Living in Hackney Scrutiny Commission

13th November 2019

1.0 Introduction

- 1.1 The Mayor of London's Environment Strategy requires each London authority to write a Reduction & Recycling Plan (RRP). The RRP details out how Hackney will contribute to the London-wide objectives, policies and proposals set out in the Environment Strategy and how these will be reflected and translated into action at the local level. Further, the RRP has to be in a manner consistent with the duty to act in 'general conformity' with the Mayor of London's Environment Strategy.
- 1.2 The RRP has therefore been written setting out the direction of travel that Hackney will take to contribute to those Strategy priorities and objectives, taking into account guidance issued by the GLA, Hackney's current services and performance, and wider benchmarking.
- 1.3 Key aspects of the RRP include service proposals for restricting residual waste through the introduction of fortnightly collections, including planning to consult with key stakeholders, and improving recycling on estates. It further covers how Hackney will minimise its environmental impact of waste activities, move towards a more circular economy and what measures it will continue to take to work with key stakeholders in waste prevention and behaviour change.
- 1.4 The Waste & Recycling Budget Scrutiny Task Group explored the rationale for the consideration of the significant change to elements of the waste collection arrangements for street level properties, and the emerging plan for preparation and delivery in the case of this being moved forward. The Group further looked at the range of work focused on improving recycling levels among flats and estates.
- 1.5 This report details the background to the requirements of the Mayor of London's Environment Strategy, provides an evidence base leading to actions detailed in the RRP, outlines the approach and progress taken with the RRP and key actions within that. It then provides a response in terms of progress to date to the recommendations from the Waste & Recycling Budget Scrutiny Task Group.

2.0 Mayor of London's Environment Strategy

- 2.1 In May 2018 the Mayor published his London Environment Strategy. The Strategy sets out objectives, targets and policies for the effective management of London's municipal waste and to accelerate the transition to a circular economy.
- **2.2** The Strategy's waste objectives are:
 - Objective 7.1 Drive resource efficiency to significantly reduce waste focusing on food waste and single use packaging;
 - Objective 7.2 Maximise recycling rates;
 - Objective 7.3 Reduce the environmental impact of waste activities (greenhouse gas emissions and air pollutants);
 - Objective 7.4 Maximise local waste sites and ensure London has sufficient infrastructure to manage all the waste it produces.
- **2.3** The two most prominent requirements of the Strategy are around the household recycling targets and minimum service levels for London:
 - 45% London wide household recycling rate (and a 50% rate of local authority collected waste) by 2025, and 50% household recycling rate (and 65% municipal recycling targets) by 2030 to be collectively delivered by local authorities; and
 - A minimum recycling collection service provision to be provided by all Boroughs by 2020 incorporating the collection of the six key dry recycling materials (including pots,

tubs and trays) for all properties and separate weekly food waste collections for all kerbside properties (and also flats where feasible).

- 2.4 The 2025 household waste recycling target of 45% is underpinned by a Route Map that was done for the GLA by WRAP¹. The modelling attempted to show the maximum contribution that London could make to the 50% national household waste recycling target. The study found that, with specified service changes/improvements applied in each London Borough in 2020, an overall recycling rate of 42% could be achieved by 2022 for London.
- 2.5 A 'business as usual' scenario was also modelled to reflect the recycling rate that WRAP believed would be achieved on the current trajectory and the modelled recycling rates were published for each London Borough in the supporting evidence for the London Environment Strategy. The modelling took into account factors such as waste contract requirements and renewals, housing stock type and joint borough working arrangements. However, the level of detail of these factors, or other factors, is unknown.
- **2.6** The service changes/improvements modelled to achieve the 42% household waste recycling rate were:
 - Intervention for kerbside properties (street level) Reduced residual and weekly separate food waste collection, adding all six dry materials to kerbside collections where not currently collected (glass, cans, paper, card, plastic bottles and household plastic packaging);
 - 2. Intervention for flats (high rise) All high-rise properties receive, as a minimum, the collection of five main dry recyclable materials (glass, cans, paper, card and plastic bottles) with an expected 40 per cent performance increase.
- 2.7 The modelling showed for Hackney that the resultant recycling rates for (1) above was 33% and for (2) above was 36%. However, the 40% increase in the performance of flats recycling is unsupported by any evidence and particularly sets unrealistic expectations of recycling rates in inner London Boroughs.
- 2.8 The Mayor's recycling targets are predicated upon all London Boroughs having introduced residual waste restrictions. The extent of the volume restrictions assumed and whether changes in residual waste collection frequencies assumed by WRAP are unclear. However, the Mayor's guidance for completing the RRPs requires Boroughs to set out how they will deliver a "Package of recycling and residual waste services or planned service changes which have reviewed household residual waste bin capacity, frequency of collections and side waste collections" or consult on such measures.
- 2.9 In reviewing RRPs, it has been stated that the Mayor will take into account the following factors: contractual constraints that restrict the introduction of new services; the proportion of flats with lack of easily accessible and/or sufficient storage space for recycling; the proportion of rented accommodation; levels of deprivation; and the numbers of households with gardens.

