



**Statement of Common Ground**  
**Between**  
**London Borough of Newham**  
**And**  
**London Borough of Tower Hamlets**

**Stage: Newham Submission Draft Local Plan (Reg. 19) and  
Tower Hamlets Submission Draft Local Plan (Reg. 19)**

**15 January 2025**

## **1. Executive Summary**

- 1.1. A statement of common ground is a written record of the progress made by plan-making authorities during the process of planning for strategic cross-boundary matters. It documents the strategic matters where effective cooperation has led to cross-boundary challenges and opportunities being identified, whether there is agreement between bodies in how these should be addressed, and how the strategic matters have evolved throughout the plan-making process. It is also a way of demonstrating at examination that plans are deliverable over the plan period, and based on effective joint working across local authority boundaries.
- 1.2. This Statement of Common ground addresses key strategic matters between the two signatories, the London Borough of Newham and Tower Hamlets, as relevant to:
  - the preparation of the Newham Draft Submission Local Plan and its progression to public Examination; and
  - the preparation of the Tower Hamlets Draft Submission Local Plan and its progression to public Examination.
- 1.3. Strategic matters overseen by other organisations will be addressed in other SoCGs, in order to streamline the process of reaching agreements with each party. Where key strategic issues overlap between different organisations that Newham have signed statements of common ground with (e.g. the delivery of housing targets), these interrelations are summarised in the [Duty to Cooperate Statement](#) (2024) and the Duty to Cooperate Addendum (2025).
- 1.4. The document is intended to be 'live', updated as circumstances change. Please see the Governance Arrangements section of the statement for more details.

## **2. Parties Involved**

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

AND

- 2.2. Tower Hamlets Council, who is the Local Planning Authority for the London Borough of Tower Hamlets, which is an inner London Borough. Tower Hamlets borders several London Boroughs, including the City of London to the west, Hackney to the north and Newham to the east, as well as being bounded by the river Thames to the south. Neighbouring areas across the river include Lewisham, Southwark, and the Royal Borough of Greenwich. Tower Hamlets is renowned for its diversity, multiculturalism and numerous historical landmarks, including the Tower of London and Tower Bridge. Part of the borough (Fish Island, Hackney Wick and Bromley-by-Bow) currently falls within the boundary of the LLDC, who were the local planning authority responsible for coordinating the growth and regeneration of the Queen Elizabeth

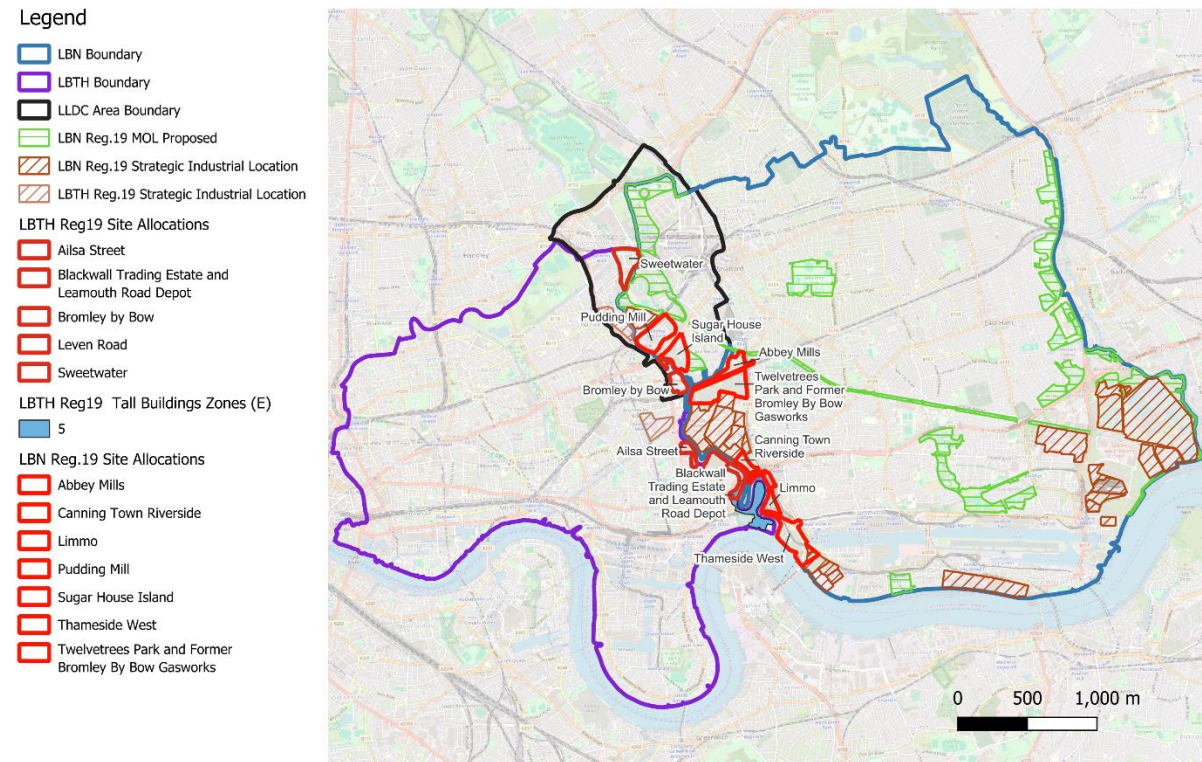
Olympic Park and surrounding areas as part of the 2012 London Olympic Games legacy. The planning powers for this area were passed back to LBTH by the end of 2024.

