APPENDIX ONE

Promoting a shared responsibility and removing barriers to improved recycling in the borough

Scrutiny Challenge Session Report.





London Borough of Tower Hamlets April 2016

1

Chair's Foreword

Councillor Denise Jones

Chair of the review panel, Scrutiny Lead for Communities, Localities and Culture

Recycling is a topic which is continually featured in the news. Waste management is one of the few council services that affect everyone. There is a perception that Local Authorities apply unnecessary and overly bureaucratic rules when it comes to recycling which residents don't understand.

The UK is bound by legislation and targets from Europe which has set a target of 50 percent of all waste produced to be sent for recycling by 2020 and Tower Hamlets rate is significantly below this. Whilst most Local Authorities need to improve performance, Members are acutely aware of the well-researched barriers to recycling such as the high proportion of flatted properties, the level of social deprivation, and the relatively transient population, which pose a particular challenge in the borough.

In addition, stricter controls regulating the quality of waste sent to recycling materials recovery facilities means contaminated loads are hit by unnecessary charges due to additional processing required.

Overview and Scrutiny wanted to investigate what the council could do to influence residents in their recycling habits. They also wanted to understand the key national and local policy, the barriers to recycling affecting our residents, what steps the local authority has already taken, and what other opportunities are available to improve both the quantity and quality of waste sent for recycling.

I am pleased to present this report which outlines the key challenges facing the borough and makes a number of practical recommendations for the council.

Members identified a number of recommendations which focus on increasing the amount of waste sent for recycling and improving its quality by reducing contamination rates. The recommendations focus on influencing behaviour through improved communications and education, investigating the worth of incentive schemes, better joint working with landlords, and service-redesign.

I would like to thank the officers and external speakers that contributed to the challenge session, especially Simon Baxter, Interim Service Head Public Realm, Owen Whalley, Service Head Planning and Building Control; and Jackie Odunoye, Service Head Strategy, Regeneration and Sustainability. I am also grateful to my Overview and Scrutiny co-opted colleagues for their support, advice and insights and to Vicky Allen, Corporate Strategy, Policy and Performance Officer for her endless support.

Recommendations

Recommendation 1: Review the Local Reward Scheme running in the borough with a view to implementing it more widely.

Recommendation 2: Promote and coordinate visits to the Material Recovery Facility for residents and estates staff.

Recommendation 3: Promote messages about recycling to residents through ESOL sessions.

Recommendation 4: Improve communication and education campaigns by making the additional costs associated with dealing with contaminated recycling waste explicit. Include clear explanatory messages about issues such as food waste and using black bin liners.

Recommendation 5: Promote recycling messages on paper communications from the council (e.g. envelopes).

Recommendation 6: Improve the size, quality, quantity and distribution of bags provided for residents for recycling waste, for example:

- Introduce smaller bags;
- Increase the number of bags produced to meet demand; and
- Increase the number of collection points bags can be obtained

Recommendation 7: Introduce a re-balancing of general and recycling waste bins on estates in the borough

Recommendation 8: Undertake a feasibility study to assess the suitability of a range of alternative service design improvements including re-use facilities in the borough.

Recommendation 9: Promote the THHF public-realm sub group, encourage attendance and the sharing of good practice amongst Registered Providers.

Recommendation 10: Amend Local Plan policy DM14 Managing Waste to provide more explicit guidance on waste and recycling facilities.

Recommendation 11: Work with developers to incorporate innovative general waste and recycling waste management systems into the Isle of Dogs opportunity area, area planning framework where possible.

Recommendation 12: Lobby Government to require packaging industry to include standardised recyclability messages on all recyclable material.

1. Introduction

- 1.1 Waste and recycling is a key service for local authorities and dealing with waste represents a significant expense for the council at a time when funding is continually decreasing. Sending recyclable material to landfill and other waste facilities is both expensive and damaging to the environment. Reducing waste collection costs by increasing recycling rates and reducing contamination could save an estimated £500,000 which could help limit the impact of public sector cuts.
- 1.2 Whilst it is recognised that the Council is one of the best performing recyclers of dry recyclates in London it faces a particularly difficult and costly operational environment in relation to high rise food waste collection and severely limited operational opportunities to increase green waste recycling given the lack of private gardens. In addition, Notwithstanding this there was a concern that the borough's overall recycling rate is well below the London and England average, and significantly below the EU's 50 percent recycling target for the country by 2020.
- 1.3 UK waste policies operate on the basis of shared responsibility. Everyone generates some amount of waste, so everyone has a part to play in preventing unnecessary waste by recycling more.
- 1.4 Ensuring residents increase the amount of waste they recycle whilst reducing the amount of recycling that is contaminated by 'recycling right' is key to achieving the savings identified above. However there are well researched barriers to recycling faced by local authorities, relating to the housing mix and demography which creates a real challenge. Nevertheless, the council must find ways of supporting residents, landlords and landowners to become more accountable.
- 1.5 The aim of the Challenge Session was therefore to explore ways in which the council and its partners could influence residents to increase the amount of recycling and to 'recycle right'; and how landlords and landowners can work together to facilitate this.
- 1.6 The session was underpinned by three core questions;
 - a) What actions can the council and its partners take to inform residents of the importance of recycling and to encourage residents to increase the amount of recycling they do and reduce the amount that is contaminated?
 - b) How can landlords, landowners, managing agents, and developers improve recycling facilities on their estates and how can they facilitate residents to recycle more, and recycle right. And how can the council support this?
 - c) What financial opportunities can the council access to support recycling activities and what are the options to use S106 planning obligations or the Community Infrastructure Levy?

- 1.7 The session was chaired by Councillor Denise Jones (Scrutiny Lead Communities, Localities and Culture) on Tuesday 19th January 2016. The session took the form of a round table discussion, informed by four presentations:
 - The challenges to recycling from Resource London;
 - Tower Hamlets policy and practice;
 - Information about the Local Green Points incentive scheme;
 - Veolia, the council's waste and recycling collection provider, provided details about their education and outreach work.
- 1.8 Also in attendance were representatives from Registered Social Landlords (RSLs) and Developers. The session was supplemented by a visit to the Bywaters Materials Recovery Facility. Other Overview and Scrutiny Committee Members that were present at the session are:

Nozrul Mustafa	OSC Co-opted Member
Reverend James	OSC Co-opted Member
Olanipekun	

1.9. The session was supported by

1.10. Evidence was received from a range of officers and experts:

Andres Taborda	Poplar Harca		
Dave Bowman	Resource Recovery Client Manager, Bywaters		
Gemma Scott	Local Authority Support Manager, Resource London		
Graham Simmonds	Managing Director, Local Green Points		
Joanna Morris	Communications, Education and Outreach Manager, Veolia		
Maeve Kavanagh	Local Green Points		
Nicholas Spencerley	Tower Hamlets Homes		
Paul Maton	Estates Director, Ballymore Asset Management Ltd		
Paul Wilson	East End Homes		
Adele Maher	Strategic Planning Manager, Planning and Building Control, Tower Hamlets Council		
Fiona Heyland	Head of Waste Strategy Policy and Procurement, Tower Hamlets Council		
Jackie Odunoye	Service Head Strategy, Regeneration and Sustainability, Tower Hamlets Council		
Liz Nelson	Interim Head Clean and Green, Tower Hamlets Council		
Owen Whalley	Interim Service Head, Planning and Building Control, Tower Hamlets Council		
Simon Baxter	Interim Service Head, Public Realm, Tower		

	Hamlets Council	
Tracey St. Hill	Principal Registered Officer, Tower Hamlet	Partnership

2. Legislative and Policy Background

European Policy

2.1 Government bodies across the European Union are bound by a set of treaty obligations and directives governing waste and recycling. The definition of recycling is set out in the EU Waste Framework Directive as:

'any recovery operation by which waste materials are reprocessed into products, materials or substances whether for the original or other purposes. It includes the reprocessing of organic material but does not include energy recovery and the reprocessing into materials that are to be used as fuels or for backfilling operations'.