3.0 Recycling performance and benchmarking

- 3.1 In order to arrive at the services and activities in the RRP, initial data analysis and benchmarking has been undertaken, and key points detailed below.
- 3.2 Recycling performance has followed an improving trend since the glass bring sites were introduced in 1998 (1% recycling rate), to the comprehensive kerbside collections of food and dry recycling for all street level and estate properties that we have today. Performance, although at an all-time high of nearly 28%, is now plateauing and to move to the next step change in recycling rates requires significant service change.
- 3.3 In March 2015 the consultancy Resource Futures completed a waste compositional analysis of household residual, recycling, food waste and garden waste on behalf of the Council. The aim of the study was to allow the Council to gain robust data and enough intelligence about

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¹ http://www.wrap.org.uk/

its current recycling services to enable it to inform service changes needed to attain future recycling targets. Over the course of two phases, waste was collected from 590 households: the sample was stratified into 6 strata, combining street level and estates households.

- **3.4** Across Hackney over half, 54.4%, of the residual waste stream was target recyclable materials accepted at the kerbside, and food made up half of those target materials.
- 3.5 The full composition profile of all collected waste streams indicated that the average household in the borough produces 13.29 kg/hh/wk of waste across all kerbside streams each week. By weight 75.4% of the total material was presented in the residual waste stream, whilst the capture rate for all of the kerbside recycling streams was calculated at only 34.5%.
- 3.6 Looking beyond Hackney, benchmarking has taken place with other London authorities. Chart 1 below details London authority's recycling rates for 2017/18. Hackney's recycling rate was 27.4%. Six out of the 12 inner London boroughs have lower recycling rates than Hackney and 5 other inner London boroughs have a higher recycling rate than Hackney. Of those inner London boroughs with a higher rate than Hackney, two operate a fortnightly collection for some or all of their street level properties. Lewisham is the other inner London authority operating a fortnightly collection. Whilst the recycling rate is lower than Hackney it has seen an increase in performance of 4.1% from the previous year following the introduction of fortnightly collections to street level properties, and these figures were yet to show a full year's impact.

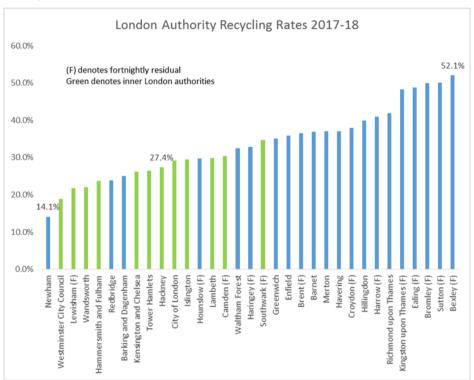


Chart 1: 2017-18 Recycling Rates

3.7 Chart 2 below details London authority's kilograms of household waste per household per year (kg/hh/yr) for 2017/18, showing that Hackney has a rate of 554kg/hh/yr. Nine out of the 12 inner London boroughs have lower kg/hh/yr than Hackney. Two of these operate a fortnightly collection service, and 7 of the outer London authorities operate fortnightly collections. The two inner London boroughs who have a higher kg/hh/yr than Hackney are both unitary authorities, one of which, Lewisham, has yet to report a full year's dataset following the introduction of fortnightly residual waste collections.

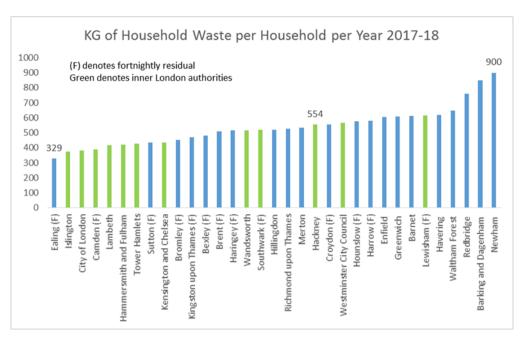


Chart 2: 2017-18 kg/hh/yr

3.8 Beyond London, research into the dominant collection frequency for the top and bottom recycling performers demonstrates the impact that restricting residual can have on recycling rate performance (Figure 1). The top 30 performers all have fortnightly residual waste collections, whilst 27 of the bottom performers are still on a weekly or more than weekly collection. It should be noted that other factors may have contributed such as a move from a charged to a free garden waste service, introduction of food waste service and / or a change to dry recycling collections.

