



Statement of Common Ground
between
London Borough of Tower Hamlets
and
the Southeast London Joint Waste Planning Group

Stage:
Tower Hamlets Draft Local Plan (Submission)

April 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 key strategic waste matters between the two signatories: the London Borough of Tower Hamlets and the Southeast London Joint Waste Planning Group (SELJWPG) as relevant to:

- The preparation of the Tower Hamlets Proposed Submission Version Local Plan and its progression to public examination;

The key strategic matter between LBTH and the SELJWPG is waste planning, specifically the waste apportionment and capacity of the authorities.

The SELJWPG is not a plan-making authority; but rather a ratified group of unitary waste authorities that are also unitary planning authorities. The group prepares a [joint waste planning technical paper](#) (2022) 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).

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.

1. Introduction

- 1.1. This Statement of Common Ground (SoCG) is made between the following parties to assist in the Examination in Public of the Local Plan:
 - The Southeast London Joint Waste Planning Group; and
 - The London Borough of Tower Hamlets (LBTH)
- 1.2. Tower Hamlets Council is the Local Planning Authority for the London Borough of Tower Hamlets. 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.
- 1.3. The South East London Joint Waste Planning Group is a joint waste planning group, ratified by the individual member boroughs, who are unitary waste authorities and unitary planning authorities. The member boroughs are the London Boroughs of Bexley, Bromley, Lewisham and Southwark, the Royal Borough of Greenwich and the City of London. The sole purpose of the group is to prepare technical evidence to support each member borough's local plan.

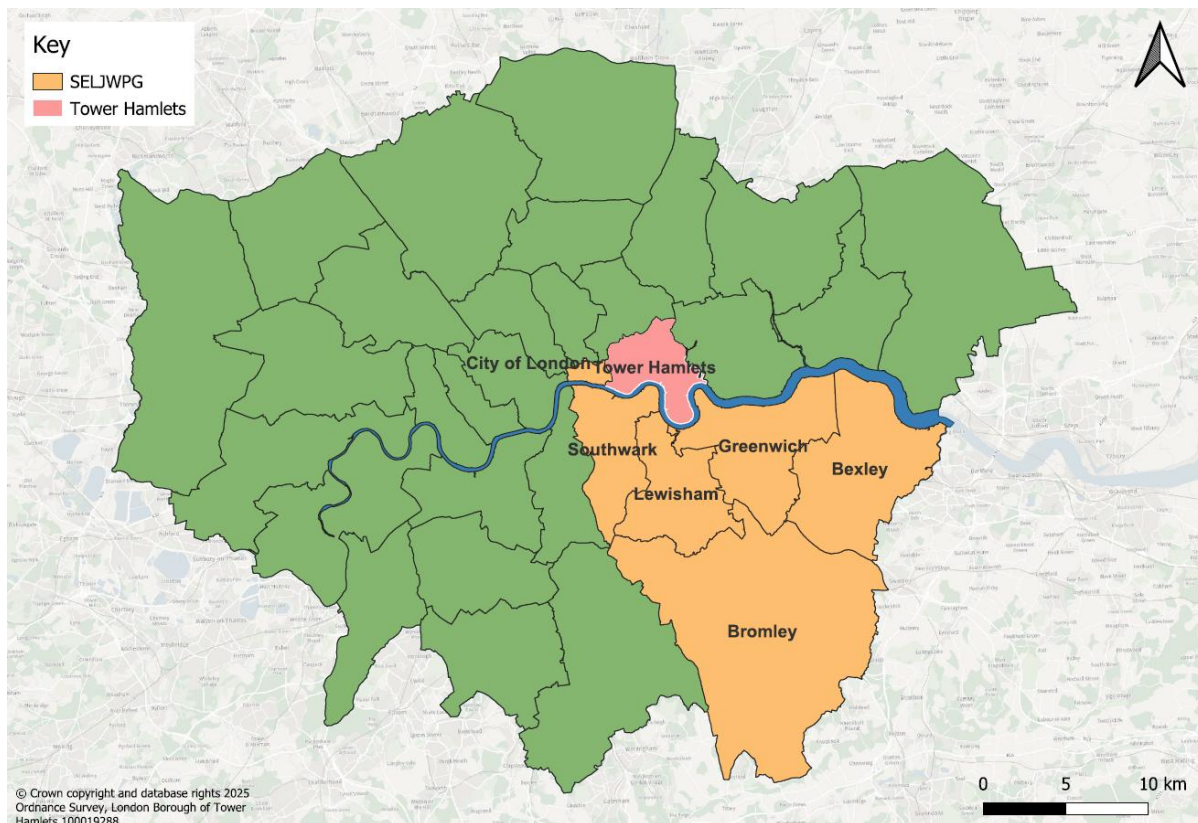


Figure 1: Map of Greater London identifying Tower Hamlets and the SELJWPG boroughs

