St. Katherine's.
Quality of public realm / Circulation and Parking	Poor public realm and circulation.
Vacancy Rate	Heckford Street is 100% vacant, and Cable Street appears to have some vacant units, although it is largely operational.
Accessibility – road / suitable for HGV	HGVs have access off the Highway and Butchers Road.
Public Transport Access	There are regular buses from the Highway to Leamouth and from Butchers Row to Charing Cross. The nearest station is Limehouse, which is on the C2C line to Fenchurch Street and the DLR.
Environmental Designations	Cable Street, part of the site, is within a conservation area.
Heritage Designations	Cable Street is part of a conservation area, and the building is a landmark and a former sweet factory. It is also opposite a listed building in St Katherine's House. Given the building's attractive design, it would be difficult to replace it with a waste site, so it would again harm the conservation area.
Physical constraints – slope, groundwater, water courses, utilities, tree coverage	None
Ownership	Segro Properties Limited and Sudbury Properties Limited own the western site.
Development Opportunities	Heckford Street is vacant and is being marketed by Segro for redevelopment. Cable Street is likely nearing the end of its usable life, although it still provides cheap accommodation for the creative sector. The cement site is fully operational; if changes are made, there is potential for waste use, but it is unlikely to happen.
Availability / Site Marketing	Segro markets the site for high-end warehousing use.
Recommendation	Contact Segro to see if they would accept a waste unit on the site, but it is unlikely, as it is higher-end warehousing. Contact the landowner on Cable Street to better understand the redevelopment timeframe, if any.
Owners Response	The Heckford Street owners did not respond, but the Cable Street owners said the site was not available for waste use.

Blackwell Trading Estate, Poplar	
Plot Name(s)	Triple Seal and Moody's Wharf
	
Site Size	The sites comprise two parcels of 0.61ha and 0.37ha, on a wider 2.2ha site.
Planning / Policy Status	Within a Local Industrial Location. Planning permission in Feb 2021 for the restoration and refurbishment of the existing buildings for continued industrial use falling within Class B1c, B2 and B8 uses—associated external alterations to the existing grade II and locally listed buildings. The Emerging Local Plan allocates this site for a residential-led mixed-use development, with the development expected to come forward between 2035 and 2039. Still, it must provide at least the same amount of light industrial floorspace as currently exists on the site.
Location	In Poplar and adjacent to the Poplar Riverside Development, next to the River Lea/Bow Creek, and East India Dock Road (A13)
Site Description	Part of a small industrial estate, used mainly by Speedy Tool Hire, Office/Manufacturing Accommodation (Tripleseal), and a largely vacant area, Moodys Wharf, used by Volker Fitzpatrick, which is used temporarily while it repairs a bridge on the A13. This is expected to be complete by the end of the year.

Clustering Uses / Occupiers	The site is part of the Blackwell Trading Estate, with various industrial uses to the north. The centre of the site is Tripleseal, which appears underused, although the company says the site is fully operational, and Volker Fitzpatrick occupies the south, aka Moodys Wharf.
Existing Uses – Noise pollution / air pollution / odour / HGV traffic / land contamination / significant traffic / dust/ vibration/attracts vermin or birds.	Heavy goods vehicle traffic to the trading estate. There is also noise from the nearby A13.
Adjacencies / Sensitivities, including visual intrusion	Adjacent to the River Lea and the A13
Proximity to residential	Mid-density residential units immediately adjacent to the Site
Quality of public realm / Circulation and Parking	Poor public realm, HGV accessing surrounding sites currently
Vacancy Rate	0% for the southern section, Moodys Wharf, is occupied with civic engineering works. The centre of the Tripleseal site appears underutilised, although the company says it is fully operational.
Accessibility – road / suitable for HGV	HGVs currently access the industrial park, but on exiting, they need to go onto the A13 and double back.
Public Transport Access	There are regular buses from a bus stop 4 minutes' walk from the site to Canning Town. Abbott Road has regular bus links to Romford, Gallions Reach, Oxford Circus and Charing Cross. The nearest station is Canning Town, which is on the Jubilee Line and the DLR.
Environmental Designations	Flood zone 3a. Moody's Wharf, the part of the site that Volker Fitzpatrick occupies, is designated as Landrick Road Landfill.
Heritage Designations	None
Physical constraints – slope, groundwater, water courses, utilities, tree coverage	River and major road adjacent to the site
Ownership	TFL owns Moody's Wharf, currently used by Volker Fitzpatrick, and a private company owns the TripleSeal site.
Development Opportunities	Moodys Wharf is occupied, but once the nearby Bridge works are completed, it could be considered a potential site. The Triple seal site is also in low-density use, and there is an open-sided warehouse for storing vehicles. Site owners say the site is fully operational.