- 2.3. Newham is strategically located at the intersection of the London-Stansted-Cambridge-Peterborough Corridor, which is centred on enterprise and innovation within emerging sectors such as digital, media, life sciences, telecommunications and advanced manufacturing, and the Thames Estuary Creative and Cultural Industries Corridor, which adds to the borough's significance. It contains three Opportunity Areas: the Olympic Legacy (which also includes parts of the other Host Boroughs) Poplar Riverside (which crosses the boundary with Tower Hamlets) and Royal Docks and Beckton, which is also the home of London's only Enterprise Zone and Europe's largest regeneration area.
- 2.4. Tower Hamlets is a dynamic borough with a wealth of opportunities for businesses, residents, and visitors alike. With its diverse population, rich history, and thriving economy, Tower Hamlets truly is a unique and exciting location to live, work, and visit. Tower Hamlets connectivity has been enhanced and the borough has been made even more attractive for businesses and residents alike, with the borough's transportation network receiving a significant boost with the long-awaited arrival of the Elizabeth line, with stations at Whitechapel and Canary Wharf. Tower Hamlets is also home to London's second financial district at Canary Wharf, which plays host to several major businesses, including financial services companies, law firms, and multinational corporations. It has also become a hub for the emerging tech industry and life sciences, with several technology and biotech start-ups choosing to set up base in the area. Tower Hamlets' close network of commercial areas, excellent transport links, and location on the edge of the City make it a popular choice for businesses and individuals to locate in the borough as well as have access to the wider London market. . The borough contains parts of the London Plan's Central Activities Zone (CAZ), as well as one metropolitan centre in Canary Wharf, eight district centres, three specialist centres, three CAZ centres, 16 neighbourhood centres, and 14 neighbourhood parades. These town centres play an important role in the wider strategic function of London and contribute significantly to the area's international appeal.
- 2.5. The LLDC returned planning powers back to the London Boroughs of Newham, Tower Hamlets and Waltham Forest and Hackney on the 1st of December 2024. As such, key strategic matters for the parts of the LLDC that fall within Newham's administrative boundaries are also addressed in the Newham Draft Submission Local Plan, and are subject to the matters addressed in this statement of common ground.

### **3. Strategic geography**

- 3.1. The map overleaf identifies the spatial representation of the key strategic matters addressed, alongside the administrative areas of the two plan-making authorities.
- 3.2. As noted above, the LLDC returned planning powers back to the London Boroughs of Newham and Tower Hamlets on the 1st of December 2024. Where relevant, the Newham draft Local Plan has retained and evolved site allocations and designations from the LLDC Local Plan (2020).

Map: Strategic Geography of relevance to the Statement of Common Ground between London Borough of Newham and London Borough of Tower Hamlets



#### 4. Background

- 4.1. Newham Council has prepared the Draft Submission Local Plan and published it for consultation between 19<sup>th</sup> July and 20<sup>th</sup> September 2024. This is the version of the plan that the Council considers to be 'legally compliant' and 'sound' and will be submitted to the Planning Inspectorate for examination in 2025. The council has undertaken two rounds of consultation prior to this, to inform the Newham Draft Submission Local Plan. These include:
  - Issues and Options Consultation, which took place between 18 October and 17 December 2021; and
  - Draft Local Plan Consultation (Regulation 18), which took place between the 9 January and 20 February 2023.
- 4.2. Tower Hamlets Council has prepared the Draft Submission Local Plan and published it for consultation between 13<sup>th</sup> September and 28<sup>th</sup> October 2024. This is the version of the plan that the Council considers to be 'legally compliant' and 'sound' and will be submitted to the Planning Inspectorate for examination in 2025. The council has undertaken two rounds of consultation prior to this, to inform the Tower Hamlets Draft Submission Local Plan. These include:
  - Early Engagement, which took place between 25 January 2023 to 8 March 2023; and

- Draft Local Plan Consultation (Regulation 18), which took place between the 6 November and 18 December 2023.

4.3. A [Duty to Cooperate Statement](#) (DtC Statement) was published as part of Newham's Reg. 19 consultation, which provides a summary of our engagement with Tower Hamlets, as a duty to cooperate partner, as part of the preparation of the new Newham Local Plan. The table below provides an extract of the relevant key strategic matters identified as part of this process and the corresponding paragraphs in the Duty to Cooperate Statement.

Key Strategic Matter	DtC Statement relevant paragraphs
Housing target	4.26, 4.27, 4.30, 4.31, 4.36-4-38
Gypsy and Traveller need	4.42, 4.43, 4.47-4.50
Bow Goods Yard SIL	4.64, 4.68-4.71 4.74
Connections along and over the Lea River	4.123, 4.125, 4.126
Metropolitan Open Land review	4.286, 4.288, 4.288-4.290, 4.294-4.295

- 4.4. The national and regional policy context forming the background to this statement of common ground is also detailed in the Duty to Cooperate Statement (2024), under 'Chapter 2: Legislative and national policy context' and 'Chapter 3: Demonstrating compliance with the duty to cooperate'.
- 4.5. During the Reg. 19 consultation process, Newham approached Tower Hamlets to agree the process leading to the preparation and signing of this statement of common ground. As part of this, Tower Hamlets:
- recognised the outstanding strategic matters set out above; and
  - raised additional key strategic issues relating to waste planning.
- 4.6. The above matters, as related to the Newham Local Plan, are also reflected in Tower Hamlet's response to Newham's Reg. 19 consultation.
- 4.7. Further, Tower Hamlets invited Newham to consider any additional key strategic matters which may arise between the two plan-making authorities through the Tower Hamlets Submission Draft Local Plan, which was under Reg. 19 consultation between 13<sup>th</sup> September and 28<sup>th</sup> October 2024. As part of this, Newham identified a further strategic matter relating to the tall buildings strategy in the Tower Hamlets Submission Draft Local Plan.
- 4.8. A meeting was held on 4<sup>th</sup> October 2024 to discuss the key strategic matters, and the agenda and notes of this meeting are attached as Appendix 1 and provide further background information.

## 5. Key Strategic Matters

### 5.1. Housing Target

- 5.2. Newham's and Tower Hamlet's housing targets are set out in the London Plan (2021). These targets were informed by the findings of the Greater London Authority's Strategic Housing Market Assessment and Strategic Housing Land Availability Assessment, both of which were

published in 2017. Correspondence with the GLA has confirmed Newham's proportion of the LLDC's London Plan housing target, which is an additional 14,800 homes on top of Newham's target to deliver 32,800 homes by 2028/29.

