

Reuse, Recycle and Waste Supplementary Planning Document

Consultation and Engagement Report

07/05/2021



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Introduction

Background and Context

- 1.1 The Reuse Recycle and Waste Supplementary Planning Document (SPD) sets out guidance for developers on how waste management should be addressed in proposals for new residential and mixed-use development. The SPD covers the entire borough and aims to re-examine and improve the way in which waste is produced and managed.
- 1.2 The SPD supports the implementation of the Tower Hamlets Local Plan policies on waste and recycling management by providing guidance on the implementation of effective waste management systems in a high-density setting. This overall strategic objective is to improve management of resources, including significant targets on levels of recycling, food waste, and use of landfill.
- 1.3 Preparation of a draft document was carried out between September 2020 and February 2021. Public consultation was then carried out during February-March 2021. A wide range of community groups, residents, industry professionals and other stakeholders engaged with the SPD and made formal responses as part of the consultation process. These responses have been reviewed and implemented where necessary.
- 1.4 It is now necessary to adopt the Reuse, Recycle and Waste SPD to enable the implementation of this guidance in development proposals. This will ensure that new residential developments implement best practice recycling and waste management systems in line with corporate and Council objectives and the development Plan (Local Plan and London Plan).

Role of the Consultation and Engagement Report

- 1.5 The SPD is subject to statutory preparation procedures under Regulations 11-16 of the Town and Country Planning (Local Development) (England) Regulations 2012. This Consultation and Engagement Report has been prepared to:
 - provide an engagement framework that describes the main consultation methods that have been used;
 - summarise the key issues raised by the community and stakeholders and;

- set out the Council's response to representations received, and how they have help shape the SPD.

Consultation and Engagement

Approach

1.6 The approach to consultation was developed in conformity with the Council’s Statement of Community Involvement (SCI) (2019), the Council’s Consultation and Engagement Handbook and in collaboration with the Communications Team. The overarching aim of consultation is to provide an opportunity for involvement from a wide range of local community groups and individuals.

How we involved the community and stakeholders

1.7 There are several stages to consultation and engagement activities to progress SPDs. The table below sets out the stages that applied to the Reuse, Recycle and Waste SPD and identifies where and how the community and key stakeholders had the opportunity to get involved.

Table 1 – Reuse, Recycle and Waste SPD Consultation Stages

Stage		Purpose of communication	How the stakeholders had their say
Stage 1 – Project scoping	April 2020 - June 2020	This stage focused on agreeing the project vision, scope and methodology.	Internal one-to-one meetings and briefing sessions.
Stage 2 – Evidence-Gathering	June 2020 - October 2020	This stage focused on working through the different parts of the SPD with stakeholders. Given the type of SPD this involved understanding the key principles, or common threads through the document. But also developing the understanding around technical solutions, the interaction with the planning process, and the different estate management scenarios in the borough.	For external stakeholders, by writing to us, completing a survey and attending workshops. Internal stakeholders were consulted through workshops.

		<p>This stage was through surveys with local authorities and workshops with external stakeholders, including developers, waste system specialists, housing associations, and architects.</p> <p>This was also through workshop sessions with internal stakeholders including waste services, development management and highways.</p>	
Stage 3 – SPD Drafting and Testing	August – December 2020	This stage focused on presenting draft guidelines to internal stakeholders for feedback and revision.	Internal workshops and meetings.
Stage 4 - Statutory Consultation	11 th January – 21 st February 2021	This stage focused on publicising the proposed recommendations and guidance and seeking feedback on them.	By writing to us, completing a survey, and attending consultation events.
Stage 5 – Adoption of SPD	May – July 2021	This stage focuses on disseminating the findings of the Statutory Consultation and deciding on adoption of the guidance and recommendations.	Briefing to members, corporate and directorate leadership teams and briefing sessions with internal teams.

1.8 Throughout the SPD preparation process, consultation techniques and activities were carried out to ensure an effective and efficient engagement. This was particularly important due to the inability to hold in-person events as a result of the COVID-19-related restrictions. Some of the methods employed included:

Meeting with elected members

Regular engagement with the Lead Member for Planning and Social Inclusion and wider members to ascertain community priorities and aspirations, to ensure these were reflected in the SPD.

Online survey and Q&A session

An early-stage online survey was conducted through the Let's Talk Tower Hamlets platform to gather ideas and feedback from local communities as the SPD was developed. An additional survey was held online for the formal consultation phase.

Internal working group

Regular meetings were held with internal council officers to seek feedback on the concepts and the document. This included officers from Strategic Planning, Highways, Public Realm and Development Management.