2. Context

- 2.1. The Waste Data Study (2023) identified that LBTH would not be able to meet its London Plan waste apportionment. As LBTH is a unitary waste authority the council prepared new evidence, namely the Waste Data Update (2024) to test a scenario in which no neighbouring waste authority was able help LBTH meet its shortfall. This was reflected in the draft policy RW1 Managing our Waste as part of the Regulation 19 (2024) consultation which proposed utilising innovative approaches to accommodate this need to also ensure compliance in meeting London Plan waste apportionment targets.
- 2.2. Due to the identified lack of waste management capacity in the borough, LBTH wrote to all London boroughs in October 2024 and June 2025 requesting assistance in meeting LBTH's waste apportionment to be in accordance with the net self-sufficiency principle in Policy SI8 in the London Plan (2021). Roughly two thirds of London boroughs wrote back to confirm that they could not provide assistance to Tower Hamlets, no boroughs offered to share capacity.
- 2.3. Objections and further clarification from statutory stakeholders, including the GLA and EA, raised concerns. To address these concerns, LBTH amended and consulted on a revised policy approach at Regulation 19 (2025) consultation that sought to meet LBTH's needs through partnership working with boroughs which have surplus waste capacity. In July 2024, the East London Joint Waste Plan Regulation 19 was published by the London Boroughs of Barking & Dagenham, Havering, Newham and Redbridge, which identified a significant surplus capacity of 1,497,000tpa by 2041. The overall capacity set out in the East London Joint Waste Plan is 2,619,508tpa, meaning that the authority has a surplus HIC waste management capacity of 1,122,508tpa. Given the objections raised by

the GLA and EA to LBTH's Regulation 19 draft plan, LBTH requested their assistance in meeting the waste apportionment targets as set out in the London Plan (2021).

- 2.4. Given that the ELJWPG are neighbouring authorities to LBTH, LBTH contacted the ELJWPG to seek assistance as they had an identified surplus capacity in their Regulation 19 Plan. As previously noted in paragraph 2.2, LBTH has also written to all London boroughs requesting assistance with the borough's shortfall in waste capacity.
- 2.5. As part of discussions with the ELJWPG, it was recommended that the SELJWPG be approached given the existing waste exports to LB Bexley to assist with LBTH's request for assistance with the borough's waste apportionment.

3. Regulation 19 Representations

- 3.1 LBTH received individual responses to its Regulation 19 consultation (2024) from SELJWPG members including the City of London, the Royal Borough of Greenwich and the London Borough of Southwark. The City of London's response did not include any matters related to waste. The Royal Borough of Greenwich, in their Regulation 19 (2024) response, indicated that they have no excess waste capacity and are therefore unable to provide assistance to Tower Hamlets.

4. Ongoing Engagement with SELJWPG

- 4.1 As part of the request for assistance to all London boroughs in October 2024 and June 2025, all six members of the SELJWPG responded to this request explaining that they were not in a position to share waste capacity at present. LB Bexley, as Chair of the SELJWPG, provided a response indicating that the group was awaiting an update to waste apportionment requirements for the London Boroughs in the emerging London Plan and that it is not possible to know at this time what impact this will have on the surplus capacity identified in the [Southeast London joint waste planning technical paper \(April 2022\)](#), which will need to be updated accordingly.
- 4.2 Following on from this, officers from LBTH met with LB Bexley as chair of the SELJWPG. At that meeting it was noted that whilst in principle SELJWPG can include other London boroughs in the pooling of waste apportionment requirements and capacities, the group is awaiting publication of the draft London Plan and will need to update its joint waste planning technical paper accordingly prior to any consideration of meeting other London boroughs waste apportionment requirements. Nonetheless, LB Bexley both as a unitary authority and as the SELJWPG has agreed to continued dialogue and discussion on this matter.