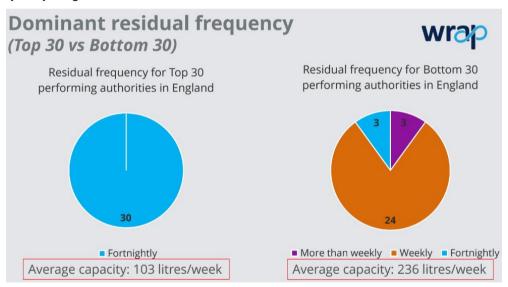


Figure 1: Dominant Residual Collection Frequency and Performance

4.0 Hackney's Approach to developing its RRP

- 4.1 Taking into account the Mayor's Environment Strategy policies and objectives, and Hackney's ambition to be a more sustainable borough, meet net zero emissions by 2040 and its manifesto commitments, Hackney's Reduction & Recycling Plan sets out that it will consider restricting residual waste, consult on such, and will implement a number of interventions to improve recycling on estates. The following paragraphs set out that approach.
- 4.2 Hackney's recycling performance is currently just under 28%, and as with many authority's rates are remaining fairly static without significant service change being implemented. For Hackney to contribute to the London wide target it will be required to investigate service

changes that look at restricting residual waste, which is usually through implementing a fortnightly collection of residual waste. This is one of the most effective ways of improving recycling rates, which shifts materials to the correct disposal point i.e. the recycling or food waste collections, especially when these remain weekly.

- 4.3 Hackney currently collects residual waste in sacks, with no limit on the amount of waste that can be presented. Not only does this produce one of the highest kilograms of household waste per year for an inner London authority (554kg/hh/yr), based on the waste composition analysis over half of that is either compostable or recyclable.
- **4.4** When introducing fortnightly collections, best practice advice is that this should be accompanied by a high quality recycling service and a weekly food waste service. Hackney has both of these, providing a comprehensive recycling service to households (street level and flats).
- **4.5** Drivers for potentially restricting residual waste collections have been identified as:
 - To be in general conformity with the London Environment Strategy;
 - To improve recycling performance;
 - To reduce the rate of increase in overall disposal costs.
- **4.6** The scoping of a move to restrict residual waste has been guided by the following principles:
 - Any implementation would follow a phased approach, looking at what sort of restriction of residual would be most effective, ranging from restricting the current number of sacks in small round bins to provision of small wheelie bins, complemented by a comprehensive education and enforcement programme;
 - Unsuitable housing typologies would be excluded, e.g. flats above shops, with separate arrangements maintained. A property survey has been undertaken, funded by Resource London, to assess suitable properties;
 - Recycling and food waste collections to remain weekly;
 - Street cleansing standards to remain unaffected by any waste service changes.
- **4.7** Any service change would be phased-in, with the current standard of street cleansing maintained in its entirety. Alongside this a robust public communications campaign, with an enforcement strategy would run concurrently with direct officer engagement with residents to ensure the necessary behaviour change required is met.
- 4.8 With regards to improving recycling on estates, work had already been underway as part of delivering the manifesto commitments. Estates-based properties display lower recycling performance relative to street level properties. The recycling rate (excluding garden waste to enable fair comparison) from street level properties is around 32% whilst the rate from estates is lower, estimated at 14%, but some estates are as low as 8-10%. As such, further improvements to recycling on estates are also needed to improve recycling performance. A programme of work has been developed to deliver on the manifesto commitment to improve recycling performance on estates, and has been included in the RRP:
 - Additional Recycling Collections increasing frequency of recycling collections at busy sites;
 - Increase bin lid apertures introducing larger sized apertures for improved ease of use:
 - Additional recycling bins introducing additional bins across Hackney Housing estates:
 - Reduced Residual Collections removing one of the three scheduled waste collections per week, at sites with capacity;
 - Green Champions scheme develop and trial a reward scheme for residents on a housing estate;

- Innovative communications use of social norming messaging and activities to encourage behaviour change;
- Reverse Vending Introduction of Hackney's first reverse vending machine to reward residents for depositing single use drinks containers, as a trial on one estate;
- Update Planning Guidance working towards getting the current planning advice included as 'Planning Conditions' for applications.
- **4.9** The above is in addition to the Estates Recycling Programme, whereby rubbish chutes are closed off and new bin stores are created for rubbish and recycling. This programme has also been included in the RRP.

5.0 Hackney's Reduction & Recycling Plan

5.1 The following section outlines the key aspects of Hackney's RRP using the GLA's Excel template, which can be found in Appendix A. It has been populated with the following information and each of the sections below relates to the worksheets in Appendix A. Please note that targets have been updated following presentation to the Task & Finish Group following further analysis from the property survey.

Dashboard

- **5.2** This consists of baseline performance data (2017-18) against common reporting metrics. A local target of 31% household recycling target by 2022/23 has been set with best estimates taken from the following key service improvements:
 - Improvement through restricting residual waste with a move to fortnightly collections (based on options modelling undertaken in 2014-15 and additional modelling in 2019);
 - Improvement by 2022 through estates interventions (manifesto commitment), based on estimated tonnage modelling;
 - Improvement on Estates Recycling Programme (closing bin chutes and building bin stores) should this be rolled out to 4,500 additional properties by 2025, based on average improvement seen on two estates.
- 5.3 Targets have been set that will see residual waste per household reduce from 544.48kg/household/year in 2017/18 to 474.43kg/hh/yr in 2022/23. In future target years (2025/26) the residual waste per household decreases to 468.23 kg/hh/yr), whilst the recycling rate increases to 31.5%). However, it should be noted that these targets do not represent the limit of Hackney's ambition.
- **5.4** It should be noted that the impact of future Government policies i.e. extended producer responsibility, consistency in collections and deposit return schemes, have not been taken into account with the setting of these targets.