2.2 The EU Directive has set specific recycling targets and requires that Member States take the necessary measures designed to achieve the following targets in relation to household waste:

'by 2020 the preparing for re-use and recycling of waste materials such as at least paper, metal, plastic and glass from households and possibly from other origins as far as these waste streams are similar to waste from households, shall be increased to a minimum of overall 50 percent by weight'.

- 2.3 A further target of 60 percent of municipal waste has been included in the EU package on the Circular Economy for 2025 and by 2030 this rises to 65 percent of municipal waste. According to a House of Commons report¹, 'fines for non-compliance including failing to meet the recycling targets are not automatic but would follow a set process'. These targets have also been adopted nationally and regionally through the Waste Management Plan for England and the London Mayor's Municipal Waste Management Strategy.
- 2.4 The Directive establishes the 'waste hierarchy'; the identification of five waste management activities in descending order of preference. The preferred activity is waste reduction; and the least desirable is landfill disposal.

7

¹ Household recycling in the UK (October 2015)

The Waste Hierarchy



UK and Regional Policy

- 2.5 The Environmental Protection Act 1990 defines the structure and authority of waste management in the areas of collection, recycling and disposal. Section 45A requires a local authority to provide recycling services, placing a duty on all England waste collection authorities to collect at least two types of recyclable waste separately from other household waste. In 2015 Regulation 13 of the Waste Regulations 2012 increased the requirement for providing recycling collection services to cover the collection of paper, metal, plastic and glass materials separate from other waste and potentially in separate streams, if necessary, in order to achieve 'high quality recycling'.
- 2.6 The Review of Waste Policy in England 2011 sets out 13 commitments to moving towards a 'zero waste' economy, prioritising efforts to manage waste in line with the waste hierarchy. Required under EU law, the Waste Management Plan for England 2013 (DEFRA) brings together existing waste management policies under a single umbrella. The document sets out where the country is in terms of waste generated in England how the country manages those materials.
- 2.7 The Waste Hierarchy has been incorporated through the planning system via an update to Planning Policy Statement 10: Planning for Sustainable Waste Management. The policy provides a framework to enable waste planning authorities to work collaboratively with their communities and consider, through their Local Plans, what sort of waste facilities are needed and where they should go, while also protecting the local environment and local amenity by preventing waste facilities being placed in inappropriate locations.
- 2.8 The London Mayor's Municipal Waste Management Strategy 2011: London's Wasted Resource, outlines proposals and policies for the recovery, treatment and disposal of municipal waste for London.
- 2.9 Waste collection and disposal responsibilities amongst the London Boroughs are split between joint statutory partnerships and independent waste authorities. At present, there are four statutory

partnerships encompassing 21 London Boroughs. The boroughs of Croydon, Kingston, Merton and Sutton form a fifth voluntary partnership known as the South London Waste Partnership. The London Borough of Tower Hamlets is one of eight authorities which independently manage their waste collection and disposal obligations.

2.10 Since 1996 the Government has imposed a tax² on all waste sent to landfill sites. The tax was set to encourage efforts to minimise the amount of waste produced and the use of non-landfill waste management options which might include, recycling, composting and recovery. This tax is paid per tonne in addition to the gate fee charged; the current standard fee for Landfill Tax is £82.60 per tonne.

Local Context

2.11 As a waste authority, Tower Hamlets has a duty to collect all waste including recycling, from all residential premises (and with the exception of garden waste) free of charge. This duty does not extend to waste created at business premises for which the council provides a separate, chargeable service. It is an offence to mix business waste with household waste.

The Council's Waste and Recycling contract

2.12 There are currently two contracts in place that allow the council to discharge its obligations to collect household and commercial waste. One contract is the municipal waste management (cleansing) contract and the second contract is for the co-mingled dry recyclable materials and food and garden waste that is collected for composting. Both contracts are held with Veolia.

Integrated Recycling Contract

- 2.13 This contract covers the collection of co-mingled dry recyclable material from all domestic properties; the collection of food and garden waste from street level properties; and processing of food and garden waste.
- 2.14 Veolia provide a weekly collection service for a range of co-mingled dry recyclable materials from all domestic properties identified by the council. This obligation includes all domestic properties that are managed by Registered Providers including Tower Hamlets Homes. This service uses a variety of receptacles for the collections including pink recycling sacks, wheeled bins and communal bulk bins for flats and estates.
- 2.15 They also collect food and garden waste from a proportion of properties within the borough. The limited numbers of properties receiving this service are predominantly those street level properties that have gardens but the service does include a small number of flats. Food and garden waste is taken to Veolia's Greenwich depot where it is

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² Finance Act 1996 (sections 39-41)

combined with green waste from other local authorities, compressed into bundles and then sent to a plant in Barking and Dagenham for processing.

Waste Treatment and Disposal

- 2.16 Tower Hamlets historically relied on landfill as the main method for disposing of its waste. However through the negotiation to extend the waste disposal contract that took place in 2012, Veolia now arrange a number of different waste disposal routes for Tower Hamlets residual waste. The waste technologies that are used include Energy from Waste (EfW) and Mechanical Biological Treatment (MBT) the 'other recovery' stage of the Waste Hierarchy. These technologies are more environmentally friendly than landfill (the 'disposal' stage) and are also not subject to the Landfill Tax and so are more cost effective.
- 2.17 Under this contract Veolia also operate the Re-use and Recycling Centre in Yabsley Street which is open to the public seven days a week. Residents can dispose of larger items of household waste at this site.
- 2.18 The co-mingled dry recycling that is collected from households and businesses is currently sorted at a Materials Recovery Facility (MRF) operated by Bywaters (Leyton) Ltd.
- 2.19 The borough works closely with organisations such as Resource London, the Local Authority Recycling Advisory Committee (LARAC) and the GLA as well as other London boroughs, sharing best practice, benchmarking activities and information on services and on issues of collaboration, for example around procurement. In April there is a Pan-London Love Food, Hate Waste campaign launching which Tower Hamlets will be a part of.

3. Barriers to recycling

- 3.1 The House of Commons report identified a number of barriers to recycling faced by councils relating to housing mix and demography. It reported that rates tend to be lower where there are challenges with social deprivation, urban classification in the index of multiple deprivation, education and language barriers. In Tower Hamlets there are over 100 community languages spoken, and the borough is ranked highly in index of multiple deprivation.
- 3.2 Another common challenge for Local Authorities is the negative correlation between lower recycling rates and high density housing with little space for recycling receptacles. In Tower Hamlets, 86 percent of households live in flats, one of the highest proportions in London. The report also correlated lower recycling rates in areas where there is an increase in multi-occupancy dwellings, transient populations and in urban inner-city areas. Tower Hamlets has relatively high levels of

- population mobility or 'turnover'3. In 2013/14 the turnover rate was 229 per 1000 population the 10th highest rate in England and Wales, and 8th highest in London.
- 3.3 Over the decade to 2014, the Tower Hamlets population has increased by 34.5 per cent the largest increase of all local authority areas in England and Wales and is projected to increase equally dramatically over the next few years.
- 3.4 An OECD report 'Greening Household Behaviour⁴' identified household size as a key characteristic in determining waste generation; while overall larger households naturally produce more waste, the waste generated per person is usually lower in larger households. Higher education levels has also been found to be associated with lower waste generation, as well as a strong positive association between home ownership and recycling rates.
- 3.5 Resource London has identified improving the yield of dry recycling from flats as one of their main areas of work.

Recycling performance

3.6 Over the last six years the borough has seen a 6.5 percent increase in the percentage of household waste it sends for recycling, reuse and composting; bringing it from 26.4 percent in 2009/10 to 28.1 percent at the end of 2014/15. The rate of improvement is broadly in line with England and London but is still significantly below both the London average (33.1 percent) and the England average (42.7 percent).

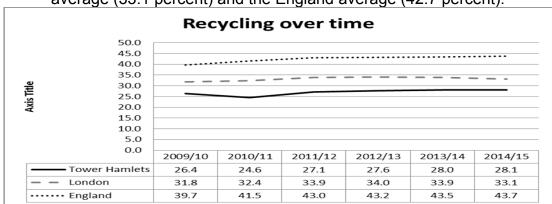


Figure 1: (source: WRAP) Recycling performance over time

3.7 Figure 1 above shows that performance across the country has plateaued in the last three years; with Tower Hamlets seeing just a 1.8 percent increase in recycling over this period. In London, thirteen of the 33 London local authorities have seen their recycling rates decrease two years in a row; only eight local authorities have seen an increase in performance over the past two years.