5. Waste Capacity Sharing

- 5.1 LBTH is facing a shortfall of 56,953tpa of Household, Industrial and Commercial (HIC) waste capacity and 192,370 of Construction and Demolition (C&D) waste capacity. LBTH has requested support in meeting that shortfall from other waste planning authorities, including the London boroughs that form the SELJWPG.

- 5.2. It should be noted that the London Plan 2021 does not identify waste arisings or apportion waste capacity for construction, demolition and excavation waste (CD&E waste) for the London boroughs.
- 5.3. The [Southeast London joint waste planning technical paper \(April 2022\)](#) states, on page 25, that “actual surplus capacity... is 244,382 tonnes per annum by 2041. This is a 14% surplus, which provides a buffer to allow for fluctuations and still provide London with operational waste facilities that meet 100% of the SELJWPG borough’s combined waste apportionment (including Bexley’s commitment to meet the apportionment requirements of the City of London and City of Westminster).”

6. Matters of Agreement

Areas of agreement/disagreement:

- 6.1. **Outstanding matter:** Whilst the 2022 technical paper identifies that there is sufficient surplus HIC waste capacity (at the date of publication) to meet LBTH’s shortfall in HIC waste capacity, LB Bexley, as chair of the SELJWPG, has pointed out that there are two main matters of uncertainty with this assumption. Firstly, that the technical paper needs updating to understand current capacity; and secondly, that the draft London Plan, when it is published for consultation in summer 2026, may likely set new waste apportionment requirements for the London boroughs and these figures are not yet known.
 - 6.1.1 **LBTH response:** LBTH acknowledges this uncertainty and that the SELJWPG should have regard to future requirements but note that London boroughs should be planning on the basis of the current adopted London Plan, specifically implementation paragraph 9.8.6 for policy SI 8 Waste capacity and net waste self-sufficiency that states “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.”
- 6.2. **Outstanding matter:** However, LB Bexley notes that the implementation text to London Plan policy SI8 goes on to state, in paragraph 9.8.7, that “Boroughs should examine in detail **how capacity can be delivered at the local level** and demonstrate how this can be provided for through the allocation of sufficient sites and the identification of suitable areas in Development Plans to meet their apportionment, and should aim to meet their waste apportionment as a minimum.” The London boroughs, when preparing local plans, must consider all land use requirements when preparing a spatial approach to growth, in order for it to be found sound at examination. This will be taken into consideration with regards to site release in paragraph 9.8.6.
 - 6.2.1 **LBTH response:** LBTH note the points raised in regard to paragraph 9.8.7 in the London Plan (2021). LBTH has carried out multiple assessments of waste capacity in the borough. Namely, LBTH commissioned Icenii to carry out a [Waste Land Availability Study \(2026\)](#) to identify if industrial sites in the borough can accommodate waste uses. The conclusion noted that there were no available or deliverable sites available.

6.3. **Outstanding matter:** LB Bexley notes that, further to the above points, paragraph 9.8.10 states that; “Where a waste site may be lost, compensatory capacity should first be explored within the borough. In cases where this can’t be provided, and suitable capacity is found in another borough, the receiving borough or joint waste planning group is encouraged to take on the apportionment and include it as part of their Development Plan.” The SELJWPG would be reluctant to assume formal responsibility for waste capacity apportioned in the London Plan for LBTH in any of the development plans of the waste planning group. If any of LBTH’s shortfall was to be considered by the group, then the terms of this agreement will need to be specifically defined.

6.3.1 **LBTH response:** LBTH notes the SELJWPG’s position on paragraph 9.8.10.



7. Governance Agreements

7.1. 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 assessing LBTH’s ability to meet its waste capacity ; or
- c) At each subsequent key stage of the LBTH Local Plan process as it progresses towards adoption

8. Signatories

8.1. We confirm that the information in this statement and referred to in the documents reflect discussion between the London Borough of Tower Hamlets and the Chair of the Southeast London Joint Waste Planning Group, which is not a waste planning authority and has no planning powers.