Availability / Site Marketing	Not available currently or being marketed
Recommendation	Contact Nagrecha Brothers Ltd for availability/operations, and TFL to see how long the works are expected to take and the site's long-term plan.
Owners Response	Tripleseal has recently signed a long-term lease, and previous approaches have been rebuffed. TFL have responded through their property, Places for London. They expect the site to become available in late 2026 and will market it for a short-term (4-5 years) lease starting in February 2026. In the long term, they are considering the site for residential use, but they said they are open to discussing alternatives.

Site Summary

- 3.2 The table below summarises the position of each site's suitability and availability using a RAG rating system, with supporting commentary.

Table 3.1 Site Summary

Plot	Site	Area (Ha)	Suitable	Available
Moody's Wharf, Lanrick Road	Blackwall Trading Estate	0.37	Emerging Residential Allocation	Owners will have a discussion
Tripleseal, Lanrick Road	Blackwall Trading Estate	0.61	Fully Operational in single use	Not Available
Towcester Road	Empson Street	1.27	Derelict Site	Not Available
Brickfield Road	Empson Street	1.89	Potential Heritage Constraint	Not Available
Iceland Road	Fish Island	0.33	Recent Planning Permission for Residential	N/A
Maverton Road Storage Area	Fish Island	0.34	Being promoted for E/V site	Owner unknown
Wick Lane	Fish Island	0.71	Has unimplemented Planning Permission	Owner not responded
Riverbank Business Park	Fish Island	0.82	Poor Quality Industrial Uses	Not Available
SafeStore	Gillender Street	0.74	The site is for single use	Not Available
Cable Street	The Highway	0.48	Potential Heritage Constraint	Not Available
Heckford Street	The Highway	1.26	Vacant Cleared Site, although subject to industrial permission	Owner not responded

Source: Iceni Projects

4. SITE OPPORTUNITIES AND CAPACITY

- 4.1 The above process has identified a single suitable and potentially available waste site. The site itself, Moody's Wharf at Blackwall Trading Estate, is measured in GIS as 0.37 Ha, although it is about to be marketed as 0.47 Ha¹.
- 4.2 The site is largely cleared and is used for open storage. There are a small number of temporary buildings (Portakabins) on the site that can be easily moved. The site does not appear to have any abnormal costs, although it was previously a waste site, and some remediation may be required.
- 4.3 At 0.47 Ha, the range of waste uses is limited, even more so at 0.37 Ha. A 0.4 Ha site falls within the small but workable bracket for certain types of waste infrastructure in London. Typically, this would be an enclosed transfer/sorting station or a specialist facility rather than a large-scale treatment plant.
- 4.4 If a waste use were to be brought forward on this site, an enclosed waste transfer station is potentially the most likely use for a site of this size. This is a facility where waste is tipped, checked, bulked and reloaded (often with limited sorting). It could handle dry mixed recycling and commercial & industrial recyclables.
- 4.5 The site could also host a small materials recycling facility, which is a manual/semi-mechanised sorting line with balers and storage for separated streams (paper/card, plastics, metals, etc.). Such a facility is mostly indoors, with limited external storage.
- 4.6 Alternatively, a specialist recycling facility could be established, for example, a site for sorting small-scale scrap, such as metal, cardboard/plastics, wood or textiles. Such a facility is highly enclosed and generally handles waste that does not decay rapidly and may produce an odour. It can therefore be more suitable for adjacency to residential uses.
- 4.7 The site could host a food-waste transfer station that receives source-segregated food waste, which is then unpackaged and pulped before being transferred to a larger anaerobic digestion plant elsewhere. However, unlike specialist recycling facilities, these facilities do

¹ The difference could be attributed to additional capacity underneath the flyover.

produce an odour and therefore might not be suitable given the adjacency to residential uses at Moodys Wharf.