³ Population turnover rates capture the size of the population flows in and out of the borough each year, relative the size of its population.

⁴ OECD (2014), Greening Household Behaviour: overview from the 2011 survey

3.8 Department for Environment, Food and Rural Affairs (DEFRA) statistics on collected waste for 2015 show that whilst households in Tower Hamlets produced a much lower amount of waste compared to the London average (just over half), they also recycled a lower proportion (28.1 percent, against 32.8 percent for London). Of the 20,146 tonnes of household waste which was sent for recycling / composting or reuse in Tower Hamlets, 95 percent was dry recycling compared to the London average of fewer than 66 percent. The green recycling (food and garden waste) was five percent compared to the London average of 34 percent.

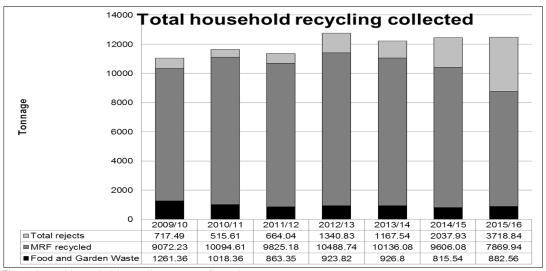


Figure 3: total household recycling waste collected

- 3.9 The graph above shows the total amount of recycling waste collected from Tower Hamlets households since 2009. Whilst there has been a steady increase in the total tonnage collected, the level of contamination has more than trebled in the last three years.
- 3.10 A major factor in the low proportion of green waste collected is attributable to the high proportion of flats in the borough. Whilst it is recognised that more can be done to improve the proportion of green recycling waste compared to dry, this report focuses mainly on dry recycling waste as this is the area where a bigger gain and impact is possible.

4. Key Findings and Recommendations

The recycling process

4.1 Recycling is the process of converting waste into a reusable material. Improving residents understanding of the recycling process is key to helping them to appreciate the importance of recycling right. To facilitate this, a visit to Bywaters, the council's contracted materials recovery facility (MRF) was arranged.

- 4.2 The Bywaters MRF processes mixed dry recycling waste into a form that can be sold on for recycling into another reusable material. It processes cardboard, mixed plastics (e.g. PET, HDPE,⁵ and film), paper, aluminium and ferrous cans, tetrapack, and glass on its 9.2 acre site in Bow. As a 'dry' MRF, food and green waste are not processed at the Bywaters site.
- 4.3 When a lorry arrives at the MRF, its load is deposited away from the general pile of recycling waste for a visual inspection so that an assessment of the level of contamination can be made. The load is also photographed so that assessments can be evidenced and negotiated if necessary because the cost of depositing the load varies depending on the level of contamination. Waste contained within black bin liners is assumed to be contaminated and classified as general waste.
- 4.4 Once this process is complete, the load is combined into a larger pile of material for the separating process to begin. The MRF separates the materials into different material types. This is done through a combination of sorting machinery and by hand. Once the materials are sorted by material type, they are baled and sold onto approved suppliers to be processed into new recycled products.
- 4.5 The sorting process begins with the removal of incorrect items. A vibrating machine separates cardboard and paper. The remaining recyclables continue onwards where steel cans are removed using magnets. Different types of plastics are identified and separated using optical scanners. Aluminium cans are separated as is glass. Smaller materials falling through a grid of 45mm² are recorded as 'fines' and are processed as 'low grade recyclates'. Finally other materials end up in a large container for waste disposal (the majority of which is energy from waste and a small percentage to landfill).
- 4.6 Incorrect items being put through the MRF have to be removed by hand. This is a time consuming job which slows down the recovery process; there is a risk that incorrect items could damage the machinery contributing to the increased fees charged. During the visit the party saw evidence of black bin bags and carrier bags getting caught up and starting to clog the cardboard and paper sorting machinery.

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⁵ Polyethylene terephthalate (PET) type of plastic found in fizzy drink and water bottles and salad trays. High Density Polyethylene (HDPE) type of plastic found in milk bottles, bleach containers and most shampoo bottles.



Figure 4: Bywaters MRF paper and cardboard sorting machinery

4.7 There has been a drop in the value of recyclable material due to the falling price of oil and the slowdown of the Chinese economy. In addition, new legislation covering reporting by Materials Recovery Facilities on the quality of recyclable materials produced by them, are making MRF operators more vigilant about the quality of recyclable materials they receive from local authorities.

Improving recycling through incentives and charging

4.8 One of the objectives for this review was to explore to what extent the council and its partners could influence residents' recycling behaviours through both charging and incentive schemes.

Pay as you throw (PAYT)

- 4.9 A House of Commons briefing paper identified the UK's weaker policy levers as a barrier faced by local authorities to improving recycling rates. High performing EU states are able to use stronger incentives such as PAYT schemes where households are charged for having nonrecyclable waste collected.
- 4.10 The OECD report presented findings from a household behaviour survey including attitudes to waste and recycling. The survey was conducted in 2011 and covered 12,000 households across 11 OECD countries. PAYT schemes were found to be common in three of the surveyed countries: Switzerland (53 percent of households), Korea (42 percent) and Japan (35 percent). The report found that households operating under PAYT disposed of less mixed waste than those which were charged a flat rate. Where the fee was charged, the volume of general household waste reduced: in Japan the reduction was around 40 litres per week for the average household and in Switzerland, the reduction was around 36 litres. The report found that weight based billing for waste disposal generally decreased waste generation by around 20 percent however the proportion of waste recycled changed to a much lesser degree.

⁶ Australia, Canada, Chile, France, Israel, Japan, Korea, Netherlands, Spain, Sweden, Switzerland

- 4.11 Unsurprisingly, when the households surveyed ranked their support for a range of waste-reduction policies, charging for general waste collection by volume or weight was the least popular policy.
- 4.12 The Republic of Ireland (ROI) operates a kerbside PAYT system; where householders buy general waste bags or a tag to go on their wheelie bin for general waste (around €10 per bin) but recycling bags are free. However, households' expectations may be different in ROI compared to households in the UK; they may be more used to paying for services individually (doctors' appointments for example). Whether the PAYT can be deemed successful is unclear; as the most recent recycling rate for the country was 40 percent⁷, four percentage points lower than that of the UK.
- 4.13 Section 23 of the London Local Authorities Act 2007 created penalty charge provision to enable LAs to fine individuals and businesses for not complying with rules relating to waste and recycling. In 2009, under the Climate Change Act, the Labour Government trialled a scheme which gave five councils in England powers to establish PAYT pilots; households which recycled the most rubbish and left the least in their bin received a rebate while charging those who put out the most non-recycled rubbished. Electronic chips were fitted to bins to monitor and fine households which threw away too much.
- 4.14 With the introduction of the Deregulation Act 2015 LAs are still able to issues fixed penalty notices (FPN) and penalty charge notices, however it has been made more difficult and less cost-effective to do so; with the process of issuing FPNs lengthier, the fines lower and more opportunities for appeals. In addition, non-payment of a FPN is no longer a criminal offence.

Rewards and incentives

4.15 The England PAYT trial did not continue and in June 2011, the Coalition Government introduced a reward scheme which provides an incentive to get involved in recycling as part of the Waste Review. In introducing the fund the government said:

"it is better to reward households for doing the right thing with their waste than to penalise them for doing the wrong thing. Through the scheme, we are encouraging councils to reward people who recycle or re-use their waste".

4.16 Reinforcing desired behaviour with rewards is becoming popular and in 2015 Government funding was made available by the Department for Communities and Local Government (DCLG) to run reward and recognition schemes. £6m was shared between the 46 projects chosen. Guidance produced by the DCLG indicates that rewards could include financial rewards for example vouchers, donations to charities,

15

⁷ Eurostat newsrelease54/2015 26 March 2015 (Eurostat, the statistical office for the European Union)

and cash or discounts on goods and services; recognition could include personalised feedback about how much a household has recycled, or a letter about how donating an item for re-use has helped the local community.