Waste Reduction

- **5.5** Waste reduction addresses the policy objective to drive resource efficiency and cut waste. It is in this section that the following main areas have been set out:
 - Consideration around the introduction of fortnightly waste collections for street based properties, including consulting with our key stakeholders;
 - Waste reduction manifesto commitments (object lending library, reuse hubs and reducing single use plastics);
 - Key policies as set out in the Sustainable Procurement Strategy.

Maximising recycling rates

5.6 Maximising recycling rates explains that the Mayor of London's minimum service standards are being met to the majority of households within Hackney. It further details:

- Manifesto commitments around maximising recycling in particular to improving recycling on estates and green champions;
- Delivery of the Estates Recycling Programme;
- Delivering other recycling services, notably commercial waste and for educational establishments:
- · Reviewing internal recycling services.

Reducing environmental impacts

- **5.7** Reducing the Council's environmental impact outlines:
 - How and when HGV waste fleets will be ULEZ compliant;
 - Alternative fuels used;
 - Results using the GLA's online tool to determine performance of new proposed waste service options against the Mayor's CO2eq emissions performance standard (EPS) and carbon intensity floor (CIF).

Maximising local waste sites

- **5.8** Maximising local waste sites outlines the services that segregate materials at Millfields Depot, which contribute to the Council's recycling rate.
- **5.9** The NLWA have provided additional information for sections on maximising local waste sites and actions around waste reduction.
- **5.10** In the RRP, each of the above sections outline key policy areas relating to the particular objective, core service provisions, behaviour change activities, expected impact towards achieving local targets (where appropriate) and key milestones.
- **5.11** In addition, Hackney has a comprehensive recycling service supported by a number of initiatives, which as a minimum maintains the current recycling rate, as well as working towards improving it. This has been added to the RRP to showcase the good work that Hackney continues to undertake.

6.0 Approval of the Reduction & Recycling Plan

- 6.1 The Mayor of London set a timetable for the development of RRPs with Boroughs allocated to one of three phases depending on their current performance, the potential for improvement and contractual timelines. Hackney was in Phase 2 requiring the RRP to be submitted to the Mayor of London by 30th June 2019, with final sign off by August 2019 by the Cabinet Member for Cabinet Member for Energy, Waste, Transport and Public Realm and the Mayor of London.
- 6.2 Hackney's RRP was approved at Cabinet on 17th June, and subsequently passed to the GLA for review. Feedback has been received from Officers at the GLA, which Hackney responded to in early August.
- 6.3 The feedback highlighted the areas that the GLA were pleased Hackney had incorporated into the RRP, to align with the Mayor's Strategy, and further detailed specific areas where the GLA expected Hackney to go further or be more specific in its RRP benchmarking or action plan. This was divided into 'priority requirements' and 'further suggestions/questions'.
- 6.4 Hackney carefully considered the points made by the GLA officers, and responded to each of them, some of which were points of clarification. Where appropriate the RRP was revised, and if it was deemed not appropriate to update the RRP, an explanation was provided. Appendix B and C details the initial officer review from the GLA and Hackney's response respectively.
- 6.5 One of the key points raised was around the proposed recycling rate. The GLA stated that the household recycling target of 32% by 2022 doesn't go as far as the WRAP routemap modelling estimate of 33-36%. The GLA wanted to know the reason for that and could Hackney go further in their household recycling target. Hackney has since revised the

proposed recycling rate. This was as a result of the property survey that has recently been commissioned with the help of Resource London, which wasn't complete at the time the RRP was produced. This survey resulted in a lower number of properties being eligible for fortnightly collections should containment be provided, than originally was modelled. The recycling rate has therefore come down from 32% to 31%. This assumes implementation of an enforcement strategy, bin lid shut and no collection of side waste. Without those policies, the performance gains would be less.

6.6 The GLA Officers have received Hackney's feedback and have since recommended to the Mayor of London that Hackney's RRP be approved. Final sign off from the Mayor of London is being awaited.

7.0 Task & Finish Group Recommendations

- **7.1** Evidence gathering for the Task & Finish Group took place over two meetings, with an additional session of a site visit to an estate having benefited from improved recycling infrastructure as part of the Council's Estates Recycling Programme.
- **7.2** In line with the terms of reference for its work, the main focus of the Group was on the measures in the RRP which are expected to play the greatest role in bringing some mitigation to otherwise escalating waste disposal costs.
- 7.3 The Group explored the rationale for the consideration of significant change to elements of waste collection arrangements for street level properties, and the emerging plan for preparation and delivery in the case of this being moved forward. The Group reached a view that the measures outlined in the RRP to further increase the household recycling rate are fully evidence-based, and that the forecast contributions which each would make to recycling gains have been reached on sound methodology.
- **7.4** A number of recommendations were put forward by the Group. These are outlined below with accompanying response or referenced to relevant sections.