- 5.3. Newham's housing target in the Newham Draft Submission Local Plan proposes a range housing target, which seeks to deliver a net increase of between 51,425 and 53,784 quality homes between 2023 and 2038. While Newham have identified sufficient housing capacity to meet our London Plan housing target, the projected phasing of delivery means that Newham will not be able to meet our London Plan housing target within the period of the London Plan. This is primarily as a result of delays to the delivery of large sites, particularly site allocations, against the assumed phasing in the 2017 Strategic Housing Land Availability Assessment.
- 5.4. In light of the above, Newham have been advised by the GLA to approach several boroughs, including Tower Hamlets to understand whether there is any available housing capacity above the London Plan (2021) individual targets, which could assist Newham in meeting its London Plan housing target within the London Plan period (2019/20 – 2028/29).
- 5.5. Tower Hamlet's housing target in the Tower Hamlets Draft Submission Local Plan sets out that the borough is able to meet their housing target in the short and medium term plan periods, with a surplus of just under 5,000 homes, and are confident that their identified growth areas will be sufficient for the final years of the Plan. The housing target includes a reassessed housing target for the area previously managed by the LLDC, beyond the London Plan period. Full detail of how the Housing Target has been arrived at is included within the [Housing Target and Trajectory report](#) which was consulted on as part of the Regulation 19 consultation.
- 5.6. Record of agreements and/or disagreements:
  - London Borough of Tower Hamlets is not able to include a higher housing target in the emerging Tower Hamlets Local Plan, as capacity modelling indicated only a small buffer for the first 5 years in the London Plan (2021) period which then reduces in the last 5 years. London Borough of Newham note this development trajectory is the inverse of Newham's anticipated growth, with the majority of our growth projected in our later Local Plan period. Given the geographical proximity and similar housing markets, there may be a beneficial relationship between the two boroughs' trajectories.
  - London Borough of Newham and London Borough of Tower Hamlets agreed to continue to engage via local plan making processes, should circumstances change.
- 5.7. **Gypsy and Traveller need**
- 5.8. In December 2023, the Government updated the Planning Policy for Traveller Sites (PPTS). The new guidance has been published in response to the October 2022 Court of Appeal ruling, which found the previous 2015 PPTS to be unlawful in its discrimination against those forced to give up their nomadic lifestyles due to disability or old age.
- 5.9. As part of our Local Plan evidence base Newham has prepared a Gypsy and Traveller Accommodation Assessment (2022), which found that there was no need for new pitches for households that meet the 2015 Planning Policy for Traveller Sites definition of Gypsies and Travellers. However, the study found a need for 23 pitches for households that did not meet

the 2015 Planning Policy for Traveller Sites definition, but whose needs would need to be considered under the Housing Act 1985 and the Housing and Planning Act 2016.<sup>1</sup>

- 5.10. The Newham Draft Submission Local Plan continues to allocate one site as a safeguarded Gypsy and Traveller accommodation site, which is an existing site containing 15 pitches. The safeguarding of this site does not count towards meeting identified future need, albeit there is scope to extend the site by a few pitches to the south of the allocation.
- 5.11. In March 2022 the Greater London Authority appointed RRR Consulting to undertake a London wide Gypsy and Traveller Accommodation Need Assessment. Publication of draft outputs of the Gypsy and Traveller Accommodation Need Assessment has been delayed on a number of occasions with draft outputs shared to London Borough's in October 2023. Following discussions, revised outputs were shared in February 2024 showing a need for LBTH for 18 pitches up to 2032. It was understood that the final GLA GTANA was to be published late summer or autumn 2024, but to date, this has yet to be published. As the GLA have already been preparing evidence LBTH have not prepared updated evidence as part of the plan production for this plan. Aside from the GLA evidence, the borough's most up to date evidence is the Tower Hamlets most recent Gypsy and Traveller Accommodation Needs Assessment (GTANA) which was published in July 2016, which is now significantly out of date, particularly in light of the updated Planning Policy for Traveller Sites (2023) which was updated following the Court of Appeal judgment in the case of Smith v SSLUHC & Others (October 2022). As such, it is considered that LBTH have no up to date figure of need in line with the London Plan policy H14.
- 5.12. The existing Gypsy and Traveller site at Old Willow Close is safeguarded through policy HF5 Gypsy and traveller accommodation. The site is split into two parcels of 3,178sqm and 8,470sqm. The site of 8,470 sqm currently contains 19 pitches with the potential to incorporate additional 3 pitches.
- 5.13. Record of agreements and/or disagreements:
- Newham and Tower Hamlets recognise each other's need figures for Gypsy and Traveller accommodation, and agree there is currently no additional capacity to support each other's' need.
  - London Borough of Newham and London Borough of Tower Hamlets agreed to continue to engage via local plan making processes, should circumstances change.
  - London Borough of Newham and London Borough of Tower Hamlets agreed to continue to engage with the GLA as part of the development of a London-wide Gypsy and Traveller accommodation needs assessment.
- 5.14. **Bow Goods Yard SIL**
- 5.15. London Plan Policy E4 encourages boroughs to meet identified demand through the provision of new land and/or intensification of existing industrial floorspace as supported by appropriate evidence. It sets out the requirement to meet economic needs by the three

---

<sup>1</sup> Note the study was undertaken before the update to the Planning Policy for Traveller sites definition in December 2023. As such, it has not been assessed whether this need would meet the December 2023 Planning Policy for Traveller Sites definition.



categories of London's land and premises for industry, logistics and services, including the Strategic Industrial Locations (SIL), Locally Significant Industrial Sites (LSIS) and Non-Designated Industrial Sites. Policy E6 requires boroughs to designate and define Locally Significant Industrial Sites with range of acceptable use, as justified by evidence in local employment land reviews. Boroughs are required to protect and deliver the employment sites following the principle of intensification, co-location and substitution as set out in Policy E7 of the London Plan.