- 4.8 Finally, the site could also host a small local recycling centre, but it typically does not process waste; it is part of the waste ecosystem and can generate waste that could impact neighbouring uses.
- 4.9 The capacity of such sites would be officially determined by the Environmental Permit issued by the Environment Agency, which would define the maximum annual tonnage.
- 4.10 A similar 0.4 Ha Recycling and Waste Transfer Station operates at Grove Technology Park in Oxfordshire². The site currently operates at 50,000 tonnes per annum but has a license for 75,000 tonnes.
- 4.11 A more local example is the existing waste site at Ailsa Street in Bow. This site is 0.53 Ha and has an operational capacity of 23,850-34,450 tonnes per annum. If this were to be pro-rated, then a 0.4 Ha site would have a capacity of 18,000 to 26,000 tonnes per annum.
- 4.12 The Ilford Recycling Centre, a small Materials Recycling Facility operated by Biffa, is slightly smaller than Moody's Wharf at 0.3 Ha. In 2023, this site had a throughput of 12,805 tonnes, according to the Environment Agency's Waste Data Interrogator.
- 4.13 The capacity of a specialist recycling facility would be entirely dependent on the materials being recycled. For example, Bywaters Construction Waste Recycling Centre³ in Bow handled 14,675 tonnes in 2025.
- 4.14 A small Food Waste Transfer Station opened in Linwood in Renfrewshire in 2024, which could handle 13,200 tonnes of Waste Per Annum⁴. However, this site was slightly larger at 0.5 Hectares.

² <https://mycouncil.oxfordshire.gov.uk/Data/Planning%20&%20Regulation%20Committee/20060220/Agenda/PN200206-06.htm>

³ <https://www.bywaters.co.uk/services/recycle/construction-waste>

⁴ <https://www.letsrecycle.com/news/bio-capital-group-acquires-linwood-transfer-station/>

- 4.15 Small local recycling centres typically take much lower levels of waste. Of the 63 Council-run “Waste Recycling Centres” listed in the Environment Agency’s Waste Data Interrogator, the largest site received 14,705 Tonnes in 2023, although the average was 5,750 Tonnes.
- 4.16 These all compare to Tower Hamlets’ apportionment of household, commercial and industrial waste in the London Plan by 2041 of 207,000 tonnes and an additional 286,000 – 337,200 tonnes of construction, demolition and excavation waste.
- 4.17 In June 2025, LBTH is requesting to transfer 34,370 tonnes per annum of Household, Commercial and Industrial (HIC) waste capacity and 56,953 tonnes per annum of Construction and Demolition (C&D) waste capacity.

Conclusion

- 4.18 This assessment follows a sound approach of identifying and testing potential waste sites in Tower Hamlets and follows a methodology agreed by the ELJWPG. We have undertaken our best endeavours to enquire about the availability of suitable sites with site owners.
- 4.19 In conclusion, there are very limited opportunities to deliver additional waste capacity in Tower Hamlets. Only one site is found to be suitable (and even then, it is proposed to be allocated for Residential), and it is only potentially available, and even then, only for a limited period.
- 4.20 If this site were to come forward for waste use, it is very small. It would not in itself fully meet Tower Hamlet’s waste capacity requirements, given the borough’s planned growth by the end of the Plan Period or the identified shortfall that it is seeking to transfer. As such, the borough must reach agreements with other areas to meet its unmet waste requirements.

A1. SITE PHOTOGRAPHS

Towcester Road - Empson Street



Brickfield Road - Empson Street

Iceland Road - Fish Island



Maverton Road Storage Area - Fish Island



Wick Lane - Fish Island

Riverbank Business Park - Fish Island



Safestore - Gillender Street



Cable Street - The Highway



Heckford Street - The Highway



Tripleseal, Lanrick Road - Blackwater Trading Estate



Moody's Wharf, Lanrick Road - Blackwater Trading Estate