Estates Recycling Programme

- 7.5 Recommendation 1 We recommend consideration is given to committing to a further infrastructure phase at the earliest possible point. This should be informed by a cost benefit analysis using collated impact data already available/collectable, and progress made in the delivery of Phase 4, within budget. The cost benefit analysis should include recycling level impact of the infrastructure changes delivered in Phase 2 (data of impact of Phase 4 on recycling levels will not be available until well past March 2020), and also wider benefits (including fire safety improvements, maintenance cost savings achieved through the closure of waste chutes, and less quantifiable aspects including existing estate residents seeing levels of waste and recycling services which match the quality of those available to residents in newer housing).
- 7.6 Response Phase 4 is currently being procured via a 2-stage procurement process. Stage one is complete and contractors have now been invited to tender. Tenders are due to be submitted in mid-November. Analysis of the tenders will allow the Estates Recycling Programme Team to assess the feasibility to include any further estates in this Phase.
- **7.7** Further, the fixed term contracts of the Team have been extended to the end of March 2021, allowing for the cost benefit analysis to be undertaken and completed during the delivery of Phase 4.
- **7.8** Recommendation 2 We recommend that Phase 4 and any future infrastructure phases maintains full balance between shaping solutions around residents views, and avoiding escalating cost. This will best enable the Council to deliver the scale of infrastructure works needed, at the required pace.
- **7.9** Response As with previous phases, a comprehensive Consultation Plan has been undertaken for Phase 4. The consultation process has been bespoke to each estate and involves compromises being reached based on feedback from residents. Table 1 below outlines the consultation undertaken for Phase 4.

Estate name	Newsletter	Online Consultation Feedback	Attend TRA Meeting	Estate walkabout	Door Knocking	Drop in Session (5pm-8pm)	Event
Broadway							
House	X	X	X				
St Marys	X	X	X	X	X		
Burma Court	X	X	X	X	X		
Portland Rise	X	Х		X	Х	Х	
Pitfield	X	Х			Х	Х	
Hill Court	X	Х			Х		
Gascoyne	X	Х	Х		Х	Х	Х

Table 1: Phase 4 Consultation Activities

- 7.10 Recommendation 3 We recommend that future updates to the Living in Hackney Scrutiny Commission explores their impact against that forecast. This is in terms of their contribution to the borough meeting a 32% recycling target by 2022, and to part-mitigation of rising waste disposal costs.
- **7.11** Response The monitoring of Phase 4 and the cost benefit analysis that will be undertaken, will feed into the overall monitoring and reporting of the borough's recycling rate.
- **7.12** Recommendation 4 We recommend that a future item at the Living in Hackney Scrutiny Commission explores action being taken by Registered Housing Providers to enable higher levels of recycling on estates they manage, including through infrastructure change to existing sites. We recommend that this item also explores any advisory and support role which the Council plays in this area.
- **7.13** Response The Recycling Team have built up good working relationships with the Registered Housing Providers in Hackney over the years working to provide recycling services, including adding new and additional recycling bins, and rolling out food waste bins.
- **7.14** Detailed below are some of the projects we have worked on with Registered Housing Providers:
 - Peabody Housing at Pembury Estate Increasing recycling capacity and reducing
 waste collections by increasing the ratio of recycling to waste bins to 50/50. The
 project added 30 additional recycling bins, 10 communal food waste bins, delivered
 recycling communications as well as issuing reusable bags and compostable liners.
 The results saw an increase in recycling tonnages, and fill rate monitoring showed it
 was feasible for the third waste collection to be dropped.
 - Sanctuary Housing at Morningside Estate Trialling recycling bins with larger apertures to increase recycling to tackle contamination. The current recycling bin lids were replaced with large aperture reverse bin lids, making it easier for residents to recycle. This showed an increase in recycling tonnages and less recycling dumped on top of the recycling bins.
 - Industrial Dwelling Society at Mountside walk and Laurel Court Promoting food waste recycling. Delivery of a communications project (leaflets and liners) to increase participation in the food waste service.
 - Peabody Housing with Resource London Hackney was one of the boroughs taking part in this two year London wide Flats Recycling Project. This tested five innovative resident focussed interventions and a minimum service standard designed to increase recycling and capture rates in purpose built flats. The results are imminent, but the strongest influence on recycling behaviours was the impact of having minimum service standard (e.g. clean and well maintained bin areas, appropriate

aperture on bins, recycling bins in appropriate places, sufficient collections, main 6 materials).