- 5.16. Newham conducted its own Employment Land Review to justify the designation of employment land in the borough. Employment land in Newham is designated as Strategic Industrial Locations which accommodate heavier industrial uses, warehouses and utilities, and Local Industrial Locations to house smaller scale, locally significant industrial areas. Co-location with residential and employment land uses is achieved in specific Local Mixed Use Areas. To review the suitability of the existing employment designations, Newham's Employment Land Review (ELR) was updated in July 2022. The findings in the ELR regarding employment land supply and demand in the borough as well as land audit on each designated employment site are used to inform the changes in the emerging Local Plan.
- 5.17. Fish Island/Marshgate Lane is a safeguarded freight rail head site which straddles Newham and London Borough of Tower Hamlets (LBTH). It is identified in the London Plan (2021) as SIL. The adopted London Legacy Development Corporation (LLDC) Local Plan 2020-2036 recognised the strategic economic importance of the site and designates it as two SILs: Fish Island South (in Tower Hamlets) and Bow Goods Yard East (in Newham). Part of the area straddling the two SILs is a single site allocation (Bow East and West) in the LLDC Local Plan. The eastern part of the site allocation (Bow East) is situated within Newham and the western part (Bow West) is situated within Tower Hamlets. The development principle of this site is set out in the LLDC Local Plan for consolidation and intensification of rail, industrial and other appropriate employment uses and release opportunity for alternative uses.
- 5.18. Newham has worked with the London Legacy Development Corporation (LLDC) and the London Borough of Tower Hamlets (LBTH) to address issues for Bow Goods Yard.
- 5.19. Newham held a meeting with the LLDC and Tower Hamlets to discuss the proposed land uses in Bow Goods Yard in August 2023. Newham highlighted our evidence regarding industrial need. LLDC indicated that they had had a range of discussions with National Rail regarding the site and National Rail were considering a range of land uses. LLDC's primary concern was ensuring improved connections into the site. Newham confirmed these would be secured through the neighbourhood policies in their emerging Local Plan. As such Newham stated that they would continue to designate Bow Goods Yard as an employment site at this stage and continue to engage with LLDC and Tower Hamlets during Newham's Local Plan review.
- 5.20. The Tower Hamlets Draft Submission Local Plan continues to designate Bow Goods Yard as Strategic Industrial Land, which aligns with Newham's approach to similarly protect it and prioritise the delivery of the use of the safeguarded rail heads, large scale industrial, freight distribution and small-scale light industrial uses.



5.21. Record of agreements and/or disagreements:

- London Borough of Newham and London Borough of Tower Hamlets will continue to work together regarding the development of this site to ensure our mutual policy aspirations are realised, alongside connectivity, public realm and local amenity benefits.

5.22. **Transport Interventions along and over the River Lea**

5.23. There is currently no way to cross the River Lea between the A13 at Canning Town and Twelvetrees at Bromley-by Bow.

5.24. Seven pedestrian and cycle bridges have been proposed to better connect Tower Hamlets to Newham. Three bridges (Lochnagar, Poplar Reach and Mayer Parry) have been progressed as a priority, as development sites in Tower Hamlets will gain better public access to town centres and public transport in Newham. Newham and Tower Hamlets' residents will gain better access across the river, better connecting them to opportunities on either side.

5.25. Newham's Regeneration team has also worked closely with LB Tower Hamlets, to progress delivery of the bridges and successfully bid for funding. Nearly £40 million in Levelling Up funding was awarded to Newham in 2022, funding the three priority Lower Lea bridges.

5.26. The various crossings have been referenced in Newham's transport policy T2, neighbourhood policies N2, N4, and N7 as well as the site allocations as appropriate. Similarly, the crossings have been included in Tower Hamlet's draft Reg. 19 Policy MC1 Sustainable travel, through indicative diagrams (in Figure 20: Connectivity map) and the implementation paragraphs, as well as the site allocations as appropriate.

5.27. Significant growth continues to be planned through both boroughs' Local Plans for the area around Canning Town Station (within Newham). With enhanced connectivity over the River Lea between the two boroughs, it is expected that the capacity of the station will need to be enhanced, and Newham are in discussions with TfL for the need for station improvements.

5.28. Record of agreements and/or disagreements:

- London Borough of Newham and London Borough of Tower Hamlets look forward to working together and with others to deliver bridge crossings of the River Lea.
- London Borough of Newham support the wording in the site allocations that supports connections between Tower Hamlets and Newham, including to Canning Town town centre and station.
- London Borough of Tower Hamlets agrees to support London Borough of Newham in seeking to secure further funding for improvements to Canning Town station to ensure it can support the growth occurring around it, in both our boroughs.

5.29. **Waste management and the Joint Waste Plan**

5.30. Policy SI 8 of the London Plan sets the strategic target for the equivalent of 100 per cent of London's waste to be managed within London's border by 2026, otherwise known as 'net self-sufficiency'.