- 4.17 DEFRA commissioned an evaluation of the first round of its schemes which looked at the strengths and weaknesses of 8 of the 28 schemes funded. Limitations recognised in the report included difficulty in monitoring performance attributable to the schemes, the need to rely on self-reported participation and funding the scheme. However, the evaluation also highlighted that the schemes were likely to have a positive impact because they could be used to validate, reinforce and improve pre-existing behaviour rather than act as a catalyst for new behaviour. It identified six preconditions that it said should be considered for a reward and recognition scheme to be successful:
 - Stable, simple, easily accessible and effective service provision;
 - Clear information and strong communications tapping into different channels;
 - In-depth knowledge of target audience;
 - Tailored and regular recognition and feedback of service-use;
 - Ability to demonstrate impact and attribution of rewards; and
 - Tailored assessment and careful selection of reward delivery mechanism.
- At the Challenge Session, Graham Simmonds from Local Green Points gave a presentation on their schemes. Local Green Points provides services to local authorities focused on waste and recycling. specialising in motivating harder to reach households to recycle, reuse and reduce waste. Local Green Points do this by using a combination of a strong community focus, communications and technology. Points are awarded to signed-up households for collectively achieving a reduction in waste and a corresponding increase in recycling. Points can be redeemed on a selection of purchases or donated to a local charity, depending on the set-up of the scheme. In addition to motivating households in recycling, Local Green Points promote the benefits of businesses signing up to the scheme being that a local loyalty card can support local high streets, driving more traffic to independent retailers and other businesses. There is no cost for local businesses to become part of the card scheme and they can benefit from free promotion and extra footfall.

Some examples of existing reward and incentive schemes are as follows:

4.19 London Borough of Bexley is an outer London borough and has the highest recycling rate in London, in 2014/15 the borough's recycling rate was 54 percent. Local Green Points is Bexley council's incentive scheme which has been running for several years to flats and estates

 $^{^{8}}$ 'Waste Reward and Recognition Scheme: emerging findings report', Brook Lyndhurst (December 2013)

properties in the borough. The scheme started small and this year the council has received further funding to expand this to cover all street level properties and for 1,500 flats above shops. Participating households can benefit from a wide range of discounts and offers provided by retail partners on the high streets and as a thank you for recycling more, are given some Green Points which can be put towards a purchase, or be donated to one of three charity projects. Green points are loaded onto a pre-pay card on a quarterly basis; 1,000 green points equates to £3.25, the equivalent cost of an adult swim. A report by London Councils ("Helping London Recycle more") notes Bexley has issued 1.2m green points (equating to a cash value of around £3,000, £800 of which was donated to one of the three charities).

- 4.20 Bexley reported that they had initially found it difficult to measure the success of the scheme because they had been unable to correlate the increase in recycling with the households signed up for the scheme, especially in flats within their estates. However the scheme is now seen as a success and the total tonnage of waste has been reduced.
- 4.21 **London Borough of Ealing** recycling rate was 40.1 percent at the end of 2014/15, significantly higher than Tower Hamlets. The council was awarded some money to support the borough's current **Greendreem**⁹ incentive scheme by targeting the four worst performing wards in terms of recycling, offering full value rewards such as iTunes vouchers and shopping vouchers for local shops. The full value rewards are extremely popular, however they are expensive to purchase, and as such residents are required to accumulate many more point than they would need for a traditional coupon. The full value rewards are consequently good at driving residents' participation in all aspects of the project to enable them to collect the points required for the reward. The prize draw where residents can win points and prizes such iPads are also extremely popular.
- 4.22 The take up rate of the scheme had not been as high as anticipated and in addition, the scheme has been expensive to run. However, the scheme has only been operating for two years in Ealing and is still bedding in. The borough advised that a business case would be put forward to decide the future of the scheme.
- 4.23 London Borough of Lambeth recycling rate was 28.1 percent at the end of 2014/15, which is on a par with the Tower Hamlets. The Golden Ticket Recycling Draw is the scheme running in Lambeth in the 2015/16 financial year. Western Riverside Waste Authority (WRWA) launched a prize draw open to all Lambeth residents whereby households received 'Golden Tickets'. Households fill out their contact details on the tickets and place them along with their clean, dry recycling into the recycling sack or bin for collection to be in with a

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⁹ information provided by David Goodship, Ealing Council, Waste Minimisation and Recycling Officer

- chance of winning a cash prize. Households can enter a ticket each time they fill a recycling sack or use their shared recycling bin.
- 4.24 Once recycling arrives at WRWA's Materials Recovery Facility for sorting, all Golden Tickets found with the correct clean and dry materials are entered into the draw. The first draw took place in October 2015 with further draws taking place up until March 2016.
- 4.25 London Borough of Hackney's recycling rate for 2014/15 was 25.3 percent – lower than Tower Hamlets. The Community Rewards scheme, scheduled to start in June 2016 onwards, is an incentive scheme for all households, including residents living in flats. funding received from the DEFRA incentives fund will cover the setup costs for a specialist company to implement the scheme in partnership with Bexley and Camden and will run for three years. All three councils will focus the schemes on a Community Points Model where residents earn points on performance and choose how to spend those points from a range of products offered by the contractor via an online account; alternatively in Hackney points can be donated to community groups or charities. Once signed up, residents will be able to gain points based on recycling performance and waste minimisation behaviours specific to their ward. In Hackney, flatted properties with the highest performance will also be eligible for a monthly individual award in addition to the Community Points. Estate properties are on different rounds to the street properties – individual lorries are weighed and the round with the highest recycling is awarded the points – spread evenly between properties signed up. Hackney council intends to roll the scheme out to all households.
- 4.26 A Community Points scheme was introduced to the 65 flats of Stockholm House, on the St George's Estate in Tower Hamlets in April 2015. The scheme is a collaboration between the East End Homes and Local Green Points and without input from the council. The project has funding support from waste contractor Urbaster and performance measurement support from London Metropolitan University. It is focused on motivating residents to compost their food waste using a new community composting system, and to dispose of cooking oil correctly. Residents can also earn points for dry recycling, compete with their neighbours to compost the most to win donations for local schools and community projects.
- 4.27 There is a competitive element to the scheme with a league table for four community projects (St George Greening Project, St Paul's Primary School, Shapla Primary School, St George Seniors club). Households sign up online, creating a low-cost communications channel that people want to use and an on-line leader board informs residents how their team is doing, according to Local Green Points. Participants are encouraged to help their charity to the top of the leader board by recycling.

- 4.28 Twenty percent of homes are signed up to the scheme (a sign up rate of 15-30 percent is typical for these schemes). An awards ceremony for community prizes and personal reward has been scheduled for spring 2016 to mark the end of the pilot.
- 4.29 Analysis of the reward schemes shows that in order to achieve success, projects should be ongoing, intensive and provide consistent communication across all channels to boost engagement. In addition an educational element about raising awareness, and the competitive element combined with financial incentives, is also important.

Recommendation 1: Review the Local Reward Scheme running in the borough with a view to implementing it more widely.

Reducing contamination – education and communications

Contamination costs

- 4.31 The cost of depositing waste for recycling at the MRF is based on both the weight of the load (tonnes) and on the level of contamination. The level of contamination is assessed via a visual inspection by the Quality Control Operator. There are three fee tiers:
 - 0-5 percent contamination (tolerance level) = £17.85 per tonne (Standard gate fee or 'acceptable')
 - 6-50 percent contamination = £66.85 per tonne (Intermediate gate fee)
 - Over 50 percent contamination = £129.05 per tonne. ('unacceptable' or non-conforming / rejected loads). The council reserves the right to verify that the load rejection is appropriate prior to any further action being taken by the MRF.
- 4.32 Where the MRF is unable to accept and process a load due to the level of contamination a price is put forward for additional handling to recover the proportion of the waste that is suitable for recycling. However, Veolia staff on recycling rounds identify bins which are clearly contaminated. This visual inspection of communal recycling bins identifies amongst other things, black plastic bags which are assumed to contain general waste. These contaminated bins are tagged, dated and left for specialist contamination crews who clear the site within 72 hours. This contaminated recycling is taken to an alternative MRF

facility for processing for which the Council is charged £99.69 per tonne. Some material recovery for recycling is achieved by these contractors and any waste not suitable for recycling is sent on for energy to waste (EFW) processing; less than one percent of the borough's waste is sent to landfill.