External stakeholder workshops and presentations

Workshops and presentations were held for various external stakeholders. One online presentation and Q&A session was held for stakeholders in the industry, such as developers, architects, waste industry professionals, etc. Another online event was held for residents and other interested stakeholders.

On-line updates

The Council's website and social media platforms such as Facebook, Twitter and LinkedIn were regularly updated to inform people of the consultation process and progress of the document.

Flyers and posters

Online consultation event details were included on posters that were placed around the boroughs parks and gardens to inform residents and other stakeholders.

Email and Letters

Those on the Local Plan Consultation database as well as local community groups, , neighbourhood forums and other locally based organisations were contacted to inform them of consultation events and activities

Consultation Programme

Approach

1.9 The consultation activities were broken down into five stages. The sections below outline the role of each stage of the SPD development process as well as key stakeholder groups, methods employed and timeframes for each.

Stage One – Project Scoping and Best Practice Review

1.10 The purpose of the communication at this stage of the project was to agree on the project vision, scope and methodology, and move on to a best practice review from other documents and other authorities. One-to-one meetings and briefing sessions were held with the Lead Member for Planning and Social Inclusion as well as officers from Strategic Planning; Environmental Services Improvement; and Development Management.

1.11 The project team led a desk-top review of a variety of existing SPDs on recycling and waste guidance, from within the UK and abroad. This analysis was presented to the project sponsors and informed ideas about options for the overall approach to the document, and types of guidance that may be used. In addition to this the project team sent surveys to over 20 London local authorities, with completed responses from 9 boroughs, on the approach to recycling and waste matters in new developments.

Table 2 – Stage 1 Reuse, Recycle and Waste SPD Consultation Details

Stakeholder groups	Methods	Description	Dates
Internal teams including Strategic Planning; Environmental Services	Briefing	Briefing note describing the project shared ahead of meeting. One-to-one meeting held including presentation and discussion.	April 2020 – June 2020

Improvement; Development Management.			
Lead Member for Planning and Social Inclusion	Briefing	Briefing note describing the project shared ahead of meeting. One-to-one meeting held.	March 2020
London Local Authorities	Emailed Survey Questionnaire to Local Authorities	An emailed survey to authorities on approach to recycling and waste matters in new developments.	May 2020

Stage Two – Evidence-Gathering

- 1.12 The consultation at this stage was the period during which the project team’s scope, methodology and key approaches could be explored with external stakeholders and internal teams, including Environmental Services Improvement and Development Management. There was a well-developed foundation to progressing to this stage with the best practice review, and expertise of the project sponsor and project team. This allowed for Stage 2 to include testing and feedback of different approaches and areas of focus, which continues into Stage 3, with drafting of the document.
- 1.13 The subject area of the SPD sees a number of different disciplines intersect, including a technical and operational perspective; a policy, legal and planning perspective; and design and placemaking disciplines. This is in addition to the balance of Council-led and private stakeholders. This being the case it was necessary to structure this part of the consultation to include opportunities to discuss and test matters with some of the disciplines brought together.
- 1.14 The structure of the workshop sessions with external stakeholders allowed for a large ‘round table’ discussion, but with significant time dedicated to virtual ‘break-out’ rooms. These are where groups of 4 or 5 of different disciplines were invited to work through a handful of key topics and questions, supported by a facilitator in each group. At both the external stakeholder and Council team sessions, in addition to

contributions in person, participants were encouraged to follow up with questions and queries.

Table 3 – Stage 2 Reuse, Recycle and Waste SPD Consultation Details

Stakeholder groups	Methods	Description	Dates
Public Realm Officers (Environmental Services Improvement)	Workshop	A workshop session was held with Environmental Services Improvement officers to discuss approaches and understand key challenges,	30 th June 2020
Development Management Officers	Workshop	A workshop session was held with development management officers to discuss approaches and understand key challenges,	1 st July 2020
Developers, Waste Systems Operators, Sustainability Consultants, Housing Associations, Architects.	Workshop	An online workshop bringing together a number of external stakeholders. The event had more than 20 attendees, and included presentations from the project team, and ‘break-out’ room discussions, with a facilitator in each.	10 th July 2020
London Waste Planning Forum	Presentation and Questions	A monthly forum of London local authority and industry waste officers and professionals. A presentation of the projects aims and objectives. Discussion and questions followed and invite to contact and comment.	14 th July 2020

Environmental Services Improvement, Development Management, Highways, High Density Living Team	Workshop	A joint workshop to bring together key internal stakeholders. To further look at key challenges with the topic, as well as understand the dynamics around the different teams on the topic.	27 th August 2020
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Stage Three – Draft Testing

1.15 The purpose of the communication at this stage of the project was to present the draft SPD and recommendations to test them with a variety of internal and external stakeholders and gather feedback ahead of publishing the draft SPD for statutory consultation.

