

Mayor and Cabinet		
Report Title	London Borough of Lewisham: Reduction and Recycling Plan 2019 - 2022	
Key Decision	No	Item No.
Contributors	Executive Director Housing, Regeneration and Environment Director of Law	
Class	Part I	Date: 11 th December 2019

1. Purpose of the report

1.1. The purpose of this report is to brief Mayor and Cabinet on the Reduction and Recycling Plan 2019 – 2022 and to ask for approval of that plan so that it can be submitted.

2. Recommendation

2.1. It is recommended that Mayor and Cabinet approve the Reduction and Recycling Plan so that it can be submitted to the Greater London Authority (GLA) for consideration by the Mayor of London.

3. Policy Context

3.1. The Mayor of London's Environment Strategy 2018 states that local authorities should achieve a 65 per cent municipal waste recycling rate by 2030, including a 50% recycling rate for local authority collected waste (LACW) by 2025. Furthermore, local authorities must send zero biodegradable or recyclable waste to landfill by 2026.

3.2. The Council's Corporate Strategy 2018-2022 details seven priorities, one of which is to ensure that we will contribute towards making Lewisham greener so that everyone can enjoy our green spaces, and benefits from a healthy environment as we work to protect and improve our local environment.

4. Introduction & Background

4.1. The recycling rate in Lewisham is currently (2019 YTD) at 29.5%. The rate of recycling is affected by the nature of the current and future housing stock within the borough. It is generally accepted that recycling is more difficult for residents in flats; there is a high proportion of flats in the borough. Further, it is expected that development within the borough over the coming years will include a large number of flats. Those factors mean that achieving recycling levels comparable with outer London boroughs, which tend to have a lower proportion of flats, will be challenging.

4.2. In May 2018, the Mayor of London published the London Environment Strategy which sets out objectives, targets, and policies for the effective management of London's municipal waste and to accelerate the transition to a circular economy.

- 4.3. The London Environment Strategy Proposal 7.2.1b sets out the Mayor of London's expectation for local authorities to develop Reduction and Recycling Plans (RRPs) by 2020, which should include local reduction and recycling targets that contribute to the Mayor's London wide targets. Every local authority in London is expected to produce and submit their RRP to the Mayor of London.
 - 4.4. RRP are intended to be short and focussed documents setting out key actions or packages of actions to be undertaken over the next 3 years.
 - 4.5. The creation of the RRP has happened in stages throughout London. Stage 1 was for the boroughs that required the most work (those which didn't offer the basic collection of 6 materials) stage 2 was for the boroughs who did offer this but weren't successfully delivering the service. Lewisham are one of the boroughs in the final stage, covering those Councils which offer the necessary elements of waste and recycling collections with the 6 main materials being collected at the kerbside.
 - 4.6. The final draft of the RRP is contained in Appendix 1. It is now ready, subject to the approval sought by this report, for submission to the Mayor of London for approval in December 2019.
 - 4.7. The Council have received support from the GLA and Resource London in the production of this reduction and recycling plan. The plan is a holistic overview on how the Council can grow and succeed in meeting the London targets over the next three years, with realistic and accountable goals set for each objective.
 - 4.8. The Reduction and Recycling Plan consists of four key objectives. These are set out below, with a summary of the work that has been carried out since 2019 and any work that will be carried out up until 2022 in an attempt to meet the four objectives.
- 5. Objective 1: Drive resource efficiency to significantly reduce waste focusing on food waste and single use packaging**
- 5.1. The Council is committed to meeting the objectives set out in the Corporate Strategy. One of these objectives was to consult with residents of Lewisham to identify the barriers to disposing of waste by the correct and most sustainable means. Findings from the consultation identified that further education, communication and information on services were required. One way of achieving this is to produce a bespoke environment communications plan, to ensure key messages are consistently communicated to residents in the borough. Officers have also been successful in securing over £11,000 of external funding in 2019 for that purpose, and will investigate and apply for any funding where relevant in future years.
 - 5.2. An audit has been carried out within key Council offices to identify types of single use plastics in use. Plastic cups and the purchasing of bottles of water for front line staff were identified as the main items used. The ordering of plastic cups has now been stopped and has been replaced with glasses. Front line staff who have no access to facilities during the day have been issued with reusable water bottles made from recycled materials reducing the amount of single use plastic purchased each year. The Council have achieved a reduction of approximately 0.5 tonnes of plastic cups per year.

- 5.3. The current provision of collection services for food waste and fortnightly residual waste is set to continue, under which collection from flats and estates are included. A full comprehensive communication programme will be delivered as part of each roll out. Officers expect to see a reduction in the amount of waste collected based on findings from the initial roll out to kerbside properties. Officers will implement communication and awareness campaigns and initiatives covering a range of reduction topics such as Love Food, Hate Waste, Real Nappies, and home composting. The Council will also investigate the possibility of rolling out food waste collections to schools.
- 5.4. Officers will commence work on updating the Council's Waste Strategy, where the team will work closely with relevant areas such as Finance to ensure budgets and essential factors are taken in to account whilst preparing the strategy. Once completed, the strategy will be submitted to Mayor and Cabinet for approval.
- 5.5. The Council will investigate the possibility of opening a re-use shop within the borough. A full project plan will be created with an aim to divert waste from incineration or recycling and encourage the reuse of items as directed by the waste hierarchy.