4.33 The majority of the council's loads fall within the intermediate gate fee. In December 2015 there were 214 loads tipped at the MRF with a total cost excluding VAT of £54,623.80, broken down as follows:

Contamination	Tonnage	Percent of Loads at Gate Fee	Total cost for Dec (EX VAT)
0-5 percent	325.52	32.71 percent	£5,810.50
6-50 percent	730.34	67.29 percent	£48,823.30
50 percent+	0.00	0.00 percent	£0.00
TOTALS	1055.86	100.00 percent	£54,623.80

- 4.34 A monthly sample report produced by Bywaters shows the percentage of particular material types passing through the MRF; in December 2015, 20 percent of waste sent for recycling was identified as general waste which was not recyclable. Non-conformance reports are also produced on a monthly basis, highlighting other items which are on the surface of the tipped load and large enough to be removed from the load by the Quality Control Officer eg large plastic toys which can be removed as it does not contaminate the rest of the load. Bywaters may not count this towards the contamination percentage; however they will still notify the council of them. In December the most common contaminants identified on the non-conformance report were kitchen and food waste, black sacks, soil and wood. Since the introduction of the 5 pence carrier bag tax, there has been a dramatic reduction in the number of these received into the MRF.
- 4.35 Islington Council provided evidence about their ongoing problems with contamination; including dumping and general abuse of public and estate recycling sites in the borough. They reported that this had got worse since the MRFs introduced stricter controls following the introduction of new legislation and the MRF Code of Conduct last year. As a result more sites are being deliberately not emptied by crews to avoid contamination of their loads, resulting in more sites overflowing and extra resources to empty bins as waste. Various teams work on this problem: recycling teams with letters to residents, stickers and door knocking; operations with managing the collections and reporting problems; enforcement, housing and caretakers. The council is drafting a strategy to address contamination in recycling collections and support better joined up working.

Communications and education

- Tower Hamlets communications has been recognised as good practice for a campaign it ran in 2011, 'recycling makes sense in every language'10. Recognising the number of languages spoken in the borough, the council, Veolia, and designers Billington Cartmell, worked together to plan a high-impact campaign to communicate with all residents including non-English speaking residents. campaign was developed based on translations of community languages with illustrations encouraging residents to recycle more using the strapline 'recycling makes sense in every language'. Informal interviews with residents identified a low use of computers and smart phones, meaning that digital communications would not reach all the audience. It was decided that outdoor advertising would be visible to all residents, and carefully picked to target residents rather than Where possible, free of charge routes were used to commuters. ensure costs were kept to a minimum. The campaign routes included DLR platforms; local streets; recycling collection vehicles; selected local bus routes; park and lamppost banners; public LCD screens; posters in Idea Stores; the council's website; and press adverts and releases including translations; local schools and events. Since 2011. recycling in Tower Hamlets has improved by one percentage point.
- 4.37 As part of their contract with the council, Veolia undertake a range of communications, advertising and outreach work. The 'Lets Sort it / Right Stuff, Right Bin' campaign informs residents that putting the right material in the right bin saves money by reducing contamination rates. The campaign says 'you might think it's just a bin but putting the wrong stuff in the wrong bin costs Tower Hamlets over £500,000 per year".
- 4.38 The campaign was launched in November 2015 and focusses on contaminated recycling waste especially in communal bins. Since this campaign began there has been a reported 15 percent rise in the number of 'acceptable' loads from estates to the MRF as well as an eight percent increase in recycling tonnage. As part of the campaign a letter and leaflet was sent to all residents from the Cabinet Member for Environment with details of exactly what can be put in recycling bins, what should be put in general waste, and addressing common questions.
- 4.39 Veolia's outreach work includes daily door knocking and speaking to residents individually about recycling. They specifically target new build properties where a 'welcome pack' is provided which includes pink recycling bags and leaflets explaining the recycling do's and don'ts in the borough. Recognising the high churn in the borough, the team re-visit areas in order to reach as many residents as possible.
- 4.40 Veolia's Education Officer works with schools; attending workshops and assemblies and setting up competitions whereby schools compete to recycle the most. The council's recycling mascot is R3cycler is brought along to schools and community events, getting children

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¹⁰ London Councils 'Helping London recycle more best practice case studies (May 2012)

involved through influencing behaviour at an early stage and getting them to influence their parents.



Figure 5: Veolia's R3cycler mascot

- 4.41 At the Challenge Session, Poplar HARCA provided leaflets and other promotional material about recycling they developed for their residents, providing local information and advice specific to their estates. Since the visit to the MRF, caretakers are now actively looking for black bags which have been placed into recycling waste bins, given the assumption at the MRF that black bin bags contain general rubbish. Caretakers try and identify which residents have contaminated the recycling bins, and when proof is found, residents are contacted about their responsibilities reminding them how to dispose of general waste and recycling waste correctly.
- 4.42 One of the barriers to recycling faced by residents is a lack of understanding about what happens to waste once it has been put out for recycling. The visit to the Bywaters MRF provided valuable insight into this process, and could be especially beneficial to change the perceptions of those who were sceptical about recycling.
- 4.43 During the tour of the MRF, participants heard about the education work undertaken by Bywaters; they have a newly refurbished classroom where groups of school children come and learn about the importance of recycling in a hands-on way. A pictorial diagram commissioned by Bywaters (below) covers a wall in the classroom, and depicts the journey of the material coming into the MRF and being processed into materials ready to be sold to factories for recycling.



Figure 6: Picture commissioned by Bywaters of their MRF

- 4.44 A group of team leaders, caretakers and cleaners from Poplar HARCA Estates Services Department were invited to visit the MRF. The visit consisted of a tour of the MRF, video presentation and Q&A session. HARCA feedback was very positive, staff found it engaging and it helped them to understand the wider issues of recycling and the effects of contamination. The caretakers saw first-hand the human element that goes into the process of sorting. They felt that the things they learned on the tour would help them to communicate the message to their residents, to encourage their staff to highlight issues of contamination and assist the council in its aim to tackle such issues.
- 4.45 Whilst under-18s are not able to visit the 'shop floor' for health and safety reasons, Bywaters actively encourages groups of over-18s to book a visit whereby they can walk along a viewing platform to see the MRF in action.

Recommendation 2: Promote and coordinate visits to MRF for residents and estates staff.

- 4.46 Some participants at the Challenge Session had views about the lack of civic responsibility that some residents displayed with regard to duties around general and recycling waste. There has been an increase in instances of residents putting dirty nappies and half eaten take-aways in with recycling waste. This is highly unpleasant for MRF operatives to deal with as, if they get past the visual inspection stage, operatives have to remove these items by hand. In addition, as a dry mixed recycling facility, Bywaters is not set up to deal with waste which is wet and contaminated with food or other non-recyclable waste.
- 4.47 Whilst participants agreed that selfish behavior could explain some instances, they felt that language barriers or a lack of understanding about recycling in general was also likely to be behind both poor recycling rates and contamination. In addition, the different recycling arrangements in each borough are an added confusion for residents and a particular problem for Tower Hamlets, which has a relatively high population churn. Residents may think they are complying with the council's rules by recycling in accordance to what they did in their previous authority.
- 4.48 Recognising the role education plays in changing behaviour, participants thought that incorporating key messages about recycling into the curriculum of the many ESOL courses in the borough would be a good enhancement to the existing education campaigns. As many of Veolia's communications materials are picture heavy and text light, in order to get over difficulties faced because of language barriers, it was suggested that these were used in the ESOL settings.

Recommendation 3: Promote messages about recycling to residents through ESOL sessions.