<p>Signed on behalf of the Southeast London Joint Waste Planning Group:</p> <p>Name: </p> <p>Date: 21 April 2026</p> <p>Position: Chair, SELJWPG Planning Policy Manager London Borough of Bexley</p>	<p>Signed on behalf of the London Borough of Tower Hamlets:</p> <p>Name: </p> <p>Date: 21 April 2026</p> <p>Position: Plan-making Manager LB Tower Hamlets</p>
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Appendix 1: GLA response (Waste) to LBTH Regulation 19 (2025)

Waste

The previous Regulation 19 response raised a general conformity issue in respect of LBTH's inability to meet its apportionment targets. LBTH maintain that they cannot meet their apportionment requirement of 207,000 by 2041 set out in LP2021, therefore the general conformity issue remains. It is understood, as noted in the DtC Statement provided to support this consultation, that Tower Hamlets have approached the boroughs preparing the East London Waste Plan to request some of their surplus waste capacity. Discussions on this matter should be concluded prior to the LBTH plan being submitted.

The supporting text to draft Policy RW1 notes that the existing Ailsa Street facility is located within a regeneration area and that it may be released for other uses. Noting that the borough is unable to meet their apportionment requirements, the Plan should not be seeking to release a safeguarded waste site. The LP2021 is clear that where a waste site may be lost, compensatory capacity must be sought but given that LBTH cannot meet its existing capacity, the Mayor is concerned that this will not be possible. In the first instance, the borough should be protecting this existing waste site unless / until there is an alternative option.

Draft Policy RW1 makes reference to small-scale waste management facilities being integrated within new developments as contributing to managing apportioned waste. Clarification is sought in what is meant by small-scale waste management. In the Mayor's previous Regulation 19 response, concerns were raised about including on-site waste segregation facilities in contributing towards the borough meeting its apportionment requirements. There is a concern that this approach is still being pursued.

The Mayor notes that Clifford House, which was previously omitted from the list of safeguarded sites, has now been included. This is welcomed.

Appendix 2: EA response (Waste) to LBTH Regulation 19 (2025)

London Borough of Tower Hamlets Draft New Local Plan: Regulation 19 - Focused Policies Consultation (2025)

Thank you for consulting us on the London Borough of Tower Hamlets Draft New Local Plan: Regulation 19 - Focused Policies Consultation (2025).

Our comments will focus on elements of the consultation within our remit. We are therefore considering amendments to **Policies PS2 – Tall Buildings** and **RW1 – Managing our Waste**. We have also considered the changes to the proposed **site allocations**.

These comments follow our previous responses to the Draft Local Plan: Regulation 18 (dated 5 January 2024), our responses to the Regulation 19 (dated 20 January 2025) and our response to follow up questions (dated 3 June 2025).

Environment Agency Position

We are disappointed that the *Focused Policies Consultation (2025)* has missed the opportunity to include many of the recommended amendments that we have highlighted in our previous responses. We are particularly concerned that the methodology for the waste apportionments is still, in our opinion, incorrect. As such, we find that this policy RW1 is **unsound**.

Policy RW1 Managing Our Waste

We are disappointed that there have been no amendments in line with our previous comments. As a result, we find the policy is not **Justified** and find the policy **unsound**.

In our letter dated 20 January 2025, we reiterated concerns previously raised during the Regulation 18 consultation – *‘we previously raised concerns during the Regulation 18 consultation regarding waste apportionments as we highlighted an under provision of land allocated. We appreciate the HIC document was submitted to address these concerns; however, we believe the methodology is flawed as it is contrary to the London Plan 2021.’*

Table 6 in the latest consultation (page 34): *‘Capacity Assessment of Existing facilities managing apportioned waste in Tower Hamlets’* shows a claimed apportioned capacity. We still believe that the methodology that has been used is flawed for the reasons previously raised.

This includes the exempt sites and the tonnage from the Northumberland Wharf sites (a civic amenity site and a transfer station). These are permitted only for transfer activities according to our databases, so that tonnage should not be counted for apportioned capacity under the Greater London Authority’s (GLA’s) guidance, which states that it must be tonnage that is treated, recycled or prepared for recycling for it to be apportioned tonnes.

We recommend that the London Borough of Tower Hamlets engage with the GLA regarding the apportionments methodology and the tonnage apportioned to them. We also suggest the need for engagement with other stakeholders of the East London Joint Waste Plan (ELJWP) on sharing apportioned tonnages.