6. Objective 2: Maximise recycling rates

- 6.1. Following the success of a project to minimise contamination of waste on an individual estate, a project plan is being created for a number of estates across the borough. The aim will be to address high levels of contamination and improve the quality of recycling sent for sorting. By working in partnership with housing partners we plan to engage with residents through different means to provide education and advice to all.
- 6.2. Officers will work on a new commercial waste recycling policy, reducing the contamination of commercial recycling and increasing the number of businesses that currently have waste agreements in place with LB Lewisham.
- 6.3. Lewisham provide a kerbside collection of paper, card, metal cans and tins, plastics and glass to all residents in the borough. 80,000 households receive a weekly food waste collection and residents can subscribe to the garden waste service. Officers will look to increase publicity of the garden waste service to increase subscription numbers and the tonnage composted to divert waste from incineration.
- 6.4. The Council are preparing to procure a new contract for the processing and sale of dry recyclables. The contract specification includes the Mayor of London's minimum level requirements for recycling, and provision has been included for additional materials and waste from commercial businesses. Bidders will be expected to agree to a flexible contract to allow for additional materials and increase in tonnages. They will also be expected to work in partnership with Lewisham to help address problems with contamination through the provision of joint information and education campaigns with the aim to help improve the quality of recyclable waste. Discussions will also commence with neighbouring boroughs for the possible joint procurement of recycling services in the future.
- 6.5. A local draft plan aimed at eliminating waste and the continual use of resources will be worked on to encourage a circular economy approach for developers in

Lewisham. Major development proposals should aim to be net zero-waste and they will be required to submit a Circular Economy Statement, as part of the Sustainable Design Statement, in line with the requirements of the draft London Plan policy S17 (reducing waste and supporting the circular economy).

The circular economy an alternative to a traditional linear economy (make, use, dispose) which aims to keep products, equipment and infrastructure in use for longer, thus improving the productivity of resources.

- 6.6 As part of the comprehensive communication plan Officers will provide information and reassurance on the standards in place for the disposal of the recycled waste collected within the borough. Where any of Lewisham recyclate is sent abroad, the contractor will only work with EA-accredited and licensed facilities, and will ensure that the contractor has a robust system of traceability with regard to its supply chain and is able to demonstrate reprocessing has taken place.
- 6.7 Producers, importers, brokers and processors all have responsibilities under relevant regulations, which apply from the point of loading the waste until it has been fully recovered or disposed of at the destination facility. Anyone involved in the shipment must ensure that any waste is managed without endangering human health and in environmentally sound manner.

7. Objective 3: Reduce the environmental impact of waste activities (greenhouse gas emissions and air pollutants)

- 7.1. Contractors will be asked to commit to minimising emissions through intelligent logistics and by the use of electric vehicles and other low zero emission options. Work will be carried out to make Lewisham a carbon neutral borough by 2030.
- 7.2. The Council will look to procure and operate Euro 6 waste collection vehicles for waste services, to procure electric vans by December 2020 and seek approval to trial new electric Refuse collection vehicles (RCV's). Compliance with ULEZ (Ultra Low Emission Zone) will be a priority.

8. Objective 4: Maximise local waste sites and ensure London has sufficient infrastructure to manage all the waste it produces

- 8.1. Landmann Way is the only centre for reuse and recycling within the borough, and has limited space. The centre is undergoing improvements which include new containers and new signage. An area is going to be considered for a re-use point where residents can browse items for re-use. If successful in creating the reuse site, it will create a reduction in the waste disposed of at the Reuse and Recycling Centre.
- 8.2. Officers will investigate the opening times of the Reuse and Recycling Centre following feedback from residents during the consultation to see if timings can be extended during peak times.
- 8.3. Highlighted in the findings from the consultation was the lack of awareness residents had about bring sites located in the borough. Officers will implement communication and awareness campaigns to residents to cover a range of topics including textile and small electronic devices recycling.