- 5.31. In order to help achieve net self-sufficiency, the London Plan policy requires boroughs to demonstrate how their Local Plans will meet assigned waste apportionment targets. Newham's waste apportionment target is as follows: 383,000 tonnes of household, commercial and industrial waste management capacity by 2021 and 407,000 tonnes by 2041. Tower Hamlets' waste apportionment target is as follows: 195,000 tonnes of household, commercial and industrial waste management capacity by 2021 and 207,000 tonnes by 2041.
- 5.32. The East London Waste Authority (ELWA) was formed in 1986 as a Statutory Waste Disposal Authority (WDA), responsible for the disposal of waste collected by London Boroughs of Barking & Dagenham, Havering, Newham and Redbridge. In 2023, ELWA published an updated Joint Strategy for East London's Resources and Waste (2027-57). The Joint Strategy sets out the aims, objectives, priorities and actions for the Partner Authorities on preventing and reducing waste, increasing reuse and recycling, supporting improvements with infrastructure, and monitoring performance. Newham, the east London boroughs of Havering, Barking and Dagenham and Redbridge and ELWA work collaboratively to address Duty to Cooperate matters. This includes the east London boroughs keeping ELWA informed of the progress on the update of the East London Joint Waste Plan.
- 5.33. The existing East London Joint Waste Plan, which was adopted in early 2012, expired in 2021. The plan was drafted within a notably different planning framework context: before the National Planning Policy Framework was introduced, before the current National Planning Policy for Waste, and under earlier iterations of the London Plan.
- 5.34. Since 2020, Newham have held regular meetings with the London Boroughs of Barking and Dagenham, Havering and Redbridge on updating the adopted 2012 East London Joint Waste Plan (ELJWP). In 2021 Newham and the east London boroughs collectively commissioned Anthesis to provide an updated evidence base to support the preparation of the East London Joint Waste Plan. This was followed up in 2022 with a supplementary piece of work which sought to correct errors in calculating capacity for the sub-region.
- 5.35. In 2022, Newham also met with Officers from the GLA to discuss next steps with regards to the preparation of the Joint Waste Plan. The GLA indicated that they were not supportive of the east London boroughs allocating waste sites through updates to our respective Local Plans. Instead, they advised east London to work collaboratively to produce an up-to-date Joint Waste Plan.
- 5.36. In 2022 the east London boroughs published the evidence base, which had been prepared to support the refresh of the east London Joint Waste Plan. This evidence base showed that there was sufficient waste management capacity in East London to meet the London Plan apportionment targets for Local Authority Collected Waste and Commercial and Industrial waste streams and to manage the equivalent of 100 per cent of Construction & Demolition waste arising over the next fifteen years. The findings of this evidence base informed the draft policies in Newham's Submission Draft Local Plan.
- 5.37. The Regulation 18 Joint East London Waste Plan outlines the waste sites within Newham that will be safeguarded to meet our apportionment target, as well as how Newham will seek to manage other waste streams. Our latest evidence, which has been refreshed as part of the preparation of the Regulation 18 draft ELJWP, sets out that East London has more than

enough management capacity to meet our apportionment target. 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. Given the location of a number of Newham's waste sites on identified site allocations within the adopted and emerging Local Plan, the draft Joint Waste Plan sets out two sites in Newham that have been identified as suitable for release given competing planning requirements (namely Newham's housing target).

- 5.38. Tower Hamlets is a unitary waste authority and not part of the ELWA. 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).
- 5.39. 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. This was largely so that LBTH could continue to progress preparation of its regulation-19 plan, and was in advance of the draft ELJWP (Regulation 18) being published. The Waste Study Update identified a waste site that had been overlooked in the 2023 study, which significantly reduces the borough's shortfall in capacity. It then tested a scenario in which no other borough was able to accommodate any of the remaining shortfall, relying on on-site segregation facilities to cover the shortfall in HIC waste and areas of search in industrial locations to cover the shortfall in Construction, Demolition and Excavation waste. The GLA has provided a response to this approach as part of their Regulation 19 representations and have indicated that the use of on-site segregation facilities and areas of search are not sound. Given the level of surplus capacity identified in the ELJWP, and following receipt of the GLA's response, which indicates that it does not believe Tower Hamlets can meet its apportionment within the borough, Tower Hamlets is seeking for a transfer of capacity of 26,363tpa of HIC waste and 56,935tpa of Construction, Demolition and Excavation waste.
- 5.40. The geographic proximity and the existing cross-boundary flows of waste between Tower Hamlets and the ELWA boroughs mean that it is important for the parties to work effectively on this strategic matter.
- 5.41. Record of agreements and/or disagreements:
- London Borough of Newham and London Borough of Tower Hamlets agreed to engage in more formal discussion on waste capacity through the Joint Waste Plan making process.
- 5.42. **Tall buildings strategy**
- 5.43. London Plan (2021) Policy D9 requires boroughs to identify location where tall buildings may be an appropriate form of development in order to optimise the use of land and meet the housing need.

- 5.44. Policy D9 part A, in particular, requires boroughs to identify in their development plan what is considered a tall building for their specific localities and Policy D9 part B requires boroughs to define the maximum height that could be acceptable in these locations.
- 5.45. Policy D9 part C sets out a comprehensive list of criteria for tall buildings to meet – visual, functional, environmental and cumulative impacts to make sure that tall buildings play a positive role in shaping the character of an area.
- 5.46. In 2022 Newham published Newham Characterisation Study (2022) as evidence base document to support the refresh of the Local Plan for Regulation 18 consultation. The document is a borough wide assessment developed in line with the Characterisation and Growth Strategy LPG and includes a tall building assessment which replaces the Tall Building Study (2018). Newham Characterisation Study has been supplemented with the Tall Building Annex (2024) for Submission Draft Local Plan. This document summarises the sieving exercise that has been undertaken to identify suitable locations for tall buildings based on an assessment of existing height, proximity to public transport, impact on open space and heritage assets.
- 5.47. The Tower Hamlets Regulation 19 Plan proposes a varied approach to indicating parameter heights on site allocations to allow for more tall buildings opportunities and therefore housing capacity. This includes removing the reference to specific appropriate heights on Tall Building Zone B (Canary Wharf), the six site allocations within that zone, and three other site allocations at Limeharbour, Marsh Wall East, and the Leamouth Road Depot/Blackwall Trading Estate. All other Tall Building Zones and site allocations continue to have appropriate heights indicated within the Local Plan. At the same time, some areas that were indicated as part of Tall Building Zone F during the Regulation 18 consultation have now been removed from the Zone in order to protect the setting of heritage assets. The approach taken is set out in a Tall Buildings Topic Paper that was published alongside the Regulation 19 consultation.
- 5.48. Newham have reviewed the Tower Hamlets Draft Submission Local Plan during the consultation period and note there have been changes made to the approach to tall buildings between the Regulation 18 and Regulation 19 Local Plans. Of relevance to Newham, is the Blackwall Trading Estate site allocation (3.5), which in the Regulation 18 Local Plan had height parameters ranging from 71m at the southern part of the site to 46-69m in the north-western part of the site. The Regulation 19 Local Plan removes height parameters from this site and it has an increased its capacity from 700 to 775 homes. The diagram also show an additional tall building location compared to the Regulation 18 Local Plan.
- 5.49. Newham are concerned that, by removing the height parameters and increasing the site capacity, the height of development on this site allocation could reach 90m AOD as per the adjacent Zone E, Leamouth. This site will be facing Newham's Riverside East site allocation where we have identified a suitable maximum height of 50m, reflecting its location and context. In addition, removing the variation in height risks creating a line of developments with consistently significant height along the River Lea (ranging from 70 to 90m AOD), reducing the amenity value of the Leaside walk, which is a key new greenspace for both boroughs, especially in light of open space deficiencies.