- **7.15** Future projects working with Registered Social Providers include:
 - Peabody & Family Mosaic Increasing recycling capacity: Family Mosaic has a high imbalance of waste to recycling bins and Peabody are now looking to rebalance this working towards getting closer to a 50/50 ratio of waste and recycling bins.
 - Working towards minimum service standards: with the headline results of the Resource London Flats Recycling Project showing the importance of having minimum standards and the impact it has on improving recycling tonnages, Officers would look to work with Providers to ensure that their sites meet the minimum standards. In many cases this is already being undertaken with ensuring reverse, large aperture bin lids, recycling bins in good condition and clearly labelled and appropriate collections to prevent overflowing bins.
- 7.16 Areas for further work should include ensuring that the bin area/stores are in good order, with sufficient lighting, and that they are cleaned regularly with bulky waste cleared promptly. Officers would like to work with the Providers to ensure sufficient recycling capacity and that the recycling sites are in convenient and suitable locations. Finally recycling communications should be sent out, as a minimum, on an annual basis.

Restriction Residual Waste

- **7.17** Recommendation 5 (Observation) Given the evidence summarised below the Task Group is convinced there are significant grounds to consider the implementation of restricted fortnightly collections for residual waste, for properties which are suitable.
- **7.18** Response Based upon the above recommendation officers have been planning and undertaking preliminary activities, should a decision to implement fortnightly collections be taken at a later date, and following consideration of the consultation responses. These are outlined in Section 8 below.
- **7.19** Recommendation 6 In the event of implementation, we recommend that future items at the Living in Hackney Scrutiny Commission explore this impact monitoring, and the measures put in place in any cases where the impact (on street level recycling rates) is lower than forecast in any areas of the borough.
- **7.20** Response This recommendation is welcomed and officers will ensure that impact monitoring and measures taken are recorded and reported back through relevant channels.
- **7.21** Recommendation 7 We recommend that in any implementation of residual waste restriction, careful consideration is given prior to any procurement of wheelie bins, with all other options fully explored.
- **7.22** Response See 'Property Survey' from Section 8.2 below.
- 7.23 Recommendation 8 We recommend that the final Communications Strategy underpinning a move to residual restriction sets out a refreshed approach to communication and education on what, where and how residents can recycle, and on tackling scepticism and misconceptions.
- 7.24 Response See 'Communications & Engagement Strategy' from Section 8.9 below.
- 7.25 Recommendation 9 That working groups are formed in areas with lower than average street level recycling rates. These should explore the forms of communications and engagement which could best achieve behaviour change in their areas. Ward Councillors should be engaged in this process, and asked to harness their knowledge to secure the involvement of other relevant community stakeholders.
- **7.26** Response See 'Communications & Engagement Strategy' from Section 8.9 below.

- **7.27** Recommendation 10 An impact of residual waste restriction on street cleanliness is a key risk to be managed. We recommend the development of a specific mitigation strategy on this
- **7.28** Response See 'Enforcement Strategy and Policies' from Section 8.14 below.
- **7.29** Recommendation 11 (Observation) All evidence considered, we are supportive of the RRP in respect of its target of a household recycling rate of 32% by 2022, and the emerging plans to achieve this.
- **7.30** Response Please note that the revised recycling rate target submitted to the GLA is 31% by 2022/23. This however, does not limit our ambition to achieve a higher performance.

8.0 Project Planning

8.1 The RRP states that Hackney will explore the possibility of restricting residual waste and will consult on such measures. To ensure a decision can be taken based upon sound evidence, consideration of responses from a consultation exercise and appropriate investigation and development of key aspects required for such a service change, a project plan has been developed. In addition a project team has been working on a number of activities ahead of a decision being taken as to whether to introduce fortnightly residual waste collections or otherwise. These are detailed below.

Property Survey

- 8.2 In order to establish how many properties could be eligible for fortnightly collections, a property survey of street level properties has been undertaken. The survey took account of what properties currently have in terms of bin provision, whether they have space for additional bins (ranging 90l to 240l), and any obstructions to service delivery that may be present. This will allow any future service to be developed on a solid grounding, identification of the most appropriate type of container to be procured, and issues to service coverage and deliverability identified at an early stage.
- **8.3** Restriction has been looked at in terms of provision of 2 x 90l bins or a 140l wheeled bin. The results of the survey identified no significant difference in coverage potential for each containment option: the 140litre wheeled bin option can be accommodated in 67% of dwellings (28,610 properties), and the 2 x 90litre bins can be accommodated in 63% (27,091 properties).
- 8.4 If coverage is considered on the basis of whole streets, there are 770 streets (82%) where at least half of the properties on the street could accommodate the required bins and 56 streets (6%) where none of the properties could fit the required bins (this includes residential streets which open directly on to the pavement with no storage facilities). Properties on high streets and in town centres (including flats above shops), typically with daily collections, are not within scope for restriction.
- **8.5** This piece of work has enabled evidence to be gathered which will later inform a decision as to the type of containment, which will also ensured that Recommendation 7 above has been taken into account.