- 4.49 Highlighting the benefits of improved recycling rates and lower contamination with council finances is recognised as an important way to get across the recycling message. This method was used in Hammersmith and Fulham who identified a potential cost saving of £500,000 per year, and in Hounslow¹¹, where the link was made between increased recycling and savings on council tax.
- 4.50 Whilst the current Tower Hamlets 'Lets sort it / Right stuff, right bin' campaign makes the link between recycling right and cost savings, as well as identifying what can and can't be included in recycling waste, it does not explain why. A newsletter from Australia ("What a Waste!" presents recycling FAQs in a clear and concise way. It explains the reasons behind the recycling rules, for example, why plastic bags cannot be accepted. The newsletter highlights interesting facts, which could stick in people's minds, helping to promote the recycling message. For example:
 - recycling one tonne of paper and cardboard saves 13 trees and two and a half barrels of oil; and
 - recycling one aluminium can saves enough energy to run a TV for three hours.
- 4.51 Participants at the Challenge Session all agreed that it was crucial to drive the message home to residents about using black plastic bags. If residents understand that recycling contractors equate black plastic bags with general waste and that processing them increases our waste and recycling costs, it may change habits. As black plastic bags are automatically treated as general waste, potentially many tonnes of perfectly acceptable recycling materials are consigned to general waste because residents do not understand the significance of using them.

Recommendation 4: Improve communication and education campaigns by making the additional costs associated with dealing with contaminated recycling waste explicit. Include clear explanatory messages about issues such as food waste and using black bin liners.

- 4.52 There are wide arrays of symbols (for example the Mobius loop) on packaging and paper which help people to identify what materials packaging is made from and how they can be recycled. They also identify whether they can be collected for kerbside recycling or whether the item needs to be taken to the local recycling centre.
- 4.53 Many companies are now including recycling messages on the envelopes of the correspondence they send to consumers. For example, BT are using the 'widely recycled' symbol along with a strapline 'together we can reduce paper consumption' and another

¹¹ London Assembly 'Waste not, want not: a review of why recycling rates vary across London (Oct 2011).

¹² What a waste! Recycling, Clean up Australia Ltd, July 2009

- company, cpp, use the Mobius loop symbol with the strapline 'please recycle me'.
- 4.54 The Recycle for London campaign was re-launched last year. The brand messages are aligned with local authority collection data which is updated annually. Brand guidelines were issued with the idea of all London boroughs adopting the same look and feel to their campaigns with a Recycle for London type logo to ensure greater consistency in recycling messaging and branding across London. Tower Hamlets has adopted the Recycle Now swoosh for their recycling campaigns.



4.55 However, there are no recycling messages on other materials produced by the council or communications sent to residents. Bespoke messages or well-known symbols and logos about recycling on products such as envelopes can help to deliver sustainability promises and address criticisms about the proliferation of packaging and often unsolicited mail. They can also act as a reminder to consumers to 'do the right thing'.

Recommendation 5: Promote recycling messages on paper communications from the council (e.g envelopes).

Improving recycling facilities on estates

4.56 One of the aims of the Challenge Session was to explore how landlords could improve recycling rates on their estates by working together and introducing service re-design. There are a number of initiatives relating to service re-design being undertaken in Tower Hamlets and other boroughs from which lessons could be learned. The benefits to landlords of working together include clarity for residents, potential pooling of resources, and adopting best practice ways of working; with the aim of gaining better recycling rates across all estates.

Service re-design and improvements

4.57 In Tower Hamlets, pink recycling sacks are provided to residents to store and dispose of recycling waste, either in their own kerbside recycling bins or in communal bins on flatted estates. There is evidence to suggest that the current pink recycling sacks are themselves a barrier to recycling for some residents, especially for those living in flats on estates. At the Challenge Session Registered Providers reported complaints from residents about the size and quality of the bags, a lack of supply, and the amount and variety of places that they can be obtained from. Council complaint statistics show that in 2014/15 issues relating to dry recycling were the tenth most common

- complaint issue, with many of the complaints relating to the pink recycling sacks.
- 4.58 The sacks are seen as being too large for many residents who often live in overcrowded conditions or with small kitchens, making the large recycling bags inconvenient. In addition, there have been complaints about the quality of the sacks which often split. These issues can be compounded for residents who struggle to take them down to the recycling bins, often having to juggle children and pushchairs.
- 4.59 There is acknowledgement from Veolia about the quality and size of the sacks and Veolia is considering alternative designs including reusable designs such as string bags. Whilst a re-usable recycling vessel would suit many residents, participants felt that this may discourage some residents from using them if they are taking down recycling on the way out. Some participants felt that smaller sacks which could be taken down more regularly and take up less space would encourage more recycling.

Recommendation 6: Improve the size, quality, quantity and distribution of bags provided for residents for recycling waste, for example:

- Introduce smaller bags;
- Increase the number of bags produced to meet demand; and
- Increase the number of collection points bags can be obtained
- 4.60 There is a need for a bin audit and re-distribution exercise as there is both an over provision of bin storage for residual waste, and an under provision of recycling bins. This is particularly true in the borough's older estates managed by RSLs. In addition, there is a higher collection frequency of general waste compared to recycling waste.
- 4.61 Peabody Housing Association provided written evidence relating to the service changes they had instigated on their estates in partnership with several London boroughs around bin re-distributions. A survey of Peabody estates in the City of Westminster identified a mismatch in the ratio of general waste and recycling facilities which was addressed on key estates by re-balancing bins to an even 50:50 split. A final round of survey and re-binning will be taking place between January-April 2016. This will also be supported by a review of collection frequencies for refuse, with a view to removing one weekly collection from key estates (there are often two/three refuse collections per week, but just one recycling collection). Evening up collection frequencies is seen as fundamental to offer an equal service for recycling if recycling performance improvements are being sought. The City of Westminster which received London Waste and Recycling Board (LWARB) funding. delivered door knocking to Westminster residents, reaching around 35

percent. With the re-binning, this resulted in recycling levels (on estates) improving from 29 percent to 36¹³ percent.

- 4.62 A re-balancing of waste and recycling bins also took place on the Peabody's Pembury Estate in Hackney to a 50:50 split. Peabody caretakers delivered a letter from the Trust (as opposed to the council), informing residents of the changes to the recycling facilities and specifically asking them to recycle more of their waste. The letter used the Recycle Now iconography and communications guidelines. Peabody reported that there has been a subsequent increase in recycling rates on the estate which Peabody attributes to greater recycling capacity, increased collection frequencies and changing some bin locations.
- 4.63 In Tower Hamlets a bin and recycling facilities survey was commissioned with Keep Britain Tidy which audited the number of refuse and recycling bins located at blocks of flats. Across the sites surveyed there was found to be a 35 percent over provision of refuse bins and 40 percent under provision of recycling bins (when compared with our waste planning guidelines). Additionally, over 56 percent of blocks have more than a once a week collection of general waste, with some having up to 5 collections a week.
- 4.64 An example of this inadequate recycling provision and an excess of refuse bins is shown below. The graph shows that Arbour House has more than 240 litres (the size of a large wheeled bin) per household for general waste but less than 50 litres per household for recycling.



4.65 Aligning existing blocks and estates to the Council's current waste planning guidelines and new builds will provide residents with more opportunity to recycle and encourage behaviour change and greater participation.

Recommendation 7: Introduce a re-balancing of general and recycling waste bins on estates in the borough.

4.66 There are several innovative examples of service re-design improvement work being undertaken by other LAs and RPs. For example, as part of the estate work, Peabody and City of Westminster will be providing some transparent estate bins so that residents can see inside the bins. The aim of the exercise is to reduce contamination; if everyone can see what has been placed in the recycling bin; residents are less likely to throw general waste in. The transparent

 $^{^{13}}$ Figures provided by Peabody Estates January 2016

- bins also help caretakers identify potential contamination, for example black sacks.
- 4.67 Some councils have re-sited their recycling bins which has minimised waste contamination by pedestrians and this had resulted in reduced cross-contamination rates. Another initiative reported by LWRB¹⁴ was a link between signage improvements and increased recycling rates (especially when accompanied with reusable bags to take the recycling to deposit). Wandsworth council's Signs of Improvement scheme¹⁵ improved signage at the point where residents dispose of their rubbish on estates (refuse chute loading hoppers and chamber doors), resulted in improved recycling rates as well as improving the areas to make disposal a more pleasant chore.
- 4.68 Islington council are currently considering physically restricting the opening of recycling bins by installing 'forest locks' on certain communal bins. This would restrict the ability of residents to throw large bags of waste into them; residents would have to post items through the limited opening space.
- 4.69 In addition, in order to create efficiencies and cut the cost of waste collection, Islington council have started using the Enevo One system. The system uses smart wireless sensors on bins which measure fill level data. This system aims to streamline the collection route by visiting bins which are actually full rather than the traditional fixed schedule collection method.