Table 5 – Stage 3 Reuse, Recycle and Waste SPD Consultation Details

Stakeholder groups	Methods	Description	Dates
Environmental Services Improvement Team	Drop-In Session	A drop-in session was held with Environmental Services Improvement Team to discuss the SPD's draft guidelines.	October 2020
Development Management	Workshop	A workshop session was held with officers from Development Management to discuss the SPD's draft guidelines. guidelines for the SPD to incorporate.	22 nd October
Highways	Discussion	A one-to- one discussion was held with Highways team leader to discuss the SPD's draft	27 th October

		design guidelines.	
Mayor's Planning Meeting and Lead Member for Planning and Social Inclusion	Briefing	The Mayor and Lead Member for Planning and Social Inclusion were briefed on the draft SPD.	18 th November 2020

Stage Four – Statutory Consultation

1.16 The statutory consultation period for the draft Reuse, Recycle and Waste SPD lasted for six weeks from 8th February to 22nd March 2021. In order to reach the widest possible audience in a context where due to COVID-19-related restrictions no in-person events could be held, a mixture of online and offline engagement methods were used, and two online events were organised. A page was set up for the consultation using the council's Let's Talk Tower Hamlets platform. The page contained a detailed explanation about the SPD and background to the project, the draft SPD to be downloaded, as well as information about the consultation events, an online survey and a question page. All events were hosted using Microsoft Teams where attendees could ask questions/make comments or write them using the chat function. A recording of the Industry Presentation was made available on the Let's Talk Tower Hamlets page to allow those who were unable to attend the event to watch it. The recording included an explanation of the background of the SPD, its objectives, how the document is structured and how to respond to the consultation. A Miro board was used at both the Industry and the Residents sessions to gather feedback and record comments.

1.17 In total, 39 people attended the events; 17 people responded to the online survey and provided 59 written comments in total; 12 representations were received via email. There were over 1,300 visits to the SPD's Let's Talk Tower Hamlets Page and 517 downloads of the draft document.

Table 6 – Stage 4 Reuse, Recycle and Waste SPD Consultation Details

Stakeholder groups	Methods	Description	Dates
General public, Local Plan Database and local community groups	Media campaign and targeted emailing	Publication on the council’s website and social media posts on Facebook, Twitter, and LinkedIn; mention in council’s external residents’ newsletter and Member’s Bulletin; targeted emails; posters in local parks and gardens. Re-tweets by councillors and mentions on their social media platforms.	8 th February – 22 nd March 2021
General public and Local Plan Database	Online consultation portal	Links to online material (Let’s Talk) including background to the project, the draft SPD, details of how to comment and links to online events and recording of Launch Event.	8 th February – 22 nd March 2021
General public and Local Plan Database	Online survey and contact details	Online (Let’s Talk) survey developed and hosted via the consultation portal. An email address was also provided for written representations. 17 people responded to the survey providing 59 written comments in total. 12 written representations sent via email were also received. There were over 1,300 visits to the SPD’s Let’s Talk Tower Hamlets page and 517 downloads of the draft document.	8 th February – 22 nd March 2021
Industry professionals	Public Workshop (Presentation and Q&A)	A workshop session was held with architecture, development, urban design and planning experts. The	24 th February 2021

		session focused on the draft SPD and guidelines for decision making in the document. The event was attended by 22 industry professionals. Comments recorded on a Miro Board.	
General public	Public Workshop (Presentation and Q&A)	One session held to present and discuss the draft SPD and guidelines for decision making. In total, 17 people attended the event. Comments recorded on a Miro Board.	17 th March 2021

Stage Five – Adoption

1.18 Following a review of the representations received through the statutory consultation process, the SPD was amended by the consultants. The preparation for adoption includes a briefing to members and corporate and directorate leadership teams on the outcome of the consultation and the recommendations for the way forward. Key changes being made to the SPD were also discussed with Strategic Planning and Development Management teams and they were also briefed on the SPD’s future monitoring and implementation after adoption.