- 5.50. This contrasts to the approach taken at the Bromley by Bow (3.4) site allocation, where Newham support the approach taken to sensitively locate the tall buildings away from the Three Mills Conservation area, riverside park and walk way.
- 5.51. Tower Hamlets note that the removal of the height parameters and increased capacity on particular sites, including 3.5 Blackwall Trading Estate, is linked to the objective of increasing housing capacity, but no analysis has been undertaken of what the additional height could be, nor what the resulting additional site capacity could be. The extra capacity on this site in the Regulation 19 Local Plan results from a reassessment of the protected view of Balfron Tower from the bridge. The view point has been moved to the west for a better visibility of the listed building, allowing for an additional tall element on part of the Blackwall Trading Estate site allocation. Any proposal on this site will still need to accord with the remainder of the Local Plan tall buildings policy, which includes a requirement when determining heights to consider the need for varied heights, to avoid harm to heritage assets and areas of ecological importance, impacts on daylight, sunlight and overshadowing, and the need to maintain sky views from street level, as well as an extensive list of design requirements for individual tall buildings to adhere to.
- 5.52. Record of agreements and/or disagreements:
- London Borough of Newham and London Borough of Tower Hamlets agreed to work together to coordinate the delivery of site allocations on the boroughs' shared boundary, through ongoing duty to cooperate discussions as part of plan-making and through formal consultation processes linked to any applications.
- 5.53. **Newham's Metropolitan Open Land Review**
- 5.54. London Plan (2021) Policy G3, Metropolitan Open Land, of the London Plan sets out that Metropolitan Open Land (MOL) is afforded the same status and level of protection as Green Belt. Policy G3 requires boroughs to work with partners to enhance the quality and range of uses of MOL. The policy sets out that any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.
- 5.55. London Green Belt can be thought of as a permanent area of open land that surrounds the city whereas MOL relates to strategically significant open spaces within the built environment of London.
- 5.56. In 2022/23 Jon Sheaff and Associates and London Wildlife Trust, undertook an initial review of Newham's Metropolitan Open Land to regularise the existing designations, understand if there were any omissions and to ensure that the existing designations met the criteria of the NPPF and London Plan. This work was revised and updated in 2024 and Newham's Metropolitan Open Land Review (2024) was published as evidence during Newham's Regulation 19 Consultation.
- 5.57. Tower Hamlets recognise that the proposed changes to the current MOL boundaries are minor in nature and the proposed omission relates to a roundabout, which is some distance from the LBTH area. As such, LBTH have no concerns with regards to the proposed changes to MOL proposed by LB Newham.

5.58. Record of agreements and/or disagreements:

- London Borough of Tower Hamlets agrees with the methodology used in Newham's Metropolitan Open Land Review and have no objections in principal to the changes proposed.

**6. Governance agreements**

6.1. This statement of common ground will be reviewed:

- 6.1..1. Whenever agreement is reached on any outstanding matters. Or
- 6.1..2. At key milestones in progress towards addressing strategic matters. Or
- 6.1..3. At each subsequent key stage of the plan making process, as it progresses towards adoption.



6.2. The table below outlines existing cooperation forums, beyond the processes of Local Plan plan-making, which will be used to continue to engage each other and progress the key strategic matters.

Key Strategic Matter	Forum	Details/frequency of the forum
Housing target	GLA's London Plan borough engagement programme, including through the All London Boroughs Planning Officers meetings.	ALBPO meets monthly to discuss a range of issues of importance to the London boroughs and the GLA. The GLA will provide the timeframe and format for engagement on the new London Plan in due course.
Gypsy and Traveller need	GLA's London Plan borough engagement programme, including through the All London Boroughs Planning Officers meetings.	ALBPO meets monthly to discuss a range of issues of importance to the London boroughs and the GLA. The GLA will provide the timeframe and format for engagement on the new London Plan in due course.
Bow Goods Yard SIL	Development management formal engagement processes	As and when relevant applications are submitted
Transport Interventions along and over the River Lea	Regeneration processes/business case development/transport and highways work programmes with TfL	TBC
Waste management and the Joint Waste Plan	East London Joint Waste Plan making processes	The working group meet regularly, and will set up further duty to cooperate discussions with boroughs seeking to use east London's Identified Capacity Surplus.

	London Waste Planning Forum	Held quarterly to discuss strategic waste matters affecting London.
Tall buildings strategy	Development management formal engagement processes	As and when relevant applications are submitted

## 7. Signatories

7.1. We confirm that the information in this statement and referred to documents reflects the joint working to date undertaken between London Borough of Newham and London Borough of Tower Hamlets towards addressing the identified strategic matters.