Consultation

- **8.6** Hackney's RRP stated that the Council would consult on restricting residual waste. A consultation package has been developed with the Consultation Team, and the consultation went live on 30th September 2019 closing on 9th December 2019. The Consultation Pack can be found in Appendix D, and this was posted to street level properties. It is also available online.
- **8.7** The consultation sets the background as to why the Council is consulting, explains what is being proposed i.e. fortnightly residual collections to street level properties, and why we are consulting. A number of FAQs are presented to allow consultees to make an informed decision, and the opportunity was taken to include a recycling leaflet explaining the services that the Council offers.

- **8.8** Officers have also set up four drop in sessions across the borough, as well as engaging with staff who live in Hackney at the Chief Exec Roadshows, and attending other events such as Hackney's Sustainability Day.
- **8.9** The questions have been set out in the following sections:
 - Your household and property type
 - Your rubbish and recycling collection service;
 - Rubbish & recycling proposals;
 - About you
- **8.10** The results of the consultation will be reported back to Cabinet along with recommendations for restricting residual waste, or otherwise, in April 2020.
- **8.11** An Equalities Impact Assessment has been written and published alongside the consultation, which will be reviewed and updated as necessary in January 2020 following analysis of the consultation results.

Communications & Engagement Strategy

8.12 Discussions have begun with the Communications Team regarding developing a comprehensive communication and engagement strategy for any potential service change. This will be designed and developed to include printed material, social media and outreach activities. The communications and engagement activity will be split over four key phases, should the proposed service change be approved at Cabinet:

Phase one – September 2019 to April 2020, with key messages being:

- Recycling the correct materials to improve recycling and reduce contamination;
- Early service change messages preparing residents for changes, which in the main is contained within the consultation with key stakeholders;

Phase two – April 2020 – October 2020, with key messages being:

- Ensuring that residents understand what the service change means for them;
- Stronger messages about the service changes and when it will begin:

Phase three November 2020 - March 2021, with key messages being:

- Supporting the service go live;
- Ensuring residents are familiar with the fortnightly collection schedule and how to use the service:

Phase four – Post March 2021, with key messages being:

- Greater focus on encouraging increased recycling behaviours, particularly on getting residents to make the most of their weekly food waste collections;
- Thanking residents for their help in the rollout.
- **8.13** Each stage will also include messages encouraging increased recycling behaviours towards the recycling targets of 2022.
- **8.14** The service change is not going to directly affect all properties, at least in the first instance. Flats above shops, properties on high density red routes, purpose built and estates properties that use communal bins will not be affected. However, they will be aware of changes and so it is important that we still communicate with them, if only informing that their services are remaining unchanged.
- 8.15 In addition to this it is important to engage with householders early on in particular areas of the borough. Whilst policies will be developed including ones around large households which would potentially allow a larger capacity containment, the proposed restriction allowance may prove difficult to adhere to in the initial months of the service change. There are also areas of the borough with low recycling rates at street level properties, and focused work is needed

- in these areas. A comprehensive communications and engagement plan will be developed that will incorporate the recommendations 8 & 9 from the Task & Finish Group.
- **8.16** It is also proposed that a team of Waste Advisors / Enforcement Officers be appointed to work in particular areas of the borough where participation in recycling is low and waste per household produced is high ahead of implementing any service change. An approach as to how this will proceed is currently being developed as part of an enforcement strategy. This will have built in review periods to assess the effectiveness of the approach, which will then be amended if necessary.

Enforcement Strategy and Policies

- **8.17** Key to ensuring an effective service roll out will be the development of key policies, which will be embedded in service standards and an enforcement policy. Policies as a minimum should include:
 - No side waste;
 - Bin lid shut:
 - No ad hoc or emergency collections in between collection dates where the resident is at fault;
 - Large family requirements;
 - Assisted collections.
- **8.18** The Enforcement Strategy will include procedures written for relevant policies, which will back up the communications and engagement strategy to affect behaviour change, and to ensure high levels of street cleanliness are maintained. Effective enforcement is essential for the success of this service change, without which performance gains are likely to be less than modelled. The enforcement strategy, policies and associates monitoring will further ensure that recommendations 6 & 10 from the Task & Finish Group will be fulfilled.

Service commencement

- **8.19** Should a decision be taken to implement restricted residual waste, it is proposed that the operational service implementation will take place in phases. The proposed timetable is for a five phase approach covering the five collection days. The first collections, if changes are approved, will commence in November 2020, finishing in March 2021, avoiding the Christmas period.
- **8.20** It is not anticipated that the collection of waste on a fortnightly basis will present any major operational difficulties. However, this is dependent on residents adhering to the new service changes, which will mean restricting their residual waste and placing the waste they produce only in the containers provided. All materials residents produce should be disposed of, reused, recycled or composted by using the appropriate services for those materials.