Table 7 – Stage 5 Reuse, Recycle and Waste SPD Consultation Details

Stakeholder groups	Methods	Description	Dates
Strategic Planning and Development Management	Presentation and discussion	Sessions were held with officers from Highways and Development Management to brief the teams on the SPD’s overall guidelines and future implementation following adoption.	12 th and 24 th March 2021

<p>Statutory Environmental Bodies</p>	<p>SEA Screening Determination</p>	<p>To confirm that the SPD does not require an SEA, in accordance with the requirements of regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations 2004.</p>	<p>April 2021</p>
<p>Political, Corporate and Directorate Leadership</p>	<p>Briefing</p>	<p>Mayor's Planning Meeting, Lead Member one-to-one, CLT and DLT to brief on the outcome of the consultation and recommendations for the way forward.</p>	<p>March-June 2021</p>

Consultation and Engagement Feedback

Overview and Summary

- 1.19 This section of the Consultation and Engagement Report summarises the feedback received through the consultation on the SPD. This includes representations and comments submitted, and the Council’s response to these. The comments and representations received through the consultation process have been used to finalise the SPD.
- 1.20 The statutory consultation period for the draft Reuse, Recycle and Waste SPD ran from 08th February to 22nd March 2021.
- 1.21 39 people attended the consultation events held by the Council. Representations were received from a range of stakeholders including local residents and students, neighbourhood forums, statutory consultees, architects and developers: 17 people responded to the online survey and provided 59 written comments in total; 12 representations were received via email.
- 1.22 A summary overview of the key issues that were raised in the representations are detailed in the table below.

Reuse, Recycle and Waste SPD Consultation Feedback Summary

Key Issues	Council Response
There has been support from stakeholders for the role of the SPD and its use as a tool to support improved recycling and waste management outcomes. The views expressed include that the document is thorough and the balance of information in the document is about right. Alongside that comments have been received that the document should make it easier to identify the key information, with a focus on making the document easily navigable.	The main audience for this document are planners and applicants, as a tool to support the submission of planning applications. The topic of the SPD can range from detailed technical advice, to presenting key principles and planning requirements. Further work has been carried out to refine the layout, design and signposting in the document. Also, a review to ensure accessibility requirements are met.
In light of the nature of the document, a	Given the technical nature of the document,

<p>number of specific comments on the guidance have been received through the consultation process. This includes on the role of the guidance for flats above shops; for commercial developments; and storage capacities in the home.</p>	<p>the specialist expertise of the Council's consultant team, alongside the Public Realm team responsible for the Borough's waste operations has led the determination of the appropriate guidance for the document. The consultation process has been very valuable to hone the guidance in the document. In respect of the matters set out here, clarifications and edits to the document have followed to ensure consistency.</p>
<p>There were two responses from respondents that addressed how prescriptive the SPD may be, specifically the choice of waste technology through the decision tree. The view expressed is that the document should not seek to identify which developments should incorporate which technologies, that there might be specific constraints for certain developments.</p>	<p>An objective of the SPD is to deliver the benefits associated with improved waste technologies, particularly addressing the impacts of large residential developments dependent on significant numbers of bins and bin stores. The SPD is supported by Local Plan policy DMW.3 which requires new waste technologies for major developments. The SPD is to provide key direction on which technologies would be expected for which type of developments. This is provided in the context, set out in the document, that these are expected approaches, to guide the design process, and not prescriptive.</p> <p>The SPD includes 'secondary' waste system approaches. These are secondary options where design or other matters mean the first option may not be implemented. Following the responses received, additional edits were carried out to ensure the language of the document is clear that these are expected systems, but not prescriptive.</p>
<p>A response has been received that requiring a certain type of waste system should not create a financial burden that constrains the development. In addition that provision should be made to discuss the financial viability of a proposal at the</p>	<p>Provision of recycling and waste management is a core planning requirement and essential element for any development. Its role is elevated by the direction set out in Local Plan policy DMW.3 as such this must be calculated in the viability of the</p>

<p>pre-application stage.</p>	<p>development. The guidance is prepared with specialist advice on the scale of development that supports the different technology options. Importantly, as above, the SPD sets out expected approaches, and is therefore not prescriptive, and allows for secondary options where robust justification is offered. A key part of the SPD is providing important focus to the role of the pre-application stage in proposing and assessing the recycling and waste systems.</p>
<p>Respondents have included other LBTH teams. Recycling and waste covers a number of different specialist areas, in addition to waste management and planning. Highways officers have provided detailed commentary on the guidance in the document, to ensure it is clear and consistent along with waste services and planning objectives. This includes a number of measures such as collection from off the highway, dragging distances, and the access requirements. Following updates they have confirmed the guidance, particularly section B4 – Servicing of collection system.</p>	<p>The input of the Council’s highways team is a crucial component given the intersection between Highways and Waste services. An additional role of the SPD is as a trusted destination for Highways requirements for applicants and planners, to ensure design proposals follow the correct principles from the outset. A number of edits and modifications have been made post-consultation to ensure the guidance reflects the Highways team’s advice.</p>