<p><b>Signed on behalf of London Borough of Newham:</b></p>  <p><b>Name: Ellie Kuper Thomas</b></p> <p><b>Date: 15.01.2025</b></p> <p><b>Position: Policy Manager, Planning and Development Directorate</b></p>	<p><b>Signed on behalf of London Borough of Tower Hamlets:</b></p>  <p><b>Name: Natalya Palit</b></p> <p><b>Date: 18.12.2024</b></p> <p><b>Position: Plan-making manager</b></p>
--	---



**Appendix 1: Agenda and minutes of Statement of Common Ground  
meeting held on 4<sup>th</sup> October 2024**

**Statement of Common Ground between:**  
**London Borough of Newham and London Borough of Tower Hamlets**

**Meeting Date:** 04.10.2024

**Time:** 14:30-16:00

**Venue:** Microsoft Teams

**Present:**

Ellie Kuper Thomas, Policy Team Manager, LBN

Claire Laurence, Principal Policy Planner, LBN

Cinzia De Vincenziis, Principal Policy Planner, LBN

Sara Chiong, Senior Planner, LBN

Marissa Ryan-Hernandez, Plan Making Team Leader, LBTH

Natalya Palit, Plan-making Manager, LBTH

Steve Heywood, Principal Policy Planner, LBN

Marc Acton Fillion, Principal Policy Planner, LBTH

**Agenda and Notes**

<b>Agenda Item</b>	<b>Notes</b> [context, position statements, areas of agreement and/or disagreement]	<b>Actions emerging</b> [what, who, and any deadline]
1. Introductions (5min)	<ul style="list-style-type: none"><li>Self-introduction by the LBN and LBTH teams.</li><li>LBN introduced the objective of the meeting.</li><li>LBN shared the agenda of the meeting.</li></ul>	
2. Waste Planning (15min)	<ul style="list-style-type: none"><li>LBN clarified the status of the waste safeguarding on the Beckton Riverside site allocation:<ul style="list-style-type: none"><li>The Beckton Riverside site was identified in the Adopted Joint Waste Plan (JWP) as a Schedule 2 waste site to meet the arising need - it was not an existing waste site but was safeguarded for future additional capacity. It has never come forward as a waste site.</li><li>The new Regulation 18 JWP has identified sufficient waste management capacity to cover off East London's apportionment target and CDE capacity needs, with a significant capacity surplus. Therefore, in the emerging Joint Waste Plan and Local Plan we are proposing not to take forward the Schedule 2 sites from the adopted JWP – (including the Beckton Riverside site) hence no longer including that safeguarding.</li></ul></li><li>LBN clarified that through the emerging JWP we are seeking to release 2 small waste sites which will both come forward for other uses and are on adopted strategic sites in the Local Plan/LLDC Local Plan.</li></ul>	LBN and LBTH agreed to engage in more formal discussion on waste capacity through the JWP plan making process.

	<ul style="list-style-type: none"> <li>• LBTH welcomes more formal discussions on capacity via the JWP plan making process</li> <li>• LBN clarified the timescale for JWP remain roughly the same as published (Regulation 19 in early 2025). We are still awaiting representations from a few requests for an extended deadline until 8 October 2024.</li> </ul>	
3. Gypsy and Traveller pitches capacity (10min)	<ul style="list-style-type: none"> <li>• LBN gave an update on their evidenced needs: <ul style="list-style-type: none"> <li>○ Conducted a Strategic Housing Market Assessment and Gypsy and Traveller Accommodation Needs Assessment (GTNAA) which identified the need for 23 pitches. The GLA identified need is currently 30 pitches.</li> <li>○ LBN has one site safeguarded and an option to extend by a couple of pitches.</li> <li>○ As the majority of site allocations in the emerging plan are in high flood risk zones which means they are not suitable for a new site.</li> <li>○ We have also worked with colleagues in our assets team to see if any smaller sites in the borough could help meet this need but also found limited opportunities for large enough sites outside of the flood zone.</li> <li>○ We are struggling to meet our need in borough.</li> </ul> </li> <li>• LBN asked whether LBTH has the additional capacity to take on LBN's need.</li> <li>• LBTH clarified on their position: <ul style="list-style-type: none"> <li>○ No additional allocations in LBTH's new plan; still safeguarding the current site and the extension.</li> <li>○ No additional capacity to take LBN's need for Gypsy and Traveller Accommodations</li> </ul> </li> </ul>	LBTH and LBN agreed to continue to engage via local plan making processes, should circumstances change.
4. Housing delivery (15min)	<ul style="list-style-type: none"> <li>• LBN clarified their latest housing delivery and trajectory position: <ul style="list-style-type: none"> <li>○ The housing trajectory in the emerging Local Plan highlights that we will not be able to deliver the London Plan target capacity within the London Plan timetable.</li> <li>○ The challenge is due to delivery phasing and not capacity. LBN have that capacity within a number of strategic housing sites but, due to a slowdown in start dates and build out rates from the assumptions made in the 2017 SHLAA, will not deliver</li> </ul> </li> </ul>	LBTH and LBN agreed to continue to engage via local plan making processes, should circumstances change.