9. Financial implications

- 9.1. It is clear that additional costs will be incurred over the three years 2019-2022 in developing and implementing detailed plans to achieve the four key objectives of the Reduction and Recycling Plan.
- 9.2. The key cost drivers are:
- a) increasing the household recycling rate (by volume) to 35% by 2022 from a current base of 28%
 - b) reducing residual household waste by 4% by December 2020 in the refreshed Waste Strategy
 - c) extension of the weekly food waste and fortnightly residual service to estates and flats in phases 3 and 4 respectively by spring 2021
- 9.3. It is estimated that potential costs of up to £1.4m could be defrayed in meeting the performance targets outlined in the Plan detailed as follows:
- a) three additional organic rounds are likely to be required to manage the (11,000 tonnes) proposed increase in recycling volumes, costing £600k as it is assumed these trucks will be hired in at current rates, with inflationary uplift. Each vehicle costs approximately £200k per annum, with staffing costs accounting for about £140k, hire costs £50k and £10k other running costs.
 - b) an addition bulk round crew to deal with the increased waste volumes from estates and flats will probably be necessary at a cost of £200k per annum.
 - c) the dry waste recycling contract will cost at least £450k per annum more than present assuming a linear increase on current costs of £1.3m; this could increase significantly as current evidence suggests that the supply side of the market is very tight with concerns over capacity and profitability. The current contract expires in July 2020 and a new contract is currently being procured, with a risk of significantly increased costs.
 - d) Other initiatives such as setting up a materials re-use shop, trialling and purchasing electric vans, setting up a “contamination hit squad” and various residents and traders communications campaigns are estimated to cost a further £150k per annum.
- 9.4. A small element of costs are likely to be offset by funding from key government partners and agencies, particularly around communications campaigns to residents about waste reduction and recycling.
- 9.5. The service will need to work closely with finance as detailed plans are developed to consider the financial implications, particularly over the course of the next year as the current Waste Strategy is reviewed and updated and phases 2 – 4 of the food waste and fortnightly residual service is extended to red routes, estates and flats.
- 9.6. Officers will return to Mayor and Cabinet upon the commencement of the Reduction and Recycling Plan for any key actions that require consideration of financial implications.
- 9.7. The Waste Management (refuse collection & disposal) service is currently forecasting a £1.9m overspend.

10. Legal implications

- 10.1 There are no direct legal implications as a result of this report. The report anticipates that future decisions will be taken arising from the implementation of the matters set out in the proposed Reduction and Recycling Plans. Those decisions will need to be made in accordance with the Constitution (including Contract Procedure Rules), whether by Mayor and Cabinet or by officers. Legal input will be obtained in relation to those decisions.
- 10.2 The Council has a public sector equality duty (the equality duty or the duty - The Equality Act 2010, or the Act). It covers the following protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. In summary, the Council must, in the exercise of its functions, have due regard to the need to:
- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
 - advance equality of opportunity between people who share a protected characteristic and those who do not.
 - foster good relations between people who share a protected characteristic and those who do not.
- 10.3 It is not an absolute requirement to eliminate unlawful discrimination, harassment, victimisation or other prohibited conduct, or to promote equality of opportunity or foster good relations between persons who share a protected characteristic and those who do not. It is a duty to have due regard to the need to achieve the goals listed above. The weight to be attached to the duty will be dependent on the nature of the decision and the circumstances in which it is made. This is a matter for the decision maker, bearing in mind the issues of relevance and proportionality. The decision maker must understand the impact or likely impact of the decision on those with protected characteristics who are potentially affected by the decision. The extent of the duty will necessarily vary from case to case and due regard is such regard as is appropriate in all the circumstances.
- 10.4 The Equality and Human Rights Commission (EHRC) has issued Technical Guidance on the Public Sector Equality Duty and statutory guidance. The Council must have regard to the statutory code in so far as it relates to the duty. The Technical Guidance also covers what public authorities should do to meet the duty. This includes steps that are legally required, as well as recommended actions. The guidance does not have statutory force but nonetheless regard should be had to it, as failure to do so without compelling reason would be of evidential value. The statutory code and the technical guidance can be found on the EHRC website.
- 10.5 The EHRC has issued five guides for public authorities in England giving advice on the equality duty. The 'Essential' guide provides an overview of the equality duty requirements including the general equality duty, the specific duties and who they apply to. It covers what public authorities should do to meet the duty including steps that are legally required, as well as recommended actions. The other four documents provide more detailed guidance on key areas and advice on good practice.

11. Environmental implications

- 11.1 Due to the nature of this report, environmental implications are mentioned with regard to Lewisham's responsibility as a waste disposal authority.
- 11.2 The GLA have strategic powers with regards to waste and recycling, and the wider environment. The Reduction and Recycling Plan has been created to adhere to the requirement placed on the Council as a London authority.

12. Crime and disorder implications

- 12.1 There are no crime and disorder implications as a result of this report.

13. Equalities Implications

- 13.1 There are no direct equalities implications as a result of this report. Officers will identify any equality implications upon the commencement of any key actions and will seek approval at Mayor and Cabinet.

14. Background papers

Please find below link to view the Reduction and Recycling Plan
https://lewishamcouncil.sharepoint.com/:x/s/CS/EeEzOiaIMQ5Aq3IeiPxpwM4Bh5eNGF_8N_z4ZHEc1zGSUg

For any questions related to the report, please contact Wendy Nicholas (Strategic Waste and Environment Manager) on 020 8314 2194.