Re-use facilities

- 4.70 On the Pembury Estate in Hackney which is managed by Peabody, a bulky waste reuse programme called 'The Loop' has been established as part of the estate's commitment towards re-use of waste. The scheme is in its early days, but has already delivered a successful chair refurbishment workshop, recruited a volunteer to make things from recovered wood, held several furniture sale days, and has identified premises to create a storage area and show room. The work with Groundwork was initiated by Groundwork London, and is backed by EU Life+ funding. Peabody is contributing £60,000 over three years to match fund it. In City of Westminster, textile and Waste electrical and electronic equipment (WEEE) recycling banks are being provided on Peabody estates in order to divert bulky waste into reuse or recycling operations.
- 4.71 Access to cars is relatively low in the borough, and new build estates are often being designed to dissuade car usage. Therefore access to the re-use and recycling centre at Yabsley Street to dispose of items such as bulky waste and clothes is limited. Ballymore reported that although residents can contact the council to arrange bulky waste

¹⁴ LWRB 'Flats recycling programme evaluation report' (Aug 2013)

¹⁵ London Councils 'helping London recycle more best practice case studies'

disposal, residents often tended to put these items out for general waste as an easy option. Ballymore use Mears repairs to collect the bulky waste that end up in the bin rooms on their estates. Where feasible the bulky waste items are taken to a re-use scheme for repair and selling on.

4.72 Islington council work with London Re-use Network to provide a free re-use collection service for Islington residents. The items are taken to 'Bright Sparks' where volunteers and trainees check the items for safety and carry out minor repairs. Unwanted furniture and some electrical items are then sold at affordable prices to members of the public and passed on to people less fortunate through the Bright Sparks shop.

Recommendation 8: Undertake a feasibility study to assess the suitability of a range of alternative service design improvements including re-use facilities in the borough.

Coordinated working

- 4.73 The Tower Hamlets Housing Forum (THHF) is a partnership between Registered Providers (RPs) and the council to deliver the housing vision for the borough. Its Public Realm sub-group meets every two months and focuses on initiatives that improve maintenance, cleanliness and health and safety of public areas on housing estates. Past attendance by officers from Public Realm has been sporadic, however this issue is being addressed and the service is now committed to attending the meetings. Engagement by the RPs is mixed and several of the national RPs with smaller housing portfolio in the borough does not attend the meetings.
- 4.74 It was reported that many RPs see waste and recycling management as the council's duty. A particular focus for the council's Clean and Green Team was tackling this perception, ensuring RPs as estate owners take appropriate responsibility.
- 4.75 The THHF Executive Action Plan highlights the development and implementation of a resident awareness campaign on recycling and bulk rubbish disposal as a key activity. A caretakers event has been arranged for March 2016 to start to address this issue, with key activities being to ascertain what THHF public realm group members already have in place and develop agreed messages.
- 4.76 It was reported that Bywaters will be presenting at the next meeting where an invite to visit the MRF will be extended to all THHF Public Realm sub-group members.
- 4.77 The service reported that the estates which have better recycling rates and fewer bins which were contaminated are those where management was more interested in recycling and other public realm issues.

Participants at the Challenge Session agreed that using the THHF public-realm sub-group forum to identify and disseminate good practice, such as that identified above, to gain improved recycling rates across all estates, was a good idea.

Recommendation 9: Promote the THHF public-realm sub group, encourage attendance and the sharing of good practice amongst Registered Providers.

Influencing improvements through Planning Policy

- 4.78 One of the aims of the Challenge Session was to understand how developers could improve recycling facilities on estates; and whether there was any scope for using Section 106 (S.106) planning obligations or the Community Infrastructure Levy (CIL).
- 4.79 Government policy on the application and use of Planning Obligations is contained within the CIL Regulations 2010 (as amended), the National Planning Policy Framework (NPPF), and the National Planning Practice Guidance (NPPG).
- 4.80 S.106 funding is negotiated with developers and used to support the impact of the development on the surrounding neighbourhood, and CIL places a levy on any planning to be used towards infrastructure. The Core Strategy sets out the council's priorities for planning obligations on its Regulation 123 list of infrastructure projects which are currently: affordable housing, sustainable transport, open space, education, health, training employment and enterprise, biodiversity, community facilities, highway work and public realm. 'Community Facilities' are identified in the council's Revised Planning Obligations Supplementary Planning document as multi-use community facilities, faith centres, youth centres, idea stores and libraries, archives and leisure facilities.
- 4.81 Planning Obligations need to meet the following tests:
 - (a) necessary to make the development acceptable in planning terms;
 - (b) directly related to the development; and
 - (c) fairly and reasonably related in scale and kind to the development.
- 4.82 As new developments are required to make proper provision for waste and recycling facilities, there is limited scope to use these funding streams for the provision of or improving community recycling facilities.
- 4.83 The National Planning Policy for Waste (2014) highlights that plans for new housing developments should ensure the design and layout of new residential and commercial development and other infrastructure complements sustainable waste management, including the provision of appropriate storage and segregation facilities to facilitate high quality collections of waste. This requirement is interpreted through the council's core strategy spatial policy 14.

- 4.84 Architects and developers are obliged to make provision for waste to be stored and collected in a manner that maximises opportunities for recycling. Consideration should be given to the design of buildings and the procedures that will be required to ensure that those who inhabit and service the building can manage the waste produced in that building in a sustainable manner.
- 4.85 The London Waste and Recycling Board (LWARB) has recently produced a good practice template recycling and waste management strategy for new build flats in London for Local Authorities to adopt. Accompanying this is their waste management planning advice for flatted properties, which has sections for developers to complete and submit with planning applicants.
- 4.86 The guidance states that in order to facilitate recycling, to meet London Plan waste management targets, while protecting visual and residential amenity and public health, proposals for flatted residential development should include detailed consideration of waste arising from the occupation of the development including consideration of how waste will be stored, collected and managed including¹⁶:
 - There is adequate temporary storage space within each flat / apartment for waste generated by that flat / apartment allowing for the separate storage of recyclable materials;
 - There is adequate communal storage for waste, including separate recyclables, pending its collection;
 - Storage and collection systems for waste are of high quality design and are incorporated in a manner which will ensure there is adequate and convenient access for all residents and waste collection operatives and will contribute to the achievement of the London Plan waste management targets;
 - Measures are incorporated to manage impact caused by odour, noise and dust; and
 - Onsite-treatment of waste has been considered.
- 4.87 The council's Development Management guidance relating to Waste Management (DM14) states that a 'development should demonstrate how it will provide appropriate storage facilities for residential waste and recycling as a component element to implement the waste management hierarchy of reduce, reuse and recycle'. The accompanying waste standards suggest minimum capacity for general waste, dry recyclable waste, and compostable waste; the suggested minimum capacity per week (litres) is unbalanced with general waste almost double that of dry recyclable waste.
- 4.88 Assessment of waste and recycling facilities is provided by the council's public realm development team as part of the planning application process. The team comments on how appropriately the waste management and recycling facilities have been addressed

21

¹⁶ London Waste and Recycling Board and London Environment Directors' Network, January 2015

4.89 Whilst national policy does not provide specific detail for developers to adhere to, as part of the Local Plan preparation there is scope for the council's guidance in DM14 on managing waste to be updated based on a new Waste Management Strategy. One of the main aims of this study is to help the council to develop options for efficiently managing waste collection in high density development, including looking into new technology. The LWARB template recycling and waste management strategy could be used as a guide for this process.

