



Outlook

RE: ELJWP examination - sharing capacity draft modification

From [REDACTED]**Date** Mon 20/07/2026 09:01**To** [REDACTED]

Hi Cara,

Thank you for sharing a draft of the proposed modifications requested by the Inspector in relation to sharing capacity, and apologies again for the delay in providing comments. Please find below GLA comments on the drafts shared via email on 30 June 2026. Should modifications to the draft Plan be subsequently proposed, and subject to any future consultations, the GLA will review the changes and provide an opinion at that time.

GLA Comments on draft proposed modifications:

In response to discussions at the examination, the ELBs have shared a draft of proposed modifications to paragraphs 4.11 and 4.12, which include reference to a new Appendix 6 (Information Requirements for Capacity Sharing Requests in the event of future site release). The GLA does not consider that the proposed modifications to paragraphs 4.11/Appendix 6 regarding sharing surplus capacity with other London boroughs will contribute to the London Plan objective of delivering net self-sufficiency. The reasons for this are as follows:

- Policy SI8B(3) of the London Plan 2021 (LP2021) encourages boroughs to collaborate by pooling their apportionment requirements. The ELJWP evidence shows that waste management capacity within the ELB area exceeds the combined HIC apportionment assigned to the ELBs in the London Plan. The GLA maintains its position that to make the most efficient use of the significant surplus capacity after London Plan apportionments have been met, the ELJWP should make provision to enter into arrangements with other London boroughs regarding sharing of this surplus capacity as part of the ELJWP.
- Considering the significant surplus capacity identified, the proposed modifications to paragraph 4.11 and associated Appendix 6 (as compared to Appendix 4 of the Duty to Cooperate Statement of Compliance that accompanied the submission of the ELJWP, examination document reference CD09) are overly restrictive and counter to the London Plan strategic objectives of ensuring net self-sufficiency and optimising the capacity of existing sites. The modifications are not considered to be positive or effective in terms of setting out how the ELBs will collaborate with and support other London boroughs in appropriate circumstances.
- Seeking to 'cap' the amount of surplus capacity that may be shared with other London boroughs does not make the most efficient use of the significant surplus capacity in the ELJWP area. Policy SI8B3 provides direct encouragement for boroughs to collaborate by pooling their apportionment requirements – this is regardless of whether or not Local Plans or Joint Waste Plans propose to release sites from safeguarding during their preparation.
- The GLA notes that the proposed criteria in Appendix 6 have been updated from those included in Appendix 4 of the DtC Statement of Compliance (CD09). While the GLA in principle supports the inclusion of an appendix within the ELJWP that sets out the criteria for assessing surplus capacity sharing requests, this should not be predicated on future site release for the reasons set out above (and additionally noting the GLA position as per Regulation 19 response and SoCG on

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draft Policy JMP2(B) and Appendix 4), nor the quantum capped based on potential site release or existing flows.

- LBTH have directly requested a proportion of the ELBs management capacity surplus, based on an assessment of capacity and site availability that follows the methodology set out by the ELBs. LBTH evidence shows that there is a lack waste management capacity with LBTH boundary. While a draft SoCG has been provided, this is subject to agreement between ELBs and LBTH.
 - As discussed at examination, the GLA position is that agreement should be reached on sharing of surplus capacity before any sites are released. As such, the ELJWP should be explicit that the ELBs have formally accepted responsibility for meeting [a portion of – noting amount is unconfirmed] the waste management capacity for LP2021 waste apportionments requirements identified for London Borough of Tower Hamlets.
 - The GLA would refer the Inspector to relevant examples of adopted plans mentioned at examination which are explicit about sharing of surplus capacity, including London Borough of Bexley Local Plan (adopted 2022, see Policy SP12 Sustainable waste management and associated supporting text); OPDC Local Plan (adopted 2022, see policy EU6 Waste and associated supporting text); and RBKC Local Plan (adopted 2024, see policy GB17 Waste Management and associated supporting text).
 - No comments are provided on the draft SoCG between ELBs and LBTH as this was provided for information only.
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If you have any questions or would like further information please let me know. Also happy to arrange a meeting if that would be helpful.

Kind regards, Karen

Karen Montgomerie

[REDACTED]
GREATERLONDONAUTHORITY
169 Union Street London SE1 0LL

www.london.gov.uk/what-we-do/planning
[REDACTED]

From: [REDACTED]
Sent: 13 July 2026 11:19

[REDACTED]
Subject: Re: ELJWP examination - sharing capacity draft modification

Hi Karen,

Hope you are well.

I believe Tower Hamlets have sent you their response to our draft mod and suggested SoCG. Just wanted to check if the GLA wants to add any comments? We are intending to send the draft modification schedule (including the modification to 4.11 and 4.12) to the Inspectors for consideration next week.

Many thanks,
Cara