	<p>that amount of capacity until 4-5 years after the London Plan period ends.</p> <ul style="list-style-type: none"> <li>• LBN asked whether LBTH has the additional capacity to meet LBN's need within the London Plan period.</li> <li>• LBTH clarified on their position: <ul style="list-style-type: none"> <li>○ No additional capacity to take on LBN's need on housing delivery</li> <li>○ Only a small buffer for the first 5 years in the London Plan period and then reduces in the last 5 years.</li> </ul> </li> </ul>	
5. Bow Goods Yard – SIL designation and emerging planning proposals (10min)	<ul style="list-style-type: none"> <li>• LBN summarised the issue: <ul style="list-style-type: none"> <li>• Network Rail submitted a planning application to the LLDC in April 2024 which seeks to deliver industrial intensification on the site while releasing some land for non-SIL uses (predominantly leisure and ancillary office).</li> <li>• The LBN Regulation 19 local plan designates the site as SIL and looks for no net loss of floor area in industrial capacity.</li> <li>• Part of the site is designated as a waste site which LBN flagged to the LLDC, to ensure its ongoing protection through the application process.</li> </ul> </li> <li>• LBN asked for any more updated information on the emerging proposal and LBTH's approach on Bow Goods Yard.</li> <li>• LBTH clarified that they do not have more updated information on NR's proposal/ intentions and the latest discussion on the site related to the highway issues around the junction at A12 and Wick Lane.</li> <li>• LBTH also clarified their approach to the site is to protect it all as SIL and are not intending to release any of it.</li> </ul>	LBN and LBTH will continue to work together to coordinate the delivery of these linked site allocations through ongoing duty to cooperate discussions and formal consultation processes linked to any applications.
6. Transport interventions along the River Lea (10min)	<ul style="list-style-type: none"> <li>• LBN summarised that both boroughs' Plans contain support for the delivery of the bridges.</li> <li>• LBN asked for LBTH's prioritisation of the bridges.</li> <li>• LBTH clarified their prioritisation: <ul style="list-style-type: none"> <li>○ No explicit prioritisation on them in the plan.</li> <li>○ However, in effect Ailsa street and the two Leven Road bridges are prioritised as there are permissions on those sites which support their delivery.</li> </ul> </li> </ul>	LBTH to support LBN's ongoing asks to TfL to prioritise improvements to Canning Town Station. LBTH to also reference this need in their strategic discussions with TfL.

	<ul style="list-style-type: none"> <li>○ There is changing prioritisation on projects in LBTH due to reduction in officer capacity.</li> <li>• LBTH acknowledged when the bridges are delivered it will increase demand of transport in Canning Town station and they will support requests to TfL to prioritise improvements.</li> </ul>	
7. Tall building areas in the LBTH Reg 19 Local Plan (10min)	<ul style="list-style-type: none"> <li>• LBN clarified the latest approach to tall building zones and asked to understand LBTH's approach to tall buildings/changes from LBTH's Regulation 18 to Regulation 19 Local Plans.</li> <li>• LBTH clarified the justification for changes from their Regulation 18 to Regulation 19 Local Plans: <ul style="list-style-type: none"> <li>○ Changes are mostly in the west.</li> <li>○ The Regulation 19 Plan does have a varied approach to indicating parameter heights on site allocations to allow for more tall buildings opportunities and therefore housing capacity.</li> <li>○ The removal of the height parameters and increased capacity on particular sites, including 3.5 Blackwall Trading Estate, is linked to this objective but no analysis has been undertaken of what the additional height could be nor what the resulting additional capacity could be. The extra capacity on this site in the Regulation 19 Local Plan results from a reassessment of the protected view of Balfron Tower from the bridge. The view point has been moved to the west for a better visibility of the listed building allowing for an extra tall element on part of the Blackwall Trading Estate site allocation.</li> <li>○ Also of note and importance to LBN: In a change from the LLDC adopted Local Plan, in the LTH emerging Local Plan, the tallest building at the Bromley by Bow site allocation has moved away from Three Mills due to heritage concern, and evidenced through a site capacity study.</li> </ul> </li> </ul>	<p>LBTH and LBN agreed that the most appropriate route to raise these concerns, regarding the potential impact of the new approach to tall buildings, was through a formal LBN response to LBTH's Regulation 19 consultation.</p> <p>LBN and LBTH agreed to work together to coordinate the delivery of these site allocations on the boroughs' shared boundary. Through ongoing duty to cooperate discussions and formal consultation processes linked to any applications.</p>
8. Newham's MOL Review (5min)	<ul style="list-style-type: none"> <li>• LBN outlined that as LBTH is aware, we reviewed our MOL boundaries, and this was discussed in advance of the Regulation 18 consultation with all affected boroughs and the GLA.</li> <li>• Following the consultation feedback at Regulation 18, we published at Regulation 19, the full MOL assessment which included reviews of the sites we decided to retain un-amended.</li> </ul>	<p>LBTH agreed to review the MOL Assessment document and let LBN know if they have any queries.</p> <p>A statement regarding LBTH's position on the MOL Assessment will be added to the</p>

	<ul style="list-style-type: none"> <li>• To ensure full compliance with the London Plan, LBN is seeking LBTH's confirmation they are happy with that assessment.</li> <li>• LBTH has agreed to review the MOL review but state they expect they will be happy with our position to retain MOL land.</li> </ul>	Statement of Common Ground.
9. Flood risk/SFRA methodology (5min)	<ul style="list-style-type: none"> <li>• LBN summarised comments received from the EA at the Regulation 19 consultation which questioned our SFRA methodology, as the EA requires further review to assess if our methodology is sound. The EA gave no indication of who is meant to check the methodology and how. As the issues relate to the Lea model, the EA may also raise this with LBTH. LBN asked whether LBTH has had this feedback.</li> <li>• LBN are meeting the EA to discuss further and are aware there may be a resource request.</li> <li>• LBTH stated that they had no feedback from the EA yet but are happy to discuss further following LBN's meeting and / or the receipt of any comments on their Regulation 19 and to consider if there are efficiency opportunities for both boroughs to work together if the same issues are raised.</li> </ul>	<ul style="list-style-type: none"> <li>• LBN agreed to update LBTH on the outcomes from a future meeting with the EA.</li> <li>• LBTH to update LBN on any EA representations sought.</li> <li>• LBTH and LBN agreed to explore options for future shared work, if required by the EA.</li> </ul>
10. AOB, conclusions and actions (5min)	<ul style="list-style-type: none"> <li>• LBN suggested and LBTH agreed that the Statement of Common Ground should be finalised and signed after the end of LBTH Regulation 19 consultation to see if any other issues need to be picked up.</li> <li>• LBTH raised that there may be some sign off delays to ensure new senior officers are sufficiently briefed.</li> </ul>	<ul style="list-style-type: none"> <li>• LBN to write up minutes and statement of common ground and circulate. The sign off process will commence following the end of Regulation 19 LBTH consultation.</li> </ul>