Recommendation 10: Amend Local Plan policy DM14 Managing Waste to provide more explicit guidance on waste and recycling facilities.

- 4.90 The intensity of development in the borough, especially in the Isle of Dogs Opportunity Area, where 60-70 storey apartment blocks are being built, supports the need for innovative ways of dealing with waste and recycling need in order to deal with the sheer amount of waste and recycling facilities needed to service such large high rises.
- 4.91 As part of its recycling and waste management strategy template, LWARB produced case studies detailing the innovative ways in which developers in conjunction with local authorities have gone about tackling waste management and recycling in new flatted developments.
- 4.92 In Wembley City development, Brent, the Envac system has been installed for the collection of general waste and recycling waste for phase 1 of the residential development. Envac is a stationary, underground vacuum system with overground deposit 'portals' located outside buildings at ground level throughout the development. The waste collected is residual, food/organic waste, dry recyclables and cardboard. The benefits of the Envac system are reported as being more pleasant to use; a tidier environment, less smelly, and less likely to attract any pests. As waste is transported and stored on the development but away from residential buildings, waste collection is less invasive and often less frequent. The development achieves a 45 percent recycling rate from household waste produced by residents.
- 4.93 Brent council does not collect any household waste from the development which is dealt with by the Envac system, however because of its statutory duty to collect waste, the council makes a contribution towards the cost of collection and management by a private provider. For future development phases, Wembley City developers are not committed to using the Envac system, partly due to cost of installation.
- 4.94 At St. George's Wharf Tower, in Lambeth, the waste management system is a set of pull-out waste bins with four compartments for general and recyclable waste provided within each kitchen. In addition, accessed through a small facilities room on each floor, is a chute

system with the ability to separate waste into two factions: general waste and recycling waste. To operate the chutes, residents press one of the two buttons on the wall panel to select either general waste or recycling. Once the 'open door' light on the wall panel is illuminated, the chute door can be opened and materials can be placed in the chute. General waste is compressed to make better use of space. Whilst the development is not fully occupied, Lambeth council have identified the potential to divert over 46 percent of dry recyclable waste away from disposal.

4.95 Ballymore Asset Management Ltd who attended the Challenge Session reported that a number of landlord developers would be interested in coming together to look at alternative options of general and recycling waste management. The role for the council would be to provide coordination and potentially funding to support a system.

Recommendation 11: Work with developers to incorporate innovative general waste and recycling waste management systems into the Isle of Dogs opportunity area, area planning framework where possible.

Influencing improvements through Lobbying

- 4.96 WRAP launched the On-Pack Recycling Label (OPRL) scheme in 2009 in response to research that identified a need to communicate better with consumers about what types of packaging can be recycled. The scheme has been developed for retailers and brand owners by the British Retail Consortium (BRC) in partnership with WRAP.
- 4.97 Under the scheme, labelling on packaging includes 'widely recycled', 'check local recycling' and 'not currently recycled'. The WRAP website identifies that over 145 organisations are signed up to the scheme over thousands of product lines.
- 4.98 Considering the low levels of recycling in the country as a whole, and the need to meet EU targets, central Government could play a more active role in encouraging residents in their recycling habits by requiring industries to include recyclability messages on their products and packaging in a clearly recognised and consistent format.
- 4.99 A move to standardisation of materials used in packaging would also help households to know what can and cannot be recycled.

Recommendation 12: Lobby Government to require packaging industry to include standardised recyclability messages on all recyclable material.

Glossary

Composting: the process of breaking down organic rubbish, such as garden and food rubbish, into a material which can be added to the garden to help plants grow.

Energy recovery from waste (EfW): the burning of rubbish to produce energy (heat) which is used to generate electricity or to heat homes.

General waste: also called residual **waste**, is material from businesses and households that cannot be recycled. It includes materials such as non-recyclable plastics, polythene, some packaging and kitchen scraps, etc.

Household waste: this includes rubbish thrown in bins at home and collected by the local council. Also, litter collection and street sweepings, garden rubbish, rubbish from civic amenity sites and rubbish collected for recycling or composting.

Kerbside collection: any regular collection of rubbish for recycling (also called recyclables). This may be from businesses or households. You may have a box for recyclables, which is collected each week from outside your house.

Landfill site: usually a large hole in the ground, such as an old quarry or mine. Can also be an area where rubbish is piled above ground and covered, creating a hill, which will be covered in grass, a process known as landraising.

Materials recovery facility (MRF): a place where materials for recycling are taken for sorting into material types before delivering to reprocessors (companies who recycle).

Recycling: the process of changing rubbish into either the same product or a different one. It involves some kind of industrial process. For example, using old plastic bottles to make new ones.

Reduction: this involves using fewer materials so less rubbish is created. For example, many glass bottle makers now use less glass to make a bottle than they did 10 years ago. This means that less glass rubbish is created when we throw the bottles away.

Residual waste: the material that remains after the process of **waste** treatment has taken place. Such treatment can include agricultural, industrial and mining. It can also be applied in a more domestic sense, referring to the household rubbish not able to be recycled, re-used or composted.

Reuse: the act of using an item more than once. For example, many supermarkets now have carrier bags which you can use over and over again, and some businesses deliver goods in reusable plastic crates.

Waste: this is the same as 'rubbish'. It is a wide-ranging term, which includes most unwanted materials.

Waste collection authority: the part of the local council which collects rubbish.

Common recycling logos and symbols

OLRP - On-pack Recycling Label symbols

Widely recycled



75 percent or more of councils provide household recycling collection facilities for that packaging type in their area.

Check local recycling



Used when 20-75 percent of councils have household recycling collection facilities for that packaging type in their area.

Not currently recycled



Used when less than 20 percent of councils have household recycling collection facilities for that packaging type in their area.

Widely recycled at recycling points: Check



CHECK LOCALLY FOR KERBSIDE

locally for kerbside Recycling provision exists in over 75 percent of councils (including both household recycling collections and at recycling centres). A household recycling collection exists in less than 75 percent of councils.

Plastic films

Some plastic films can also now be recycled



KERBSIDE

at supermarket's carrier bag collection points. Look out for the 'Recycle with carrier bags at large stores - not at kerbside' message on your bread bag, breakfast cereal, toilet and kitchen roll wraps, grocery produce, multipack shrink wrap and newspaper and magazine wraps.

Metal paint cans



Empty metal paint cans are accepted for recycling at most local authority recycling centres. Check your council's website for more information.

Other logos and labelling Mobius Loop



Indicates that an object is capable of being recycled - not that the object has been recycled or will be accepted in all recycling collection systems. Sometimes this

symbol is used with a percentage figure in the middle to explain that the packaging contains xpercent of recycled material

The Green Dot



The Green Dot does not necessarily mean that the packaging is recyclable, will be recycled, or has been recycled. It is a symbol used on packaging in many

European countries and signifies that the producer has made a financial contribution towards the recovery and recycling of packaging

Glass



Please dispose of glass bottles and jars in a bottle bank

Recyclable steel

The product is made of recyclable steel





Compostable

The 'seedling' is the registered trademark of European Bioplastics. Products certified to be industrially compostable according to the European

standard EN 13432/14955 may bear the 'seedling' logo

Tidyman



Dispose of this carefully and thoughtfully. Do not litter. This doesn't relate to recycling, but is a reminder to be a good citizen, disposing of the item in the most appropriate manner

Plastics



Identifies the type of plastic resin used to make the item by providing a 'Resin Identification Code'. It is represented with a 'chasing

arrows' symbol surrounding a number between 1 and 7 that defines the resin used

Recyclable aluminium



The item is made of recyclable aluminium

Waste electrical



Waste electrical items from household appliances to mobile phones to IT equipment

Paper



To be given the National Association of Paper Merchants' mark, paper or board must be made from a minimum of 50 percent, 75 percent or 100 percent

genuine waste paper and/or board fibre, no part of which should contain mill produced waste fibre

Wood



the FSC.

The Forest Stewardship Council (FSC) logo identifies products which contain wood from well managed forests independently certified in accordance with the rules of