9.0 Financial implications

- **9.1** This report sets out key activities included in the RRP, which have significant cost implications flowing from the implementation of the plan to deliver the recycling and other targets set under the Mayor of London's Environment Strategy.
- **9.2** The current annual cost to the Council of waste collection and disposal is £13.9m. The 2019/20 service budget for refuse collection and co-mingled recycling is £6.9m, an increase of £700K on the 2018/19 budget, which reflects the pay award, changes affecting staff holiday pay and the increasing number of households in the borough.
- **9.3** The 2018/19 waste levy payment to the North London Waste Authority was £6.8m. As outlined in the Council's Medium Term Planning Forecast the cost of the waste disposal levy is expected to rise significantly over the medium term to long term as new waste management infrastructure is constructed over the next seven years.
- **9.4** As has been known for some time, NLWA's existing waste management infrastructure at Edmonton is reaching the end of its operating life and options for a replacement facility are

being developed. The estimated levy payments based on the latest estimates from NLWA and included in the Council's financial planning for the next 3 years is set out in Table 2 below.

	2018/19	2019/20	2020/21	2021/22
Estimated NLWA Levy £000	6,765	6,998	7,993	10,400
Increase £000		233	995	2,407
Increase %		3.4	14.2	30.1

Table 2 Estimated Levy Payments

- 9.5 It is therefore essential for the Council to mitigate this additional cost as far as possible and diverting waste from landfill, i.e. increasing our recycling rate is the most significant factor in this. The development and implementation of the RRP is key to supporting this aim and mitigating the extent of the increase in the waste levy. Current tonnage estimates suggest that service changes could result in cost avoidance of approximately £250k per annum.
- **9.6** The RRP sets out initiatives and options that impact on the waste collection and disposal services and these are set out in section 5 above.
- 9.7 It is considered that the most effective way of increasing the recycling rate is to restrict residual waste through reduced residual waste collections. A move to fortnightly collections for street based properties is a significant service change and would require implementation funding. The service has worked with finance to estimate the cost of mobilisation with higher end costs amounting to £2m. This estimate includes consultation and communications, householder engagement activities and equipment costs, such as the provision of containers.
- 9.8 In addition to the costs outlined above, there will be a need to employ additional enforcement officers to bring about the required behavioural change to ensure that the service change is successful and delivers the desired increase to the recycling rate. This has been estimated at £1.2m which covers a period of 2 years should the decision to restrict residual be taken at Cabinet. This again is an upper cost, and any enforcement strategy implemented will have a review period to ensure that the approach taken is performing and amendments made if necessary.
- **9.9** The total estimated upper end cost of implementing a shift to fortnightly collections is £3.2m over a 2 year implementation period. Once a decision on the model for fortnightly collections is taken the costs will be fully identified with all implications explored and financially evaluated.
- 9.10 There will also be an impact on the productivity of the waste crews, and a potential negative impact on the street cleansing function and changes that are introduced will need to be managed. It is also recognised that there are potential efficiency savings which may flow from reducing the frequency of residual waste collections but this will take time to realise.
- 9.11 The cost of the implementation is significant and with the financial challenges facing the Council the service will need to work with the Group Director of Finance and Corporate Resources to evaluate the impact of this plan on the overall financial position of the Council. This could increase the savings required to balance the Council's budget over the medium term. Due diligence and detailed financial modelling will be undertaken to fully understand the investment required for this service change and options to resource this investment will need to be identified as part of the Council's financial planning.
- **9.12** There will be a requirement for checkpoints within the implementation plan to evaluate the success of the service change to ensure that the desired outcomes, i.e. increased recycling rates, are on target so that we do not get to the end of the implementation with limited success and the one off investment becomes an ongoing requirement.

9.13 In addition to the impact of the RRP on the waste service there are potential impacts on other areas of the Council. The RRP will include detail on how the Council is reducing its environmental impact overall including details of how and when all HGV waste fleets will be ULEZ compliant and details of alternative fuels used. These will be included in the Council financial planning.

10.0 Conclusion

- 10.1 This report has highlighted the key elements of Hackney's RRP, which has been submitted to the GLA, demonstrating that we are in 'general conformity' with the Mayor of London's Environment Strategy.
- **10.2** The report further outlines the recommendations made by the Waste & Recycling Task & Finish Budget Group, and responses to those.
- 10.3 The report then goes on to detail the activities currently being undertaken, which will inform a decision as to whether Hackney should take the decision to implement fortnightly residual waste collections.
- **10.4** The decision is due to be taken at Mayor & Cabinet in April 2020. That report will set out the results of the consultation, the proposed type of containment, a proposed communications and engagement plan and the proposed enforcement strategy and policies that will be required should the decision to implement fortnightly collections be taken.

11.0 Appendices

- 11.1 Appendix A Hackney's Reduction & Recycling Plan (Appendices Ai-Aiv)
- 11.2 Appendix B GLA Officer's Feedback to the RRP
- 11.3 Appendix C Hackney Response to GLA (Appendices Ci-Cii)
- 11.4 Appendix D Consultation Pack (Appendices Di-Diii)